

From: Jerry Bodine [<mailto:jbodine.bwphotog@yahoo.com>]

Sent: Monday, May 09, 2016 3:01 PM

To: Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>

Subject: Subject: Comments on Damming and Water Rights in Alpine Lakes Wilderness

Dear Mr. Kaputa,

I want to provide my input to the subject issues. As a member of the Alpine Lakes Protection Society (ALPS) for decades, I have very strong feelings about these proposed activities; I expended a great deal of effort in supporting ALPS' activities leading to the Wilderness designation for this area in the first place. My personal attitude, without delving deeply into the politics of policing the requirements of the Wilderness Act of 1964, is that those requirements are NON-DEBATABLE. PERIOD. Now, we are faced with a designated working group (IWG) that seems oblivious to those requirements and refuses to recognize them. For example, re-naming our beloved lakes as "reservoirs" really raised the hair on my neck, as well as other indications of their lack of caring about the preservation of Nature's "systems." Therefore, lacking a legal background or knowledge of the history of amendments to the "ACT" since its inception, I can only offer my support of ALPS' effort to resist IWG's proposals. With all this in mind, then, I offer a number of comments:

The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The EIS should include a "Wilderness Protection" alternative. This alternative should promote Wilderness values by not seeking any increase in the amount of water removed from the Alpine Lakes Wilderness; not expanding easements; not encroaching on wilderness lands; not using mechanical transport; and not building any structure or installation in the Wilderness. Under the Wilderness Protection alternative, any new water supplies should be obtained from sources outside the Wilderness, and use non-Wilderness options for improving instream flows (for example, the IPID change in diversion point discussed below). The Wilderness Protection alternative should comply with all provisions in the Forest Service's administrative Alpine Lakes Wilderness Management Plan, including: "Except as provided for in Section 4(d)(4) of the Wilderness Act, watersheds will not be altered or managed to provide increased water quantity, quality or timing of discharge."

The Wilderness Protection alternative should evaluate public purchase (buy-back) of private water rights in the Alpine Lakes, which would allow removal of dams and other structures from the lakes to restore the Wilderness area to its true natural character.

The EIS should include a "Water Right Relinquishment" alternative. This alternative should analyze existing water rights to the Alpine Lakes and acknowledge those rights that have been relinquished or abandoned.

The EIS should include an alternative that recognizes IWG members' water rights are limited to the purposes for which they were initially granted (for example, irrigation) and cannot be redirected to other purposes (such as suburban development).

The EIS should include a "Water Conservation" alternative that emphasizes aggressive water conservation measures by the City of Leavenworth, Icicle-Peshastin Irrigation District, the Leavenworth Fish Hatchery and other water users. This alternative should evaluate water markets that facilitate selling and trading of water rights.

The Water Conservation alternative should evaluate a transfer of water rights from IPID to Leavenworth for properties within the city limits that have now converted from orchards to residential properties. This alternative should analyze how appropriate reductions in water usage (that is, not using agricultural water quantities for lawn irrigation) would save water that would then be available for other Leavenworth needs.

The Water Conservation alternative should evaluate how IPID spills large quantities of water back into the Wenatchee River at the end of several of its canals. This alternative should evaluate how this 19th century irrigation practice (which was required to ensure water made it to the furthestmost customers) could be replaced with modern pumping and piping technologies. The EIS should consider the resulting reduction in water demand as an alternative water supply.

The EIS should include a "Water Right Change" alternative. This alternative would evaluate improving Icicle Creek flows by moving IPID's point of diversion downstream (to the Wenatchee River). This measure, which would add 100 cfs of water to Icicle Creek every year, would convert the IPID diversion from gravity flow to pumping (requiring electrical power). This alternative should therefore analyze renewable energy options to supply that power, including solar, wind and in-canal hydroelectric.

The EIS should analyze each proposed action's site-specific impacts, past practices, and the restoration, mitigation and funding that are needed in the future. At each site, proposed construction activities and proposed water diversions need to be spelled out in detail.

The EIS should discuss the hydrological and biological impacts of the current drawdowns of the lakes, and any proposed changes. The analysis should include a review of scientific literature on the impacts of water removals upon wildlife, vegetation, soil and wilderness values.

The EIS should provide a detailed operations, maintenance and environmental monitoring plan for the water infrastructure, and analysis of the wilderness impacts of specific maintenance actions, including helicopter use.

The EIS should fully explain the purpose and need for the water these projects would provide.

The EIS should fully explain what human activities caused the degraded conditions (such as low instream flows in Icicle Creek) that the projects seek to improve. We should not be repeating the mistakes of the past.

The EIS should analyze adequacy of proposed instream flows to support spawning, rearing and migration of steelhead and bull trout.

Sincerely,
Jerry Bodine
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