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Via email: Mike.Kaputa@co.chelan.wa.us

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

RE: Scope of Programmatic EIS for Icicle Creek Water Resource Management Strategy

Dear Mr. Kaputa,

Thank you for the opportunity to comment on the Scope of the Programmatic Environmental Impact Statement for the Icicle Creek Water Resource Management Strategy. It is my understanding that you are currently soliciting questions, recommendations and comments regarding the Guiding Principles that helped to delineate the scope, as well as the baseline projects briefly outlined in the “Icicle Strategy”. My comments are as follows:

- 1. A Water Balance Chart should be prepared for the Icicle Creek system.** This chart should show: a) the baseline flows expected for Icicle Creek and the tributary lakes during a “normal” flow year, a “drought” year, and anticipated future flows that take into account the impacts of global warming; b) water outputs from Icicle Creek under current operations during “normal” and “drought” years showing the locations of the diversions, the maximum rates and volumes of diversion, whether the diversions are firm or interruptible, and the holders of the diversionary rights; and c) locations of problem areas in the drainage system that the IWG is trying to address to improve instream flows. Note that all of the flow rates and volumes should be presented for each individual water right—for example, Snow/Nada Lakes should be broken into the diversions for the Fish Hatchery and for the Icicle Peshastin Irrigation District (IPID).
- 2. The Guiding Principles outlined by the IWG need to be ranked in order to establish the relative importance of each principle.** Clearly, some of the principles are legal requirements (Tribal Treaty Harvest, State and Federal

Laws, Wilderness Act), which take precedence over other principles presented (eg. Improve Domestic Supply, Improve Agricultural Reliability). For that reason, not all guidelines are created equal. Rather, there are Required Guiding Principles and Additional Guiding Principles, and they should be noted as such. This ranking must be done because the projects that will follow from this scoping document will all be tied to these Guiding Principles, and not all of them will be able to be met. So, the ranking system will help to define which project should take precedence.

3. **“Conservation First” should be added as the 10th Guiding Principle.** While conservation of water as a limited resource is of clear interest to those within the working group, defining Conservation First as a separate Guiding Principle will more clearly demonstrate the IWG’s desire to meet water needs through conservation before attempting to find and develop any “new” sources of water. Additionally, bringing water conservation to the forefront will keep conservation as the first line of action in meeting future water needs. Generally, conservation is cheaper, easier, and faster than developing new water sources.
4. **Relocating the diversion locations along Icicle Creek must be considered as an alternative to meet the Guiding Principle of Improving Instream Flow.** Clearly, if the stretch of Icicle Creek that most suffers from reduced stream flow is the segment downstream of the diversion structures for the irrigation districts, the City of Leavenworth, and the Fish Hatchery, then using a pumping system to divert flows to the gravity diversion channels from the confluence must be studied, considered, and compared.
5. **Transferability of water rights must be demonstrated in the Eightmile Lake Restoration Project.** It appears that the water rights for the Alpine Lakes (including Eightmile Lake) were granted to the IPID, and the agreements with the Forest Service in the Wilderness Act were negotiated with the IPID. It is not clear to me how any changes made to Eightmile Lake can be made in order to provide water to a municipal water provider, as that appears to be outside of the water usages established by these two agreements. The summary of the water rights presented in the *Alpine Lake Optimization and Automation* report prepared by Aspect Consulting and Anchor QEA describe the rights as certified “for the purpose of irrigation of 7,000 acres lying within the lands of the Icicle and Peshastin Irrigation Districts.”
6. **Limits of Inundation of Eightmile Lake perimeter should be mapped.** This mapping would help to define what the potential impacts would be of raising the water level of Eightmile Lake by 4 feet, including the impacts to trails, campsites, forested areas, and habitat. It would also help to determine the feasibility of raising the lake—ie would the lake even be able to impound the

higher water level, or are there geologic factors that would keep the lake from being able to impound a higher level of water?

7. Alpine Lakes Optimization, Modernization, and Automation operation strategy needs to be defined, particularly since it is linked to the “Improve Instream Flow” Guiding Principle:

- a) How much water will be taken from each lake during a “normal” water year?
- b) Will the ease of water withdrawal increase the “baseline” withdrawal rate that currently gets drawn? For example, will irrigated acreage increase so that the needs for irrigation rise, and every year becomes a “drought” year? We all know that demands will rise as supply becomes available, and providing a more regular supply may only make for more severe shortages as the impacts of global warming become clearer.
- c) How will the benefits to Instream Flows (as an interruptible flow) be balanced with the needs of irrigation (as a firm demand)?

8. Stage/Storage data and bathymetry needs to be developed for each of the Alpine Lakes within the “optimization” program.

Thank you again for this opportunity to comment. Please include me in all future mailings on this project.

Sincerely,

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