From: Timothy R Gartland [mailto:timgartland@centurytel.net]
Sent: Wednesday, April 27, 2016 10:44 AM
To: Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>
Subject: Comment regarding Icicle Work Group and SEPA Checklist

Dear Mr. Kaputa,

It appears to me that answers submitted in your SEPA Environmental Checklist related to Icicle Work Group proposals are incomplete. That is, your responses ignore the upstream impacts of the Icicle Work Group's proposed increases to water flows over those upper stretches of Icicle Creek and its tributaries. The manipulated flows meant to provide additional water during the late summer and early fall are by definition unnatural, and as such will (of course) have an impact. Yet your SEPA responses make no mention of this simple fact.

Here are some examples to support my observation:

Regarding:
Section B. Environmental Elements
Subsection 8. Land and Shoreline Use

Question a: What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.
Your answer: "The proposal will increase instream flow, which will provide beneficial results for a variety of agricultural, recreational, domestic, commercial, and natural uses on adjacent properties."
This response fails to account for the deleterious effects to wildlife, wildlife systems and humans that have come to count upon the natural seasonal reductions to instream flows (upstream of the proposal's beneficiaries.)

Question j: Approximately how many people would the completed project displace?
Your answer: "None anticipated."
This response fails to account for the upstream property owners, camp site users and other visitors who count on using the natural seasonal reductions for swimming and wading who will be discouraged by the danger presented by the increased flows. If the water flow were increased 30 or 50% on the stretch where I generally camp it would render the stream unsafe for entry. As it is now, I and other campers can wade, swim or bathe themselves naturally. The increased flows could result in the entire population of future campers losing swimming areas forever.

Subsection 12. Recreation

a. Would the proposed project displace any existing recreational uses? If so, describe.
Your answer: "The proposal would improve some recreational opportunities by enhancing the natural aesthetic of the affected geographical area through increased streamflow in Icicle Creek."
This response fails to account again for the upstream property owners, camp site users and other visitors who count on using the natural seasonal reductions for swimming and wading who will be discouraged by the danger presented by the increased flows.

Section D. Supplemental Sheet for NonProject Actions

Question 2. How would the proposal be likely to affect plants, animals, fish or marine life?
Your answer: "The program is designed to improve instream flow and habitat for fish."
The response fails again to account for the deleterious effects to wildlife and humans that have come to count upon the natural seasonal reductions to flows upstream of the proposal's beneficiaries.

Question 4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated for governmental protection; such as parks, wilderness, wild and scenic rivers,

threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?
Your answer: "Implementation of the Guiding Principles would not result in any long-term changes, new construction or lasting disturbance to any environmentally sensitive areas."
This response fails to account for the permanent presence of unnatural, counter seasonal increased water flows from originating sources within wilderness areas through to the downstream beneficiaries. To repeat, the increased flows would be permanent and unnatural.

The few examples above illustrate how your responses ignore upstream impacts of the increased water flows. Which is surprising because the impacts of artificially storing and releasing water flows are well documented from a long history of numerous projects around the globe. The impacts include those associated with river-line erosion and changes in water temperature, not to mention the increased dangers to humans wishing to bathe in and along its shores. River-line erosion impacts shores and riverbed, and threaten shoreline ecosystems. Further, stream beds can deepen and thus narrow over time. The counter seasonal increases also result in the cooling of the waters. These cooler temperatures can impact fish, flora and fauna in ways not addressed in your responses.

Water flows have seasonally ebbed and flowed since time began. Aquatic and land animals have come to depend upon this ancient system, including myself. I look forward to the naturally low volumes and warmer waters to cool myself during the hot summer months. Aquatic animals may depend upon the lower volumes to breed or build fat stores. Land animals may advantage the lower flows to traverse the river or complete migratory travel. The artificial manipulation of the flows is by definition abnormal and unnatural, and as such will definitely impact the systems and the animals which populate the flows. Your responses should acknowledge and respect this fact. Its my observation that they do not. And as such, you should make amendments to correct the omissions.

Respectfully submitted,

Tim Gartland
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Frequent recreational visitor to the Icicle River and Valley