

From: Doug Scott [<mailto:scottdoug959@gmail.com>]
Sent: Friday, May 06, 2016 1:11 AM
To: Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>
Cc: George Nickas <gnickas@wildernesswatch.org>; John Gilroy <jgilroy@pewtrusts.org>
Subject: Formal Comment: Icicle Work Group's "Icicle Strategy."

Mr. Kapula --

On behalf of my company, Doug Scott Wilderness Consulting, I wish to comment on your proposed Icicle Work Group's Icicle Strategy.

As background, in the mid-1970s I was the Northwest Representative of the Sierra Club based in Seattle. As such, I represented the large coalition of organizations (local, state, and national) which sought the designation of the Alpine Lakes Wilderness Area. I testified at the U.S. Forest Service hearings in Seattle and Wenatchee, at the congressional field hearings, and at the hearings before both the Senate and House committees in Washington, DC.

I worked closely with the sponsors of the legislation that designated the wilderness area, notably Representatives Lloyd Meeds, Joel Pritchard, and Mike McCormack, who represented the Wenatchee side of the wilderness area, and with Senators Henry M. Jackson and Warren Magnuson, as well as the many congressional committee members involved. I worked closely with leaders of the U.S. Forest Service, including the chief, and with officials in the Department of Agriculture and the White House.

I attended and was recognized at the Forest Service's celebration of the new wilderness area in 1976 at Snoqualmie Pass.

I have often visited the Icicle, including the hike up the Snow Lake Trail to the Enchantments area at the eastern end of the wilderness area. I was involved in the enactment of the amendment which added 22,172 acres in the lower valley of the Middle Fork, Snoqualmie River sponsored by Representative Xxxxx Xxxxx and Senators Xxxxx Xxxxx and Maria Cantrell. I attended and was recognized at the celebration of this addition held near the new boundary.

The Alpine Lakes Wilderness Area is a beloved part of America's National Wilderness Preservation System:

The wilderness area--every acre of it -- is protected with the full strength of the 1964 Wilderness Act.

The building of new dams or water diversions, however “minor” you may think they would be, is illegal.

Were your proposal to succeed, it would constitute a very serious and unacceptable precedent.

I can assure you that any such final decision will, on the day it is issue, bring you before a federal judge and will be prosecuted with the full resources of the national wilderness movement and with the well-regarded legal skills of the top environmental attorneys practicing today.

Prior to that, you are obligated legally to produce and reveal a complete and thorough environmental impact statement to cover your proposal and -- as you have indicated you will do -- to

include the mandatory full range of alternatives to your proposed action.

This include the non-action alternative -- leaving well enough alone without violating the wilderness area.

Every alternative -- every -- that would achieve your goal without violating the wilderness area.

Three notable facts:

The father of the Alpine Lakes Wilderness Area in the U.S. Senate was Senator Henry M. Jackson who was also chairman of the committee which produced the area. Senator Jackson was also the father of the National Environmental Policy Act. It would be a slur on his memory for you to cut corners in any way in meeting your obligations under his statute. A lawsuit is certain.

Senator Jackson chaired the meeting of the entire Washington congressional delegation in which final issues of the boundaries and wording of the Alpine Lakes Area Management Act of 1976.

I represented the coalition of supporting organizations in presenting to this private meeting the results of final negotiations which I carried out with Bill Ruckelshaus, then of Weyerhaeuser Company, who acted on behalf of the timber industry coalition, including local governments -- including Wenatchee County. Mr. Ruckelshaus was, of course, the first

administrator of the U.S. Environmental Protection Agency which oversees the environmental impact statement process.

You have similar but separate obligations under statutes of the State of Washington.

Issues of impacts on the interests and needs of Native American Tribes and on anadromous fisheries are mandatory topics you must cover in complete detail.

You are on notice. Your agency and its constituents are apparently not aware of what you are doing, for you court an enormous waste of your time, the time of many other agencies, organizations, and individuals, and the money the taxpayers who pay for your efforts. And it will be for naught. You will learn this as have those who attempted much smaller dams and diversions within the Selway-Bitterroot Wilderness Area, Montana.

You will end up empty handed and ... with our thanks, the author of yet another strong pro-wilderness precedent.

Think again!

Doug Scott
Principle

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Doug Scott, a forester by training, is recipient of the highest honor of the national Sierra Club, the John Muir Award.

cc:

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