272 Mapleway Road Selah, WA 98942 April 30, 2016

Mike Kaputa 411 Washington Street Suite 201 Wenatchee, WA 98801 <u>Mike.kaputa@co.chelan.wa.us</u>

Dear Mr. Kaputa,

Thank you for the opportunity to comment on the preparation of the Programmatic Environmental Impact Statement (PEIS) for the Icicle Strategy. I have the following comments:

Regarding the handouts shown on the website http://www.co.chelan.wa.us/natural-resources/pages/sepa-public-open-house,

1. Alpine Lakes Optimization, Modernization and Automation handout: I have a strong objection to the project description: "Seven *reservoirs* (emphasis added) located within the Alpine Lakes Wilderness Area are currently used to augment water supply for Icicle and Peshastin Irrigation Districts (IPID) and the US Fish and Wildlife Service Leavenworth National Fish Hatchery: Upper and Lower Snow, Nada, Colchuck, Eightmile, Klonaqua, and Square Lake." Further, "The purpose of this project is to manage release from these "*reservoirs*" (emphasis added) based on water levels and changing conditions in a way that would optimize the water supply in the basin and be coordinated among all users."

Nowhere does it mention that these "reservoirs" are not, in fact, "reservoirs" but named geographic features (lakes) located within the Alpine Lakes Wilderness. It is also apparent that there was no consideration made for "users" of the Alpine Lake Wilderness, only for those who wish to consume the water from those "reservoirs" aka, lakes, from within the Alpine Lakes Wilderness.

2. Domestic Conservation Efficiencies handout: Quoting the project description, "Future conservation projects identified by the IWG include replacing residential meters, *evaluating* (emphasis added) a conservation oriented rate structure, expand conservation education and xeriscape programs, increase domestic leak detection programs, and rebates for efficient residential fixtures. Additionally, City of Leavenworth is *exploring* (emphasis added) opportunities for reclaimed water and replacing leaky watermains. In the 1970's and 1980's, energy conservation was looked at as a stop-gap measure used prior to construction of coal or nuclear plants. The coal or nuclear plants would then provide the "real" energy necessary for an expanding economy.

We now know that those coal and nuclear plants were not necessary and energy conservation is the preferred alternative in the Pacific Northwest.

So why is the IWG providing first for hard engineering regarding "optimizing, modernizing and automating" the "reservoirs" but only "evaluates" and "explores" conservation opportunities? Shouldn't it be the other way around? Why do you first want to mine the water in the Alpine Lakes Wilderness before you have evaluated and explored the potential for conservation?

As a senior water right holder in the Yakima basin, I am familiar with the rush towards high dollar capital projects for new water sources (especially when the State or Federal government is paying) with conservation playing second or third fiddle.

I do understand that IPID has specific water rights from the Alpine Lakes Wilderness. My understanding is that those rights are for agricultural purposes. I question the conversion of those agricultural right to domestic water rights, especially when the IWG is only proposing an "evaluation" of a conservation oriented rate structure and the City of Leavenworth is only proposing "exploring" opportunities for reclaimed water and replacing leaky watermains.

Shouldn't you at least replace the leaky watermains? With all respect, replacing leaky watermains would appear to be a good place to spend capital dollars. Leaky watermain replacement could provide additional water through conservation with a side effect of improving the city's infrastructure.

I would like to see an alternative that does not allow "optimizing, modernizing and automating" the "reservoirs" but does require a conservation oriented rate structure, increased domestic leak detection, rebates for efficient residential fixtures and replacement of leaky watermains. Opportunities for reclaimed water should also be evaluated.

Thank you for your consideration of these comments.

Kind regards,

Margie Van Cleve