



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 4, 2016

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OKANOGAN COUNTY
PLANNING & DEVELOPMENT

Perry Huston, Director
Okanogan County Planning
123 Fifth Avenue North, Suite 130
Okanogan, WA 98840

Re: Draft EIS – Amend Okanogan County Zoning Ordinance

Dear Mr. Huston:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Okanogan County's (County) proposed zoning ordinance amendments. On March 11, 2016 Alexander Mackie and I had a chance to briefly discuss the County's approach and he provided some insight, which was much appreciated. I'm writing to follow up on that discussion and provide further comments.

First, I would like to thank you for your efforts to incorporate the Washington State Department of Ecology's (Ecology) concerns regarding water resource issues in the County. In a general sense, I would recommend that the County continue to consider Ecology's previous comments to previous SEPA notices regarding the Comprehensive Plan and the Zoning Ordinance. These previous letters outline Ecology's concerns and our suggestions on the issues that warrant further analysis.

The County's efforts to define Exempt Wells and Projects are a step in the right direction. I think that there is room to more fully define those terms and the accompanying text to better demonstrate the County's intent to ensure adequate water availability for future uses. Ecology would like to see a more thorough analysis on how the proposed ordinance would affect areas closed or limited by rule. We would also appreciate more clarity on the potential water resources effects of this Zoning Ordinance as compared to the status quo. To that end, I would propose that Ecology and the County meet and continue to work together on mutual solutions to water resource constraints in the County. As a point of clarity, the Draft EIS should cite to chapter 90.44.050 RCW regarding permit exempt wells.

While I understand that the County's approach is to evaluate zoning impacts based on population growth rather than parcel size, the Zoning Ordinance is important from a water resource perspective in that it establishes an expectation among county residents on how and where development can occur. This is especially pertinent in those areas where Ecology has previously noted concerns about impacts to water resources, including areas where there are closed water

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bodies or sources with water users subject to curtailment based on instream flows. The EIS would benefit from a more robust section addressing the Methow and Okanogan Rules in Chapter 173-548 WAC and Chapter 173-549 WAC.

If you would like to set up a meeting to further discuss Ecology's comments, please contact me at (509) 454-4240 or trevor.hutton@ecy.wa.gov.

Sincerely,



Trevor Hutton, Section Manager
Water Resources Program
Central Regional Office

TH:JR
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