



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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January 18, 2022

Lisa Wood  
SEPA\NEPA Coordinator  
WDFW Regulatory Services Section  
600 Capital Way North  
Olympia, WA 98501-1091

Re: SEPA Register 202200036, 22-002

Dear Lisa Wood:

Thank you for the opportunity to comment on the Determination of Non Significance for the Milles Lake Dam Safety Repairs project. We have reviewed the documents and have the following comments.

**SHORELANDS/ENVIRONMENTAL ASSISTANCE**

Thank you for the opportunity to provide comments to this project as it pertains to the Shoreline Management Act of 1971, RCW chapter 90.58; State master program approval/amendment procedures and master program guidelines, WAC 173-26; Wetlands 90.48; and Shoreline management permit and enforcement procedures, Chapter 173-27 WAC.

According to the Okanogan County Shoreline Master Program, Miles Lake is a Shoreline of the State with a "Rural" environmental designation. The project materials demonstrate that approximately 833 SF of wetland B will be directly impacted. In addition, 32.31 CY of cut and fill within Wetland B will also occur for the purpose of this project. Additional Wetland areas remain outside of the work area not directly impacted. Wetland B is a slope wetland. If the applicant interrupts hydrologic connection of the remaining areas of Wetland B, then additional review for the direct impacts of the remaining areas may be needed. More information regarding on sediment and erosion control measures and other BMPs are needed to determine full extent of project impacts to critical areas.

Wetland determination or wetland rating forms were provided upon request. Wetland enhancement of Wetland A (Cat II, HGM class: Lake Fringe) is proposed for the Wetland impact at Wetland B (Cat II, HGM class: Slope). Depending on the functions and values of the directly and indirectly impacted Wetland area, the provided wetland mitigation may not be sufficient for the lost wetland area. If the applicant mitigation for wetland impact will be located in a wetland of a different HGM class, then the applicant may need to provide mitigation documentation demonstrating no-net-loss. The credit-debit method may be a useful document to help demonstrate mitigation proposed is sufficient. Credit-Debit Method can be found at the following website: <https://ecology.wa.gov/Water-Shorelines/Wetlands/Tools-resources/Credit-debit-method> .

Avoidance and Minimization Checklist (worksheet) can be found at the following website:  
<https://ecology.wa.gov/Water-Shorelines/Wetlands/Mitigation/Avoidance-and-minimization>

For unavoidable impacts, appropriate mitigation ratios are based on wetland rating. For example: for impacts to a category IV wetland, the ratio for enhancement is 6 SF for every 1 SF impact. The applicant will need to provide information that the proposed mitigation is enough to offset the total proposed impacts. More information regarding mitigation ratios maybe found on page 120, Table 6b-1 of the interagency guidance at the following website: <https://ecology.wa.gov/Water-Shorelines/Wetlands/Mitigation/Interagency-guidance>.

In summary, the applicant will need to demonstrate how the proposed project will provide a functional lift in functions and values in the post construction condition.

Please contact **Alicia Schulz**, Shorelands and Environmental Assistance (SEA) program, [alicia.schulz@ecy.wa.gov](mailto:alicia.schulz@ecy.wa.gov) or (509) 454-4260 should you have any questions about the comments provided.

## WATER RESOURCES

The Dam Safety Office acknowledges that the applicant is in the process of obtaining the necessary Dam Safety construction permits for the Milles Lake Dam Safety Repairs. The permit can be found by entering the following link into your search engine:

<https://apps.ecology.wa.gov/publications/summarypages/ecy07038.html>

Please submit the dam construction permit and plans to:

WA Department of Ecology  
Dam Safety Office  
P.O. Box 47600  
Olympia, WA 98504-7600

For more information, please contact **Charlotte Lattimore** by e-mail at [charlotte.lattimore@ecy.wa.gov](mailto:charlotte.lattimore@ecy.wa.gov) or by telephone at (360) 407-6066.

Sincerely,



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