

From: GW Shannon [<mailto:gwshannon@gmail.com>]
Sent: Tuesday, May 10, 2016 6:10 PM
To: Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>
Subject: IWG comments from public on PEIS

Mike Kaputa, Director

Mike.kaputa@co.chelan.wa.us

Chelan County

411 Washington Street, Ste. 201

Wenatchee, WA 98801

Re: Icicle Work Group; Comments on the scope of the PEIS

Dear Mr. Kaputa:

I have concerns about the collaborative efforts by members of the Icicle Working Group and the agency participation in the study. It seems awkward or unprofessional to have agencies commit to a number of projects with either a yes or no in advance of public and environmental review on specific projects. The premise the IWG has in regards to the project goals, second paragraph, also seems flawed *“If a project is determined to be fatally flawed, it must be replaced or modified to ensure all guiding principles are met.”* How can IWG be realistically committed to that goal without specific project and environmental assessments. It sounds as if successful projects with proper funding and meeting public and environmental review could be jeopardized or delayed because other projects were cancelled.

The process feels to me like backroom politics, especially with a \$2,885,000 budget since 2012. For example, Icicle-Peshastin Irrigation District’s manager said to me in person at the meeting that if they accessed water (either tunnel or pipe) from Upper Klonauqua Lake, they would give that water to the Department of Ecology for fish purposes. I wonder what the Irrigation District will get in return from the Department of Ecology? I am under the impression that water the irrigation district utilizes shall only be used for irrigation purposes.

I also have a concern about increasing water for development (transfer of water rights) without having a detailed PEIS alternative to look at major conservation of water by all users. Even though the amount seems minimal, is the water coming from Icicle-Peshastin Irrigation District's increased flow through optimization or from reduced use of water by the Leavenworth Fish Hatchery, or other source? Why is the hatchery's participation even needed in the working group as they already have federal mandates to reduce water usage and their funding will come from federal sources?

Is it true that the US Forest Service is not a voting member of the IWG? If they aren't a voting member, it seems that they should be to represent the Alpine Lakes Wilderness. Many of the projects take place in wilderness and those wilderness impacts and considerations are not being considered. The Alpine Lakes Wilderness is more than a reservoir. It is a unique wilderness with many shared natural resources used by the public. The Forest Service has a mandate to protect wilderness resources even though Icicle-Peshastin Irrigation District has water rights for irrigation purposes. As stated in the Forest Service's policy:

In wildernesses where the establishing legislation permits resource uses and activities that are nonconforming exceptions to the definition of wilderness as described in the Wilderness Act, manage these nonconforming uses and activities in such a manner as to minimize their effect on the wilderness resource.

In fact, are there not water right issues that are involved at Eight-Mile Lake that have not been resolved or will need to be resolved in the courts? Any impacts in the Alpine Lakes Wilderness should be addressed in a specific alternative. In looking at the estimated cost of optimization at the seven lakes (reservoirs) which is estimated at \$680,000.00, has the IWG looked at the Alpine Lakes Wilderness Management Plan in that regard? In Section 4(d)(4) of that plan, it states *"watersheds will not be altered or managed to provide increased water quantity, quality or timing of discharge."*

Why are the releases set infrequently under current management? It seems you could hire a couple high school graduates to camp out part of the summer with a radio at different lakes to gain a level optimization close to what the irrigation district is trying to achieve at a much lower cost. The irrigation district would still have maintenance and monitoring costs associated with any optimization of the dams.

Thank you for this opportunity to comment on the Icicle Work Group's analysis.

Greg Shannon

313 Olive Street

Cashmere, WA 98815

c. Governor Jay Inslee