

May 11, 2016

Chelan County Natural Resources Department
Attention: Mike Kaputa, Director
411 Washington Street, Suite 201
Wenatchee, WA 98801

Via email to: mike.kaputa@co.chelan.wa.us

RE: Icicle Creek Water Resource Management Strategy – SEPA scoping

Dear Mr. Kaputa:

I have visited the Alpine Lakes multiple times every year since 1969. In the 70s and early 80s my activity was primarily in the Icicle Creek drainage. This is a captivating place. I found that there were a lot of people who shared my attraction. Over time I spread my attention to other parts of the Alpine Lakes making room for others in the increasingly popular Icicle. Overall, my visits to the Wilderness have been a highly meaningful part of my life.

For the most part I would consider myself an outdoor recreationist (climbing, backcountry skiing, hiking, kayaking among others). Occasionally, I have been motivated toward an activist role interacting with the USFS concerning their management of the Alpine Lakes Wilderness and surrounding areas. The “Icicle Creek Water Resource Management Strategy” generated by the Icicle Creek Working Group (ICWG) now draws my attention because of its significance locally for the Alpine Lakes Wilderness and potentially nationally for precedence with regard to the National Wilderness Act. I agree that a PEIS is needed and here respond to the request for comments on its scope.

My comments that follow are based on the public information at:
<http://www.co.chelan.wa.us/natural-resources/pages/icicle-work-group>

Range of Alternatives. The PEIS needs to present a range of alternatives with significantly more extensive analysis than given in the present information for scoping. The issues are complex and significant. A single preferred-action proposal from a consensus group of stakeholders is inadequate.

Recognition of Wilderness values. All alternatives need to account for the special circumstances for construction and maintenance of structures in Wilderness Areas. The “SEPA Determination of Significance” does not even mention the Alpine Lakes Wilderness Area even though the “Primary Development Area” involved with the “Base Package of Projects” involves a significant footprint in the Wilderness. PEIS must recognize that the Alpine Lakes Wilderness is a community natural resource that must be respected and protected. Correspondingly, historical management of the seven natural lakes that have served as storage reservoirs and associated legally-standing water rights must also be respected as important to the identity and economic well-being of the local community. However, that does not justify nor does the Wilderness Act allow expansion of storage facilities beyond actual traditional use without highest level decisions at the National level. Environmental analysis must include the direct biological and hydrological effects on lakes, surrounding terrain and outlet streams associated

with management of the lakes in the past and future for all alternatives. The PEIS list of relevant laws, rules and plans should include the Wilderness Act of 1964; the Alpine Lakes Area Management Act of 1976, the Alpine Lakes Area Land Management Plan (1981), and the Wenatchee NF Forest Plan (1990) as amended.

Reduction of Wilderness footprint. The 7 managed lakes encompass the largest lakes and a significant fraction of the total lake area in the Icicle Creek drainage. That is a lot of impact for an area in the Cascades named for its unique lakes. Some alternatives (at least one and perhaps all) should include the aim to enhance Wilderness values through reduction in footprint, appearance of structures and the mode of maintaining them. What is the cost benefit ratio for each of the 7 managed lakes? Could one or more of them be returned to a natural condition without significant loss of flexibility or dependability? Could there be public buyback of associated water right to enable compensating adjustment on the user end? An alternative should explore this possibility.

Clarity about water rights and priority for in-stream flow. The PEIS needs to give historical background on actual water withdrawal and use and a clear explanation of corresponding water rights including identification of purposes for which they were granted. This background is needed for understanding the strategy (a preferred alternative?) presented by the ICWG. “The Projects” page for the present SEPA scoping proposes “the adoption of an integrated package of projects to meet agricultural and domestic water supply needs while increasing the amount of in-stream flow required to maintain healthy fish populations.” The stated “Metrics” indicate significant gains for in-stream flow. Sounds good, but what is the actual priority when the inevitable water-availability crunches occur. In-stream water flow has generally been on the losing end. Given that the total water rights at times exceed the total flow, there must be some sort of relinquishment of priority to in-stream flows to make this work. This issue is especially important since increases in releasable water storage in the ICWG plan are associated with a specific water right holder (IPID) and corresponding specific use. Please make this explicit and more clear in the PEIS for the ICWG strategy and other alternatives, including one that does not increase storage in the Alpine Lakes.

Alternative diversion points. A pivotal issue for Icicle Creek in-stream flow appears to be the Boulder Field and the traditional stream bed downstream from the Irrigation Districts' diversion points. The most direct approach to enhancing in-stream flow in these sections would be to have diversion points farther downstream, possibly from the Wenatchee River and at multiple places. This is obviously unattractive since new infrastructure and pumping would be required. In order to minimize these requirements, this (these) diversion point(s) could be active only during drought conditions and withdraw only the amount needed to support the in-stream flow in the critical reaches between it and the normal-continuously operating, gravity flow diversion point upstream. Perhaps there would be a mechanism for in-stream flow to buy the gravity flow loss that the IPID would incur. (This raises a question in my mind: Does the IPID have a right to the potential energy of the water that it withdraws?)

Aggressive Conservation. Conservation is the only way to achieve a sustainable future. There is not more water. The ICWG discussion concerns manipulation of the timing of run off to maintain availability during the dry part of the year. This becomes more true with the

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disappearance of perennial snow and ice from the watershed. Some alternative(s) should put heavy emphasis on conservation and multiple (recycled) use.

Thank you for considering these comments.

Sincerely,

Charles Raymond
3798 NE 97th St.
Seattle, WA 98115

(206) 522-3798
cfr98115@gmail.com