

**From:** Jena Gilman [<mailto:jena.gilman1@gmail.com>]

**Sent:** Thursday, May 05, 2016 11:50 AM

**To:** Mike Kaputa <[Mike.Kaputa@CO.CHELAN.WA.US](mailto:Mike.Kaputa@CO.CHELAN.WA.US)>

**Cc:** [maib461@ecy.wa.gov](mailto:maib461@ecy.wa.gov)

**Subject:** Scoping Comments - Icicle Work Group's "Icicle Strategy" Scoping Request

Dear Mike:

The Icicle Work Group's "Icicle Strategy" is a recipe for serious degradation of Alpine Lakes Wilderness lands and waters that are becoming increasingly important to the exploding numbers of hikers and other outdoorspeople throughout our State. Instead of honoring these wilderness values, the "Icicle Strategy" instead celebrates the banality of suburban sprawl and the enshrinement of golf courses as our society's vision of the highest and best use of our water resources.

Any environmental impact statement (EIS) for the water theft and attack on wilderness that the promoters champion in the "Icicle Strategy" must consider the following at minimum:

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- The EIS should fully explain the purpose and need for each of the water projects outlined in the "Icicle Strategy".
- The EIS should analyze each of the proposed action's site-specific impacts, past practices, and the restoration, mitigation and funding needed in the future. At each site, proposed construction activities need to be explained and illustrated in detail as well as how wilderness and habitat values will be maintained throughout the period of construction for Wilderness users and the complete array of fauna and flora that inhabit these areas.
- The EIS should discuss the hydrological and biological impacts of the current drawdowns of the lakes within the Wilderness and the incremental impacts of any proposed changes. The analysis should include the impacts of water removals upon all wildlife, vegetation, soil and wilderness values.
- The EIS should provide detailed operations and maintenance plans for proposed infrastructure and an analysis of the impacts on the wilderness experience of specific maintenance actions, including helicopter operations.
- The EIS should consider a Wilderness Protection Alternative. This alternative would promote wilderness values as set forth in the Wilderness Act of 1964, would not allow new water infrastructure or diversions inside the Alpine Lakes Wilderness, and would require all new water supply to be obtained outside the Alpine Lakes Wilderness.

- The EIS should consider a serious Water Conservation Alternative. This alternative would assess using aggressive water conservation measures by area cities, including restrictions on lawn watering and provision for landscaping that is suited to the climate without irrigation for any new development. This alternative should also assess transfer of water rights from irrigation districts to cities, where orchards have already been torn out and replaced with residential subdivisions. This alternative should also assess agricultural irrigation efficiency, such as replacing open gravity canals with pipes and pumps. This Alternative should also consider water re-use technologies.
- The EIS should consider an Irrigation District Water Right Change Alternative, which would fix Icicle Creek's low flow problem. This alternative would evaluate moving the Icicle-Peshastin Irrigation District's water right diversion, which presently takes 100 cubic feet per second out of Icicle Creek, to the Wenatchee River downstream.
- The EIS should consider a Water Right Relinquishment Alternative. Removal of water from the Alpine Lakes Wilderness is an issue only because the Icicle-Peshastin Irrigation District holds water rights that were grandfathered when the Wilderness was created. When the dam at Eightmile Lake failed the Irrigation District did not fix it because they did not need the water. When a party doesn't use their rights, they lose them. The "Use It Or Lose It" doctrine should govern. The EIS needs to acknowledge this issue.

Please use some common sense in the scoping process. Anything in the "Icicle Strategy" that affects and detracts from the wilderness character of the Alpines Lakes Wilderness on a long-term, short-term, or cumulative basis needs to be fully vetted.

Finally, the Alpine Lakes Wilderness, and particularly the Enchantment Lakes area, is a national asset, important to people far beyond Chelan County. Therefore, public meetings and notices limited to Chelan County will be inadequate to the public's inquiry into the "Icicle Strategy" and its proposed actions within the Wilderness.

Thank you for your attention,

Sincerely,  
 Jena F. Gilman, P.E. (WA 23673)  
 1480 SW 10th Street  
 North Bend, WA 98045

- Born in Yakima 1952
- Raised in Moses Lake (MLHS Class of 1971)
- First sight of Nada and Snow Lakes: July 25-26, 1969