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WISE USE MOVEMENT

P.O. Box 17804, Seattle, WA 98127

May 10, 2016

Chelan County Natural Resources Department
Attention: Mike Kaputa, Director
411 Washington Street, Suite 201
Wenatchee, WA 98801
Email: <Mike.Kaputa@CO.CHELAN.WA.US>

RE: SEPA Scoping Comments on the Icicle Creek Water Resource Management Strategy

GENERAL COMMENTS

The Wise Use Movement agrees that the Icicle Creek Water Resource Management Strategy (ICWRMS) would have a significant adverse impact on the environment such that an environmental impact statement must be prepared. However, it would save taxpayers and concerned citizens significant resources if the ICWRMS were withdrawn. The Wise Use Movement strongly opposes the ICWRMS for the following reasons:

- The Department of Ecology used a process taken from the fatally flawed Yakima Work Group to select a small number of participants to prepare the ICWRMS while discouraging public participation. The Yakima Plan is not a national model and neither is the ICWRMS.
- The Icicle Workgroup, like the Yakima Work Group, included the agency conveners as workgroup members. This is unacceptable and introduces an unwarranted level of agency control over what should be an advisory committee.
- The Icicle Workgroup is providing policy direction in an advisory capacity to a number of Federal Agencies, including the Bureau of Reclamation, the US Forest Service, the US Fish and Wildlife Service, and NOAA-Fisheries. Both the Icicle Workgroup and the Yakima Work Group have failed to comply with the Federal Advisory Committee Act.
- The Department of Ecology is asking for scoping on an ICWRMS programmatic EIS under the State Environmental Policy Act (SEPA), Chapter 43.21C Revised Code of Washington (RCW). This allows Ecology to avoid responding to comments on project specific impacts from the ICWRMS, as it did with the Programmatic EIS for the Yakima Plan.

- The ICWRMS has specific adverse environmental impacts to resources located in the Alpine Lakes Wilderness Area, within the Okanogan-Wenatchee National Forest, yet no NEPA environmental impact statement is proposed at this time.
- We also strongly object to the Department of Ecology and Chelan County's continued efforts to hide from the public the impacts that the ICWRMS would have on the Alpine Lakes Wilderness Area. Chelan County gave several PowerPoint presentations of the ICWRMS without showing the Alpine Lakes Wilderness Area on its maps. In addition, the Determination of Significance issued by G. Thomas Tebb (Director, Office of Columbia River) and Mike Kaputa (Director, Chelan County Natural Resource) fails to even mention the Alpine Lakes Wilderness Area. The Chelan County SEPA Environmental Checklist list of environmental information (page 4) fails to list even a single National Forest Service document concerning the Alpine Lakes Wilderness, and the Alpine Lakes Wilderness Area is mentioned only three times in the Applicant's entire Environmental Checklist (pages 7, 13, and 22).

The Department of Ecology's Office of Columbia River relies on state legislation passed in 2006 to "to aggressively seek out new water supplies for both instream and out-of-stream uses." When the Office of Columbia River assaults our Nation's wilderness areas that belong to all this country's citizens, they have crossed the line. After 10 years of failing to find new water supplies at a cost of \$200 million dollars it is time for the Washington Legislature to terminate the Office of Columbia River.

- It appears that the ICWRMS has been rushed out on some sort of artificial timetable. The Environmental Checklist states that the Icicle Strategy is made up of nine Guiding Principles (page 5), but only seven bullets are shown. This is a sloppy presentation. Until Chelan County can provide clear and concise information to the public about the Guiding Principles that form the basis of the ICWRMS, the scoping notice must be withdrawn until Chelan County can get its head out of the beer.

Comments on the Guiding Principles (Environmental Checklist pages 5 and 6)

The Wise Use Movement objects to a small cabal, including members with a direct financial interest, agreeing to an ICWRMS prior to the preparation of environmental review. The Chelan County Natural Resources Department has stated that ALL nine guiding principles must be met. This is completely prejudicial to the SEPA planning process that depends on the presentation and review of alternatives. There is no legal precedent that requires that ALL nine guiding principles be met.

Regarding "Improve Instream Flows in Icicle Creek Historic Channel"-

- The DPEIS must identify and locate the "historic" Icicle Creek channel; identify the historic yearly Icicle Creek streamflows; identify the current yearly Icicle Creek streamflows; identify the source for the proposed 60 cfs minimum flows (drought years); explain why "minimum instream flows" must be reduced during a drought year; identify an alternative that would provide 250 cfs minimum flows during all years; identify an alternative that would provide "optimum instream flows" during all years; identify the

yearly maximum Icicle Creek streamflows; identify the environmental impacts from Icicle Creek streamflows from less than 60 cfs and more than 2,600 cfs.

Regarding “Improve sustainability of Leavenworth National Fish Hatchery (LNFH)”-

- The DPEIS must identify and address the following: the location and history of the LNFH; the production output of the LNFH since its construction compared to the historic runs of wild salmon; the amount of water withdrawn from the Icicle Creek or groundwater for the LNFH; impacts to fish production from cutting water withdrawals to the LNFH by half; clarify whether fish passage at Grand Coulee would remove the “obligation” for continued use of the LNFH; include fishery disease and predation morality since the construction of the LNFH; clarify the status of the LNFH NPDES permit.

Regarding “Protect Tribal and Non-Tribal harvest”-

- The DPEIS must identify and address the following: tribal and non-tribal harvest of wild fish spawning in the Icicle Creek and Wentachee River basins since the construction of the LNFH; tribal and non-tribal harvest of LNFH hatchery fish since the construction of the LNFH.

Regarding “Improve Domestic Supply”-

- The DPEIS must explain and address the following: the City of Leavenworth’s 1995 water right change application to Ecology in 1995, and subsequent lawsuit against Ecology to increase their annual water right withdrawal; identify the City of Leavenworth’s current water usage and any City water conservation plan; an explanation of why the City is demanding more water withdrawals and why demand for more water cannot be met by conservation; an estimate of the likely number of new residences through 2050, with and without additional water withdrawals; an estimate of the lawn acreage within the City; and an estimate of the number of groundwater wells and annual withdraw volumes.

Regarding “Agricultural reliability” -

- The DPEIS must explain and address the following: include an alternative that does not rely on any modifications to current withdrawals from lakes within the Alpine Lakes Wilderness area; include an alternative that does not rely on any withdrawals from lakes within the Alpine Lakes Wilderness area; provide detailed crop selection and acreage for each irrigation district with water withdrawal rights in the Alpine Lakes Wilderness Area; clarify whether these water rights withdrawals are specific to the lakes within the Alpine Lakes Wilderness Area or are withdrawals from Icicle Creek; and provide an explanation of why current interruptible agricultural users must be converted to senior water right holders.

Regarding “Enhance Icicle Creek Habitat” -

- The DPEIS must explain and address the following: identify fish passage impediments and projects that would improve fish passage, and explain why such measures have not been previously undertaken; and identify all proposed land acquisition/easements.

Regarding “Comply with State and Federal Law, and Wilderness Acts” -

- The DPEIS must explain and address the following: list how many different Wilderness Acts are under consideration; identify the regulators; review any water rights maintained under the 1976 Alpine Lakes Wilderness Act; disclose all agreements signed by the US Forest Service concerning land exchanges within the Alpine Lakes Wilderness Act; and

explain why LNFH, IPID, and COIC withdrawals are not currently appropriately screened.

Specific Comments on Base Package

IPID Irrigation Efficiencies. The DPEIS must evaluate a range of irrigation efficiencies for the IPID, including alternative crop selection, crop insurance, land fallowing, aquifer storage, water delivery costs, and re-reg reservoirs. The DPEIS must include the historic as well as 2015 drought acre-foot usage by the IPID.

COIC Irrigation Efficiencies. The DPEIS must evaluate a range of irrigation efficiencies for the COIC, including alternative crop selection, crop insurance, land fallowing, aquifer storage, water delivery costs, and re-reg reservoirs.

Domestic Conservation Efficiencies. The DPEIS must evaluate a range of domestic conservation efficiencies, including water delivery costs, elimination of leaky water pipes, restrictions on lawn watering; and use of low-flow toilets, clothes washers, and shower heads.

LHFH Conservation and Water Quality Improvements. The DPEIS must evaluate water use savings from a smaller size hatchery. The hydrologic continuity between wellfield and instream withdrawals must be analyzed.

Alpine Lakes optimization, Modernization, and Automation. The DPEIS must evaluate dropping these projects. In addition, the DPEIS must include an alternative of restoring the seven lakes within the Alpine Lakes Wilderness Area to their natural (pre-irrigation use) conditions.

Eightmile Lake Restoration Project. The DPEIS must evaluate dropping this project. In addition, the DPEIS must include an alternative of restoring Eightmile Lake to its natural (pre-irrigation) condition.

Water Markets. The DPEIS must prioritize a water market that makes maintaining optimum instream flows in Icicle Creek as the highest priority.

Habitat Improvements and Land Acquisition. The DPEIS must identify all locations proposed for “engineered logjams.” In addition, the DPEIS must identify all existing impediments blocking fish passage and explain why such blockages or impediments still exist in 2016.

Rehabilitate LNFH Intake, Operational improvements at Structure 2, Icicle Creek Passage, and Tribal Fisheries Improvements. The DPEIS must evaluate a range of alternatives for rehabilitation of the LNFH, including a smaller size hatchery.

Screening Improvements. The DPEIS must identify all faulty diversion screens and explain why such faulty diversion screens still exist in 2016.

Instream Flow Rule Amendment. The DPEIS must explain how the Wenatchee Instream Flow Rule (WC 173-545) meets the purposes of this chapter to retain perennial rivers, streams, and

lakes in the Wenatchee River basin with instream flows and levels necessary to protect water quality, wildlife, fish, and other environmental values when instream flows are defined as “minimum flows.” The DPEIS must include optimum instream flows that would protect water quality, wildlife, fish and other environmental values more consistent with historic flows.

Specific Comments on the Environmental Checklist

Chelan County’s Environmental Checklist is inadequate and has failed to provide the most basic information about the proposal and have failed to answer questions either accurately or carefully, as required by RCW 197-11-960. The following are specific comments on errors and omissions in Chelan County’s Environmental Checklist:

A.2. Name of Applicant. The name of the applicant is “Chelan County Department of Natural Resources.” However, the proposal purports to benefit irrigation districts, the City of Leavenworth, as well as the Leavenworth National Fish Hatchery. Why are these not listed as co-applicants?

A. 7. The Environmental Checklist states that each individual project proposed under the ICWRMS would have its own environmental review process. The PEIS must clarify that “environmental review” may also lead to Findings of No Significant Impact (FONSI) and that additional environmental impact statements on individual projects may not be prepared.

A.8. We request that environmental information from the US Forest Service regarding the Alpine Lakes Wilderness Area be reviewed and listed. We also request that the following report be added:

U.S. Fish and Wildlife Service (USFWS). 2004. Comprehensive Hatchery Management Plan for the Leavenworth National Fish Hatchery. Planning Report Number ?, U.S. Fish and Wildlife Service, Leavenworth National Fish Hatchery, Leavenworth, Washington. http://www.fws.gov/pacific/fisheries/hatcheryreview/reports/leavenworth/le--002leavenworthhgm_000.pdf

A. 11. The Environmental Checklist states that the ICWRMS proposes to enhance instream flows, water supplies, and aquatic habitat project that fulfill nine Guiding Principles established by the Icicle Work Group, but, as noted above, only seven bulleted items are listed on page 5 and 6. This only creates confusion as to what the proponents actually intend. In addition, RCW 43.21C.030(b)(iii) requires a detailed statement on alternatives to the proposed action. WAC 197-11-784 defines “Proposal” as including “a particular or preferred course of action or several alternatives.” While an applicant may submit an application for a preferred course of action, when it comes to planning, it is not appropriate for government agencies to huddle with a small number of stakeholders, cut deals, and establish a single plan of action. By doing so, government agencies commit themselves, prior to any environmental review, to their selected plan. Any programmatic EIS must, therefore, disclose a range of alternatives, and not a preferred alternative established by the Icicle Work Group.

In addition, the response to Section A. 11 gives figures in both acre-feet and cfs. For consistency purposes, the DPEIS must provide both acre-feet and cfs figures to aid the reviewer in understanding the quantities of water involved.

B.1. Earth - Earthquakes. The DPEIS must identify all known or suspected earthquakes faults in the area.

B.a. 2). Surface Water. The DPEIS must identify all proposed habitat improvement projects, passage barrier removal, and improved diversion screening.

B.3.a. 4). Surface Water. The DPEIS must identify all new proposed surface diversions and alternative locations. The DPEIS must analyze the adverse environmental impacts from new home construction on instream flows.

B.3.b.1). Ground Water. The DPEIS must analyze the amount of projected new rural domestic wells in response to any increase in domestic reserves under the Wenatchee Instream Flow Rule. The DPEIS must provide domestic water conservation measures alternatives in lieu of increasing domestic reserves. The DPEIS must analyze the adverse environmental impacts from new home construction on ground water. The DPEIS must analyze the hydrologic continuity between instream flows and groundwater from any LNFH groundwater augmentation wells.

B.4.b. Plants. The DPEIS must analyze the adverse environmental impacts on vegetation from new home construction.

B.4.c. Plants. The DPEIS must review all US Forest Service information concerning ESA listed plant species within the Alpine Lakes Wilderness Area.

B..5.a and b. Animals. The DPEIS must review all US Forest Service information concerning ESA listed animal species within the Alpine Lakes Wilderness Area.

B.5. d. Animals. The Environmental Checklist claims that the Alpine Lakes Optimization will preserve and enhance wildlife. This is incorrect. Additional development in the Alpine Lakes Wilderness Area would have an unacceptable adverse impacts to fish and wildlife. The DPEIS must not let the Applicant claim that additional Alpine Lakes Wilderness Area development would benefit aquatic wildlife.

B.6.c. Energy and Natural Resources. We again object to any construction projects in the Alpine Lakes Wilderness Area. We again request that an alternative be developed without any such construction projects.

B.7.b.2 Noise. What additional noise levels would be generated by pumps and associated mechanical and electrical equipment within the Alpine Lakes Wilderness Area? Would such noise be covered by “local noise ordinances?”

B.8.a. Land and Shoreline Use. Again, we question why Chelan County would fail to mention the Alpine Lakes Wilderness Area as part of its description of Land and Shoreline use. Chelan

County claims that increasing instream flows would provide beneficial results for natural uses. Chelan County fails to disclose that increasing flows by new construction projects in the Alpine Lakes Wilderness Area would have adverse impacts.

B.8.c. Land and Shoreline Use. Chelan County describes new Alpine Lakes reservoirs in the Alpine Lakes Wilderness Area as an “improvement.” Congress designated the Alpine Lakes Wilderness Area, not the Alpine Reservoirs Wilderness Area. The fact that Chelan County has portrayed the Alpine Lakes as “reservoirs” multiple times, demonstrates that Chelan County has little appreciation of and little understanding of wilderness or wilderness values. This is especially ironic, given that the Applicant is the County’s “Natural Resources Department.” It appears that this Department is more interested in dismantling and destroying natural resources than preserving, protecting, or enhancing.

B.8.1. Land and Shoreline Use. Chelan County again fails to mention the US Forest Service or the Alpine Lakes Wilderness Area in addressing proposed measures to ensure the proposal is compatible with existing and project land uses and plans. The DPEIS must review US Forest Service planning documents for the Alpine Lakes Wilderness Area.

B.10.b. Aesthetics. Chelan County claims that new construction projects within the Alpine Lakes Wilderness Area would “improve views.” Increasing water withdrawals from the Alpine Lakes Wilderness Area would not improve views of these areas and would have adverse impacts on recreational aesthetics. The DPEIS must address these impacts.

B.12.a. and c. Recreation. Again, Chelan County refused to even specifically list the Alpine Lakes Wilderness Area as a recreational opportunity in the vicinity or to list proposed measures to reduce or control impacts on recreation. The DPEIS must include an alternative that does not include construction activities within the Alpine Lakes Wilderness Area. The DPEIS must include recreation usage of the Alpine Lakes Wilderness Area, including day visits.

D.1. Chelan County asserts that implementation of the Guiding Principles is intended to “improve the environment,” without addressing impacts from construction activities within the Alpine Lakes Wilderness Area.

D.2. Again, Chelan County asserts that the program would improve instream flow and habitat for fish and benefit terrestrial species, without addressing impacts from construction activities and additional water drawdowns within the Alpine Lakes Wilderness Area or impacts from new home construction. Chelan County again asserts that the Alpine Lakes Optimization, Modernization, and Automation would “benefit aquatic wildlife.” Chelan County must not be allowed to describe the proposed program as beneficial while avoiding the purposes of SEPA to disclose to decisionmakers the potential significant adverse impacts.

D.3. Contrary to the assertions of Chelan County, the proposed Alpine Lakes Optimization, Modernization, and Automation would deplete natural resources by increasing water withdrawals from these lakes.

D.4. Contrary to the assertions of Chelan County, the proposed Alpine Lakes Optimization, Modernization, and Automation would result in long-term changes to the environmentally sensitive Alpine Lakes Wilderness Area. Chelan County also asserts that the proposed changed management regime for Alpine Lakes Wilderness Area drawdown “is to improve instream habitat for ESA-listed salmonids and other aquatic species in the Icicle Basin.” The DPEIS should clarify whether Alpine Lakes Wilderness Area drawdowns are also intended to provide new water supplies for the City of Leavenworth, the LNFH, and IPID and COIC. The DPEIS must include an alternative that increases instream flows without additional modifications to the Alpine Lakes Wilderness Area.

Additional Specific Comments and Issues

The following are specific comments and issues to be addressed as part of any DPEIS on the ICWRMS. SEPA requires the following elements be included:

- (i) the environmental impact of the proposed action,
- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
- (iii) alternatives to the proposed action,
- (iv) the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and
- (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented. *RCW 43.21C.031(2)*.

1. Alternatives

* A no-action alternative is the most critical part of any EIS because it avoids all the adverse environmental impacts from the ICWRMS proposed project. The Applicant’s Environmental Checklist (page 6) states that the DPEIS will describe both the base package and other alternative projects that could meet Guiding Principles. Again, a slavish attachment to the Guiding Principles, is contrary to SEPA. The DPEIS must include alternatives to the Guiding Principles, including alternatives that do not require more construction within the Alpine Lakes Wilderness Area, and that return the Alpine Lakes Wilderness Area to its pre-irrigation withdrawal condition.

The Department of Ecology refused to provide any alternatives to the Yakima Plan in its PEIS, other than the no-action alternative. Ecology should uphold SEPA and not work to circumvent it. Why would Ecology include alternative projects to meeting the Guiding Principles, when it refused to provide any alternative projects in the Yakima Plan PEIS?

2. Earth Resources

* How will the DPEIS evaluate the project’s potential impacts and identify potential mitigation measures for those impacts, such as impacts of filling, soil contamination and erosion; and potential impacts from earthquakes?

3. Air Resources

* How will the DPEIS evaluate the project’s potential impacts on existing air quality?

* How will the DPEIS evaluate compliance with the requirements of the Clean Air Act for construction and operation phases?

- * What would be the project's contribution to climate change gases?
- * What would be the carbon footprint of the proposed projects?
- * Will the DPEIS evaluate the impacts on air quality and visibility caused by fugitive and exhaust emissions from construction, traffic, and truck emissions, and all point source emissions? Will the DPEIS analysis include airborne pollutants associated with any built project's day-to-day operations?

4. Water Resources

- * Will the DPEIS evaluate the effects of a 100-year and 500-year flood on any project site?
- * What water quality monitoring would be proposed?
- * Will the DPEIS include a description of the potential for spills of contaminants into waters of the United States and the measures such as an emergency response plan to mitigate impacts?
- * What is the scope of the water quality analysis? Will the DPEIS disclose which water bodies may be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters? Will it also report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether the Washington Department of Ecology has developed a water quality restoration plan (Total Maximum Daily Load) for the water bodies and the pollutants of concern? If a Total Maximum Daily Load (TMDL) has not been established for those water bodies on the 303(d) list, in the interim will the DPEIS demonstrate that there will be no net degradation of water quality to these listed waters?
- * Will the DPEIS explain how anti-degradation provisions of the Clean Water Act would be met for any proposed project?
- * Will the DPEIS address the effects on water quality from the runoff of pollutants, including fertilizers and pesticides from residential landscaping and from storm water associated with additional impervious surfaces that might result from providing additional water to the City of Leavenworth for new residential construction?

5. Shoreline Habitat

- * Will any damage to the Alpine Lakes Wilderness Shoreline result from the proposed projects and associated uses in the area?
- * Will the Biological Assessment required for compliance with Section 7 of the Endangered Species Act be a clearly identifiable section?
- * Will an assessment of fisheries and benthic impacts specifically address the requirements for an Essential Fish Habitat Assessment per the Magnuson Stevens Act?
- * Will studies be carried out of an assessment: 1) species type, life stage, and abundance; based upon existing, publicly available information, 2) potential changes to habitat types and sizes; and 3) the potential for fishery population reductions.
- * Will the DPEIS assess potential indirect impacts to fish and wildlife that may result from changes in water movement, sediment transport, and shoreline erosion?
- * Will the DPEIS include a Benthic Macroinvertebrate Community Assessment of the nearshore areas of lakes in the Alpine Lakes Wilderness and along Icicle Creek?
- * Will the DPEIS comprehensively address the interconnections between the

benthic, fisheries and avian resources?

6. Biological Resources

- * Will the DPEIS analyze potential impacts on fish, wildlife and their habitats from every element of the ICWRMS, along with identification of mitigation measures?
- * How will the DPEIS consider ecological objectives? Will ecological objectives be designed to protect water quality and to maintain and/or enhance the natural habitats in the Alpine Lakes Wilderness as well as Icicle Creek for the benefit of fish and wildlife resources and the public?
- * Will the DPEIS address measures that compensate for the loss of habitats of value to fish and wildlife?
- * Will the DPEIS identify the endangered, threatened, and candidate species under the Endangered Species Act (ESA), and other sensitive species within the proposed project area for each alternative? In addition, will the DPEIS describe the critical habitat for these species and identify any impacts the proposed project will have on these species and their critical habitat?
- * Will the DPEIS describe the current quality and potential capacity of habitat, its use by fish and wildlife on and near the proposed ICWRMS project area, and identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation?
- * Will the DPEIS evaluate effects on fish and wildlife from any habitat removal and alteration, aquatic and terrestrial habitat fragmentation caused by land use and management activities, and human activity? How will endangered species and habitat, including steelhead or salmon in the Alpine Lakes Wilderness and Icicle Creek be protected?
- * How will Ecology ensure that its decision complies with the Migratory Bird Species Act of 1918, as amended?
- * What major plant communities are present and affected? Will the DPEIS consider impacts on any sensitive plant species, particularly those endemic to the Alpine Lakes Wilderness and Icicle Creek? How will any sensitive plant species in the vicinity be protected?
- * How much new impervious surfaces would be developed?

7. Avian Impacts

- * How will the DPEIS describe any avian impacts to the Alpine Lakes Wilderness and Icicle Creek? How will the DPEIS establish a baseline data set? The species, number, type of use, and spatial and temporal patterns of use must be described. Information derived from other studies, which provides a three-year baseline data set, must be included if available. Information must be based on (1) existing, published and unpublished research results, especially research that describes long-term patterns in use, and (2) new field studies undertaken for this DPEIS. Data on use throughout the year, especially in Spring for migratory species, and under a range of conditions must be collected. Data collection must allow a statistically rigorous analysis of results. Issues needing to be addressed include: (1) bird migration, (2) bird flight during storms, foul weather, and/or fog conditions, (3) food availability, (4) predation, and (5) benthic habitat and benthic food sources.
- * Will a Biological Assessment be prepared under Section 7 of the Endangered Species Act?

8. Noise and vibrations

- * How will the DPEIS include an assessment of the magnitude and frequency of underwater noise and vibrations, and the potential for adversely affecting fish and mammal habitats from construction and operation of any facilities? Will the DPEIS include an assessment of fish and

mammal tolerance to noise and vibrations, with particular emphasis on noise and vibration thresholds that may exist for each of the species? Will the DPEIS also include the potential of noise impacts to human activity?

* How will the DPEIS address identification of existing noise levels and evaluation of the project's potential short-term and long-term noise impacts along with potential mitigation measures?

* Has a noise contours map been developed for any proposed ICWRMS project and does it show day-night average sound level (DNL)? How will any DNL's that are in excess of local ordinance requirements be mitigated?

* Will the DPEIS evaluate noise generating activities associated with construction and ongoing operations, including traffic to and from the project site?

9. Environmental Health

* How will the DPEIS address impacts of any hazardous materials and identification of mitigation measures?

10. Land and Shoreline Use

* How will the DPEIS address compliance with land use laws, plans and policies?

* How will the DPEIS address compliance with the State Shoreline Management Act and the Chelan County and City of Leavenworth Shoreline Master Programs?

* How will the DPEIS address compliance with federal laws governing Wilderness areas?

11. Aesthetics

* How will the visual impacts be mitigated?

12. Recreation

* How will the DPEIS address any ICWRMS project impacts on recreational use of the Alpine Lakes Wilderness Area?

13. Transportation

* How will the DPEIS address the project's potential transportation impacts and identification of mitigation measures?

* How many vehicle trips will be generated, including trips by employees and service and delivery vehicles?

* How will the positive effects of alternative fuels and hybrid cars be factored into trip generation projections?

* Will the DPEIS evaluate the level of service and overall traffic generation from any ICWRMS project activities including: construction traffic; and the level of service and overall traffic generation reasonably expected from project-associated growth in the City of Leavenworth?

* Will the traffic study calculate road maintenance costs attributable to the project?

* What is the scope of mitigation of traffic impacts that will be considered in the DPEIS?

* What is the capacity of surrounding highways, streets, and roads, to accommodate additional traffic associated with any proposed project and additional residential development?

14. Public Services and Utilities

- * How will be the need for additional public services, including public safety and emergency services, and for infrastructure improvements be met?
- * Will the effects of induced development, including pressure for urban growth expansions, be considered? What will be the scope of such an analysis? i.e., what communities in Chelan County will be included in the analysis?

15. Cultural Resources

- * How will the DPEIS address requirements to comply with federal and state laws concerning cultural resources?
- * Will the scope of the cultural resources analysis include identifying all historic properties or cultural resources potentially impacted by the project or associated offsite development, including traditional cultural properties, other Native cultural resources, and non-Native historic properties? Will the DPEIS evaluate the impacts to any identified historic properties and cultural resources, i.e., what are the impacts of the project and associated off-site development (e.g., housing, amenities)?
- * How will historical tribal uses of this area be factored in, including effects on sacred sites and fishing grounds?
- * How will the project affect the cultural heritage of the area?
- * Will the DPEIS consider Tribal fishery impacts?
- * How will the DPEIS coordinate with the State Historic Preservation Officer?

16. Environmental Justice

- * Will the DPEIS consider, based on the experience of such projects elsewhere, effects on levels of poverty?
- * Will the DPEIS assess whether low income or people of color communities will be impacted by the proposed project and disclose what efforts were taken to meet environmental justice concerns?

17. Socio-Economics

- * Will a comprehensive economic analysis be undertaken to identify potential effects of the proposed project on Chelan County?
- * What will be the time frame for the assessment of economic and social impacts; 10, 20, 50 years?
- * For comparison purposes, will the socioeconomic effects of other similar projects on other communities in the state be examined?
- * How many jobs will be created; at what wage levels? What percentage of work would be reserved for local contractors? Will prevailing wages be paid?
- * What will be the consequences on property values and property taxes in Leavenworth and Chelan County?
- * How will effects on quality of life, including community character, demographics, and small town atmosphere, be assessed?
- * How will the DPEIS address safety considerations during construction of any project?

18. Other Issues

- * What tribal consultation would occur with nearby Indian tribes?

- * How will Washington communities be consulted with and involved in the SEPA process?
- * What consultation with school districts and other service providers will occur?
- * What other permits and approvals are required?
- * Has a geo-tech study been done for any proposed project site? What extra structural precautions will be taken for potential earthquake liquefaction?
 - * Will any proposed project be affected by seismic faults or fractures?
 - * Will the DPEIS address the potential for increased litter?

Please send us a copy of the DPEIS if it becomes available.

Sincerely,

John de Yonge

PRESIDENT