

Methow Valley Citizens' Council • PO Box 774 • Twisp • WA

Okanogan County Board of Commissioners:

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To the County Commissioners:

With our mission to protect the rural and agricultural character and biological integrity of the Methow watershed, the Methow Valley Citizens' Council has been closely following the update of the comprehensive plan. This review is of particular interest to those of us who have worked for decades to preserve these vital aspects of our lives, our livelihoods, and our environment.

For almost 35 years the Methow has been protected by the two addenda to the county's comp plan that specifically focus on the Methow--the Methow Valley Plan from 1976 and the Upper Methow Valley Comprehensive Plan, first completed in 1988 and revised in 2000. These two plans, adopted by resolution by the county commissioners, have been instrumental in preserving the Methow environment and economy through their detailed, well-considered assessment of the area's past, present, and future. It is through these plans that we have been able to protect air and water quality that support the viability of agriculture and build strong year-round recreation, along with open space and scenic vistas. All these elements--rarities in the 21st century--help maintain our collective quality of life.

It is difficult to overestimate the importance of these protections. These plans grow out of many hours of careful study and effort by a diverse and representative group of local residents. Their vision for their region and their community culminated in the comp plan and is codified in county zoning. MVCC wants to ensure that these plans continue to serve the Methow Valley by seeing that they are updated along with the rest of the comp plan.

Even though we have been following this process from the beginning--through the planning commission hearings and now the county commissioners' review--we are still unclear about the status and fate of these Methow addenda. We appreciate the assurances that the county intends to keep "hands off the Methow," but other statements are confusing and even contradictory--that the comp plan will not include any subarea plans and that the upper Methow Valley will be designated a study area so it can be brought up to date. It is not clear (particularly given the different shadings for those areas on the most recent map, dated March 19, 2010) if this study-area status will also be granted to the rest of the Methow.

We have also heard that all the protections for the Methow will be covered by the zone code. It is vital that the zone code not exist in a vacuum, but that it be backed up by the underlying philosophy of the comp plan.

The Methow Valley and Upper Methow plans were adopted by resolution by the commissioners and as such must be updated along with the overall plan. If there is not adequate time to complete these reviews within the timeline of the overall update, both the Methow Valley and Upper Methow should be designated as study areas to allow for the time to perform the necessary review.

Boundaries of Methow Sub-Area Plans

Another MVCC concern is to clarify the boundaries covered by these plans. Subunit A (the upper Methow Valley) is clearly delineated and, at present, the Methow Valley plan goes south to Gold Creek. We understand that the planning commissioners have talked about extending what has been zoned as the Methow Review District south to Black Canyon. While this is welcome, we suggest that the southern boundary be Amy's Manor to coincide with the change in topography, which would then be appropriately reflected in the county's planning. Whichever southern boundary is chosen, the Methow addendum should cover the whole area.

The Lower Valley Advisory Group, appointed by the county to provide recommendations for this area and with a diverse membership drawn from many sectors of the community, made specific recommendations for the area south of Black Canyon, but these recommendations are not reflected in the current draft of the comp plan. The Lower Valley should have its own plan or be covered by the Methow Valley addendum, which can be revised to incorporate the goals and policies articulated by the Lower Valley Advisory Group.

Resource Lands Designations

MVCC understands that the commissioners recently elected to designate only public lands as agricultural resource lands. Rather than this blanket basis for designation, we recommend the use of more detailed and scientific criteria, including soil characteristics, historic use, and the availability of water and irrigation.

The goal of the resource-lands designation should be to ensure that the county has adequate land to preserve the current and future economic viability of agriculture. Public lands on their own do not address this need, in particular for orchards, vegetables, and specialty crops, which are grown largely on irrigated private land.

Similarly, for mineral resource lands, the county should apply an overlay based on proven mineral deposits, rather than permitting mineral extraction from any land in the county.

The Public Input Process

We know that the commissioners have been receiving input from many individuals and groups in the county and agree that this is a vital part of the update. Nevertheless, we cannot help but note that some groups appear to have had considerably more influence--at least outwardly--in having their concerns reflected in the comp plan.

For instance, a letter from the Coalition for Property Rights that was sent to the commissioners in January (included in the information distributed for one of the early study sessions) provides the coalition's positions on three main assumptions that the commissioners were working with at the time--the use of GMA terminology, the inclusion of optional elements in the comp plan, and the designation of resource lands, in particular for agriculture. We were struck by the fact that CPR's positions--to eliminate all GMA terminology, to eliminate all but the required sections of the comp plan, and to designate only public lands as resource lands--were all among the early revisions made to the plan by the commissioners.

By contrast, many of the goals and policies produced by the dozen neighborhood groups were not only not incorporated in the body of the plan, but were in fact excised even from the appendix by the planning commission.

While we understand that there is no way to incorporate all public input and that doing so would result in an unwieldy document with contradictory goals, we question the process by which these public comments are

evaluated.

Build on history of protections and strengthen local control

As the county grows and the world changes economically and culturally, places like Okanogan County--and, in particular, the Methow Valley--are more important than ever. We urge you to build on the strong base that the county has backed for almost 40 years.

We appreciate the hard work and review by the planning commission and the county commissioners, and recognize the desire to simplify the task by making the comp plan more focused and postponing the review of other documents. The two Methow addenda, however, are an integral part of the plan and cannot be cast aside.

Okanogan County is special and unique in all its regions. Moreover, these regions are all interconnected--by air, by water, and by soil, as well as by culture and economic interdependence. While our immediate focus is on the Methow Valley, we affirm our support for meaningful environmental protections countywide, as well as our support for the right of local residents to determine how their areas grow and develop.

Many of the individuals who worked on the original Methow Valley plans, as well as others who bring new ideas and energy, are ready to assist the county with these updates. Please do not hesitate to contact us if we can be of further assistance.

Thank you for the opportunity to comment.

Sincerely,

The Methow Valley Citizens' Council Board of Directors

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