



North Central Washington
AUDUBON SOCIETY

North Central Washington Audubon Society

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Okanogan County Commissioner's Office,
123 Fifth Avenue North, Room 150,
Okanogan, WA 98840

9 May 2011

Dear Okanogan County Commissioners:

Thank you for the opportunity to comment on the update to the Okanogan County Comprehensive Plan (OCP). This document provides important guidance to future development in Okanogan County.

North Central Washington Audubon Society is a Chapter of the National Audubon Society, and it is a local non-profit organization formed by a group of naturalists and concerned citizens. We cover Okanogan, Ferry, Chelan and Douglas Counties. We have 510 members, with 149 living in Okanogan County.

Okanogan County is very special. The diversity and abundance of natural habitats that provide habitat for all forms of wildlife, including birds, is vast. Many of our members reside in, and visit Okanogan County to enjoy this abundance. We believe the OCP should reflect this fact, and provide for the protection of these habitats and species into the future. A policy statement to this effect should be inserted right up front in the document (see below).

Unfortunately, the document we have read seems to downplay, or even ignore, the natural richness of Okanogan County in favor of policies that would encourage and favor growth and the degradation of these things.

We would like to offer the following specific thoughts:

Environmental Concern Policy Statement: There is no statement of the high value Okanogan residents place upon clean air, clean water, wildlife habitat, view sheds or open space. We would like to suggest some wording for a County Wide Planning Policy 15: *"It is the intent of Okanogan County to recognize the natural richness and*

abundance of Okanogan County, and to establish policies that will ensure the presence of the clean air, clean and abundant water, rich fish and wildlife habitats, and open, rural character in perpetuity.” (or something to this effect).

Shrub-Steppe: This habitat provides homes for many unique species that are entirely dependent on its existence. Large blocks of shrub steppe are becoming increasingly rare, as fragmentation from residential and agricultural development encroaches. Much of the shrub-steppe habitat is on private land, and is therefore largely unprotected in this current version of the OCP. We think that creative and appropriate zoning in areas with such habitats are essential tools for Shrub-Steppe conservation. This should be reflected in the OCP and in the attached Critical Areas Ordinances.

Sharp-tailed grouse: These birds are listed as a Threatened Species in Washington state, and as a Species of Concern with federal government. There are only a few places left in the state where they occur, and two major population concentrations occur in Okanogan County - the area around Scotch Creek and in the Tunk Valley. Zoning proposed for these areas would allow for one-acre lot size, with all of the associated activity that would ensure the elimination of these populations. Aquifers in these areas feed the shallow, fragile streams that the sharp tails depend on. The Tunk Valley is of particular concern to us, as the drilling of numerous wells near Tunk Creek, or near small springs and tributaries, could eliminate these surface waters in the dry months, and result in the loss of the riparian vegetation the sharp tails depend on. We think that protective zoning, with large minimum lots sizes, and requirements for clustering or other tools to reduce sprawl, would benefit Tunk and other sharp tail grouse habitats. A Sub Area plan for Tunk Valley would be appropriate in working towards this goal.

Community Involvement: Some of our members were involved in community groups that met in the past few years and developed input to Okanogan County. We thank you for including the Methow Sub Area plan in the current draft, and would like to see the downstream boundary extended to the mouth of the Methow. We also would like to request that other community input that supports protection of natural species and habitats and species be included.

Resource Lands: We think it is inappropriate to designate Forest and Agricultural lands of resource significance only on public lands. This is not the intent of these designations.

Shoreline Management Plan (SMP) and Critical Areas Ordinance (CAO): These important documents need to be emphasized and used effectively to protect the things we value.

A possible parallel experience from Chelan County

We understand the desire to expand the tax base and to accommodate the visitors who have fallen in love with eastern Washington and want to make a home here. But it doesn't have to be a choice between "no money for schools" vs. a "five acre checkerboard." This same question was recently faced in the Stemilt/Squilchuck basin near Wenatchee. The upper reaches of this area are mostly intact forest, home to totem birds and a migratory corridor for elk. The middle elevations are mostly working orchards and farms, with urban development (City of

Wenatchee) at the lowest elevations. All of the stakeholders met, over a year or so, and came to a remarkable conclusion: that the expansion of new homes should be as higher density suburbia, connected to the urban utilities, in the lower elevations, leaving the middle reaches as working agriculture and the upper reaches as intact landscape. These upper reaches provide the very amenities – hunting, fishing, bird-watching, skiing, hiking – that drew new residents to the area. Perhaps such an approach – build densely, recreate widely – could work in the Okanogan.

North Central Washington Audubon Society is a citizen-based group of naturalists committed to the perpetuation and enhancement of the wildlife and natural habitats of our region.

Thank you for the chance to comment on your plan.

Sincerely,

Mark Oswood
President

Rachel Scown
Conservation Chair