

April 1, 2011

SEPA Responsible Official
Okanogan County
Office of Planning and Development
123 - 5th Ave. N. Suite 130
Okanogan, WA 98840

Dear Sirs and Madams:

**Subject: Comments on Environmental Impact Statement Addendum A:
Revisions to the Okanogan County Comprehensive Plan February 11,
2011**

Thank you for the opportunity to comment on the update of the on *Environmental Impact Statement Addendum A: Revisions to the Okanogan County Comprehensive Plan*. While we agree with Okanogan County that because of the probable adverse environmental impacts of the new comprehensive plan an environmental impact statement (EIS) is needed, we believe the environmental impact statement (EIS) even with the addendum is inadequate. We recommend that the county prepare an EIS that complies with the State Environmental Policy Act (SEPA).

Futurewise is a statewide public interest group. Our mission at Futurewise is to promote healthy communities while protecting working farms, working forests, and shorelines for this and future generations. We have members across Washington State including Okanogan County.

The three EIS documents produced to date fail to comply with SEPA

As we understand it, Okanogan County has prepared three EIS documents related to the comprehensive plan:

- *Environmental Impact Statement (Draft 1) Okanogan County Comprehensive Plan Revisions* (March 11, 2009).
- *Environmental Impact Statement (Draft 1) Addendum 1 Revisions to Okanogan County Comprehensive Plan* (preferred alternatives) (May 12, 2009).
- *Environmental Impact Statement Addendum A: Revisions to the Okanogan County Comprehensive Plan* (February 11, 2011).

All of these documents were accessed on March 22, 2011 at <http://okanogancounty.org/planning/>. Taken together, these documents do not meet the requirements for a non-project EIS. In addressing the adequacy of a nonproject EIS for rezone, the Court of Appeals wrote that:

In *Leschi v. Highway Comm'n*, 84 Wn.2d 271, 525 P.2d 774 (1974), a majority of the Supreme Court held that the adequacy question is one of law, subject to *de novo* review by the courts. The test to be applied is "whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data." *Leschi v. Highway Comm'n, supra* at 286, 525 P.2d at 785.¹

SEPA and its implementing regulations require that an EIS shall include:

- A Fact Sheet meeting the requirements of WAC 197-11-440(2).
- A table of contents.
- A summary.
- Alternatives including the proposed action and the no-action alternative.
- A description of the affected environment, the significant impacts, and mitigation measures.²

WAC 197-11-442 provides that while a county shall have more flexibility in preparing an EIS for a nonproject action for a comprehensive plan, "alternatives should be emphasized." Further:

(4) The EIS's discussion of alternatives for a comprehensive plan, community plan, or other areawide zoning or for shoreline or land use plans shall be limited to a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics. The EIS content may be limited to a discussion of alternatives which have been formally proposed or which are, while not formally proposed, reasonably related to the proposed action.³

¹ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

² WAC 197-11-440.

³ WAC 197-11-442(4).

WAC 197-11-440(6)(a) requires that for the elements of the environment significantly affected by the proposed action, “the EIS shall describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts.” In the *Ullock* decision, the Court of Appeals held “that an EIS is adequate in a nonproject zoning action where the environmental consequences are discussed in terms of the maximum potential development of the property under the various zoning classifications allowed.”⁴

Applying these standards to the three EIS documents prepared to date; we see they fail to meet them. None of the documents include a fact sheet or a table of contents. The addendums do not identify the environmental documents they add to or modify as they are required to do.⁵ Despite the emphasis that nonproject EISs are to place on alternatives, the only alternatives discussed are the existing and proposed comprehensive plans and zoning. And they are really only discussed in terms of their zones. There is almost no discussion of policies. There is no discussion of implementing measures other than zoning. One of the issues related to the comprehensive plan has been the county’s apparent decision not designate any private farmland or ranchland for protection.⁶ It has been proposed to designate and protect these lands, but it is not considered as an alternative.

Other than acreages in various comprehensive plan designations and zones, there is no description of the existing environment, such how much land is used for agriculture, the county’s leading employer.⁷ This is surprising because economic impacts were identified as an affected element of the environment during scoping.⁸ There is no description of available water supplies, fish and wildlife abundance and habitat, or existing and projected housing units despite the fact that these were all identified during scoping as affected elements of the environment.⁹ There is little disclosure as to how the proposed comprehensive plan and alternatives will affect the existing environment. Other than a contention that the new comprehensive plan will have lower densities than the current comprehensive plan, no mitigating measures are identified. Further, the three EIS documents prepared to date have almost no supportive opinion and data as an EIS is required to include. Other than the

⁴ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 581, 565 P.2d 1179, 1184 (1977).

⁵ WAC 197-11-625(1).

⁶ Marcy Stamper, *County to use public land base to satisfy state call for agriculture, resource lands* Methow Valley News Online p. 1 of 2 (09-28-2010 | Volume: 108 | Issue: 19). Accessed on Feb. 8, 2010 at: <http://www.methowvalleynews.com/story.php?id=4298> and enclosed with the paper original of this letter.

⁷ *Id.* at pp. 1 – 2 of 2.

⁸ Okanogan County, *Environmental Impact Statement Addendum A: Revisions to the Okanogan County Comprehensive Plan* p. 2 (February 11, 2011).

⁹ *Id.*

comprehensive plan or zoning, we could not find a citation to single study or report. In short, these three documents fail to comply with SEPA or the rules adopted to implement SEPA.

The Environmental Impact Statement Addendum A: Revisions to the Okanogan County Comprehensive Plan fails to comply with SEPA

The section of our letter includes comments on *Addendum A* in addition to those common to the three environmental documents. We start with what appears to be a description of the alternatives.

Description and Analysis of Alternatives. Addendum A pp. 3 to 7

Pages 3 through 7 of *Environmental Impact Statement Addendum A: Revisions to the Okanogan County Comprehensive Plan (Addendum A)* appear to summarize and compare the current and proposed comprehensive plan and zoning, which if we understand the addendum correctly are the two alternatives being considered. However, it contains many deficiencies.

First, it is unclear what the alternatives being considered are. What is the actual “no action alternative” and what other alternatives being considered is not clearly identified and needs to be. As we documented above, nonproject EISs for comprehensive plans are to emphasize alternatives.¹⁰ *Addendum A* does not meet this requirement. Indeed, the addendum frames the alternatives using some, but not all, of the county’s existing zones making it unclear how the new comprehensive plan will change relative to the existing comprehensive plan.

Second, it does not fully summarize the existing comprehensive plan and zones that it attempts to identify. For example, on page 3 *Addendum A* includes the Methow Review District. However, *Addendum A* does not mention the *Upper Methow Valley Comprehensive Plan* and the existing comprehensive plan designations including the “Rural Residential Designation” which has a density of one dwelling unit per five net residential acres and the “Low Density Residential Designation” which has a density of one dwelling unit or less per 20 acres.¹¹ It also does not mention the allowed densities in the Methow Review District which are 20 acres per housing unit with an allowance for a second unit per OCC 17.14.040(2) in the Uplands MRD 20 zone, five acres per housing unit with an allowance for a second unit per OCC 17.14.040(2) in the Valley Floor MRD 5 zone, a minimum of one acre per housing unit Valley Floor MRD 1 zone,

¹⁰ WAC 197-11-442.

¹¹ *Upper Methow Valley Comprehensive Plan, an update of the: Community Master Plan Methow Valley Planning Area Sub Unit A* p. 34 [Adopted by Resolution No. 25-2000 by the: Okanogan County Board of Commission (March 6, 2000)]. Accessed on March 23, 2011 at: <http://okanogancounty.org/planning/>

and a minimum of Minimum of 12,500 square feet/unit Valley Floor MRD 12,500 zone.¹² It does not identify the acreages in these various zones, include a map of them, or analyze them.

In fact, with exception of the Minimum Requirement District, none of the descriptions discuss allowed the densities of either the existing or proposed comprehensive plan designations or zones. So it is difficult to understand or analyze their impacts.

Third, there are several Okanogan County zones that are not mentioned as well. These include the Agriculture District (AD) and the Auto-Oriented Commercial District.¹³ They are certainly part of the no action alternative, which seems to be the existing zoning. Are they part of the other alternative as well?

Fourth, on page 4 *Addendum A* indicates that land under a public ownership will be designated as "Resource Lands." Does this mean they will be designated as agricultural, forest, and mineral resource lands of long-term commercial significance under the Growth Management Act? If so, the *Addendum A* should make that clear. *Addendum A* should then analyze the adverse environmental impacts of attempting to convert forest and range land to pastures, crop land, barns, orchards, and other agricultural activities. How will irrigation water be transferred from the river valleys to the county, state, and federally owned land? If current water rights holders transfer their water rights to county, state, and federal lands what will happen if they then want to transfer them back to private land? Water rights transfers must be approved. Will that likely occur and if so what will the environmental impacts be moving those rights from the valleys up to the foothills? None of these issues are analyzed in *Addendum A*.

Indeed, *Addendum A* does not attempt to quantify the land used for agriculture, forestry, and mining in the county. There are several sources for information on agricultural lands including Okanogan County's own *Level 1 Watershed Technical Assessment Final Report: Okanogan River Watershed Resource Inventory Area 49* and *Methow Basin (WRIA 48) Watershed Plan*.¹⁴

¹² Okanogan County Code Section (OCC) 17.14.070 Density. Accessed on March 23, 2011 at: http://nt5.scbbs.com/cgi-bin/om_isapi.dll?clientID=452742170&infobase=okanco.nfo&jump=17.14.070&softpage=PL_frame#JU_MPEDEST_17.14.070

¹³ Chapter 17.07 OCC and chapter 17.18 OCC. Accessed on March 23, 2011 at: http://nt5.scbbs.com/cgi-bin/om_isapi.dll?clientID=452742170&depth=3&infobase=okanco.nfo&record={537E}&softpage=PL_to_cframe

¹⁴ ENTRIX, Inc., *Level 1 Watershed Technical Assessment Final Report: Okanogan River Watershed Resource Inventory Area 49* p. 3-19 (Okanogan Watershed Planning Unit: Sept. 2006). Accessed on March 24, 2011 at: <http://okanogancd.org/Ok%20Watershed%20Plan.html> and enclosed with the paper original of this letter. According to the Okanogan Conservation District's Okanogan Watershed Plan webpage the "Okanogan County Commissioners approved the plan as presented in April 2010." *Methow Basin (WRIA 48) Watershed Plan* p. 6, p. 12 & p. 45 (Approved by the Okanogan County Board of

Another source is the 2007 Census of Agriculture found that Okanogan County had 1,205,229 acres of land in farms.¹⁵ This includes farm and ranch land and lands in the Colville Indian Reservation, but does not include federal grazing allotments. As the Census of Agriculture explains: "All grazing land, except land used under government permits on a per-head basis, was included as "land in farms" provided it was part of a farm or ranch."¹⁶ We recommend that the county designate all of its land in farms that has long-term commercial significance as agricultural lands of long-term commercial significance.

An alternative to the idea of designating public owned land for agricultural, forest, and mineral resources lands of long-term commercial significance should be to also consider designating and protecting existing forest, mineral, and agricultural lands that qualify as natural resource lands of long-term commercial significance. Retaining the existing agricultural lands, for example, for winter pasture, barns, orchards, and irrigated agriculture would likely have lower environmental impacts than attempting to convert publically owned timberland and grazing land for these purposes. It would certainly have lower risks for farmers and ranchers. Retaining existing privately owned gravel mines will also likely have lower environmental impacts than requiring them to relocate to county, state, and federal land. It would also have lower risks for existing mine owners as well.

Fifth, the EIS and Addendum A should analyze a wider range of alternatives that would better protect Okanogan County's environment and natural resources. For example, we suggest an alternative that uses transferable development rights to encourage development in the county's existing cities and towns and maintains its agricultural and forest lands.

Another alternative that should be included in the EIS is incorporating the existing *Upper Methow Valley Comprehensive Plan* and its implementing regulations as part of the new comprehensive plan. This plan was adopted with extensive community involvement and addresses many important environmental impacts.

County Commissioners June 20, 2005). Accessed on September 22, 2010 at: <http://okanogancounty.org/water/Documents%20on%20Site/Methow%20Basin%20plan%20text.pdf> and cited pages enclosed with the paper original of this letter.

¹⁵ United States Department of Agriculture, National Agricultural Statistics Service, *2007 Census of Agriculture, Washington State and County Data Volume 1 Geographic Area Series • Part 47* Chapter 2: County Level Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2007 and 2002 p. 293 (February 2009). Accessed September 23, 2010 at: http://www.agcensus.usda.gov/Publications/2007/Full_Report/Volume_1_Chapter_2_County_Level/Washington/index.asp and cited pages enclosed with the paper original of this letter.

¹⁶ United States Department of Agriculture, National Agricultural Statistics Service, *2007 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47* Appendix B pp. B-14 – B-15 (February 2009). See also the definition of "woodland pastured" in Appendix B on p. B-25.

Responses to Scoping Issues Addendum A pp. 7 to 17

It is unclear what required part of an EIS this section attempts to address. It does not “describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts.”¹⁷ For example, the “earth” section does not describe the existing geology and soils in Okanogan County. It does not identify, for example, whether any of the Natural Resource lands will be on erodible soils and what the impacts of attempting to farm such soils would be. It does not identify the prime farmland soils in the county and what the consequences of not protecting those soils for agriculture will be. There is no attempt to analyze the impacts of the alternatives, only an unsubstantiated claim that the “overall footprint” of development will be reduced presumably by the new comprehensive plan alternative. Even if this is true, if that smaller footprint will be focused on flood plains, geological hazards, and easily erodible soils, the environmental impact may be much greater than the existing comprehensive plan. Because *Addendum A*, and earlier environmental documents, do not identify anything about existing geology and soil conditions there is no way of knowing the relative impacts of the alternatives.

All of the elements of the environment suffer from these problems. The bottom line is that *Addendum A* is not “substantiated by supportive opinion and data” as SEPA requires.¹⁸

There are readily available sources for much of data that the *Addendum A* requires. For example, soils data can be downloaded from the United State Department of Agriculture Natural Resources Conservation Service website in a variety of forms, including geographic information system (GIS) data. This includes such information as easily erodible soils and prime farmland soils. The website can be found here: http://www.or.nrcs.usda.gov/pnw_soil/wa_reports.html

The “air” section on page 8 does not identify the current air quality of the county and does not attempt to compare the air emissions of the alternatives. Data on air quality if Okanogan County can be obtained from the Washington State Department of Ecology which maintains several air quality monitoring sites in the county. A map showing the monitoring sites can be accessed here: <https://fortress.wa.gov/ecy/enviwa/Default.htm> Another source of air quality data is the recently released second annual County Health Rankings. “The County Health Rankings are a collaboration between the Robert Wood Johnson Foundation and the University of Wisconsin Population Health Institute, and part of the Mobilizing Action

¹⁷ WAC 197-11-440(6)(a).

¹⁸ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

Toward Community Health (MATCH) project.”¹⁹ The project looks at a wide variety of health outcomes and demographic characteristics for the all of the counties in the United States. The 2011 County Health Rankings Snapshot for Okanogan County shows that the county had 30 days in a year where the air quality was unhealthy for sensitive populations due to fine particulate matter air pollution.²⁰ As a comparison, Washington had six of those days and the national benchmark had zero days.²¹

The ground water section does not discuss the existing condition of ground water resources. The surface water section does not discuss the existing condition of surface water resources and surface water availability. Neither the surface nor ground water sections document whether there is any legally or actually available surface or ground water to support the rural and urban growth allowed by either alternative. Neither section discusses the impacts of this growth, particularly if it uses exempt wells, on senior water rights holders.

This is particularly important because a significant number of Okanogan County’s subbasins and streams are already overappropriated. As the *Level 1 Watershed Technical Assessment Final Report: Okanogan River Watershed Resource Inventory Area 49* concluded:

The Joseph and Osoyoos subbasins appear to be overappropriated for both surface and ground water, while the Salmon subbasin appears to be overappropriated only for ground water. Projecting appropriations to meet water demand to 2026, the Salmon subbasin would also become overappropriated for surface water in 20 years, but appropriations in the Sinlahehin and Omak subbasins would remain well below the available surface and ground water.²²

Cities in the county lack needed water either for current users or future growth. “Brewster has already fully used its existing water right of 1,205 acre-feet per year (AFY), and by 2026 is projected to need an additional water right of 887 AFY ...

¹⁹ *County Health Rankings The Team* webpage accessed on April 1, 2011 at: <http://www.countyhealthrankings.org/about-project/team> and enclosed with the paper original of this letter.

²⁰ *County Health Rankings 2011 | Okanogan, Washington*. Accessed on April 1, 2011 at: <http://www.countyhealthrankings.org/washington/okanogan> and enclosed with the paper original of this letter.

²¹ *Id.*

²² ENTRIX, Inc., *Level 1 Watershed Technical Assessment Final Report: Okanogan River Watershed Resource Inventory Area 49* p. ES-3 (Okanogan Watershed Planning Unit: Sept. 2006). Accessed on March 24, 2011 at: <http://okanogancd.org/Ok%20Watershed%20Plan.html> and enclosed with the paper original of this letter. According to the Okanogan Conservation District’s Okanogan Watershed Plan webpage the “Okanogan County Commissioners approved the plan as presented in April 2010.” A copy of this webpage is also enclosed with the paper original of this letter.

Oroville (279 AFY), Riverside (227 AFY), Okanogan (137 AFY), and Tonasket (78 AFY) would also need additional annual water rights.”²³ Streams are also overappropriated:

ENTRIX summarized data for the 23 named streams that have more than 1 cfs of flow appropriated (Appendix A-1.2b); of these we have flow data for only 13. Flow data for 9 of the 13 suggest that these streams may be overappropriated (Table ES-1), and part of a tenth stream (Lower Salmon Creek) is dewatered by irrigation diversions every summer. In addition, unquantified water claims could affect a much longer list of streams.²⁴

The proposed comprehensive plan’s decision not to designate and protect private agricultural lands could increase demand for water on the converted land.²⁵ This would make these impacts even worse. None of the SEPA documents prepared to date, including Addendum A, include any of this readily available information.

The ground water section also does not discuss the potential of septic tanks at one acre densities to pollute ground water. Marylynn Yates, in a peer reviewed scientific journal, analyzed data and cases of ground water pollution from septic tanks. She concluded that septic tanks are major contributors of waste water, septic tanks are the most frequently reported cause of ground water contamination, and the most important factor influencing ground water contamination from septic tanks is the density of the systems.²⁶ Lot sizes associated with ground water contamination cases ranged from less than a quarter acre to three acres.²⁷ More recent studies support these conclusions. For example, an “observational study identified septic system density as a risk factor for sporadic cases of viral and bacterial diarrhea in central Wisconsin children.”²⁸ The greater the density of septic tanks the greater the likelihood of diarrheal disease.²⁹ And the highest septic tank densities were one septic

²³ *Id.* at p. ES-5.

²⁴ *Id.* at p. ES-8.

²⁵ *Id.*

²⁶ Marylynn V. Yates, *Septic Tank Density and Ground-Water Contamination* 23 *GROUND WATER* 586, p. 590 (1985). Accessed on March 31, 2011 at: <http://info.ngwa.org/gwoll/pdf/852537546.PDF> and enclosed with the paper original of this letter. *Ground Water* is a peer reviewed scientific journal. See the enclosed *Ground Water* Editorial policies accessed on March 31, 2011 at: http://www.ngwa.org/publication/gw/gwreview/editorial_policies.aspx

²⁷ *Id.*

²⁸ Mark A. Borchardt, Po-Huang Chyou, Edna O. DeVries, and Edward A. Belongia, *Septic System Density and Infectious Diarrhea in a Defined Population of Children* 111 *ENVIRONMENTAL HEALTH PERSPECTIVES* 742, p. 745 (2003). Accessed on March 31, 2011 at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1241485/pdf/ehp0111-000742.pdf> and enclosed with the paper original of this letter. *Environmental Health Perspectives* is a peer reviewed scientific journal. See the *EHP* Journal Information accessed on March 31, 2011 at: <http://ehp03.niehs.nih.gov/static/information.action> and enclosed with the paper original of this letter.

²⁹ *Id.* at pp. 745 – 47.

tank per 11 acres.³⁰ A study of the potential for nitrate pollution of ground water in Cedar Valley, Iron County, Utah lead to a recommendation that the minimum lot size for septic systems should be five acres in one part of the valley and 15 acres in three other parts.³¹ So one acre lots present a significant risk, really a certainty, of ground water contamination. The EIS should disclose this important information and include mitigating measures.

The plants section does not discuss the county's plant life. The Washington State Department of Natural Resource's Washington Natural Heritage Information System maintains a list of rare plants. The list for Okanogan County can be accessed here, and a copy is enclosed with the paper original of this letter:
<http://www1.dnr.wa.gov/nhp/refdesk/lists/plantsxco/okanogan.html> The program also has GIS data on the locations of rare plants.

The animals section does not discuss the native species in the county. This is especially a problem given that the number of endangered, threatened, and sensitive species in the county. Enclosed with the paper original is the 2010 Species Distribution by County for Okanogan County which lists the priority species and habitats in Okanogan County, including the endangered, threatened, and sensitive species.³² The Washington State Department of Fish and Wildlife also can provide GIS data on the locations priority species and habitats and endangered, threatened, and sensitive species.

The energy and natural resources section does not discuss existing energy consumption and how it will change under the alternatives. The environmental health section does not discuss the county's existing environmental health conditions. It also does not discuss the potential for diarrheal disease due to ground water contamination from the very high densities of septic tanks and drainfields the comprehensive plan would allow.³³ *Addendum A* also does not discuss other factors affecting public health. For example, the *2011 County Health Rankings Snapshot* for Okanogan County shows that the county has a low health ranking, ranking 37th lowest out of Washington's 39 counties.³⁴ One of the reasons for this low ranking is that only 53 percent of the county's residential Zip codes had a healthy food outlet, which is defined as a grocery

³⁰ *Id.* at 747.

³¹ Mike Lowe, Janae Wallace, and Walid Sabbah, and Jason L. Kneedy, *Science-Based Land-Use Planning Tools to Help Protect Ground-Water Quality, Cedar Valley, Iron County, Utah Special Study* 134 pp. 27 - 28 (Utah Geological Survey, a Division of Utah Department of Natural Resources: 2010). Accessed on March 31, 2011 at: <http://geology.utah.gov/online/ss/ss-134/ss-134text.pdf> and enclosed with the paper original of this letter.

³² Accessed on March 30, 2011 at: <http://wdfw.wa.gov/conservation/phs/list/>

³³ Mark A. Borchardt, Po-Huang Chyou, Edna O. DeVries, and Edward A. Belongia, *Septic System Density and Infectious Diarrhea in a Defined Population of Children* 111 ENVIRONMENTAL HEALTH PERSPECTIVES 742, p. 745 - 47 (2003).

³⁴ *County Health Rankings 2011 | Okanogan, Washington*, accessed on April 1, 2011 at: <http://www.countyhealthrankings.org/washington/okanogan>

store or produce stand or farmers' market.³⁵ In comparison, 69 percent of Washington's residential Zip codes have accesses to healthy food outlets and the national benchmark is 92 percent.³⁶ As the *County Health Rankings* explain studies have linked the access to outlets selling healthy foods to the consumption of healthy food and improved overall health outcomes.³⁷ The *County Health Rankings* recommend that this health problem be solved by promoting "local food systems and farmers' markets."³⁸ This solution can be implemented by a comprehensive plan alternative that designates and protects the county's existing farms and ranches, focuses growth into existing cities and towns where they can create markets for grocery stores and farmers markets, and encourages farm stands and farmers markets which can increase incomes for farmers because they can sell healthy food directly to consumers with the farmers and ranchers enjoying the higher prices they can charge when selling directly to consumers.

The land and shoreline use does not discuss existing land use patterns. The housing section does not discuss the current number of housing units in the county or housing needs or future housing projections.³⁹ The aesthetics section does not discuss the county's current conditions; even though Okanogan County is well known for highly scenic landscapes on which the county's visitor industry depends.⁴⁰ The section on light and glare does not address current lighting conditions or even note in passing that the night sky still is quite visible in many parts of Okanogan County. The recreation section does not identify existing recreational conditions. The transportation section does not identify existing transportation conditions. The public services section is also devoid of data on where public facilities and services are located and available. The utilities section has the same problems.

The section on economic impacts says nothing about the county's economy. The Washington State Employment Security Department has documented that the "[a]griculture and government sectors were, and will be for the foreseeable future, the

³⁵ *County Health Rankings 2011 | Okanogan, Washington* and *County Health Rankings 2011 | Okanogan, Washington | Access to healthy foods*, accessed on April 1, 2011 at: <http://www.countyhealthrankings.org/washington/okanogan/30> Both webpages enclosed with the paper original of this letter.

³⁶ *County Health Rankings 2011 | Okanogan, Washington*.

³⁷ *County Health Rankings 2011 | Okanogan, Washington | Access to healthy foods*.

³⁸ *County Health Rankings Find Programs and Policies that Work*. Accessed on April 1, 2011 at: <http://www.countyhealthrankings.org/take-action/find-programs-and-policies-work#built> and enclosed with the paper original of this letter.

³⁹ This data is available at the State of Washington Office of Financial Management website: <http://www.ofm.wa.gov/pop/default.asp>

⁴⁰ See for example *Upper Methow Valley Comprehensive Plan, an update of the: Community Master Plan Methow Valley Planning Area Sub Unit A* pp. 23 – 24 [Adopted by Resolution No. 25-2000 by the Okanogan County Board of Commission (March 6, 2000)].

main driving force of the Okanogan County economy.”⁴¹ Agriculture is Okanogan County’s largest employer, providing jobs to 16 percent of county residents.⁴² “In 2007, agriculture, forestry, fishing and hunting paid an annual average of \$35,305 ...”⁴³ This was a higher annual wage than those in the construction industry, although not as high as manufacturing workers who earned an average of \$37,302.⁴⁴ Many of these manufacturing workers process agricultural and forest products.

A report prepared for the Washington State Department of Commerce estimates that travel spending in Okanogan County totaled 129.2 million dollars in 2009, the latest year for which figures are available.⁴⁵ This is up from 101.2 million dollars in 1999.⁴⁶ The report estimates that travel spending supported 1,640 jobs in Okanogan County in 2009.⁴⁷ Again, this necessary data is omitted by the economic impacts section.

And the economic impacts section does not discuss the adverse economic impacts on these sectors of allowing the existing farms and ranches to convert to residential development under the new comprehensive plan and zoning. This is clearly a major weakness of *Addendum A* and the EIS.

In the public safety section there is no information on law enforcement, fire, and emergency services. Where is their currently capacity to serve an addition population growth and where is there no capacity? On this the addendum is silent.

The customs and culture section does not identify existing conditions including how the state and federal lands contribute to the forest products, agriculture, and visitor sectors. The impact of converting forest and range land to agricultural lands on these economic sectors is not analyzed. The climate change section does not identify current emissions and future emissions, even though that is the current state of the art. See Fehr & Peers, EDAW, and AECOM, *Assessment of Greenhouse Gas Analysis Tools* (State of Washington Department of Commerce: December 2009).⁴⁸

⁴¹ T. Baba Moussa, *Okanogan County Profile* p. 1 of 6 (Washington State Employment Security Department: January 2009), accessed on Feb. 8, 2010 at: <http://www.workforceexplorer.com/article.asp?PAGEID=94&SUBID=&ARTICLEID=9420&SEGMENTID=3> and enclosed with the paper original of this letter. Hereinafter *Okanogan County Profile*.

⁴² Marcy Stamper, *County to use public land base to satisfy state call for agriculture, resource lands Methow Valley News Online* p. 1 of 2 (09-28-2010 | Volume: 108 | Issue: 19).

⁴³ *Okanogan County Profile* at p. 5 of 6.

⁴⁴ *Id.*

⁴⁵ Dean Runyan Associates, Inc., *Washington State County Travel Impacts 1991-2009* p. 14 (Washington State Department of Commerce, Tourism Office: Sept. 2010). Accessed on March 17, 2011 at: http://www.experiencewa.com/images/pdf/R_2009CountyTravelImpactReport-DeanRunyan.pdf and cited excerpts enclosed with the paper original of this letter.

⁴⁶ *Id.* p. 13.

⁴⁷ *Id.* at p. 40.

⁴⁸ Accessed on March 23, 2011 at: <http://www.commerce.wa.gov/site/1277/default.aspx>

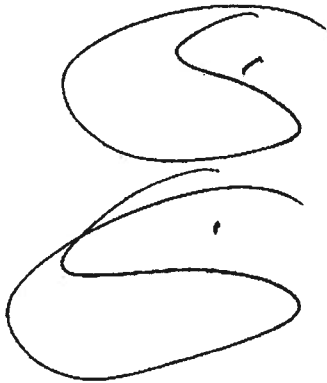
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None of these sections analyze how the alternatives will impact these elements of the environment or reasonable mitigation measures. As we documented above, SEPA, in WAC 197-11-440(6)(a), requires no less.

As we have seen, the three environmental documents prepared to date, including *Addendum A*, do not comply with SEPA and the regulations adopted to implement SEPA. We urge you to prepare an environmental impact statement that does.

Thank you in advance for considering our comments. We would be happy to provide additional information, data sources, and analytical methods. Please contact me at telephone 206-343-0681 and email tim@futurewise.org

Sincerely,

A handwritten signature in black ink, consisting of two stylized, overlapping 'S' shapes. The top 'S' is smaller and positioned above the larger bottom 'S'. The lines are fluid and continuous.

Enclosures

