



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 2, 2019

Rocky Robbins
Okanogan County Planning
123 5th Avenue N. Suite 130
Okanogan, WA 98840

Re: Proposed Revisions to Okanogan County Comprehensive Plan

Dear Rocky Robbins:

Thank you for the opportunity to comment on the scope of the Environmental Impact Statement for proposed revisions to the Okanogan County Comprehensive Plan. We have reviewed the documents and have the following comments.

WATER RESOURCES

Ecology seeks to ensure that the County's Comprehensive Plan will include provisions that facilitate the proper management and protection of water resources. Currently, the County's Draft Comprehensive Plan does not adequately discuss protection of and impacts to groundwater and surface water supply.

This action involves areas that are subject to the Instream Resources Protection Plan for the Methow River basin (WAC 173-548), Okanogan River basin (WAC 173-549), and Columbia River (WAC 173-563). Ecology regularly sends out Orders alerting water right holders they will be shut off in favor in instream flows for the Methow and Okanogan Rivers. Because users are already being shut off in the Methow and Okanogan River basins, it is critical the County carefully consider how to evaluate water availability and legal water sources to support and sustain growth in Okanogan County. There should be analysis related to the limited availability of water in these basins and how proposed densities in various zones would or would not be viable as a result of water availability limitations.

Water Resources urges the County to prepare an EIS that fully and accurately discloses the wide-ranging impacts on water resources that would be caused by different zoning approaches, and an expanded description of the zoning densities. The current alternatives supplied by the County do not include sufficient detail for Ecology to evaluate the County's analysis of impacts to water resources and fish populations. The EIS should include analysis of development regulations that



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would prevent adverse impacts on groundwater and surface water supplies, existing water right holders, instream flows, and habitat for fish and wildlife.

Additionally, Ecology's understanding of legal water availability changed as a result of recent court decisions and Water Resources recently issued a letter to the County describing our concern that going forward, an adequate source of water supply for new development may not be available without mitigation in closed tributary basins. Chapter 3, Section 5(e), notes County support for water bank development to mitigate for permit exempt groundwater uses. The Water Resources Program encourages the County to work closely with them to seek viable solutions that allow for rural water supplies in areas with limited resources.

Finally, the Draft Comprehensive Plan references the County's plan to offer a program that would promote the re-issuance of water rights lost through relinquishment. Relinquished water rights cannot be re-issued. Ecology recommends the County contact the Water Resources Program for assistance in clarifying the County's intent for this program.

If you have any questions or would like to respond to these Water Resources comments, please contact **Jolee Ramos** at (509) 454-4173 or email at jolee.ramos@ecy.wa.gov.

Sincerely,



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