

DATE: September 2, 2019

TO: Okanogan County Regional Planning Commission  
Courtney Ingle, Okanogan Planning Director  
123 Fifth Avenue North  
Room # 130  
Okanogan, Washington 98840

FROM: Ted E. Bear  
POB 165  
68 Dancing Bear Road  
Carlton, Washington 98814

RE: Bear Comments for the 2019 Draft Comprehensive Plan and the DEIS

Dear Okanogan County Planning Director, Courtney Ingle, and the Regional Planning Commissioners,

During the past 42 years I have worked hard as a logger, a fisherman, and a school teacher, while living and farming with my family on our 90-acre homestead in Carlton, Washington. I thoroughly recognize that all of our lives are completely dependent upon the quality and quantity of water available to us; therefore, I support and have included the following comments about water resources prepared by the Methow Valley Citizens' Council, and I recommend that Okanogan County decision makers include in our County Comprehensive Plan 2019 the Council's highly researched and informed comments which are listed below.

## **Water Resources**

Is it in the comp plan? Yes and No. It's in Chapter 3, p 16-18.

There is **no** reference to instream flow rules or surface water, but there is reference to "the constraints of the law."

There is a general planning objective on p. 13 (456-457) that says the county will participate in controlling illegal diversions and withdrawals.

- Out of basin water transfers are addressed on page 18.
- Water banks are also supported on pages 17-18. The language looks fine, or our suggestions below.
- Introduction p.4 (107) there's recognition of the Colville Tribes, but not the Yakama Nation. Both Tribes have

treaty rights to water bodies in the county.

Where should it be placed in comp plan?

- The county needs to add a Land Use Element. This chapter could be included within that element, or under Chapter 12 Natural Environment.
  - The chapter should be retitled to include ground and surface water. We recommend retitling as "Water Resources"
  - Some goals may also be included as General Planning Objectives (p.4), if that's the format the county sticks with.
- Note that anything labeled as an Objective should be measurable, so consider changing Objectives to Goals

### **New proposed language:**

**Title: (Change to) Water Resources**

**Goals:**

- Harmonizing watershed and land use planning, ensuring legal and physical water availability, and protecting instream flows and senior water rights holders are critically important goals of the Comprehensive Plan.

- Ensure adequate quantities of legally and physically available water to support activities within Okanogan County
- Protect groundwater from contamination via On Site Septic (OSS) systems.
- Protect water quality of streams and lakes from pollution caused by inadequate or failing septic systems and other sources.

**Policy:**

- The County will participate in watershed planning efforts in WRIAs 48 and 49 as an initiating government and will consider revisions to the Comprehensive Plan and development regulations to incorporate data and recommendations from newly completed or amended watershed plans.
- The County will encourage and support efficient water use and transfer of saved water to towns and designated growth areas and to maintain and enhance fish and wildlife habitat and instream flows.
- The County will approve only developments that comply with the adopted instream flow rules for each watershed.
- The County will discourage the transfer of water from agricultural and industrial uses to rural residential development outside of towns and designated growth areas.
- The county supports water banks and exchanges to allow development in designated growth areas where water is not legally and physically available consistent with instream flow rules, water law and fish and wildlife habitat needs, and consistent with adopted land use plans and zoning ordinances.
- The County supports establishment of water banks or exchanges, administered by independent non-profit entities, that can buy or accept water in trust for reallocation for agricultural, residential, or municipal purposes within the County.
- The County will review existing data and studies and designate critical aquifer recharge areas throughout the county. The County will rely on the maps provided by the US Geological Service (Golder Associates, 2003) to designate critical aquifers for the Methow Valley. (These maps are in the Methow Aquifer Study by Northwest Land and Water contained in Chapter 5, appendices of the draft comprehensive plan)
- The County will work with County Health Department to determine if (a) any upgrades are necessary for OSS criteria for new developments over critical aquifer recharge areas, and (b) any changes in zoning are necessary to accommodate OSS.

**Implementation Measures:**

- Policies should be developed, refined and updated in coordination with Watershed planning groups, Tribes and Nations with treaty rights, irrigators and other stakeholders.
- Policies will be implemented via the Zone Code, Subdivision Regulations, Critical Areas Ordinance, Shorelines Master Program and the site analysis/permitting process for buildings and developments.

Sincerely,



Ted E. Bear