

**From:** Laurel Schandelmier [<mailto:lschandelmier@gmail.com>]  
**Sent:** Tuesday, May 10, 2016 10:20 PM  
**To:** Mike Kaputa <[Mike.Kaputa@CO.CHELAN.WA.US](mailto:Mike.Kaputa@CO.CHELAN.WA.US)>  
**Subject:** Icicle Creek Water Resource Management Strategy – SEPA scoping

To whom it may concern,

Thank you for the opportunity to provide scoping comments on the Icicle Creek Water Resource Management Strategy. I am a concerned citizen who enjoys the fact that our Washington wilderness area and its natural resources are able to be shared by all. I understand that managing the resources in a fair and equitable way can be challenging, but I'd like to share my thoughts on this proposed plan.

I think the public would appreciate a better understanding of the purpose and intent of making these proposed changes to improve instream flows. Is the intent primarily to address current water rights that are not being satisfied? Are new water rights being issued? Who primarily stands to benefit from these increased flows? I would ask that other alternatives be considered in an effort to minimize, or even reverse damage to existing wilderness area.

A "Wilderness Protection" alternative that would not increase the amount of water removed from the Alpine Lakes Wilderness, not create a disturbance or encroach on wilderness lands, and not expand easements should be considered. Any new water supplies would ideally be obtained from non-wilderness sources and use non-wilderness options for improving instream flows. Additionally, evaluating the feasibility of purchasing back private water rights to the Alpine Lakes to allow removal of dams and other structures to restore the wilderness to its pre-developed state would be most preferred. If this is not possible, I agree that installing remotely controllable valves to allow for the controlled drawdown of lake levels over a season, responding to current weather patterns and water needs, would add flexibility and robustness to the system.

Alternatively, a "Water Right Relinquishment" option could analyze existing water rights to the Alpine Lakes if any have been relinquished or abandoned. Water rights should be limited to the purposes for which they were originally granted, such as for irrigation, and should not be redirected for other purposes, including suburban development. A "Water Conservation" option emphasizing aggressive water conservation measures by the City of Leavenworth and other water uses could analyze markets available for selling and trading water rights. For example, if some properties have been converted from orchards to residential properties, the water rights could be sold or traded accordingly. This option would have an "efficiency first" mentality: first, reduce the sources of water demand before looking to bringing in additional capacity. Aggressive reductions in water usage for non-agricultural purposes, such as watering lawns, could be encouraged through such measures as low-flow fixtures, drip irrigation, planting native species in gardens that require no or little irrigation, greywater recycling, and rainwater harvesting.

Additionally, the EIS should analyze each proposed action's site-specific impacts, past practices, and any restoration, mitigation, or funding needed in the future. For each site, proposed construction activities and water diversions should be laid out in detail. The EIS should discuss the hydrological and biological impacts of the current level of lake drawdown, as well as any proposed future changes. The analysis should include a review of scientific literature on how

water removals impact wildlife, vegetation, soil, and overall ecosystems. A detailed operations, maintenance, and environmental monitoring plan for the water infrastructure alongside an analysis of wilderness impacts of specific maintenance actions should be included. The EIS should include maps, diagrams and photos to clearly show the current situation at each of the lakes and other project locations and how that would change under the proposed actions. The EIS should fully and completely explain the need for the water these projects would provide. What human activities caused the degraded conditions - i.e., low instream flows in Icicle Creek - should be identified, avoided in future, and ideally mitigated.

Thank you for considering these comments.

Regards,

Laurel Schandelmier