

## **APPENDIX A**

### **DPEIS Comments and Responses**

## APPENDIX A

### DPEIS COMMENTS AND RESPONSES

The Draft Programmatic Environmental Impact Statement (DPEIS) for the Icicle Creek Subbasin was filed with the Washington State Environmental Policy Act (SEPA) Register on May 31, 2018. A Notice of Availability and Public Hearings appeared in the *Wenatchee World* and *Leavenworth Echo* on May 31, 2018. The Washington State Department of Ecology (Ecology) sent a news release announcing the availability of the DPEIS and the date, time, and location of the public meetings to area media. The 60-day comment period ended July 30, 2018.

Ecology and Chelan County distributed 35 copies of the DPEIS to members of the Icicle Work Group; Federal, State and local agencies; Native American Tribes; irrigation districts; interested members of organizations and entities; and the general public. The DPEIS and supporting materials were also available online at Chelan County's website.

A public hearing was held in Leavenworth on June 27, 2018 to provide information on the DPEIS and solicit comments. The hearing was attended by 82 people, and 7 people provided comments that were transcribed by the court reporter.

A total of 9,981 comments were submitted via email, letter, comment form, or court reporter on the DPEIS. Of these, 8,825 were considered. Comments not considered included comments submitted before or after the comment period, duplicate comments (same commenter, same comment was only counted once), and emails from the co-leads with "test" included in the subject line. In total, there were 203 late/early comments, 943 duplicate comments, and 10 "test" comments not considered. Ten comments were catalogued and responded to, and later determined to be late comments. However, because responses were already developed, these comments were considered.

Copies of comment letters and the public hearing transcripts are reproduced in this Appendix to the FPEIS. Responses to the individual comments follow. For clarity and concision, comments from different senders with the same content are only provided once, with a list of commenters following the comment. In that same vein, responses are only provided once on these comments.

The following table provides a list of those who commented on the DPEIS, the number of the comment letter, and the page number where the comment letter and the responses appear.

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

**Table A-1**  
**List of those commenting**

Letter Number	Commenter	Page Number	
		Comment	Response
Icicle Work Group (IWG) Members			
001	Bureau of Reclamation	A-23	A-363
002	U.S. Fish and Wildlife Service, Washington Fish and Wildlife Office	A-24	A-363
003	U.S. Fish and Wildlife Service, Leavenworth Fisheries Complex	A-25	A-363
004	U.S. Forest Service	A-26	A-363
005	Washington State Department of Fish and Wildlife, North Central Region	A-26	A-363
006	Icicle Creek Watershed Council	A-31	A-366
	Trout Unlimited – Washington Water Project		
007	Washington Water Trust	A-35	A-368
008	Daryl Harnden, IWG Agricultural Representative & Local Farmer	A-36	A-368
009	Yakama Nation	A-37	A-368
State Agencies			
010	Washington State Department of Agriculture	A-38	A-369
011	Washington State Department of Health, Department of Drinking Water	A-38	A-369
Other Organizations			
012	Alpine Lakes Protection Society	A-39	A-369
	The Wilderness Society		
	American Whitewater		
	Aqua Permanente		
	Center for Environmental Law & Policy		
	Conservation Congress		
	Doug Scott Wilderness Consulting		
	El Sendero Backcountry Ski & Snowshoe Club		
	Federation of Western Outdoor Clubs		
	Friends of Bumping Lake		
	Friends of Clearwater		
	Friends of Enchantments		
	Friends of Lake Kachess		

Letter Number	Commenter	Page Number	
		Comment	Response
Other Organizations (cont.)			
012 (cont.)	Friends of Wild Sky	A-39	A-369
	Great Old Broads for Wilderness		
	Icicle Creek Watershed Council		
	Issaquah Alps Trails Club		
	Kittitas Audubon Society		
	The Mazamas		
	Middle Fork Recreation Coalition (MidFORC)		
	North Cascades Conservation Council		
	North Central Washington Audubon Society		
	River Runners For Wilderness		
	Save Our Sky Blue Waters		
	Seattle Audubon Society		
	Sierra Club		
	Spokane Mountaineers		
	Spring Family Trust for Trails		
	Washington Wild		
	Wild Fish Conservancy		
	Wilderness Watch		
013	Washington Trails Association	A-49	A-375
	The Mountaineers		
	Access Fund		
014	Alpine Lakes Foundation	A-52	A-376
015	Chelan-Douglas Land Trust	A-53	A-377
016	Great Old Broads for Wilderness	A-54	A-377
017	North Central Washington Audubon Society	A-54	A-377
018	Olympic Park Associates	A-56	A-378
019	Pacific Crest Trail Association	A-56	A-378
020	Pacifica Law Group	A-57	A-379
021	Washington Native Plant Society	A-64	A-380
022	Wise Use Movement	A-65	A-380
Public Hearing Comment Forms			
023	Anne Bridges	A-66	A-381
024	Kathleen Ward (Fromm)	A-67	A-381
025	Natalie Williams	A-68	A-382



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Letter Number	Commenter	Page Number	
		Comment	Response
Public Hearing Transcript			
026	Chad Spies	A-68	A-382
027	Jan Petrie	A-69	A-382
028	Jerome “Jerry” Schneider	A-69	A-382
029	Will Henson	A-70	A-382
030	Gro Buer	A-71	A-383
031	Norm Stoddard	A-72	A-383
032	Greg Shannon	A-72	A-383
Individuals			
033	Alan Hunt	A-73	A-383
034	Bill Burwell	A-74	A-384
035	Dick Rieman	A-74	A-385
036	Dick Rieman (2)	A-75	A-385
037	Drew Meyers	A-76	A-385
038	Edward Henderson	A-77	A-386
039	James Woods	A-78	A-387
040	Janet Thompson	A-79	A-387
041	Janiese Loeken	A-79	A-389
042	Jeffrey Currier	A-80	A-389
043	Julia Beebs	A-80	A-389
044	Julianne Lamsek	A-81	A-389
045	Laurie Colacurcio	A-82	A-389
046	Ryan Jones	A-82	A-390
047	William and Margaret Byers	A-83	A-390
048	Allison Oster	A-83	A-390
049	Ansel Wald	A-84	A-390
050	Brynne Koscianski	A-84	A-390
051	Chris Murray	A-85	A-390
052	Darrel Martin	A-85	A-391
053	Deanna Pumplin	A-86	A-391
054	Richard Fiddler	A-86	A-391
055	Jeff Lambert	A-87	A-392
056	John Russell	A-87	A-392
057	M Johnson	A-88	A-392
058	Mark Shipman	A-88	A-392
059	Matt Parker	A-89	A-392
060	Michelle Bright	A-89	A-392

## DPEIS COMMENTS &amp; RESPONSES

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
061	Natalie Williams	A-90	A-393
062	Peter Fiddler	A-91	A-393
063	Sam Smith	A-91	A-393
064	Thor Thompson	A-92	A-393
065	Timothy Gartland	A-92	A-393
066	Will Henson	A-93	A-395
067	Will Henson (2)	A-94	A-395
068	Andrea Fisher	A-94	A-395
069	Charles Bagley	A-95	A-395
070	Christopher Barchet	A-96	A-395
071	James Donaldson	A-97	A-395
072	Mark Curtis	A-97	A-396
073	Melinda Mueller	A-98	A-396
074	Pete Fry	A-98	A-397
075	Rebecca Caulfield	A-99	A-397
076	Allison Kutz	A-99	A-398
077	Anastasia Christman	A-100	A-398
078	Barbara Gamrath	A-100	A-398
079	Brian Telfner	A-101	A-398
080	Brianne Vanderlinden	A-101	A-398
081	Brittany Granger	A-102	A-398
082	William All	A-102	A-398
083	Carol Sund	A-103	A-398
084	Carolyn Graham	A-103	A-399
085	Cedar Hyde	A-104	A-399
086	Christian Chabot	A-104	A-399
087	CJ Beegle	A-105	A-399
088	Constance Anderton	A-105	A-399
089	Craig Mabie	A-106	A-399
090	Danielle Graham	A-106	A-399
091	David Panozzo	A-107	A-399
092	David Van Cleve	A-107	A-400
093	Deanna Gill	A-109	A-400
094	Deloa Dalby	A-110	A-400
095	Elizabeth Vu	A-110	A-400
096	Gabriel Houle	A-111	A-400
097	Greg Wellman	A-111	A-400

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
098	Harvey Halpern	A-112	A-401
099	Jane Erickson	A-112	A-401
100	Jeanne Poirier	A-113	A-401
101	Jeffrey Whittall	A-113	A-401
102	Juliet Maurer	A-114	A-401
103	Karen Thomas	A-114	A-401
104	Kathleen and Robert Nerenberg	A-115	A-402
105	Katrina Kok	A-115	A-402
106	Kendra Stegner	A-116	A-402
107	Kimberly Stachowski	A-116	A-402
108	Lane Aasen	A-117	A-402
109	Laura Shauger	A-117	A-402
110	Lawrence Lewin	A-118	A-402
111	Leann Arend	A-118	A-402
112	Louise Suhr	A-119	A-402
113	Mary Eve	A-119	A-403
114	Matthew Busch	A-120	A-403
115	Mattias Huhta	A-120	A-403
116	Michael Schemmel	A-121	A-403
117	Michael Wyant	A-121	A-403
118	Michelle Privat Obermeyer	A-122	A-404
119	Mike Gundlach	A-122	A-404
120	Misa Heater	A-123	A-404
121	Pat Siggs	A-123	A-404
122	Patrick Podenski	A-124	A-404
123	Peter Dunau	A-124	A-405
124	Peter Polson	A-125	A-405
125	Philip Evans	A-125	A-405
126	Prithvi Shylendra	A-126	A-405
127	Rebecca Walton	A-126	A-405
128	Rebeccah Leiter	A-127	A-406
129	Robert Werth	A-128	A-406
130	Robert Yates	A-129	A-406
131	Roberta de Regt	A-129	A-406
132	Robin Buxton	A-130	A-406
133	Ronald Harden	A-130	A-406

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
134	Sandra Ciske	A-131	A-406
135	Sara Papanikolaou	A-131	A-407
136	Sarah Leyrer	A-132	A-407
137	Stefanie Dirks	A-132	A-407
138	Steve Swenson	A-133	A-407
139	Steven Cox	A-133	A-408
140	Steven Jones	A-134	A-408
141	Timothy Hall	A-134	A-408
142	Tina Thompson	A-135	A-408
143	Alan Moen	A-135	A-408
144	Alex Bond	A-136	A-409
145	Alexander Phillips	A-137	A-409
146	Allison Shaw	A-137	A-409
147	Andrea Riley	A-138	A-409
148	Ann Crosby	A-138	A-409
149	Bruce Williams	A-140	A-411
150	Carina Wedel	A-141	A-411
151	Carolyn Waldow	A-141	A-411
152	Cathy Craver	A-142	A-411
153	Charles Raymond	A-142	A-412
154	Chris Lish	A-144	A-413
155	Claire Giordano	A-146	A-414
156	Cliff Leight	A-146	A-415
157	David Foster	A-147	A-415
158	Diana Rosenberg	A-147	A-415
159	Diana Timpson	A-148	A-415
160	Donald Mazzola	A-148	A-415
161	Donald Potter	A-149	A-415
162	Edward Henderson	A-149	A-416
163	Elaine Badejo	A-151	A-416
164	Erik Hagstrom	A-152	A-416
165	Evan Schelter	A-152	A-416
166	Fabian Frank	A-153	A-416
167	Francis and Gerald Conley	A-153	A-417
168	Greg Shannon	A-154	A-417
169	Gregory Sheehan	A-155	A-418
170	Heather Heffner	A-155	A-418

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Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
171	Howard Nebeck	A-156	A-418
172	Isaac Gundersen	A-156	A-418
173	Jacqueline Shin	A-157	A-419
174	Jana Hobbs	A-157	A-419
175	Janna Treisman	A-158	A-420
176	Jena Gilman	A-159	A-421
177	Jeremy Jostad	A-160	A-422
178	Jessica O'Sell	A-160	A-422
179	Jim Perkins	A-161	A-422
180	Joan Frazee	A-161	A-422
181	John Pollock	A-162	A-422
182	Kathleen Hurley	A-162	A-423
183	Kathleen Shannon	A-163	A-423
184	Kathleen Ward	A-163	A-423
185	Kathy Haviland	A-164	A-423
186	Kelsie Maney	A-164	A-424
187	Kevin Farrell	A-165	A-424
188	Kyle Kohlwes	A-166	A-424
189	Lael White	A-166	A-424
190	Laurence Leveen	A-167	A-425
191	Lisa Bellefond	A-167	A-425
192	Marjorie Fields	A-168	A-425
193	Mathias Ricken	A-168	A-425
194	Megan Johnson	A-169	A-425
195	Meghan Young	A-169	A-426
196	Michael Weinberg	A-170	A-426
197	Mitchell McCommons	A-170	A-426
198	Monica Charpentier	A-171	A-426
199	Nancy Zahn	A-171	A-426
200	Nete Olsen	A-172	A-428
201	Patrick Conn	A-174	A-429
202	Rachel Nunez	A-175	A-429
203	Rachel Youngberg	A-175	A-429
204	Richard Curtis	A-176	A-430
205	Richard Forbes	A-177	A-430
206	Richard Forbes (2)	A-177	A-431

## DPEIS COMMENTS &amp; RESPONSES

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
207	Richard Haydon	A-178	A-431
208	Richard Korry	A-179	A-431
209	Richard Noll	A-179	A-432
210	Richard Rutz	A-180	A-432
211	Robert Metzger	A-182	A-434
212	Scott Prescho	A-182	A-434
213	Steve Uyenishi	A-183	A-434
214	Tami Rust	A-183	A-434
215	Teresa Catford	A-184	A-434
216	Terri and Ronald Jones	A-184	A-434
217	Tessa Rue	A-185	A-434
218	Bill Burwell	A-185	A-434
219	Antje Fray	A-186	A-434
220	Christine Clum	A-187	A-435
221	Dawn Serra	A-188	A-435
222	Jennifer Schultz	A-189	A-435
223	Joe McPhee	A-190	A-435
224	LD Anderson	A-191	A-435
225	Linda Berd	A-192	A-436
226	Linda Yow	A-193	A-436
227	M Lou Orr	A-194	A-436
228	N Refes	A-195	A-436
229	Noel Orr	A-196	A-436
230	Sherry Olson	A-197	A-436
231	Singgih Tan	A-198	A-437
232	Aimee Polekoff	A-199	A-437
233	Al Kisner	A-200	A-437
234	Alice Nguyen	A-201	A-437
235	Amy Davis	A-202	A-437
236	Andrew Fisher	A-203	A-437
237	Ann Rogers	A-204	A-438
238	Antje Fray (2)	A-205	A-438
239	Arrie Hammel	A-206	A-438
240	Barbara Trudell	A-207	A-438
241	Beth Stanberry	A-208	A-438
242	Bill Parker	A-209	A-438
243	Billy Angus	A-210	A-438

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**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
244	Bonnie Macraith	A-211	A-438
245	Carol Ann Brady	A-212	A-439
246	Carol Hatfield	A-213	A-439
247	Carol Hatfield (2)	A-214	A-439
248	Carol Jackson	A-215	A-439
249	Carolyn Wacaser	A-216	A-439
250	Cheryl Lechtanski	A-217	A-439
251	Cris Smith	A-218	A-440
252	Darlene Marley	A-219	A-440
253	Donna Greathouse-Neel	A-220	A-440
254	Echo Mitchell	A-221	A-440
255	Edson Rood	A-222	A-440
256	Elizabeth Lynch	A-223	A-440
257	Gayle Areheart	A-224	A-440
258	George Wuerthner	A-225	A-441
259	Gita Barbezat	A-226	A-441
260	Helga Oestreicher	A-227	A-441
261	Jeffrey Christo	A-228	A-441
262	Jessica McGeary	A-229	A-441
263	Joseph Breazeale	A-230	A-441
264	Joy Keithline	A-231	A-442
265	Kathy, Mark, Chris, & Jessie Groth	A-232	A-442
266	Kevin Spelts	A-233	A-442
267	Lisa Dahill	A-234	A-442
268	Loren Amelang	A-235	A-442
269	Louise Wallace	A-236	A-442
270	Lynn Welch	A-237	A-442
271	Maggie Frazier	A-238	A-442
272	Maija Dravnieks	A-239	A-443
273	Martha Jo Willard	A-240	A-443
274	Martha Stevens	A-241	A-443
275	Mary Leon	A-242	A-443
276	Marya Bradley	A-243	A-443
277	Maryann Foss	A-244	A-443
278	Maureen Knutsen	A-245	A-444
279	Michael and Barbara Hill	A-246	A-444

## DPEIS COMMENTS &amp; RESPONSES

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
280	Michelle Rice	A-247	A-444
281	Mike Hemphill	A-248	A-444
282	Nina Council	A-249	A-444
283	Pamela Nelson	A-250	A-445
284	Patricia Always	2-251	A-445
285	Randall Potts	A-252	A-445
286	Robert Bauer	A-253	A-445
287	Robert Fritsch	A-254	A-445
288	Rose Jenkins	A-255	A-446
289	Ruth Parcell	A-256	A-446
290	Scott Elliott	A-257	A-446
291	Teresa Hayes	A-258	A-446
292	Thelma Nelson	A-259	A-446
293	Theo Giesy	A-260	A-446
294	Amy Derocher	A-261	A-447
295	Larry Oneil	A-262	A-447
296	Catherine Buchanan	A-262	A-447
297	Cheyenne Lively	A-263	A-447
298	Christina Durtschi	A-263	A-447
299	Courtney Carlisle	A-264	A-448
300	Jace Bylenga	A-264	A-448
301	Mary Gallagher	A-265	A-448
302	Nicole Marcotte	A-265	A-448
303	Carlie Miller	A-266	A-449
304	David Johnhoy	A-266	A-449
305	Douglas Hedrick	A-267	A-449
306	Fit Cahall	A-267	A-449
307	Inga Walker	A-268	A-449
308	Jacob Gunn	A-268	A-450
309	Jean Coy	A-269	A-450
310	Judy Knold	A-269	A-450
311	Kevin Shipe	A-270	A-450
312	Manuela Giese	A-270	A-450
313	Mark Salser	A-271	A-450
314	Michaela Mansfield	A-271	A-451
315	Robert Pasko	A-272	A-451
316	Robert Schutzner	A-272	A-451



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Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
317	Rachel Swerdlow	A-273	A-451
318	Roberta Daniels	A-273	A-451
319	Alyssa Barton	A-274	A-451
320	Andrea Carter	A-274	A-452
321	Aylin Llona	A-275	A-452
322	Barry Truman	A-275	A-452
323	Chris Gnehm	A-276	A-452
324	Daniel Erickson	A-276	A-452
325	Denise Mahnke	A-277	A-452
326	Dorothy Hiestand	A-277	A-452
327	Ellen Lyons	A-278	A-453
328	Gerry Smith	A-278	A-453
329	James Davis	A-279	A-453
330	Janet Way	A-279	A-453
331	Kate Butt	A-280	A-453
332	Kevin Jones	A-280	A-453
333	Kristeen Penrod	A-281	A-453
334	Kristen Long	A-281	A-453
335	Kristina Fury	A-282	A-454
336	Mark Stewart	A-282	A-454
337	Matt Knox	A-283	A-454
338	Mayellen Henry	A-283	A-454
339	Menno Sennesael	A-284	A-454
340	Niels and Susan Andersen	A-284	A-454
341	Oliver Dunn	A-285	A-454
342	Patrick Conn	A-285	A-454
343	Paul Fior	A-286	A-455
344	Paul Granquist	A-286	A-455
345	Rachel Thomas	A-287	A-455
346	Rose Lagerberg	A-287	A-455
347	Shanna Sierra	A-288	A-455
348	Sigrid Asmus	A-288	A-455
349	Sue Tiffany	A-289	A-455
350	Suzanne Davis	A-289	A-455
351	Tanya Lawson	A-290	A-455
352	Venard Trevisanut	A-290	A-456

Letter Number	Commenter	Page Number	
		Comment	Response
Individuals (cont.)			
353	Barbara Cunningham	A-291	A-456
354	Barbara Cunningham (2)	A-292	A-456
355	Cassandra Bufano	A-293	A-456
356	Jennifer Schultz (2)	A-293	A-456
357	Mark and Susan Vossler	A-294	A-456
358	Mark and Susan Vossler (2)	A-295	A-456
359	Mary Johnson	A-296	A-456
360	Nancy Anderson	A-297	A-456
361	Robert Havrilla	A-298	A-456
362	Robert Havrilla (2)	A-299	A-457
363	Edith Lie	A-300	A-457
364	Linda Carroll	A-301	A-457
365	Bruce Turcott	A-302	A-457
366	Tim McNulty	A-302	A-457
367	Thom Peters	A-303	A-457
368	Susan Cuturilo	A-303	A-457
369	Shirley Sonnichsen	A-304	A-458
370	Seth Rolland	A-304	A-458
371	Scott Elliott	A-305	A-458
372	Peter Carskaddan	A-305	A-458
373	Mr. Shelley Dahlgren, PhD	A-306	A-458
374	Michael Siptroth	A-306	A-458
375	Julie Stohlman	A-307	A-458
376	Emily Myette	A-307	A-459
377	Denise Harnly	A-308	A-459
378	Bob Aegerter	A-308	A-459
Form Letters			
379	Wilderness Watch email message submitted by 5,616 individuals. For the list of submitters, see page A-272.	A-309	A-459
380	Sierra Club email message submitted by 1,572 individuals. For the list of submitters, see page A-305.	A-342	A-460
381	Washington Wild email message submitted by 234 individuals. For the list of submitters, see page A- 308.	A-352	A-460
382	The Wilderness Society email message submitted by 227 individuals. For the list of submitters, see page A-310.	A-354	A-461

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Letter Number	Commenter	Page Number	
		Comment	Response
Form Letters (cont.)			
383	Washington Trails Association email message submitted by 773 individuals. For the list of submitters, see page A-312.	A-356	A-461
384	Email message submitted by 23 individuals. For the list of submitters, see page A-318.	A-361	A-462
385	Mailed message submitted by 2 individuals: Gena Di Labio and Teresa Dix.	A-362	A-462

## Responses to Common Issues

Several commenters identified themes or issues that were repeated in numerous comments. The most commonly-raised issues are summarized below, with an accompanying response.

### Programmatic EIS

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**ISSUE:** Many comments received stated that the DPEIS did not contain enough detail or analysis of potential impacts. There were also comments stating that several projects were not described in enough detail or were not developed enough to provide sufficiently detailed analysis. Some also commented that the DPEIS is part of phased review without clearly stating such.

**RESPONSE:** This is a programmatic evaluation that complies with SEPA rules. Programmatic review occurs on broader actions, such as plans, policies, or programs, rather than on specific, single-site projects. As a result, there is generally more flexibility in preparing a PEIS because there is less detailed information available on the environmental impacts. A programmatic EIS will provide discussion in more general terms, with subsequent review providing more detailed review once specific projects and details are identified. A programmatic EIS is inherently a phased review. The programmatic EIS provides a comprehensive understanding of impacts, so that the broader consequences and tradeoffs associated with the Icicle Strategy can be evaluated. This provides general types and magnitude of potential impacts.

This PEIS included detailed review when available. The amount of detail varied by Alternative based on the level of information available or development of projects making up the various alternatives. Once projects and elements within the Preferred Alternative are more refined, project level environmental review will occur. Project level environmental review may be satisfied by adoption of the programmatic EIS or supplemental EISs depending on the threshold determinations of individual permitting agencies, and will include more specific impacts analysis and mitigation measures where appropriate. NEPA must also be completed for projects with a federal nexus.

In response to comments about project detail and development, a programmatic SEPA review was launched at the earliest possible point in programmatic development to allow decision-making to be guided by the environmental review process. Because of this, some projects contained within the action alternatives were somewhat conceptual in nature, and less detailed analysis was conducted as a result. Projects and impacts were described in as much detail as possible based on information available at the time of writing.

## Alternatives

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**ISSUE:** Several comments discussed the alternatives considered in the DPEIS. These comments included a desire to see alternatives not considered (i.e. dam removal or LNFH removal) included as a Program Alternative, concern about a “true” No-action Alternative where no projects are completed, and a desire to see an alternative that did not include projects within the ALWA.

**RESPONSE:** The development of the alternatives considered in the PEIS is detailed in Chapter 2. The co-leads relied heavily on comments received during the SEPA scoping to develop several different alternatives. Each alternative can achieve the goals established in the Guiding Principles, as described in section 1.5. Several alternatives were recommended during the SEPA scoping phase that were not considered for further analysis. These are described in section 2.11. These include reservoir removal, findings of water right relinquishment as part of environmental review, and removing the LNFH.

Per WAC 197-11-786, a reasonable alternative is one that could feasibly attain or approximate the proposal’s objective. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy’s objectives of increasing instream flow or improving agricultural reliability. More detail is provided in Section 2.11. One commenter noted that in the Uinta Wilderness, dam removal occurred. However, the project in the Uinta Wilderness is not analogous because of water storage lower in the basin that was used to substitute high lake storage. Replacement storage does not exist in the Icicle Creek Subbasin. Chelan County has evaluated a multitude of new storage sites throughout the Wenatchee basin as part of watershed planning, which did not prove to be feasible.

The removal of LNFH did not receive additional consideration because it was determined that the goal of protecting tribal fish harvest and improving sustainability of LNFH could not be reached through LNFH removal. Additionally, LNFH provides mitigation for Grand Coulee Dam. An alternatives analysis was conducted by USFWS to determine the best means of continuing hatchery production to mitigate fish impacts of the Grand Coulee Dam. That analysis reviewed the option of removing LNFH and found that upgrades and improving operation of the current facility was preferred. More detail is provided in Section 2.11.

Water right relinquishment for IWG water right holders was also not considered as a Program Alternative in the DPEIS. There were also several comments received about the DPEIS not including a relinquishment analysis. Relinquishment was not considered as an alternative or as part of the DPEIS because a relinquishment analysis is conducted during water right permitting, not during environmental

review. An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are also numerous exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.

In response to concerns over projects being included in the No-action Alternative, the purpose of the No Action Alternative is to describe what would likely occur if the proposed program or plan did not proceed, not what would occur if no projects were pursued within the Icicle Creek Subbasin. Those projects could proceed more slowly, for different purposes than the Icicle Strategy, or not optimized or integrated with one another. However, a No Action Alternative that ignores likely project development is not a true baseline for comparison of other alternatives. Based on discussions with Icicle Work Group members, the co-leads believe several projects would likely be pursued should the Icicle Strategy not proceed. The description of the No-action Alternative was the co-leads attempt to accurately describe likely actions that may occur should no action be taken on the Icicle Strategy.

Regarding comments that there was no alternative that focused on projects outside the ALWA, Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads included information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. In that event Eightmile Lake would only meet irrigation district agricultural reliability, without regard to instream flow or domestic use benefits outlined in the Guiding Principles. This is discussed in section 2.3.1 of the PEIS. Finally, including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.

## Conservation

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**ISSUE:** Many comments stated a desire for increased conservation measures to be included in the Program Alternatives.

**RESPONSE:** Each Program Alternative includes conservation elements. These include canal and lateral piping as part of the COIC Irrigation Efficiencies and Pump Exchange project, up to 10 cfs of conservation improvements within IPID in accordance with the IPID CWCP, up to 20 cfs of conservation improvements at LNFH, and funding dedicated to domestic conservation improvements.

More detail regarding the specific domestic conservation improvement projects will be

developed once this element moves to project planning. However, to help address concerns raised by commenters regarding lawn watering, the domestic conservation element of the Preferred Alternative will include water conservation opportunities for lawn reduction that can extend domestic and agricultural irrigation supplies, consistent with the Guiding Principles. More detail regarding this was provided in Chapter 2.

## **Supplemental or Revised DPEIS**

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**ISSUE:** The co-leads received several comments that indicated a desire for the co-leads to revise or issue a supplemental DPEIS prior to issuing the FPEIS. The reasons listed for this ranged from a desire for more information, to the removal of Alternative 4 or other specific elements from the DPEIS, and an additional opportunity to review prior to the issuance of the FPEIS.

**RESPONSE:** Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating a proposal's probable significant adverse environmental impacts. While there has been some modification in the document between the draft and final stages of this document, the proposal has not changed in a significant way, and new information has not been found indicating that new probable significant adverse environmental impacts are likely.

The co-leads have also addressed comments concerning level of detail in the previous section describing the programmatic nature of this PEIS, including future project-level and NEPA review as appropriate.

Some commenters recommended narrowing the scope of the PEIS by removing specific projects/elements or Alternative 4 from consideration and re-releasing the DPEIS. However, the co-leads elected not to limit the number of alternatives considered in the PEIS which were all developed in response to scoping comments. Some commenters desired increased storage in the basin, which was the genesis for Alternative 4, and indeed Alternative 4 is the most adaptable to climate change. The co-leads analyzed a range of alternatives in the PEIS that all meet the objectives of the Icicle Strategy. Including this range of alternatives is required by SEPA. While the co-leads reviewed several Alternatives, a Preferred Alternative was selected that balanced objectives and impacts.

## **NEPA Integration**

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**ISSUE:** Many comments were received regarding NEPA. Several comments sought to point out that NEPA and SEPA are separate processes with different requirements, some were concerned the NEPA would not be performed on projects within the ALWA, and several stated that the USFS should be lead agency on projects within the ALWA.

**RESPONSE:** The co-leads met with the USFS, USFWS, and Bureau of Reclamation before launching SEPA scoping for the PEIS to develop a NEPA/SEPA integration strategy. The co-leads understand the NEPA requirements are not met through this PEIS. NEPA lead agencies will determine what additional analysis may be required to meet NEPA rules. An appropriate lead agency will be determined based on NEPA rules.

The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions, land ownership, or funding. The co-leads envision that project-level NEPA will occur for projects with such a nexus. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.

The lead agency for NEPA review will depend on permitting requirements and NEPA rules. The USFS will likely serve as lead agency for projects within the ALWA that require a USFS permit. Per the USFS comment letter, coordination will occur at the project level for any projects that may have permitting actions required by USFS. Project-level detail regarding permitting and NEPA integration will also be provided during project-level SEPA review.

## Wilderness

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**ISSUE:** Numerous comments were received that expressed support for wilderness, wilderness values, and public land. Several also expressed concern with wilderness impacts or Wilderness Act compliance. The primary concern related to Wilderness Act compliance was that the IPID easements are not valid and projects cannot be built in the ALWA.

**RESPONSE:** The co-leads recognize the importance of the ALWA to the Icicle Creek Subbasin and understand that many care deeply about the wilderness area. Because of this, the co-leads analyzed the impacts of the alternatives on the wilderness character of the ALWA. The co-leads generally found the impacts of the Preferred Alternative would be less than significant at the programmatic environmental review stage. Specific details are provided in Section 4.17.

The FPEIS provides general language from the IPID easements and applicable wilderness regulations to provide a comprehensive understanding of the proposal and issues. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID, not as a part of programmatic environmental review. Per USFS's comment letter (Letter 4), this will occur during project level planning.

The IWG and co-leads will work with the USFS on this issue as they move to project-level review and implementation on the Preferred Alternative to ensure compliance with all applicable rules and regulations. This will likely include a minimum tools analysis and potentially other mitigation measures to minimize wilderness impacts.



## Alternative 4

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**ISSUE:** Several commenters expressed blanket opposition to Alternative 4 or opposition to storage enhancement elements included in Alternative 4. The reasons for this opposition included concern about recreation, wilderness, and aesthetic values.

**RESPONSE:** The co-leads understand the concerns listed by commenters. Alternative 4 was not selected as the Preferred Alternative in the FPEIS.

## **Comment Letters**

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 001



IN REPLY REFER TO:

CCA-1604  
2.1.4.17

United States Department of the Interior

BUREAU OF RECLAMATION  
Pacific Northwest Region  
Columbia-Cascades Area Office  
1917 Marsh Road  
Yakima, WA 98901-2058

JUL 30 2018

VIA ELECTRONIC MAIL AND U.S. MAIL

Mr. Mike Kaputa  
Director, Natural Resource Department  
Chelan County  
411 Washington Street, Suite 201  
Wenatchee, WA 98801

Subject: Bureau of Reclamation Comments on the Draft Programmatic Environmental Impact Statement for the Icicle Creek Water Resource Management Strategy, Chelan County, Washington

Dear Mr. Kaputa:

The Bureau of Reclamation is responding to your letter inviting comments of the Draft Programmatic Environmental Impact Statement (DPEIS) for the Icicle Creek Water Resource Management Strategy (Icicle Strategy). Reclamation thanks you for the opportunity to review and comment on the DPEIS.

1-1

As a result of our review, Reclamation requests that Leavenworth National Fish Hatchery (LNFH) projects be removed from the five action alternatives presented in the DPEIS. Those actions are the responsibility of federal agencies that are not participating in the preparation of the DPEIS as co-lead agencies. For those federal agencies, the National Environmental Policy Act (NEPA) provides one of the most essential and powerful tools for informed decision making to avoid a premature, arbitrary, or preordained outcome. Reclamation wants to ensure NEPA is implemented in a manner that properly fulfills its purpose of providing informed decision making for the LNFH. To date, of the federal actions identified in the DPEIS alternatives, Reclamation has only initiated NEPA for the Snow Lake Water Control Valve Replacement Project (<https://www.usbr.gov/pn/programs/ea/wash/snowlake/index.html>).

Nevertheless, Chelan County and the Washington State Department of Ecology included LNFH projects in each alternative with an unreliable assumption that those LNFH projects will be approved through the federal NEPA process. Because NEPA has not been initiated on other projects listed, but those projects are still included in the DPEIS, the public could mistakenly assume Reclamation and the U.S. Fish and Wildlife Service (Service) have already decided what projects move forward to implementation. It is possible that through the NEPA process, Reclamation and the Service will choose not to implement a project or find an alternative that is

Comment Letter 001

2

- 1-1 | as good as or better than the proposed project. If this were to be the case, the analysis in the DPEIS could be rendered unreliable.
- 1-2 | We would also like to note that LNFH is owned and operated by the Service, and Reclamation has operation and maintenance funding responsibility. Therefore, Reclamation and the Service are co-lead agencies for any proposed undertakings affecting LNFH.

Thank you for your time and consideration of our comments. Should you have any questions or concerns with our comments, please contact Ms. Christina Davis-Kernan, Technical Projects Program Manager, at 509-575-5848, extension 284, or by email at [cdaviskernan@usbr.gov](mailto:cdaviskernan@usbr.gov), or Ms. Elizabeth Heather, Environmental Protection Specialist, at 509-575-5848, extension 341, or by email at [ehether@usbr.gov](mailto:ehether@usbr.gov).

Sincerely,

Dawn A. Wiedmeier  
Columbia-Cascades Area Manager

cc: Mr. Dave Irving  
Leavenworth Fisheries Complex Manager  
12790 Fish Hatchery Road  
Leavenworth, WA 98826

[dave\\_irving@fws.gov](mailto:dave_irving@fws.gov)

## Comment Letter 002

## Comment Letter 002



## United States Department of the Interior

**FISH AND WILDLIFE SERVICE**  
**Washington Fish and Wildlife Office**  
 Central Washington Field Office  
 215 Melody Lane Suite 103  
 Wenatchee, WA 98801-8122



In Reply Refer To:  
 01EWFW00-2018-TA-1437  
 X Ref: 01EWFW00-2016-TA-0800  
 Hydrologic Unit Code: 17-02-00-11-04

JUL 26 2018

Mike Kaputa, Director  
 Chelan County Natural Resource Department  
 411 Washington Street, Suite 201  
 Wenatchee, Washington 98801

Dear Mr. Kaputa:

This responds to your request for scoping comments on the State Environmental Policy Act (SEPA) Draft Programmatic Environmental Impact Statement (DPEIS) for the Icicle Strategy. The DPEIS evaluated the potential environmental impacts of implementing a comprehensive water resource management plan for the Icicle watershed. Potential projects are identified in five alternatives which were evaluated at a programmatic level along with a no-action alternative. The DPEIS is intended to serve as the basis for future project-level environmental review and analysis.

2-1

The U.S. Fish and Wildlife Service's (Service) Central Washington Field Office submitted a letter on May 11, 2016, in response to a scoping request for developing the DPEIS. In that letter, we expressed our support for developing the DPEIS to assess projects that could provide a more secure water supply for agricultural and municipal uses while also advancing the conservation of Endangered Species Act (ESA) listed species. Additionally our letter recommended that the Chelan County Natural Resources Department, Washington Department of Ecology, Washington Department of Fish and Wildlife and the Service collaborate under the Fish and Wildlife Coordination Act (FWCA), as amended (16 U.S.C. 661 *et seq.*), to produce a single Coordination Act Report (CAR) that assesses the effects of the Icicle Strategy, considers the fish and wildlife resources at risk, and recommends measures to protect, develop, and improve these habitats.

Due to the large number of projects in the DPEIS that have a federal nexus, the Service again recommends that a single CAR be prepared, this time concurrent with the preparation of the Final Environmental Impact Statement or a subsequent draft. Efficiencies can be gained through a comprehensive planning and reporting effort that satisfies the requirements of both SEPA and

Mike Kaputa

2

2-1

FWCA. Although not binding, federal agencies involved in water resource development projects must strongly consider the recommendations of the CAR to prevent loss or damage to fish and wildlife resources and to mitigate any unavoidable impacts. We look forward to future discussions regarding this possibility.

2-2

The Service also encourages continued coordination and collaboration with federal stakeholders as site-specific projects are developed and packaged for National Environmental Policy Act (NEPA) review and consultations in accordance with section 7(a)(2) and for implementation of priority recovery actions associated with section 7(a)(1) of the ESA of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Thank you for your assistance in the conservation of listed species. If you have questions about this letter or your responsibilities under the Act, please contact Cindy Raekes at the Central Washington Field Office in Wenatchee at (509) 665-3508, extension 2009 (e-mail: [cynthia\\_raekes@fws.gov](mailto:cynthia_raekes@fws.gov)) or Sierra Franks at (509) 665-3508, extension 1880, of this office.

Sincerely,

Eric V. Rickerson, State Supervisor  
 Washington Fish and Wildlife Office

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 003

Comment Letter 003



United States Department of the Interior  
U.S. Fish and Wildlife Service  
Leavenworth Fisheries Complex  
12790 Fish Hatchery Rd.  
Leavenworth, Washington 98826  
509 548-7641



July 30, 2018

Mr. Mike Kaputa, Director  
Chelan County Natural Resources Dept.  
411 Washington St, Suite 201  
Wenatchee, WA 98801

Dear Mr Kaputa:

This letter is in response to your request for comments and input regarding the draft Programmatic Environmental Impact Statement (PEIS) evaluating alternatives that would meet the Icicle Work Group's (IWG) Guiding Principles. Please note that this memo is intended to complement earlier comments provided by the Service's Central Washington Field Office (dated July 26, 2018).

3-1

The Guiding Principles are a list of shared goals to 1) improve instream flow in Icicle Creek, 2) Improve sustainability of Leavenworth National fish hatchery (LNFH), 3) Protect Tribal Harvest Opportunities, 4) Improve domestic water supplies, 5) Improve agricultural reliability, 6) Enhance Icicle Creek habitat, and 7) Comply with State and Federal Laws and Regulations. After reviewing the draft PEIS we believe that it serves as good faith effort by all of the water users and other interested parties in Icicle Creek to work collaboratively and develop solutions together that help address these shared goals. As such the Fish and Wildlife Service continues to support the Icicle Strategy and the work of the IWG. We are committed to continued engagement and coordination between the projects being considered within the IWG and projects and activities planned to renovate and improve the sustainability of LNFH.

3-2

Our review of the alternatives reveals a suite of possible solutions that are comprehensive and do a good job of describing the breadth of possible actions that could be implemented. We are impressed by the detail provided in the document and are confident that it is a rigorous and thorough treatment of the pertinent environmental and project level issues. A number of the projects described in the four action alternatives are projects focused on LNFH infrastructure and operations. These LNFH specific projects are largely focused on reducing surface water use at the hatchery, evaluation of new rearing methods, improved effluent treatment facilities, addressing fish passage and screening issues at LNFH, and improving access to ground water

3-2

resources. These project are all subject to evaluation under a separate federal NEPA process that is currently ongoing. As such it would be inappropriate for the FWS to advocate for a particular action or no action alternative until conclusion of the federal NEPA process is complete. For this reason, we are refraining from making detailed or specific comments to the draft PEIS.

If you have additional questions or concerns, please don't hesitate to contact me at your earliest convenience.

Sincerely,

David Irving  
Complex Manager

## Comment Letter 004

## Comment Letter 005



United States  
Department of  
Agriculture

Forest  
Service

Okanogan-Wenatchee National Forest

215 Melody Lane  
Wenatchee, WA 98801  
509-664-9200  
Fax: 509-664-9280

**File Code:** 1950; 2320; 2670  
**Date:** July 30, 2018

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

Dear Mr. Kaputa,

The Okanogan-Wenatchee National Forest (Forest) has completed an initial review of the Icicle Creek Water Resource Management Strategy Programmatic Environmental Impact Statement (PEIS) that was prepared pursuant to the Washington State Environmental Policy Act (SEPA).

4-1

The PEIS describes a number of projects that are proposed to occur on National Forest System (NFS) lands, including within the congressionally designated Alpine Lakes Wilderness (Wilderness). Any actions proposed on NFS lands will require coordination with the Okanogan-Wenatchee National Forest to ensure that all applicable legal, regulatory, policy and Forest Plan requirements are met.

This includes, but is not limited to review pursuant to the Wilderness Act, National Forest Management Act, National Environmental Policy Act and Endangered Species Act. This would also include review for consistency with the Wenatchee National Forest Land and Resource Management Plan, as amended by the Northwest Forest Plan. Implementation actions located on NFS lands will require prior authorization from the Forest before proceeding.

Activities within the areas covered by a Special Warranty Deed (SWD) or a Ditch Act Authorization (PL 9999PL.99-545) such as automation, in kind dam replacements, Klonauqua tunnels, geotechnical analysis, and other activities proposed within these reserved areas would need to be reviewed on a project specific basis. Given the complexity of these proposed projects, I recommend that the IWG engage the Forest early in the planning process for project level implementation. The earlier you engage on planning for implementation level projects the more time we will have to collaborate on the proposed project and develop and necessary mitigation.

We look forward to working with you to clarify next steps in the planning and coordination process. If you have additional questions please feel free to contact Erick Walker, Deputy Forest Supervisor at (509) 664-9308 or [ewalker02@fs.fed.us](mailto:ewalker02@fs.fed.us) or [ewalker02@fs.fed.us](mailto:ewalker02@fs.fed.us)

Sincerely,

MICHAEL R. WILLIAMS  
Forest Supervisor



Caring for the Land and Serving People

Printed on Recycled Paper



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

North Central Region • Region 2 • 1550 Alder Street NE, Ephrata, WA 98823  
Telephone: (509) 754-4624 • Fax: (509) 754-5257

July 27<sup>th</sup>, 2018

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

RE: WDFW Comments – State Environmental Policy Act Draft Programmatic Environmental Impact Statement for the *Icicle Creek Water Resource Management Strategy*

Dear Mr. Kaputa,

Since 2012, the Washington Department of Fish and Wildlife (WDFW) has been an active member of the Icicle Work Group (Work Group). Within this forum, we work to ensure that the development and execution of the *Icicle Creek Water Resource Management Icicle Strategy* (Icicle Strategy) adequately addresses the needs of resident and anadromous fish and wildlife, and optimizes ecological function. In addition to our role within the Work Group, WDFW works to support Ecology's Office of Columbia River (OCR) mandate under RCW 90.90.005(2) to, "aggressively pursue development of new water supplies for instream and out-of-stream uses."

WDFW appreciates the deference provided by the Work Group and OCR to date, and the opportunity to provide comments on this Draft Programmatic Environmental Impact Statement (PEIS). WDFW would also like to acknowledge the value that OCR and the Chelan County Natural Resources Department bring to managing water resources in Icicle Creek. Our Agency strongly supports the integrated approach to water management exemplified by efforts such as the Icicle Strategy; indeed, it is often difficult to make progress on water management issues absent such an approach. We look forward to working with you to hone a final package of actions that best meets the Strategy's multiple benefit objectives.

WDFW promotes developing the Final PEIS in a way that clearly assesses positive and negative impacts from the following actions and different combinations thereof:

- Icicle Peshastin Irrigation District (IPID) Irrigation Efficiencies, Dryden Pump Exchange, and Full Pump Exchange
- Cascade Orchards Irrigation Company (COIC) Irrigation Efficiencies and Pump Exchange
- Domestic Conservation Efficiencies
- Leavenworth National Fish Hatchery Conservation and Water Quality Improvements
- Alpine Lakes Reservoir Optimization, Modernization, and Automation
- Eightmile Lake Storage Restoration

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 005

Page 2

- Eightmile Lake Storage Enhancement
- Upper Klonauqua Lake Storage Enhancement
- Upper and Lower Snow Lakes Storage Enhancement
- Tribal Fishery Protection
- Habitat Protection, Enhancement, and Mitigation
- Fish Passage and Screening
- Water Markets
- Instream Flow Rule Amendment (WAC 173-545)
- Legislative Change to Overriding Consideration of Public Interest (OCPI)

**General Comments**

- 5-1 | 1. It is clear that water made available through the Icicle Strategy will be employed to bolster instream flows within Icicle Creek and provide a reliable source for out-of-stream uses within the Wenatchee Basin. This said, the specific allocations, management, and legal protection of water produced through the various iterations of actions is not clear. Further, there are questions pertaining to how this water will be managed for instream and out-of-stream uses downstream of Icicle Creek's confluence with the Wenatchee River. Given that OCR is a co-lead and the primary funder of the Icicle Strategy, WDFW suggests that project water flowing beyond the Wenatchee confluence follow the two-thirds out-of-stream, one-third instream, allocation mandated through RCW 90.90.010. Doing so would aid in achieving minimum instream flow targets established through WACs 173-545-050 & 060.
- 5-2 | 2. Water availability and corresponding allocations, e.g. reservoir refill reliability, should be attended to adaptively, as the benefits built upon these assumptions may erode over time. WDFW is concerned that potential, unforeseen, decreases in annual supply will be manifested in a corresponding decrease in instream flow given that out-of-stream uses typically receive preference. WDFW recommends that the Final PEIS ensure that supply assumptions and corresponding actions promote adaptive and phased management, and protect instream resources in perpetuity.
- 5-3 | 3. As per our comment letter submitted to the U.S. Bureau of Reclamation on January 8, 2018 (*Snow Lake Valve Control Structure Draft EA*), the timing and execution of construction may adversely affect resident terrestrial species. WDFW biologists recognize potential impacts affecting black bear (*Ursus americanus*), mountain goat (*Oreamnos americanus*), and wolverine (*Gulo luscus*). For example, the fall work window overlaps with wolverine and black bear denning periods. Impacts to mountain goats are to seasonal habitat use areas via disturbance and potential for direct interaction through human habituation and food conditioning (minerals accessed through urine, and loss of fear of humans).
- 5-4 | In addition, claims that ESA-listed species are rarely documented in the area and that resident species will avoid adverse impacts by dispersing throughout the project area during construction are conclusory and insufficiently documented. The lack of documented observations likely indicates the level of surveying efforts, versus a verification of absence. The default approach by implementing parties should revolve

2

Page 3

- 5-4 | around the assumption that these species are present. Care must be taken to limit the amount of noise and potential interaction. WDFW looks forward to, and appreciates, the opportunity to help guide Best Management Practices (BMPs) and mitigating measures in future project-level environmental assessments.
- 5-5 | 4. WDFW recommends that, before project-level EAs/EISs are developed, the Icicle Strategy process include and fund pre- and post-project fish and wildlife surveying, along with monitoring during project implementation. Much of the data informing the presence and abundance of wildlife in the project areas is in need of being updated and expanded relative to the proposals within this Draft PEIS. Data gathered from these efforts should be incorporated into the project-level proposals to inform timing, location, BMPs, and mitigation. WDFW proposes that these efforts attend to the presence, distribution, and behaviors of at least the following:
- Northern Spotted Owls
  - Amphibians
  - Mollusks
  - Mountain goats
  - Black bears
  - Wolverines
  - Raptors
  - Fishes
- 5-6 | 5. While the Icicle Strategy and Draft PEIS primarily attends to actions within the Icicle Creek Subbasin, the footprint of effects extends throughout the Wenatchee Basin. This applies to terrestrial as well as aquatic impacts. WDFW understands the challenges and complexities associated with meeting competing needs within the context of future development and protecting natural resources. Accordingly, we request that the co-leads consider and attend to the cumulative impacts resulting from the developments facilitated by Icicle Strategy actions.
- Forest and shrub steppe resources will be impacted by future development within the Wenatchee Basin as a result of Icicle Strategy actions. History has repeatedly shown that development, regardless of mitigating efforts, will reduce and fragment habitat available to resident species. From a cumulative effects standpoint, reductions in habitat are correlated with reductions in species presence, complexity, health, and abundance. For example, development within low-lying habitat can diminish food source accessibility, particularly during the winter. Limiting accessibility to proper nourishment will result in weaker, less productive, populations throughout the food chain. Development also results in habitat losses beyond the boundaries of the direct habitat alteration. This is especially true if development occurs within a previously undisturbed area. New development adjacent to existing development has a lower impact than development within and surrounded by native habitat, e.g. fragmentation in addition to direct loss.
- WDFW requests that the co-leads provide information pertaining to how water supplies developed through the Icicle Strategy will correspond to future development on an

3



## Comment Letter 005

## Comment Letter 005

Page 4

- 5-6 | acreage and geographic basis.
- 5-7 | 6. WDFW would like to see additional information attending to project benefits, new project combinations, long and short-term impacts, resource management, and mitigation actions incorporated into the Final PEIS and supporting documentation. One way to accomplish this could be to issue a supplemental Draft PEIS once the scope and combination of prospective actions have been refined. This process may best allow interested parties to understand and comment on the implications of different incarnations of the Icicle Strategy. These issues could also be resolved through careful consideration of comments on this Draft PEIS especially if accompanied by collaborative development of the final document.
- 5-8 | 7. Given the implications and challenges of modifying flows within Icicle Creek for instream and out-of-stream uses, WDFW recommends the expansion of the Instream Flow Subcommittee (IFS). Monitoring and adaptive management within this context is paramount to ensuring instream habitat is not only protected, but enhanced. The IFS and its operations should receive additional resources as the Icicle Strategy moves towards implementation and include tribal, federal, and NGO representatives.
- Irrigation District Efficiencies and Upgrades**
- 5-9 | 1. WDFW supports infrastructure upgrades and corresponding efficiencies implemented by IPID and COIC. Depending on funding source, there may be implications pertaining to how 'saved' water is reallocated amongst instream and out-of-stream uses. In regard to both IPID and COIC pump-back projects, WDFW favors the pump station locations residing within the Wenatchee River, preferably downstream of the confluence with Icicle Creek. In the event that the latter is infeasible, an assessment of impacts to the bypass reach should be conducted and mitigated for in the event that it adversely impacts instream flow and associated habitat.
- 5-10 | 2. It is unlikely that IPID would remove the diversion structures located on Icicle Creek, as they would likely reside as a contingency. This narrative has been consistent throughout the Work Group. That said, WDFW encourages exploration of eventual replacement of the existing diversion structure with a roughened channel that allows sufficient water diversions and improves fish passage, recreational opportunities, and aesthetics.
- Domestic Conservation Efficiencies**
- 5-11 | 1. Information on land use trends should be incorporated into the long-term cost and feasibility analyses guiding large-scale infrastructure upgrades, along with supply allocation. Stakeholders in and outside of the Work Group have raised valid concerns about these trends, as some have already become evident. This is exemplified where productive croplands transition to amenity-based landscapes. In adhering to the 2050 planning horizon and the prospective change in land use, the cities of Leavenworth, Peshastin, and Cashmere should bring forth a strategy for reducing water consumption. A community-driven approach to move toward BMPs for residential water use should be part of the Icicle Strategy, as illustrated within Yakima Basin Integrated Plan.

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- Alpine Lakes Reservoir Optimization, Modernization, and Automation**
- 5-12 | 1. WDFW acknowledges the many benefits associated with modernizing storage infrastructure, particularly the improved capabilities of optimizing the timing and volume of releases. Thorough monitoring of aquatic and terrestrial habitats and associated species affected by the increased drawdown frequency will be needed as these projects move forward. Fluctuations in lake levels can alternately make available and/or reduce fish, amphibian, and wildlife habitat, leading to potential adverse impacts through drying or flooding habitat at the "wrong" times. WDFW expects and requests that resources are made available to ascertain baseline habitat conditions and monitor changes affecting aquatic and terrestrial species. In addition, changes in flow regimes will also require monitoring. The public funding proposed to improve these private facilities adds to the argument for strong monitoring and mitigation of environmental impacts.
- 5-13 | 2. As mentioned in our 2016 Draft PEIS scoping comments, storage water releases should be prioritized and balance to maximize benefits to aquatic species' various life stages. Specifically, critical species and pertinent life stages include: steelhead (adult, rearing); rainbow trout (adult, rearing); bull trout (adult/sub-adult, rearing); cutthroat trout (adult, rearing); and lamprey (adult). We look forward to working with the co-leads and Work Group members in developing storage release scenarios in a manner that meets the needs for both instream and out-of-stream uses.
- Eightmile Lake Storage Restoration**
- 5-14 | 1. WDFW's comments above touch on some expectations related to restoring infrastructure at Eightmile Lake. Of particular concern is how water will be managed in the event that both the infrastructure and Ecology's water right determination allow for the full utilization of IPID's 2,500 AF storage right, providing an additional 900 AF for out-of-stream uses. The consistent narrative heard within the Work Group is that this volume will be donated, or transferred, to the Department of Ecology. While this volume of water may not be considered a "new" supply as per RCW 90.90.010, WDFW would like to see at least one-third of this volume permanently protected instream from the outlet at Eightmile to the Columbia River mouth.
- 5-15 | 2. The Draft PEIS states at p. 63 that, "[b]ecause releases will be utilized to mitigate consumptive domestic use when the instream flow rule is not met, the quantity made available for domestic use will be stretched to 3,600 acre-feet when accounting for natural flow availability." This statement is opaque and reinforces the concerns WDFW staff have already expressed about the accounting of current and prospective water use within WRIA 45. Please explain how IPID's paper water right of 2,500 AF would be "stretched" to 3,600 AF.
- 5-16 | 3. The Draft PEIS indicates that the aforementioned 900 AF will be repurposed for domestic use. Historically, and currently, this entire volume of water has not been utilized for consumptive uses. How does Ecology plan to employ non-consumptive water for consumptive purposes?

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- 5-17 | 4. Calculations on p. 65 indicates 1,125 AF, not 900 AF, of additional water is associated with this action. What is the reason for the difference?
- 5-18 | 5. On May 9, 2018, WDFW gave verbal authorization for an Emergency Hydraulic Project Approval (HPA) permit to IPID to perform work needed to prevent a catastrophic failure at the dam due to high spring runoff flows and projected impacts from the 2017 Jack Creek fire. Catastrophic failure could result in loss of life and/or property in Icicle Canyon and an evacuation warning system is currently in place until the emergency work is completed and the dam temporarily stabilized. The Emergency HPA requires mitigation for unavoidable impacts because of the emergency actions; the IPID will be required to address these impacts after the emergency condition has passed. This is a separate action, with separate mitigation from that proposed in the Draft PEIS.
- 5-19 | **Alpine Lakes Storage Enhancement**  
1. WDFW recommends that the co-leads choose not to pursue these projects. The increased lake levels, drawdown amounts, and invasive nature proposed by these actions are highly impactful and come with substantial legal uncertainty and litigation risk. There are other projects within the Icicle Strategy that can significantly improve in- and out-of-stream water supply through efficiencies, automation, pump-backs and other improvements; we recommend that these options be exhausted. Should alternatives eventually prove insufficient, these projects could be considered anew.
- 5-20 | **Habitat Protection, Enhancement, and Mitigation**  
1. It is unclear how habitat projects in the lower reaches of Icicle Creek would compensate for short- and long-term construction impacts in the headwaters or for the cumulative impacts of these projects. Habitat mitigation is intended to compensate for unavoidable impacts. Accordingly, there must be a robust analysis illuminating how habitat protections and enhancements proposed within the lower reaches will provide 'equal or better' habitat function relative to project impacts upstream. If a clear connection cannot be developed, restoration within lower reaches may be better viewed as additional to mitigation required upstream. We look forward to working with you to develop appropriate mitigation in terms of scale, location, and type.
- 5-21 | 2. WDFW disagrees with the assertion that land acquisitions proposed within the Upper Wenatchee Community Plan (UWCP), "will be sufficient to provide 'commensurate compensation for impacts to fish and wildlife resources' in the Icicle Creek basin" given that all lands specified within the UWCP reside outside of the Icicle Creek Subbasin. WDFW encourages this action within the context of additionally. That is, acquisition and subsequent protection/restoration of lands adjacent to the Icicle Subbasin would be additional to any required mitigation.
- 5-22 | 3. The UWCP map on page 65 is not legible. Please provide a better map.
- 5-23 | 4. Project level EA/EISs will be necessary to determine specific mitigation needs, which may or may not be met through compliance with local, state and federal permitting as is stated in the Draft PEIS. Specific, project-level information will be required to evaluate

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- 5-23 | the actions necessary to avoid and minimize adverse impacts, and may necessitate additional mitigation.

**Fish Passage and Screening**

- 5-24 | 1. WDFW views the fish screen upgrades as mandatory, compliance-driven actions. Our Agency continues to work in concert with the Work Group and outside entities in forwarding fish screen compliance in concert with anadromous passage at the boulder field. WDFW is concerned about how the interplay between screening and fish passage is being characterized. Specifically, the Draft PEIS claims that screens must be brought into compliance before passage is implemented. To the contrary, federal and state biologists have indicated that 1) there will be a lag in upstream migration that could take up to two years, 2) anadromous passage, while infrequent, has already been recorded, and 3) potential funding entities have stipulated that passage at the boulder field must be assured before the funding for screen construction is made available. The claim in the Draft PEIS that the Work Group, as a whole, insists that the screens are updated before there is passage at the boulder field does not reflect the perspective of WDFW.
- 5-25 | 2. Due to the presence of non-native species such as eastern brook trout and lake trout in Eightmile, Nada, Lower and Upper Snow Lakes, WDFW does not recommend up- or downstream passage from these lakes in order to protect bull trout and other native fish from these non-native species introduced decades ago. The presence of non-native fish should be considered when planning construction projects at these lakes and the operation of their dams. Efforts should be made to ensure that the non-native fish species are not passed downstream.

**Water Markets**

- 5-26 | 1. WDFW requests that the co-leads and operators of the proposed water market coordinate with Agency staff. WDFW wants to assure that the movement/transfer of water rights and utilization of wet water benefits instream habitat and aquatic species.

**Instream Flow Rule Amendment**

- 5-27 | 1. It is unclear within the Draft PEIS who the recipients of the 0.5 cfs within the Icicle Subbasin will be. One is left to wonder if this water will be made available to future domestic wells located within the confines of the Subbasin, the City of Leavenworth, or some combination thereof. Please specify how this water will be apportioned amongst its recipients both in terms of consumptive use and total withdrawal.
- 5-28 | 2. As evident within the Wenatchee Reserve (Reserve) and the Draft PEIS, the accounting of water under the Reserve may not reflect actual withdrawals from the system. Reserve calculations merely account for consumptive use. Generally speaking, the Department of Ecology assumes that 70-80 percent of water withdrawn for consumptive use is 'returned to the system'. Based upon these assumptions approximately 1.7 – 2.5 cfs would be withdrawn from the Icicle Subbasin with no guarantee that the non-consumptive portion would return within the same Subbasin or in time to offset reductions during critical flow periods. This is particularly true in the event that the City of Leavenworth is the recipient of this water. As stated in our recent water right review attending to the City of

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- 5-28 | Leavenworth's application to access the Reserve, "[WDFW] propose[s] that the well field be considered the primary source of water, rather than Icicle Creek."
- 5-29 | 3. As per WAC 173-545-090 (Wenatchee Reserve):  
 (1)(iv) "Icicle Creek near Leavenworth: Up to 0.1 cfs. Reservation of an additional 0.4 cfs will be considered after completion of flow restoration efforts targeting habitat between the city of Leavenworth and Icicle Irrigation District's point of diversion and the U.S. Fish and Wildlife Service hatchery return. Rule making will be required to establish this additional reservation."  
 (3) "All water uses from the reservation must implement water use efficiency and conservation practices, consistent with the watershed plan."  
 (5) "All water uses relying on the reservation must be measured and reported. The manner and form of such measuring and reporting to support the accounting system for the reservation water uses may be specified by the department, Chelan County, or by a local government, utility, or other public water purveyor in a permit, approval, license, or order. An accounting of all appropriations from the reservation shall be maintained by the department and the Chelan County natural resource department. The accounting shall, at a minimum, include estimated and measured use in gallons per day."  
 (8) "The department shall notify both Chelan County and the planning unit or its successor, in writing, when it determines that fifty percent, seventy-five percent, and one hundred percent, respectively, of the total reservation is appropriated. The department shall also issue a public notice in a newspaper of general circulation for the region at the same three junctures."  
 (9) "The department shall require measuring and reporting for permitted surface and groundwater appropriation from the reservation. If more accurate water use data are needed, the department may, after consulting with the planning unit and Chelan County, require measuring and reporting for groundwater withdrawals otherwise exempted from permit requirements under RCW 90.44.050."

**Legislative Change to OCPI**

- 5-30 | 1. Notwithstanding the merits of limiting actions and impacts within the Alpine Lakes Wilderness proposed through Alternative 3, it brings forth a potential fatal flaw. In seeking to, "waive impacts to instream flows when conservation and pump-exchange-based supplies cannot perfectly meet demand required to provide domestic reliability," the co-leads contemplate a precedent with far-reaching implications. Specifically, rulings set forth through *Swinomish* and *Foster/Yelm* reflect the need to protect minimum instream flows in light of development. The establishment of minimum instream flows throughout the State are the direct result of over-allocation and adverse ecological effects, versus an abundance of a water within a given reach. Given that minimum instream flows within Icicle Creek are often unfulfilled, this action arguably conflicts with the Strategy's Guiding Principal to improve instream flow.

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- 5-30 | While WDFW understands the desire to provide new and reliable water for development, our Agency cannot support actions that erode policies that protect natural systems from further degradation. Protecting wilderness values is not exclusive of downstream ecological necessity. The out-of-stream interests benefiting from this proposed action and Icicle Strategy in general can and should contribute more to shoring up inefficient use. Such improvements should be realized before seeking a legislative fix that should be used sparingly, if ever.

**5-31 | Alternative Portfolio Composition**

Guided by our Agency's Legislative mandate to, "[p]rotect and enhance fish and wildlife and their habitats," WDFW encourages the co-leads to develop a portfolio of actions that provide water for instream and out-of-stream uses while simultaneously limiting ecological impacts, especially within the Alpine Lakes Wilderness. WDFW encourages the development of a new alternative that includes and analyzes following actions, in no particular order of preference. We believe that these actions will maximize in- and out-of-stream benefits, provide significant climate resilience, and best protect upper watershed/Wilderness resources.

- Icicle Peshastin Irrigation District (IPID) Irrigation Efficiencies, Dryden Pump Exchange, and Full Pump Exchange
- Cascade Orchards Irrigation Company (COIC) Irrigation Efficiencies and Pump Exchange
- Domestic Conservation Efficiencies
- Leavenworth National Fish Hatchery (LNFH) Conservation and Water Quality Improvements
- Alpine Lakes Reservoir Optimization, Modernization, and Automation
- Eightmile Lake Storage Restoration
- Tribal Fishery Protection
- Habitat Protection, Enhancement, and Mitigation
- Fish Passage and Screening
- Water Markets

Again, WDFW strongly supports the process that has led to the development of this Draft PEIS, we appreciate the opportunity to provide these comments, and we look forward to working with you to hone and implement a preferred Icicle Strategy alternative.

Sincerely,



Jeff Dengel, Region 2 Environmental Planner

CC: James Brown, Region 2 Director  
 Carmen Andonaegui, Region 2 Habitat Program Manager  
 Michael Garrity, Columbia River and Water Policy Manager

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# ICICLE CREEK SUBBASIN PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 006

Comment Letter 006

July 30, 2018

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

Dear Director Kaputa,

Please accept this document as the joint comments of the Icicle Creek Watershed Council (ICWC) and Trout Unlimited (TU) on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Icicle Creek Water Resources Management Strategy (Icicle Strategy).

ICWC is a local non-profit that has been working since 1997 to improve the ecology of Icicle Creek. ICWC is a sub-committee of the Icicle Canyon Coalition, a 501(c)(3), non-profit organization created in 1994 to address environmental issues associated with the Icicle Creek Watershed.

TU is a national organization with more than 50 years of experience working to conserve, protect, and restore North America's coldwater fisheries and their watersheds. We are leaders locally and nationally working with irrigators, cities, ranchers, federal and state agencies and others on projects that enhance habitat and flows for fish and local communities. In addition, the Icicle Creek Basin is the home watershed for the Trout Unlimited Icicle Valley Chapter. All reaches of Icicle Creek offer important recreational fisheries for many of our local members.

The purpose of the DPEIS is to evaluate and review strategies and alternatives designed to meet seven Guiding Principles established by the Icicle Work Group (IWG) by improving water resources management with state, federal and tribal mandates. The Guiding Principles include:

1. Improve Instream Flows
2. Improve sustainability of the Leavenworth National Fish Hatchery
3. Protect tribal and non-tribal harvest
4. Improve domestic water supply
5. Improve agricultural reliability
6. Enhance habitat in Icicle Creek
7. Comply with all state/federal laws and Wilderness Acts

ICWC and TU have been members of the IWG since its inception in 2012. We support collaborative efforts to develop a holistic water resources management strategy for Icicle Creek and applaud the work of IWG member groups and other participating stakeholders. The needs of fish, farms, and families must be balanced. It is imperative a comprehensive Icicle Creek

water resources management strategy ensure healthy ecosystems, a robust economy, and shared costs of the Icicle Strategy among the various users.

6-1

We also appreciate the work of Chelan County and the Washington State Department of Ecology (Ecology) Office of the Columbia River (OCR), the IWG co-conveners, and their consultants to develop the DPEIS which lays out the alternatives and background information for the Icicle Strategy. Unfortunately, despite its 1600 plus pages and 5 years of planning efforts we believe the document lacks sufficient information. We offer the following comments to convey our concerns with the DPEIS, request additional information, and suggest a revised draft be provided for a second round of public comments before Chelan County and OCR develop a preferred option.

## GENERAL COMMENTS

6-2

**1. Clarification on what can and cannot happen within the Alpine Lakes Wilderness is essential before we know what projects can or even should move ahead for further environmental review or be included in a potential Alternative.** All the Alternatives (except the No-Action Alternative) rely on projects that require close collaboration and legal interpretation from the United States Forest Service to ensure that the projects comply with all federal laws, thus satisfying the Guiding Principles. These include all projects within the Alpine Lakes Wilderness. The May 25, 2018 letter from Pacifica Group to Ecology Director Bellon and OCR Director Tebb outlines many of these concerns.

6-3

**2. We do not want to see any delayed compliance-related upgrades at the hatchery as a result of being a project element of the DPEIS.** We fully support the Guiding Principle to improve sustainability of the Leavenworth National Fish Hatchery (LNFH) and have continued to support requests for federal funding to allow hatchery infrastructure improvements. To-date, we have not seen signs of sufficient federal support to ensure important projects such as screening, fish passage and water efficiencies will take place. Without some funding assurance the LNFH sustainability goal cannot be satisfied.

6-4

**3. Projects considered for early implementation need to be clearly identified and evaluated to understand costs/benefits as a function of project sequencing.** It has been suggested by one IWG consultant (Aspect Consulting) and co-conveners that some projects might be ready for implementation without additional environmental review, but information about specific projects and sequencing of implementation from IWG consultant and co-conveners have been vague. This comment reiterates of one of the recommendations that we and numerous other entities proposed during the public scoping process for the DPEIS.

6-5

**4. Changes to Icicle-Peshastin Irrigation District (IPID) water use and water rights will rely on a tentative determination of the water rights including a beneficial use analysis.** Since all the Alternatives rely on an IPID water right change and approval by their Board

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- 6-5 of Directors, without a tentative determination and associated beneficial use analysis it remains impossible for us to understand what options exist for IPID-related projects.
- 6-6 5. **The DPEIS should provide clarity or a time-scale for what “short-term” and “long-term” mean with respect to the 60 cfs/100 cfs short-term and 250 cfs long-term instream flow Guiding Principle goals for discharge in lower Icicle Creek.** The DPEIS provides data as far in the future as the 2080s – is this long-term? Furthermore, the DPEIS should provide direction for what projects/actions may be implemented long-term that would help achieve the 250 cfs goal.
- 6-7 6. **The DPEIS incorrectly used non-drought and drought “scenario” data derived from exceedance probabilities using recent discharge observations to evaluate instream flow impacts resulting from proposed actions, both for current conditions and projected future conditions.** It should instead use 2014 and 2015 indicator years (2014 for non-drought conditions and 2015 for drought conditions) as stated in Chapter 2, pages 2-17 to 2-18. Using average exceedance scenarios effectively washes out (under-predicts) low flow conditions, a fact recognized by the DPEIS, and is not appropriate for demonstrating satisfaction of the instream flow Guiding Principle. The indicator year method should also be used to evaluate the impacts of each Alternative under future climate conditions using the University of Washington Climate Impacts Group report (Appendix F).
- 6-8 7. **Potential environmental impacts associated with flow augmentation using Wilderness lakes are not adequately evaluated.** We commend the methodology applied by Washington Department of Fish and Wildlife (WDFW) in their Icicle Creek Tributary Monitoring Report and agree with identified data gaps. We recommend more observations and additional affected creeks should be included, as well as analysis of the lakes themselves, to ensure protection of aquatic ecosystems and recreational fisheries. Documents that may be useful when determining how to assess current conditions and potential impacts include *Multi-Metric Index Development for Biological Monitoring in Washington State Streams* (Ecology, 2003) and *Final EPA-USGS Technical Report: Protecting Aquatic Life from Effects of Hydrologic Alteration* (USGS and USEPA, 2016).
- 6-9 8. **The DPEIS does not include an adequate range of alternatives, and it is premature to select a preferred alternative.** We suggest the addition of a pure conservation Alternative to a revised DPEIS. Rigorous conservation measures could enable satisfaction of the Guiding Principles and meet future water needs while minimizing impacts to Wilderness by eliminating the need for other expensive and controversial projects. A new pure conservation Alternative should include the IPID Full Piping and Pump Exchange and would not necessitate the OCPI legislative fix. Including information about ag land conversion and the accompanying water conservation opportunities is appropriate and should be included in any suite of actions.

## DETAILED COMMENTS

## Water Rights

- 6-10 TU and ICWC applaud the willingness of IPID to participate in the IWG despite what will require an open, public conversation about their water rights. However, we have also been clear through our IWG participation that certainty about IPID water rights is key to understanding what options might be available under the IWG. Changes to IPID water use and water rights will rely on a tentative determination of the water rights including a beneficial use analysis. In addition, the DPEIS proposes to convert IPID’s historical irrigation water right to include instream flow and municipal use by obtaining a new secondary use permit to authorize the re-operated water uses. Since all DPEIS Alternatives rely on a change to IPID water rights, approval by Ecology (and potentially USFS), and approval by IPID’s Board of Directors, it remains impossible for us to understand what options exist until these uncertainties are addressed. TU and ICWC are concerned that nearly all Alternatives rely on proposed but unconfirmed quantities of water.

## Instream Flow, Non-Drought and Drought Conditions/Scenarios, and Climate Change

- 6-11 1. The IWG Guiding Principles include instream flow goals for non-drought and drought conditions. The description of how the DPEIS defines these conditions is found in Chapter 2, pages 2-17 to 2-18. The DPEIS states that both ‘indicator’ years (i.e., observations from specific years – 2014 for non-drought and 2015 for drought) as well as exceedance probabilities (50% for non-drought and 80% for drought) were used. Exceedance probabilities can be difficult to understand. It would be helpful if these non-drought and drought exceedance scenarios were more explicitly defined, particularly for interested members of the public with less technical backgrounds. Furthermore, the years of observation for each exceedance probability scenario (50%/non-drought and 80%/drought) should be provided along with the associated discharge data. Discharge data for indicator years should also be provided. An explanation of and justification for the decision to evaluate Alternatives using discharge data on a weekly time step (rather than daily) should be provided. Finally, historic lake augmentation and Icicle Creek diversions are difficult or impossible to account in discharge observations collected by the United States Geological Survey (USGS) Icicle Creek Gaging Station #12458000, so the DPEIS should be explicit about the discharge data used when evaluating the effects of proposed Alternatives on instream flow.
- 6-12 2. In Chapter 2, pages 2-17 to 2-18, the DPEIS indicates that exceedance probabilities, which were used to develop non-drought and drought “scenarios” by averaging discharge observations across drought years and non-drought years, under-predict weekly low flows under both scenarios as a result of the averaging technique (low flows do not necessarily occur at the same time in any given set of years). The DPEIS also states that it is insufficient to consider the instream flow Guiding Principle met if the

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- 6-12 | annual quantities meet “average” drought or non-drought year conditions (i.e., exceedance probability scenarios). TU and ICWC agree with the DPEIS’s assertion that the instream flow Guiding Principle can only be satisfied if instream flow goals are met when the indicator non-drought and drought years are applied. We also agree that 2014 is a suitable indicator non-drought year and 2015 is a suitable indicator drought year.
- 6-13 | 3. DPEIS Chapter 2, page 2-17 states that when evaluating the effect of each Alternative on instream flow under non-drought and drought conditions, the evaluation used the indicator years of 2014 (representative non-drought) and 2015 (representative drought) for each Alternative and the exceedance probabilities (50%/non-drought scenario and 80%/drought scenario) as a comparison with indicator year conditions for Alternative 1 only. In fact, it appears the DPEIS instead used exceedance scenarios for each Alternative and applied the indicator years for comparison with exceedance scenarios for Alternative 1 only. TU and ICWC suggest that the DPEIS correct this error and provide the amended version for additional comment so the public can adequately review how proposed actions will impact streamflow conditions under observed flow regimes.
- 6-14 | 4. TU and ICWC appreciate inclusion of the University of Washington Climate Impacts Group (UW-CIG) report on *Changing Streamflow in Icicle, Peshastin, and Mission Creeks*. The report acknowledges that climate and hydrologic models were not specifically calibrated to each individual basin, and that hydrologic models assumed no change in land cover, which present some data uncertainties. The report also states that the purpose of the analysis was to provide a preliminary estimate of climate change impacts and implications of the preliminary evaluation will help determine if more detailed, site-specific modeling is warranted. TU and ICWC suggest the DPEIS discuss how information provided in the UW-CIG report is integrated with the effects of proposed actions on streamflow and the environment, and whether the results of this necessitate a more in-depth (site-calibrated) climate and hydrologic investigation.
- 6-15 | 5. With respect to the effects of proposed actions on instream flows under climate change conditions, TU and ICWC appreciate the application of 2080s projections to each Alternative found in the bar graphs in Appendix F that follow the UW-CIG report on *Changing Streamflow in Icicle, Peshastin, and Mission Creeks*, but we are curious why 2030s and 2050s information are not also included and applied to each Alternative. We also found that the DPEIS does not clarify what baseline data were used to develop the aforementioned bar graphs and after calling Aspect Consulting to obtain this information we learned the exceedance probability scenarios for recent discharge data (50%/average non-drought; 80%/average drought) were utilized. TU and ICWC strongly recommend the DPEIS remain consistent by following its assertion that it is insufficient to consider the instream flow Guiding Principle met using “average” non-drought and drought conditions when considering the effects of changing climate conditions on Icicle Creek discharge. TU and ICWC suggest the indicator year method for assessing the instream flow Guiding Principle for non-drought and drought climate change conditions be applied. Potential indicator year methods include:

- 6-15 | a. Applying the modeled percent change values from the UW-CIG report to the 2014 and 2015 indicator years identified in Chapter 2 of the DPEIS. This should include information about which model (or models, or average across models) is/are applied along with the associated percent change values.
- b. Using 2015 data as a proxy for non-drought conditions under 2080 climate change conditions. The UW-CIG report states that, on average, models project 2015 discharge conditions will become routine by the 2070s. The report also illustrates that hydrologic models for the 2080s forecast a percent change in Icicle Creek discharge that aligns with observed percent change in discharge during 2015, where percent change represents a departure from modeled historic normal (1970-2000). This methodology would require selection of suitable proxies for 2030s and 2050s non-drought conditions, as well as an appropriate technique for simulating drought discharge conditions for each future period.
- c. No matter what approach is taken, TU and ICWC recommend consultation with UW-CIG for appropriate data selection/application, and a thorough discussion of the methodology and justification within the DPEIS.
- 6-16 | 6. The bar graphs provided in DPEIS Chapter 2 and Appendix F illustrate the effects of each Alternative on instream flow when applied to recent discharge conditions and future climate conditions, respectively. While many Alternatives appear to (mostly) satisfy the 60 cfs/100 cfs short-term goals for drought and non-drought, respectively, Alternative 5 appears to be the only package where the 250 cfs long-term instream flow Guiding Principle goal may be met when applied to recent discharge conditions. There is no Alternative that appears to meet the 250 cfs goal for more than one week during the early August-early October low flow period under 2080s climate projections. TU and ICWC suggest the DPEIS provide a time scale to specify “short-term” and “long-term” and discuss if there are additional projects/actions that may be considered in future planning and management decision-making to achieve 250 cfs. We also reiterate our concurrence with the DPEIS assertion that the indicator year method must be used for evaluating the effects of each Alternative under specific flow scenarios to satisfy the instream flow Guiding Principle and again suggest the DPEIS be revised and resubmitted for public comment with the indicator year method applied.

**Water Conservation and Changing Land Use**

- 6-17 | Robust conservation measures can greatly reduce diversions from Icicle Creek and augmentation of Icicle Creek flows using the Wilderness lakes. While there are many excellent conservation projects included in the DPEIS, it does not adequately examine the potential of additional conservation and efficiency measures for all users, and more information is

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- 6-17 necessary to confirm proposed actions and conservation benefits. Furthermore, the DPEIS fails to adequately consider/discuss changing land use over time and potential future opportunities for water conservation as orchards are converted to residential land use.
- 6-18 1. The DPEIS does not include a full analysis of IPID actual water needs, but rather relies on the stated paper water rights. A tentative determination and beneficial use analysis by Ecology is needed before the full conservation potential can be accurately calculated.
- 6-19 2. The IPID Full Piping and Pump Exchange is a key conservation project option to include in a pure conservation Alternative. It provides the greatest conservation benefit - only the water that is actually needed by irrigators is taken out of the river. Its high projected cost would better align with other Alternatives if implementation of this project was included with other conservation projects and without expensive, impactful, and controversial Wilderness projects.
- 6-20 3. The DPEIS does not consider conversion of agricultural lands to residential use. When orchards are taken out and replaced with houses, water demand sharply decreases. Could future land use conversion and associated water conservation provide an opportunity to help reach the long-term goal of 250 cfs? Can a mechanism be put in place to transfer some water rights to instream flow? The Wenatchee Valley has and continues to experience orchard-to-residential conversion, and with few homes available in a market of many interested buyers, development pressure on agricultural lands is not expected to change in the foreseeable future. We understand the DPEIS cannot predict exact acreages and locations for agricultural-to-residential conversion but suggest discussion of the trend and implications for Icicle Creek water management strategies is warranted.

**Hydrologic Alteration of Natural Stream, Lake, and Riparian Conditions**

- 6-21 1. Discharge, temperature, and chemical effects of augmentation flow releases described in the Alpine Lakes Optimization and Automation Feasibility Study were analyzed by the Washington Department of Fish and Wildlife (WDFW) in their Icicle Creek Tributary Monitoring Report. The WDFW analysis, which included French Creek and Leland Creek during the 2017 augmentation season, found at least a doubling of natural flow conditions in each stream and temperature alteration that exceeded spawning and rearing conditions for ESA-listed bull trout. WDFW identified information gaps, such as travel time of augmentation flows and the natural hydrograph in Leland Creek, source of temperature increases approaching 5 degrees Celsius in Leland Creek during peak augmentation, and changes in water chemistry/dissolved oxygen of Prospect Creek and French Creek associated with augmentation flows. TU and ICWC concur with the WDFW conclusion that additional data and analysis are required. We strongly advise filling these identified data gaps and more comprehensive evaluation of the potential effect on aquatic ecosystems receiving augmentation flows. While we support improving the

- 6-21 health of the lowest reaches of Icicle Creek, we suggest the health of 42 miles of mostly Wilderness stream and riparian ecosystems not be damaged as a result.
- 6-22 2. The effects of flow augmentation releases and lake drawdown on the temperature, chemistry, biology, and general ecology of the lake ecosystems are not evaluated in the DPEIS. TU and ICWC suggest potential environmental impacts on the Wilderness lakes should be included for the DPEIS to comprehensively cover all environmental impacts associated with proposed actions. Again, while we support restoration of lower Icicle Creek we suggest the health of the Wilderness lakes not be impaired as a result.
- 6-23 3. Potential effects of discharge, temperature, and water chemistry alterations resulting from flow augmentation using the Wilderness lakes on specific organisms such as ESA-listed species, resident and anadromous salmonids, and other flora/fauna should be included in the DPEIS (e.g., how might flow augmentation impact bull trout, steelhead/rainbow trout, aquatic macroinvertebrates, etc.). Maintaining healthy, intact, unimpaired reaches throughout Icicle Creek and its tributaries is critical for ecological health and robust recreational fisheries.
- 6-24 4. TU and ICWC suggest additional investigation of proposed action impacts to the affected aquatic ecosystems be completed and incorporated in a revised DPEIS submitted for additional public comment. Documents that may be useful when determining how to assess current conditions and potential impacts include *Multi-Metric Index Development for Biological Monitoring in Washington State Streams* (Ecology, 2003) and *Final EPA-USGS Technical Report: Protecting Aquatic Life from Effects of Hydrologic Alteration* (USGS and USEPA, 2016).

Please do not hesitate to follow up with us for further discussion or clarification of our comments. We hope they are useful for crafting a revised DPEIS for additional public comment that will ensure the best possible long-term management of Icicle Creek water resources.

Sincerely,

Sharon Lunz, President  
Icicle Creek Watershed Council

Lisa Pelly, Director  
Trout Unlimited-Washington Water Project



**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 007

Comment Letter 007

Washington Water Trust   2018		
Icicle Cr Flow Restoration – PEIS Comments		
7-1	OVERALL COMMENT: The following represent comments by Washington Water Trust to the proposed Programmatic Environmental Impact Statement of projects of the Icicle Work Group. As a founding, and continuing, member of the Icicle Work Group, Washington Water Trust has maintained support for the overall approach of identifying suites of projects to restore flows to Icicle Creek, and therefore supports IWG approach and processes identified in the PEIS. Additional comments below are substantive edits as to the accuracy and detail of information provided in the PEIS regarding projects with which WWT has specific knowledge as a project sponsor.	7-10
	<b>General Comments</b>	
7-2	<ul style="list-style-type: none"> <li>Throughout the document, the project refers to a canal, but not the lateral distribution system. COIC includes a shared intake with LNFH, a main canal, and several laterals.</li> </ul>	7-11
7-3	<ul style="list-style-type: none"> <li>Overall the document did a good job capturing the benefits from the COIC project. WWT attests to the environmental benefits of this project, which will improve flows in the most flow-limited reaches of Icicle Creek by adding up to 11.9 cfs of flow below the current COIC diversion.</li> </ul>	7-12
	<b>Comments by Page</b>	7-13
7-4	<ul style="list-style-type: none"> <li><b>P. 2-58</b> – Please add the following language: During May-June of 2016, an alternative for a 6-8 cfs pump station was chosen by over 70% of the vote from COIC shareholders. The advisory group recommended additional contingencies including an additional shareholder vote to approve selection of a preferred pump station site. In January of 2017, COIC shareholders gave preliminary approval to up to 3 alternatives for a pump station site.</li> </ul>	7-14
7-5	<ul style="list-style-type: none"> <li><b>P. 2-59</b> - The map can be updated with a final pump site – additional information can be provided by WWT once a final site is chosen.</li> </ul>	7-15
7-6	<ul style="list-style-type: none"> <li><b>P. 2-60</b> - WWT cost estimates for the project are currently at \$4.7 million for an up to 8 cfs system.</li> </ul>	7-16
7-7	<ul style="list-style-type: none"> <li><b>P. 2-86</b> – WWT can attest to the project benefits described here. The SEPA document correctly explains that a new COIC POD would have a compliant fish screen and that moving COIC's diversion would also enable LNFH to site and design their own diversion and screen improvements in a way that only required consideration of the operational needs of LNFH.</li> </ul>	7-17
7-8	<ul style="list-style-type: none"> <li><b>P. 2-90</b> - Regarding quantities and costs, WWT will have more refined estimates (cfs, AC/ft, cost, cost per acre feet) as the project develops in successive design and construction. This statement also applies to information regarding the COIC project on p. 2-97, p. 2-101, p. 2-112, and p. 2-119 of the PEIS.</li> </ul>	7-18
7-9	<ul style="list-style-type: none"> <li><b>P. 3-41</b> – Regarding the table analyzing the number of parcels served, as they relate to COIC, this is a dynamic quantity that can change over time with management decisions. Numbers of parcels served may change during the course of the PEIS and EIS processes.</li> </ul>	7-19
7-10	<ul style="list-style-type: none"> <li><b>P. 4-20</b> - Also conform this to the instream benefits described on p. 3-14. The water right for COIC, in its original documentation, lists its season of use as “during the irrigation season”, so both references should restate as “during the irrigation season, as specified by the water right, historically between April and October.” Pump station sites on both the Wenatchee River and Icicle Creek are being considered. In the event the pump station is built on the Wenatchee River, it would be located about .3 miles upstream from the Icicle Creek</li> </ul>	

confluence. The resulting reduction in flows in this reach of the Wenatchee River would be equal to the actual quantity of water diverted by COIC, currently estimated at up to 8 cfs at peak demand, but usually much less than this..

- P. 4-41** - In both pump station locations, the full 11.9 cfs of the COIC water right would likely be protected instream below the diversion and in the natural channel of Icicle Creek to a point below LNFH. Below LNFH, up to 8 cfs of flow would be protected further downstream to the new point of diversion in Icicle Creek, or to the confluence of Icicle Creek with the Wenatchee River in the event the pump station is built on the Wenatchee River. All of these quantities are subject to final review of the proposed change by the Washington Department Ecology, as the writers of this PEIS are not arbiters of water rights and/or have not passed the water rights through a Washington State water rights change process.
- P. 4-24** – Check the language here: The slight upstream move on the Wenatchee River would likely be permissible, but any case, as in 4-41, would be subject to state law, as determined by the Report of Examination by the Washington Department of Ecology.
- P. 4-50** – There is a typo in the sentence, "In addition, relocating the COIC diversion would conserve water and potentially increase instream flow downstream of RM 5.7 to the Wenatchee River." The correct RM is 4.5.
- P. 4-85** – **EDIT** - "In the long term, this project would contribute to beneficial increases in instream flows in Icicle Creek from RM 4.5 to its confluence with the Wenatchee River, or to the Icicle Creek Pump Station near RM .75 in the event this pump station site is used."
- P. 4-86** – “however, this would present a negligible impact to fish that are already adapted to naturally elevated flow during this time of year.” You should clarify that the creation of rearing habitat is just one function provided by flow. Increased flow at this time would also be expected to improve outmigration conditions.
- P. 4-153** - Irrigation season as May through September should be corrected to “during the irrigation season, as specified by the water right, historically between April and October.” Also, “COIC is considering relocating their point of diversion from Icicle Creek to a location on the Wenatchee River. Construction-related activities would include installing a new diversionary structure near or on the Wenatchee River, installing conveyance piping, and decommissioning COIC-specific diversionary works on Icicle Creek.” Change to: COIC is considering relocating their point of diversion from Icicle Creek to a point either on the Wenatchee River or Icicle Creek, near the confluence. Construction-related activities would include installing a new diversionary structure at these downstream sites and installing conveyance piping. (there are no COIC-specific diversionary works to decommission).
- P. 4-270** – “Impacts from work at the existing COIC diversion on Icicle Creek would be limited to kayaking and fishing. Based upon the small footprint of these projects and the temporary nature of the disturbance, meaningful impacts to existing water-dependent recreational activities are unlikely.” No work is planned on the existing COIC diversion as part of the COIC project.
- P. 4-283** – Correct this sentence: Under the COIC Irrigation Efficiencies and Pump Exchange Project, construction-related activities would include installing a new diversionary structure on the Wenatchee River to: Under the COIC Irrigation Efficiencies and Pump Exchange Project, construction-related activities would include installing a new diversionary structure on the Wenatchee River or on Icicle Creek.
- P. 4-320** – “The COIC pump station on the Wenatchee River would likely use solar power to operate; thus, there are no anticipated impacts to electrical utilities.” Need to add “or Icicle Creek.” This statement is not accurate. The pump station will use PUD power, actually, and



## Comment Letter 007

## Comment Letter 008

- 7-19 | tie into 3-phase power systems. Appropriate coordination with the PUD will take place to facilitate this.
- 7-20 | • **P. 4-327** – “Under the COIC Irrigation Efficiencies and Pump Exchange and Pump Exchange Project, construction activities, such as canal piping and building a pump station, would impact transportation by increasing traffic from construction worker commuter trips and slowing traffic from heavy equipment transport. No roadway closures are anticipated and standard safety procedures would be followed for transport of heavy equipment.” I don't think we can say that no roadway closures are anticipated, particularly since the conveyance structures cross some roads. Perhaps better characterized that road access may be limited to single lane closures and would include consultation with local public utilities and transportation authorities in accordance with state and local laws”

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**From:** Daryl Harnden <deharnden@gmail.com>  
**Sent:** Saturday, July 14, 2018 5:43 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Strategy

- 8-1 | I support Alternative One as presented by the Icicle Working Group at the public meeting on June 27. As a member of the Icicle working Group I have been involved in developing this alternative and I believe it will achieve all the goals set by the working group. Daryl Harnden

Sent from [Mail](#) for Windows 10

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 009

Comment Letter 009



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

July 30, 2018

Mr. Mike Kaputa, Director  
Chelan County Natural Resource Department  
411 Washington St., Suite 201  
Wenatchee, WA 98801

Re: Icicle Water Strategy PEIS

Dear Mr. Kaputa,

9-1

I am writing on behalf of the Yakama Nation to offer our comments on the captioned subject. The Confederated Tribes and Bands of the Yakama Nation is a federally-recognized Indian tribe with certain rights that were reserved in the Treaty of June 9, 1855 with the United States (12 Stat. 951). Among these reserved rights, Article III reserved the right to fish at "all usual and accustomed fishing places" in perpetuity. One such place near present-day Leavenworth was so important to certain tribes at the Walla Walla treaty grounds that it was specifically identified as the "Wenatshapam Fishery" and reserved, along with a six square-mile parcel of land, in Article X of the Yakama Treaty. Both the land and the fishery were subsequently lost when federal surveyors found that the Northern Pacific Railroad and the town of Leavenworth were built within the intended Article X reservation. A remnant of that historical tribal fishery was resurrected in 1987 and continues to this day in Icicle Creek. This fishery is one of few remaining opportunities for tribal members having ancestral ties to that area to harvest the prized spring chinook salmon that return to Icicle Creek.

The Yakama Nation maintains a continuing and vital interest in the Treaty trust resources potentially affected by water management decisions in Icicle Creek, particularly those affecting ESA-listed fish and the spring chinook salmon produced at Leavenworth National Fish Hatchery. Pursuant to our responsibilities under traditional law and custom, and in the interests of our fisheries, we must work to preserve and enhance these resources wherever possible. Tribal fisheries on the lower Columbia River are regulated to a great extent by the abundance of ESA-listed spring chinook and steelhead, some of which originate in the streams and rivers of the upper Columbia River including Icicle Creek. Leavenworth NFH was constructed as partial mitigation for salmon losses associated with the construction of Grand Coulee Dam, which was built without fish ladders and blocks access to roughly one-third of the salmon-producing watersheds in the Columbia Basin. Accordingly, the Yakama Nation regards Leavenworth NFH as a promise by the United States to replace, in small measure, the damage incurred by tribal fishers from construction of Grand Coulee. We believe the United States should keep its promises; accordingly, we expect that the hatchery mitigation program will persist as long as the dam for which it was created still stands.

Post Office Box 151, Fort Road, Toppenish, WA 98948 (509) 865-5121

9-2

The Yakama Nation recognized the proposed Icicle watershed planning process as both a potential opportunity and a potential threat to our resource interests at its inception in 2012. As a member since inception, we have witnessed a diverse coalition of stakeholders, assembled as the Icicle Watershed Group (IWG), invest considerable time and effort to describe, consider, and address the effects of climate change that already challenge the conservation and management of our trust resources in the Icicle watershed. The result of this investment and these efforts is the so-called "Base Package" of actions presented as Alternative 1 in the PEIS. Alternative 1 is the product of extensive analysis, negotiation, compromise, and general acceptance by the members of the IWG. As such, it represents a defensible, broadly-supported, and cost-effective climate change adaptation plan that should be selected in the ROD for this SEPA review.

Sincerely,

Gerald Lewis, Chairman  
Fish and Wildlife Committee  
Yakama Tribal Council

cc: Fish and Wildlife Committee  
Yakama Nation DNR  
Fisheries Resource Management Program  
OLC – Ethan Jones  
Tribal Attorney Tom Zeilman  
NOAA-Fisheries – Dale Bambrick  
USFWS – Dave Irving  
WDFW – Jim Brown  
CCT – Randy Friedlander

## Comment Letter 010

## Comment Letter 011



July 26, 2018

Mr. Mike Kaputa  
Chelan County Natural Resource Department  
411 Washington St., Suite 201  
Wenatchee, WA 98801

RE: Programmatic Environmental Impact Statement for Icicle Water Strategy, Chelan County, WA

Dear Mr. Kaputa:

10-1 The Washington State Department of Agriculture (WSDA) has reviewed the May 2018 Programmatic Environmental Impact Statement (PEIS) for the Icicle Water Strategy in Chelan County, Washington. WSDA supports the Base Package, Alternative 1, given that it represents the best balance for all water needs in the basin after four years of intensive study by the working group.

Alternative 1 includes recommendations that meet all seven of the Icicle Working Group Guiding Principles; these objectives were agreed upon by all working group members in December 2012 and include goals focused on improving ecological function in Icicle Creek as well as the need to provide reliable water resources for agriculture and domestic water users.

This alternative seeks to improve water availability by modernizing and automating the outlet works and gate infrastructure at seven lakes in the Alpine Lakes Wilderness Area, improving irrigation water delivery and on-farm efficiencies in the Icicle-Peshastin Irrigation District, augmenting streamflow by moving a diversion and improving water delivery for Cascade Orchard Irrigation Company, and rebuilding the Eightmile Lake dam to restore usable storage. Many other improvements are included and focus on conserving and protecting water resources for tribal and non-tribal fisheries and future domestic water needs. As proposed, Alternative 1 would result in providing 89 cfs and 31,958 acre-feet of total water benefit, exceeding the minimums needed in low water years for fish and wildlife, agriculture, and domestic uses. Ultimately, this provides resource managers with tools to balance water needs in the face of a changing climate and aligns with state and Federal laws.

WSDA appreciates the efforts of Chelan County, the Department of Ecology's Office of the Columbia River, and Icicle Working Group members in addressing the water needs in this sub-basin. Again, we support implementation of Alternative 1 (Base Package) as a means of meeting the 7 Guiding Principles of the Working Group and appreciate the opportunity to provide comment on the PEIS.

Sincerely,

Derek I. Sandison  
Director

cc: Tom Tebb

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**Will Guyton**

**From:** Mike Kaputa  
**Sent:** Tuesday, July 31, 2018 9:43 AM  
**To:** Mary Jo Sanborn  
**Subject:** FW: Comments - DPEIS for Icicle Creek WRMS

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**From:** Johnson, Deborah L (DOH) [mailto:deborah.johnson@doh.wa.gov]  
**Sent:** Monday, July 30, 2018 7:31 PM  
**To:** Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>  
**Cc:** Tebb, G. Thomas (ECY) <GTEB461@ecy.wa.gov>  
**Subject:** Comments - DPEIS for Icicle Creek WRMS

Thank you for the opportunity to review and comment upon the Draft Programmatic Environmental Impact Statement for the Icicle Creek Water Resource Management Strategy. While this office focuses on drinking water, we recognize that it is challenging to adequately balance water resources allocations and planning between domestic supply, fish, and irrigation and to address the needs of numerous stakeholders who may have competing interests. We strongly support this endeavor to address Icicle Creek's ecological functions and evaluate future supply through a sustainability & climate change lens.

11-1 **1.5.1.4 Improve Domestic Supply.** The 2006 Wenatchee Watershed Plan is cited as projecting 31 new homes in the Icicle Creek Subbasin through 2014, with additional development demand at 4.7 homes per year; from 2014 through 2050, approximately 169 new homes were anticipated. Since the plan is now 12 years old, & it's currently four years past the initial projection period, it would be possible to include a measure of these projections. From 2006 through 2014, how many new housing starts occurred in the area? Whether 2006-14 growth did not meet, just met, or exceeds the estimate of 31 might offer a better idea of how on-target these estimates are & could potentially offer a basis for reevaluation.

11-3 The 2011 City of Leavenworth Water System Plan (WSP) is cited in this section as well ("future demand through 2050"). Leavenworth's WSP update has been adopted & was approved by DOH on June 21, 2018 – see <http://cityofleavenworth.com/col-assets/uploads/2018/02/14-10-01-Leavenworth-WSP-final-2018.pdf>. This is noted in Chapter 3 (p. 3-147). Targeted reanalysis would be appropriate where the 2011 version is cited. If they differ, data from the 2018 update should be used. (This should also be updated in 1.11 Documents Adopted under SEPA, which refers to the 2011 version. The consultant is the same.) The 2011 version is also referenced in 3.4.3 (p. 3-24).

11-4 **1.10.23 Critical Areas Review.** The Chelan County regulations cited would apply only to unincorporated areas. Within incorporated areas (Cashmere, Leavenworth, & Wenatchee), the cities' own comprehensive plans & regulations for critical areas & zoning would apply. This same comment is applicable to 1.10.22, 1.10.24, & 3.16.1.3. It may apply to other sections within the document where exclusively the County's code is discussed, such as 3.2.4 & 3.2.4.3.

11-5 **1.10.25 Water System Plan Update.** Suggest modifying the section title to read "Water System Plans." WAC 246-290-100 deals with basic content of WSPs overall (both new & updates). You may wish to reference "Part 2 of Chapter 246-290 WAC" (which encompasses WAC 246-290-100 through -140) which addresses all planning/engineering documents.

11-6 I believe the reference to "any new group" was probably meant to say any "new Group A system." At the same time, a Group A system isn't defined as one serving "1,000 or more connections or [meeting] other requirements." That language is drawn from WAC 246-290-100(2)(a), with "other requirements" referring to ss. (b) through (g), describing the categories of community public water systems that must submit a WSP to DOH for review. It would probably be

# ICICLE CREEK SUBBASIN PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

## Comment Letter 011

- 11-6 | most accurate to modify this sentence to say: "Water system planning is required under Part 2 of Chapter 246-290 WAC for any community public water system meeting certain thresholds set forth in WAC 249-290-100."
- 11-7 | The sentence about updates is partially correct; a WSP update would be triggered by any of the listed items, which come from WAC 246-290-100(2)(e). But regardless, a WSP must be updated at least every ten years (or less, depending on the DOH approval period – see WAC 249-290-100(9)).
- 11-8 | **2.3.1 Domestic Conservation.** Municipal Water Law was the common name of 2003 state legislation. Today, it would be more accurate to refer to RCW 70.119A.180 (the complementary rule is Part 8 of Chapter 246-290 WAC).
- 11-9 | **Chapter 3 (generally).** Dryden, Monitor, Peshastin, and Sunnyslope are variously called cities or towns throughout Chapter 3. On p. 3-133, Dryden is said to have its own comprehensive plan. These are not incorporated areas with their own governance structure but instead are part of unincorporated Chelan County. None should have its own comp plan unless the County has prepared a subarea plan for that specific area.
- 11-10 | **3.16.1 Regulatory Setting.** Suggest substituting "State Growth Management Act & local planning/regulations thereunder" for the last 3 bullets, to be consistent with the initial part of the list & also how it is presented in 3.16.1.2. Also, "The Forest Practices Act" should probably say "State" for clarity.
- 11-11 | **3.19.1 Water Purveyors.** While City of Leavenworth may be the largest purveyor within the area, it is not the only Group A system. If a full list of purveyors is desired, see <https://fortress.wa.gov/doh/eh/maps/SWAP/index.html> (includes wellhead protection area depictions).
- 11-12 | **Chapter 4 (generally).** The evaluation of domestic conservation efficiencies (repeated for each alternative & differing impact scenarios by environmental element throughout this chapter) refers to City of Leavenworth but sometimes also Chelan County, although Chelan County isn't a water purveyor. Is this meant to refer to the Chelan Co. PUD?

This concludes our comments. Please let me know if you have any follow-up questions or need additional information.

**DEBORAH JOHNSON**  
Wellhead Protection Specialist  
Office of Drinking Water  
Environmental Public Health Division  
Washington State Department of Health  
[deborah.johnson@doh.wa.gov](mailto:deborah.johnson@doh.wa.gov)  
360-236-3133 | [www.doh.wa.gov](http://www.doh.wa.gov)



## Comment Letter 012

Alpine Lakes Protection Society • The Wilderness Society  
American Whitewater • Aqua Permanente • Center for Environmental Law & Policy  
Conservation Congress • Doug Scott Wilderness Consulting  
El Sendero Backcountry Ski & Snowshoe Club • Federation of Western Outdoor Clubs  
Friends of Bumping Lake • Friends of the Clearwater • Friends of Enchantments  
Friends of Lake Kachess • Friends of Wild Sky • Great Old Broads for Wilderness  
Icicle Creek Watershed Council • Issaquah Alps Trails Club • Kittitas Audubon Society  
The Mazamas • Middle Fork Recreation Coalition (MidFORC)  
North Cascades Conservation Council • North Central Washington Audubon Society  
River Runners For Wilderness • Save Our Sky Blue Waters • Seattle Audubon Society  
Sierra Club • Spokane Mountaineers • Spring Family Trust for Trails  
Washington Wild • Wild Fish Conservancy • Wilderness Watch

July 30, 2018

Submitted via email to: [nr.iciclespa@co.chelan.wa.us](mailto:nr.iciclespa@co.chelan.wa.us)

Tom Tebb  
Director, Office of Columbia River  
Washington Department of Ecology  
1250 Alder Street  
Union Gap, WA 98903

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

RE: **Comments on Draft Programmatic Environmental Impact Statement (DPEIS)  
for the Icicle Creek Water Resource Management Strategy**

Dear Directors Tebb and Kaputa:

Thank you for the opportunity to provide comments on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Icicle Creek Water Resource Management Strategy. Many of the undersigned organizations provided comments in 2016 during the scoping period for the DPEIS. As you will see below, many of the concerns highlighted during the scoping period still remain despite the efforts of the Icicle Work Group (IWG) to scope and refine the range of alternatives presented in the DPEIS. **Because of the range of deficiencies in the DPEIS outlined below, the Washington State Department of Ecology (Ecology) and Chelan County should withdraw, revise, and re-release the DPEIS once the deficiencies are addressed.**

12-1

12-2

With multiple demands, and a changing climate, it will be challenging to meet instream flow targets, ensure agricultural reliability, enhance hydrologic function of the basin, and protect wilderness values. But that is the task taken on by this DPEIS. We believe there is a package

## Comment Letter 012

Comments on Icicle DPEIS – July 30, 2018  
Page 2

- 12-2 | based in strong conservation measures that can accomplish those goals, but the current alternatives in the DPEIS do not.

**Wilderness Values**

The undersigned organizations have come together out of our concern and respect for the Alpine Lakes Wilderness and its Enchantment basin. This area is one of the most iconic and treasured natural resources in the entire National Wilderness Preservation System. These are national interest lands, owned by everyone in the nation and protected by Congress to preserve their wilderness character. As detailed in the DPEIS, thousands of hikers explore and visit this area each year and a myriad of wildlife species depend on the critical habitat it provides. Our organizations and members have great interest in the management and stewardship of these lands, and are committed to working to ensure wilderness, recreation, scenic, and other natural resource values are protected into the future.

**Tribal Treaty Rights**

We recognize and respect the importance of the salmon in the Wenatchee River watershed to the Treaty Rights of the Yakama Nation and Colville Confederated Tribes and both the wild stocks and the hatchery stocks developed to mitigate for the construction of the Grand Coulee Dam, which eliminated spawning habitat for huge numbers of wild salmon and other fish species.

**Valid Existing Water Rights**

We also recognize valid, prior existing water rights in the Wenatchee River basin for agriculture, and the importance of that local source of food and the economic benefits to Chelan County and the region.

- 12-3 | **Positive Project Elements**

There are some project elements presented in the DPEIS that the undersigned organizations could support as part of a comprehensive plan that meets the requirements for fish, agriculture and wilderness preservation while simultaneously reducing water diversions and making meaningful investments in domestic and agricultural water conservation. Favorable elements in the DPEIS include: piping and pumping systems, additional domestic conservation, critical upgrades (such as circular ponds) of outdated hatchery infrastructure, fish passage and habitat improvements, and telemetric control of valves at the existing dams. However, there are fundamental flaws in the DPEIS as discussed below that must be addressed before this process moves forward.

**Improper Constraints of IWG Guiding Principles**

- 12-4 | IWG does not have broad-based support. Chelan County defines IWG as “made up of a diverse set of stakeholders representing local, state and federal agencies, tribes, irrigation and agricultural interests and environmental organizations.” While at IWG’s inception it included

Comments on Icicle DPEIS – July 30, 2018  
Page 3

- 12-4 | more nonprofit environmental organizations, today only three remain. Important environmental groups have departed IWG, including the Center for Environmental Law and Policy and Wild Fish Conservancy—groups that capture broad environmental values. The Icicle Creek Watershed Council also announced its departure last year, but the group has since rejoined IWG albeit on a provisional basis due to outstanding concerns related to the limited investment in water conservation and the degradation of the beauty and ecology of the Alpine Lakes Wilderness.

Furthermore, many groups who have been invited to the table have declined to join, including the Alpine Lakes Protection Society, The Wilderness Society, and Chelan-Douglas Land Trust, due to concerns about scope of the projects, IWG unwillingness to make adjustments to the proposal, IWG’s prohibition on public criticism, IWG refusal to treat westside owners of these public lands the same as eastside owners of these public lands, or for other reasons. While this “broad-based coalition” of IWG involves federal agencies, municipalities, tribes, and irrigation districts, it falls short in representation from the conservation and recreation community. Consequently, for this non-representative, self-selected group to create “guiding principles” that then become the purpose and need of the DPEIS is self-serving and problematic.

**Deficiencies of DPEIS**

- 12-5 | At present, the range of alternatives currently presented in the DPEIS includes actions unprecedented in a federally designated wilderness area and threatens to exploit one resource (i.e., the wilderness and the water it provides) under the guise of protecting another (i.e., fish in Icicle Creek). Chelan County and Ecology can and should do better to meet instream flow targets, ensure agricultural reliability, enhance hydrologic function of the basin, and protect wilderness values. As proposed, the alternatives analyzed in the DPEIS fail to do so.

SEPA expressly requires an EIS to contain a detailed discussion of alternatives to the proposed action. RCW 43.21C.030. “The required discussion of alternatives to a proposed project is of major importance, because it provides a basis for a reasoned decision among alternatives having differing environmental impacts. Pursuant to WAC 197-11-440(5)(b), the reasonable alternatives which must be considered are those which could ‘feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.’” *Weyerhaeuser v. Pierce County*, 124 Wn.2d 26, 38, 873 P.2d 498 (1994). When, as in this case, the proposal is for public projects, “the EIS must contain a sufficient discussion of offsite alternative proposals.” *Id.* at 39. Also, “there must be a reasonably detailed analysis of a reasonable number and range of alternatives.” *Id.* at 41.

The DPEIS lacks a sufficient discussion of offsite (i.e. non-wilderness) alternative proposals and does not analyze a reasonable range of alternatives, as the *Weyerhaeuser* decision requires. Although the DPEIS does list five alternatives plus a no-action alternative, only one of these alternatives (Alternative 5) relies primarily on an off-site proposal (Full IPID Pump Station). Furthermore, all of the alternatives repeat the same Eightmile dam “Restoration” project (construction of a dam in a wilderness area), and thus the DPEIS cannot fulfill SEPA’s requirement for analysis of off-site projects. The alternatives are mere variations on the theme of

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- 12-5 | building dams, pumps, and pipes inside a wilderness area. As discussed below, it is likely that such construction will be unlawful under the Wilderness Act, a problem the DPEIS does not even acknowledge. Because all of the alternatives involve construction in the wilderness, they do not represent “a reasonable range of alternatives,” as required by the *Weyerhaeuser* decision.

Our specific concerns and recommendations for moving forward with the DPEIS process include:

- 12-6 | **1. The entirety of the DPEIS rests on a flawed assumption of “paper water,” not “real water” based on the actual water usage by the primary water rights holders in the Icicle basin. Ecology must perform an extent and validity determination for the three primary water rights holders in the basin before a new DPEIS and alternatives are developed and released for public comment.**

One thing is clear in the DPEIS: the Icicle Peshastin Irrigation District (IPID) has a paper right to an extraordinary amount of water relative to other water rights holders in the basin, and Chelan County, Ecology, and the City of Leavenworth all want a portion of it to meet their needs. It is also clear that under Western water law, water rights holders must use the water or risk to lose it, simply phrased as “use it or lose it.” See RCW 90.14.170-190 (water rights relinquished if not actually used for five consecutive years). See also *Dept. of Ecology v. Theodoratus*, 135 Wn.2d 582, 592–597, 957 P.2d 1241 (1998) (water rights are based on actual, beneficial water use, not installed capacity of water systems).

The condition of IPID’s water infrastructure in the Icicle basin shows that in its near 80 years of operation, IPID has not maintained its facilities to actually store and use its full water right. This was recently demonstrated in the 2018 Eightmile dam emergency, where the risk of heightened spring flows led to emergency stabilization efforts at the delapidated dam. At Eightmile Lake, a portion of the earthen dam washed away in a 1990 flood event, and IPID did not take steps to restore the dam at that time. Since then—for the last 28 years—IPID has annually released approximately 1,400 (and up to 1,600 acre-feet) at Eightmile Lake (DPEIS, 2-63). The DPEIS states that the condition of the existing facilities at Eightmile Lake has limited the active storage volume to 1,370 acre-feet with an operational range of 23 feet (DPEIS, 3-48).

It is clear, therefore, that IPID has relinquished at least part of its paper water rights. How much of its water rights have been relinquished is precisely the question that a proper PEIS must answer. Yet the DPEIS specifically fails to account for IPID’s potential relinquishment of part of its water rights at Eightmile Lake, despite consistent questions and concerns raised by many groups since the genesis of the Icicle Work Group efforts. The DPEIS and all of its alternatives—including the No Action Alternative—assume that IPID has a right to its full paper right at all of the wilderness lakes, including 3,500 acre-feet at Eightmile Lake (as described in Alternative 4, DPEIS, p. 2-103). IPID has never utilized this much water in the entire history of its operation. Water that IPID has not used now belongs to the federal government under the

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- 12-7 | federal reserved water right doctrine.<sup>1</sup> If the Eightmile Lake dam is rebuilt, it should remain at its current elevation, where it has been since at least 1990, because that elevation is the largest necessary to support whatever remains of IPID’s relinquished water right. In addition, as discussed below, any dam rebuilding must be approved by the U.S. Forest Service and must comply with the National Environmental Policy Act (NEPA) and other federal and state laws. These points also apply to the U.S. Bureau of Reclamation and the U.S. Fish & Wildlife Service in connection with new storage proposed at Snow and Nada Lakes.

- 12-9 | The most egregious misinterpretation of IPID’s water rights is represented in Alternative 4, where massive storage projects are analyzed that result in far more water storage than is needed, at the expense of wilderness values and natural hydrologic function of the basin. Alternative 4 also includes the false assumption that IPID has a right to water at Upper Klonauqua Lake, to which the IPID has no right.

- 12-10 | Finally, Ecology has confirmed that it has not made an extent and validity determination of either IPID or the Leavenworth Fish Hatchery, as stated in a letter to The Wilderness Society on June 14, 2018:

*“The IPID and the Leavenworth National Fish Hatchery both have storage water rights that originate within the Alpine Lakes Wilderness... At this time, Ecology has not made an extent and validity determination of either IPID or the Leavenworth National Fish Hatchery’s diversionary or storage water rights.”*

In other words, the issue of how much water is legally available is not known and has not been addressed.

- 12-11 | Failure to revise the DPEIS to account for IPID’s possible relinquishment of some of its water rights would constitute a violation of SEPA. SEPA requires an EIS to analyze reasonable project alternatives. “SEPA rules define ‘reasonable alternatives’ as less environmentally costly action that ‘could feasibly attain or approximate a proposal’s objectives.’” *King County v. Central Puget Sound Growth Management Bd.*, 138 Wn.2d 161, 183, 979 P.2d 374 (1999) (citing WAC 197–11–786). Here, a less environmentally costly action that still achieves the proposal’s objectives would be to limit the dam repair work to the minimum necessary to support IPID’s post-relinquishment water rights, not IPID’s paper water rights or its installed water system capacity. There is no justification to “overbuild” the dams to support a water right that no longer exists.

<sup>1</sup> See *U.S. v. New Mexico*, 438 U.S. 696, 698–700, 98 S.Ct. 3012, 57 L.Ed.2d 1052 (1978). The reserved federal water rights apply only if the federal land reservation pre-dates the state-law claim, and only to the extent necessary to accomplish the primary purpose of the federal reservation. In this case, the National Forest reservation occurred in 1897, according to USFS’s website, which pre-dates IPID’s 1927 water rights adjudication. The purposes of the National Forest reservation, per *U.S. v. New Mexico*, are to “improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber” (citing 16 U.S.C. § 475). Thus, the federal government in this case has reserved rights to any water from the Alpine Lakes Wilderness necessary to accomplish these purposes.



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- 12-11 | Instead, the DPEIS should analyze how much of IPID’s water rights remain and should analyze the impact of building the dams to support that level of service. It is necessary to conduct this analysis because, if IPID has relinquished some of its rights, then *none* of the alternatives analyzed in detail in the DPEIS will be feasible anymore, since all rely on the assumption of un-relinquished rights.
- It is alarming that Ecology, the co-convenor of IWG and co-lead agency of the Icicle DPEIS, has allowed the IWG process to consume significant time and public funding since 2013 without determining such a fundamental question, especially since groups such as the Alpine Lakes Protection Society and The Wilderness Society have been bringing this specific issue to Ecology’s attention for years. Ecology must perform that determination now to inform a revised DPEIS before more public money is spent on the Icicle watershed management planning process. The public cannot comment upon the merits of Ecology’s determination until after Ecology makes it and discloses it. This is a fundamental reason why the preparation of a Final PEIS would be premature; the DPEIS should be revised to address its deficiencies, and a revised DPEIS should be released for public comment, before a final EIS is prepared.
- 12-12 |
- 12-13 | **2. The alternatives and range of projects identified in the DPEIS do not currently comply with the Guiding Principles of the Icicle Work Group, including compliance with federal laws such as the Wilderness Act. The perfunctory checklist in the DPEIS is clearly inadequate. A revised DPEIS needs to analyze limitations on the scope and validity of IPID’s water rights, which would limit several proposals; acknowledge areas of non-compliance; and identify the appropriate path forward to ensure complete compliance with federal law.**
- One of the seven IWG guiding principles cited in the Icicle DPEIS is to “comply with State and Federal Law, and Wilderness Acts.” Several layers of law are relevant to the projects and actions described in the DPEIS, and the interpretation of those laws will determine the viability of the projects proposed, specifically the construction of new dams at Eightmile and Snow Lakes and a tunnel between the Upper and Lower Klonauqua lakes, as well as automation and optimization efforts throughout the wilderness lake system. At present, the DPEIS fails to meaningfully consider fundamental legal issues that will determine which projects can and cannot be built, including federal wilderness law and state water law.
- The DPEIS is insufficient because the lead agencies have declined to consider what they are legally permitted to do in the first place, under the “minimum necessary” standard of the Wilderness Act. The time to make that determination is during SEPA review to daylight the government’s decision-making process and facilitate meaningful public comment (which are two of the main purposes of SEPA), not afterward. It is nonsensical to suggest that years of effort and significant taxpayer dollars should be expended to evaluate alternatives that are likely to be unlawful in the first instance. The agencies here appear to be procrastinating their resolution of issues that are difficult but necessary to resolve. Two glaring examples include: (1) the DPEIS erroneously assumes that IPID’s easements supersede federal wilderness law; and (2) the DPEIS fails to fully analyze limitations on the scope and validity of IPID’s water rights, which would limit several proposals (as discussed above).
- 12-14 |
- 12-15 |

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On March 30, 2018, the U.S. Forest Service wrote to IPID that its dam repair/replacement proposal “contains elements that are beyond the scope of the rights reserved by IPID in the Special Warranty Deed.” The Forest Service requested IPID to “submit a detailed proposal” for both the emergency abatement and any long-term actions to replace the dam, and stated:

*“Any modification to the dam and ground disturbance (equipment operation, road construction, etc.) of the surrounding lands may require a Special Use Authorization from the Forest. The federal action of authorizing activities on National Forest Lands is subject to a wide variety of laws including (but not limited to): Wilderness Act, National Environmental Policy Act (NEPA), National Historic Preservation Act, and Endangered Species Act (ESA).”*

As the DPEIS Purpose and Need section acknowledges, the U.S. Forest Service manages 87 percent of the land in the Icicle sub-basin, 74 percent of which is located within the Alpine Lakes Wilderness. All of the lakes discussed in the DPEIS are located within the Alpine Lakes Wilderness, which adds multiple layers of federal law to consider for all actions proposed on federal land, most notably the 1964 Wilderness Act, 1976 Alpine Lakes Area Management Act, and the 1981 Alpine Lakes Wilderness Management Plan (ALWMP). Relevant direction from these laws is cited below and requires federal interpretation and development of guidance for federal actions in relation to the Icicle DPEIS, which has not been completed despite recommendations for such analyses during the 2016 scoping period for this DPEIS.

The DPEIS fails to address the Wilderness Act requirement of federal approval of facilities that are not compliant with wilderness regulations. Furthermore, Section 4(c) of the Wilderness Act relates to the concept of minimum tool requirements, applicable to activities such as access to inholdings and maintenance of water developments in wilderness:

*Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area. [emphasis added]*

This provision sets such a high bar for the utilization of these nonconforming uses that these uses are unlikely to be available for the wilderness projects described in the DPEIS.

Specific management guidance for water resources in the Alpine Lakes Wilderness is provided in the 1981 ALWMP:

*Management Objective: to preserve water bodies and stream courses in a natural state with minimal modification or human-caused contaminants. . .*

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- Management Direction: (1) except as provided for in Section 4(d)(4) of the Wilderness Act, watershed will not be altered or managed to provide increased water quantity, quality or timing of discharge. . . [emphasis added]*
- 12-18 Interpretation and guidance from the U.S. Forest Service regarding the myriad elements of the Icicle DPEIS relevant to the agency's land management authority is imperative and should happen as a part of the SEPA process. IPID currently maintains agreements and easements with the U.S. Forest Service for IPID facilities at Eightmile, Colchuck, Square and Klonaka lakes, which require consultation with the Forest Service. At present, the DPEIS takes IPID's interpretation of its rights at face value, but the DPEIS needs to take a harder look. Ultimately the range of projects described in the Icicle DPEIS on National Forest lands will require Forest Service consultation and approval. Most of the projects proposed are unprecedented in the National Wilderness System and run afoul of wilderness law and, as noted above, state water law. Many of these projects would unreasonably cause significant harm to wilderness and its purposes, including recreation (by damaging trails, campsites, changing aesthetics, etc.) and scenic and conservation values.
- 12-19
- 12-20 Because the projects are in wilderness, non-motorized access and non-motorized equipment (i.e. hand tools) and traditional skills should be required whenever feasible. Since the dams were originally built that way, the exceptions should be rare. *See Wilderness Watch, Inc. v. USFWS*, 629 F.3d 1024 (9th Cir. 2010) (requiring site-specific, comparative analysis of options to determine if an action that violates the Wilderness Act's activity limitations is indeed the "minimum necessary").
- 12-21 Some of the most egregious projects are included in Alternative 4 of the DPEIS, including: (1) drilling a tunnel between two lakes (Upper and Lower Klonaka); (2) building a higher dam at Upper Snow Lake (enlarging that lake and submerging designated wilderness lands); and (3) increasing the height of the Eightmile Lake dam (making that lake bigger than it has ever been and submerging designated wilderness lands). The DPEIS utterly fails to consider the issue of compliance with federal law. *See, e.g.*, Tables 2-9 through 2-12, which state that each alternative "complies with federal law" — this claim is simply false, given the lack of analysis of IPID's water right and federal wilderness law. Furthermore, these projects were not part of the proposed action in the SEPA scoping conducted by the IWG in 2016, so the public was not asked to comment on them during scoping. It should also be noted that IPID has no right to enlarge Eightmile Lake and has no water rights or infrastructure at Upper Klonaka Lake.
- 12-22
- 12-23
- 12-24 Finally, the DPEIS fails to account for the necessity of conducting project-level NEPA processes with the U.S. Forest Service as the lead agency regarding dams and tunnels in wilderness on National Forest lands. As one of many examples of this huge omission, DPEIS Table 5-2 of "Permits/Approvals and Relevant Triggers" (pages 5-8 through 5-13) repeatedly states, erroneously, that a U.S. Army Corps of Engineers National Permit and NEPA Categorical Exclusion "are the likely level of regulatory compliance for this project" – for Optimization/Automation, for Eightmile "Restoration," and for the "Enhancement" (expansion)

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- 12-24 projects at Eightmile, Upper Klonaka, and Snow Lakes. The necessity of U.S. Forest Service NEPA analysis is conspicuous by its absence throughout the DPEIS.
- 12-25 Again, these huge gaps in the DPEIS mean that preparation of a Final PEIS would be premature; the DPEIS should be revised to address its deficiencies, and a Revised Draft PEIS should be released for public comment, before a Final EIS is prepared.
- 12-26 The failure to consider the restrictions imposed on the proposal by the Wilderness Act constitutes a violation of SEPA. As noted above, SEPA requires reasonable alternatives to be explored in an EIS. However, each of the alternatives, except alternative 5 (which the DPEIS gave only "a very cursory review," DPEIS at 2-35), treats the wilderness lakes as if the lakes are subject to essentially unrestricted development of new infrastructure, including the installation of higher dams, additional dams, mechanical pumps, and underground pipes. The installation of any of this new infrastructure would constitute a violation of the Wilderness Act, so the alternatives analyzed in the DPEIS are not actually "reasonable." While it is true that not every alternative analyzed in an EIS must be legally certain, the alternatives analyzed in the EIS must nonetheless be feasible. *King County*, 138 Wn.2d at 184.
- Here, there has *only* been analysis of the proposal under the legally uncertain assumption that IPID may install all of the infrastructure. There has been *no* analysis of what the proposal might look like if some of the infrastructure cannot be installed. A proper DPEIS would have at least considered the possibility that IPID might have to make do with less infrastructure at the lakes due to the restrictions of the Wilderness Act, and state water law.
- 12-27 **3. The DPEIS presents an inadequate range of alternatives, since every alternative would significantly impact and harm wilderness values. A revised DPEIS needs to include an alternative that minimizes wilderness impacts, respects wilderness values, and is informed by the extent and validity determination of water rights as discussed above.**
- 12-28 At present, every alternative in the DPEIS—including the No Action Alternative—includes actions that would significantly harm wilderness values. As discussed above, the DPEIS should be withdrawn, revised, and re-released with a new range of alternatives that are informed by the validity determination of the primary water rights holders in the Icicle basin as well as compliance with federal laws such as the Wilderness Act. The DPEIS currently includes the "Eightmile Restoration" project in every alternative, which would "restore usable storage to the historical and permitted high water storage elevation" (DPEIS, p. 2-15) requiring construction of a new dam approximately four feet higher than the current dam. If the dam cannot be raised due to water rights relinquishment and/or Wilderness Act constraints, then it is hardly "reasonable" to suggest a raised dam as a component of every one of the proposed alternatives. A revised DPEIS should include an alternative that includes restoration of the dam to its current height and not any higher. The failure to analyze that scenario means that the DPEIS fails to present an adequate range of alternatives. That is not allowed under NEPA and is an important consideration if the U.S. Forest Service were to adopt, in full or in part, this DPEIS.



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- 12-29 **4. The DPEIS improperly phases (and therefore evades) environmental review of the project components of each alternative, which avoids meaningful analysis of the cumulative impacts of each alternative. A revised DPEIS should include a meaningful and appropriate cumulative impacts analysis that provides more substantive and detailed information for each alternative, such as the number of helicopter flights required for all project components in designated wilderness of each alternative.**
- 12-30 “When a lead agency knows it is using phased review, it shall so state in its environmental document.” WAC 197-11-060(5)(e). Here, although the DPEIS calls itself a “programmatic” EIS, there is no discussion of what phases the project will proceed in, or what additional environmental reviews will be done during each phase. The level of detail in the DPEIS is not sufficient to conduct a site-specific review of each project (required by WAC 197-11-060(5)(e)), yet there is no indication that subsequent phases of review will address this deficiency. Thus, the DPEIS appears to be engaged in phased review without disclosing the phases as required under WAC 197-11-060(5)(e).
- The DPEIS’s failure to disclose and discuss the project’s phases is not some picayune, technical violation of SEPA; it has real-world consequences. As Washington courts have noted, the failure to properly tier the phases of a project can lead to a failure to analyze cumulative impacts. *See East County Reclamation Co. v. Bjornsen*, 125 Wn App. 432, 441 105 P.3d 94 (2005). Indeed, this DPEIS suffers from exactly such a failure—for example, there is no analysis of the cumulative impact of the helicopter flights needed for each phase of the project, or the combined visual impacts of the various new pieces of infrastructure that will be installed by the end of the project.
- 12-31 Since this project appears to be operating under phased review, the DPEIS must disclose what the phases are and what additional review will be forthcoming. Failing to do so is both a technical violation of SEPA and leads to a failure to analyze cumulative impacts, which is another, separate violation of SEPA.
- 12-32 **5. The DPEIS presents inadequate cost estimates for project proposals, skewing alternatives away from Alternative 5, which presents a pragmatic and thoughtful solution to these complex issues (e.g., the full IPID pump exchange). A revised DPEIS needs to accurately scope the potential cost of infrastructure proposals in federally designated wilderness, including consideration of the “minimum tool requirements” (as required by section 4(c) of the Wilderness Act) for federal actions in a wilderness area.**
- 12-33 The cost estimates and timelines for projects proposed for construction within the Alpine Lakes Wilderness are questionable because the DPEIS fails to properly account for the protections of the Wilderness Act, the land management role and authority of the U.S. Forest Service, and the requirement for NEPA analysis and compliance. Cost estimates are an important facet of assessing the reasonableness of alternatives. Analyzing cost-prohibitive alternatives does not help address the mandate to analyze a range of reasonable alternatives; nor does omitting the

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- 12-34 additional costs of operating under the restrictive Wilderness Act limitations. While a cost-benefit analysis need not be included in an EIS, WAC 197-11-455, if the agency chooses to include cost information, it must do so in an unbiased and accurate manner.
- 12-35 The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5. Alternative 5 includes the “Full IPID Pump Station,” which would move IPID’s point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek, especially in future decades when climate change will reduce flows in the Icicle watershed. As evidenced by the cost of the recent emergency dam repair at Eightmile Lake, which required an estimated \$100,000 to fly a piece of heavy construction equipment (an excavator) to the site—after IPID had expected to spend a mere \$2,000 to “walk” it on the ground through the Wilderness to the dam (i.e., a cost overrun of five thousand percent on that one item)—cost estimates such as \$1.6 million for “Restoration” of the Eightmile dam and \$3.9 million for the “Eightmile Dam Enhancement” seem woefully low.
- 12-36 **6. The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed unnaturally timed releases of water from the wilderness lakes, which will significantly alter stream hydrology. The DPEIS fails to recognize that altering the natural flow regime can degrade a stream’s physical and chemical properties, leading to loss of aquatic life and reduced aquatic biodiversity. A revised DPEIS requires proper documentation and analysis of the riparian ecosystem and the potential cumulative impacts of the suite of infrastructure projects on that ecosystem to ensure no harm to wilderness streams or lakes.**
- The current DPEIS proposes a range of projects that will alter the natural hydrologic function of wilderness lakes and streams in the Icicle basin. To date, the IWG has not adequately invested in monitoring activities across the basin to fully understand and evaluate the potential impacts to the health of wilderness streams and lakes. Usually, Ecology would be the lead agency to ensure no harm when discharging water from Square, Klonauqua, Eightmile, Colchuck and Snow lakes. Ecology developed an advanced multi-metric index model of biotic integrity in 2012 for the Cascades Region which allowed Ecology to determine the health of reaches along the Wenatchee River and the health of Icicle Creek up as far as Ida Creek Campground.
- 12-37 That same level of detailed analysis has not been applied in the DPEIS, either by Ecology or by any other agency. Appendix A of the DPEIS does identify the Washington State Department of Fish and Wildlife as gathering base-line data for the proposed projects. However, the results from 2016 and 2017 analyze only two wilderness streams (Leland Creek and French Creek) of the five streams of concern, and that analysis was not detailed enough to determine the health of either Leland Creek or French Creek. No analysis was completed at the wilderness lakes. We are concerned that IWG has not done adequate sampling and monitoring of impacts from past releases into these wilderness streams, including cumulative impacts, as it is required under WAC 197-11-080 (requiring agencies to obtain missing information regarding significant adverse impacts, if the cost of obtaining information will not be exorbitant). The cost and delay

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of obtaining the missing data would not be exorbitant, yet the absence of such data is leading IWG to make environmentally harmful decisions.

12-38 The DPEIS describes impacts on a stream resulting from the release of water from a wilderness lake (to improve the historic channel in lower Icicle Creek) as “insignificant” or they are found to be within the naturally occurring flow range of the stream. The DPEIS goes on to identify the release of water as a benefit for the affected riverine system. This simple analysis is faulty and ignores the natural flow regimes of each stream as having a characteristic pattern of flow magnitude, timing, duration, frequency, and rate of change. All of these patterns play a critical role in supporting the chemical, physical, and biological integrity of each receiving stream, which collectively form the foundation of a healthy Icicle system supporting robust fisheries.

12-39 Changes to stream chemical and physical conditions following flow alteration can lead to the reduction, elimination, or disconnection of optimal habitat for aquatic biota. The DPEIS fails to recognize that “human-induced alteration of the natural flow regime can degrade a stream’s physical and chemical properties, leading to loss of aquatic life and reduced aquatic biodiversity. Protecting aquatic life from the effects of flow alteration involves maintaining multiple components of the flow regime within their typical range of hydrologic variation.” See *Final EPA-USGS Technical Report: Protecting Aquatic Life from Effects of Hydrologic Alteration*.

12-40 Altered flows can fail to provide the cues needed for aquatic species to complete their life cycles. For example, Pale Morning Duns (Order *Ephemera Danica*) will not emerge until stream water temperatures reach 60 degrees Fahrenheit. Timing is also a factor, as they will also avoid emerging until the month of July has arrived. Alteration of the quantity and timing of river or stream flows can also significantly affect fisheries resources by introducing competing non-native fishes.

12-41 Furthermore, the ability of a stream to support aquatic life is linked to the maintenance of key flow-regime components. For example, altering the regime by increasing flows brought about by releasing relatively high water velocities from a lake during mid-summer causes stream surface water, rich in oxygen, to bypass the sub-surface environment. The typically low summer flows and corresponding low velocity allow oxygen to be pulled into the sub-surface environment, which needs oxygenated water this time of year to support invertebrates living in sub-surface environments. Invertebrates are a source of food for other aquatic life, including fish, and tend to live in a subsurface zone (hyporheic zone).

12-42 In addition to the impacts of unnaturally timed increases in discharge rates, the DPEIS also needs to examine the impacts of unnaturally reduced discharge during the period when storage is recovered, as well as lake shoreline (edge) effects.

12-43 Further complicating these challenges are the expected changes to historic hydrologic conditions resulting from climate change, which adds additional complexity to the task of estimating acceptable levels of hydrologic variation.

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12-45 If the projects described in the current DPEIS move forward, water will be discharged from wilderness lakes to improve the last four miles of Icicle Creek. The health of Prospect Creek, the last mile of Leland Creek, the last five miles of French Creek, all of Eightmile Creek, the last five miles of Mountaineer Creek and the upper 20 miles of Icicle Creek are all affected by the proposed projects and must be adequately analyzed. The DPEIS ignores lake ecology and how it might affect the streams below the lakes that are discharging water from the hypolimnetic zone, particularly Eightmile, Square and Upper Snow lakes. Since Ecology has developed a model to determine stream health, Ecology should take the lead and determine the health of both lakes and streams that are part of the proposed project.

12-46 With this summary of hydrological alteration in mind, and the importance of stream and lake health, it would be prudent to avoid implementing any of the DPEIS action alternatives until a team of scientists, educated in matters associated with stream and lake health, are ready to share their findings. Such a study would help assure that the Alpine Lakes Wilderness remains a healthy wilderness, and that none of the targeted wilderness streams and lakes are harmed.

12-47 **7. Conservation components in the DPEIS are insufficient. A revised DPEIS must expand these conservation actions to significantly reduce demands on Icicle Creek’s water, thereby allowing its watershed to function more naturally. This will better support our region’s livability and economy over the long-term.**

12-48 Water conservation methods have the potential to meet City of Leavenworth and IPID consumptive demand in the Icicle watershed. A fundamental premise of this approach is that water users are entitled only to the amount of water they need, and must exercise reasonable efficiency in their water use. From a pragmatic standpoint, reducing demand and obtaining new supply through water conservation and efficiency measures and practices is good policy and will be more palatable to the public than projects that manipulate and increase diversions from the Enchantment Lakes region of the Alpine Lakes Wilderness.

12-49 From review of documents and field sites, it is clear that significant water savings can be obtained through tightening up water delivery and consumption infrastructure in the Leavenworth area, and through demand management efforts. Further, with respect to the City of Leavenworth, re-calculation of future demand is appropriate.

12-50 It appears feasible that water conservation and efficiency measures, combined with a transfer of water and service duties from IPID to the City of Leavenworth, could meet the consumptive use needs of both entities.

Here are more specific comments on water efficiency and conservation:

12-51 (a) **Incorrect Legal Assumptions.** The DPEIS is incorrect and inadequate in its assumptions regarding necessary water efficiency and conservation. As is established by state statute and court decisions, reasonable efficiency in the use of water is not an option for water right holders. It is a requirement. The DPEIS offers various combinations of water efficiency and conservation projects on the assumption that achieving water efficiency is optional. However, achieving reasonable efficiency for Icicle Creek diverters, i.e., City

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- 12-55 of Leavenworth, the Leavenworth National Fish Hatchery, and IPID must be a baseline for all alternatives, and not a bargaining chip for achieving other objectives. This is how the Cascade Orchard Irrigation Company's efficiency upgrades are treated in the DPEIS, and this treatment should extend to all other Icicle Creek water users.
- 12-56 (b) Applied Conservation Analysis. The DPEIS should contain analysis of Washington State water conservation laws, policies and requirements as they apply to each of the Icicle Creek water users. This is particularly appropriate given that this is a "programmatic" EIS, and should be included as part of the extent and validity analysis of water rights as discussed above. To the extent these users do not meet state requirements, projects to improve efficiencies should be established as baseline projects that will be applicable across all of the DPEIS alternatives.
- 12-57
- 12-58
- 12-59 (c) Applied Water Waste Analysis. To the extent water users are wasting water, they are not entitled to maintain and use their rights. An evaluation of the extent of water waste committed by Icicle Creek water diverters, particularly IPID, should include review of conveyance loss and efficiencies from the point of release of water in the Alpine Lakes Wilderness, the canal system, operational spills and any other particulars of the water delivery system. This analysis is particularly important to understand the benefits and appropriate allocation of costs associated with the IPID Full Piping and IPID Pump Exchange alternatives. A water waste analysis is particularly appropriate given that this is a "programmatic" EIS, and should be included as part of the extent and validity analysis of water rights as discussed above.
- 12-60 (d) IPID Irrigation Efficiencies Project (Section 2.5.2). This DPEIS section contains no discussion of actual efficiencies of the system (i.e., consumed water vs. transportation loss and waste). It is rife with vague, unquantified, and anecdotal information about actual conservation activities (i.e., "some farmers have complained"; only "small portions" of canals remain unlined). It lacks discussion about wasteful water use on converted residential properties. For more information and photographs of IPID's inefficient water use, see R.P. Osborn, Center for Environmental Law & Policy, Memo re "Water conservation potential for consumptive demand reduction and supply for City of Leavenworth and Icicle-Peshastin Irrigation Districts" (July 9, 2015), incorporated herein by reference.
- 12-61
- 12-62 (e) Domestic Conservation (Section 2.5.4) – City of Leavenworth. The DPEIS confuses wants and needs. The City of Leavenworth and Ecology need to come to agreement regarding water rights for the City of Leavenworth, including to resolve an outstanding court case. The DPEIS does not provide resolution to this issue but instead proposes to provide additional water rights (i.e., wants) to the City of Leavenworth without requiring the City to implement anything other than an inadequate water conservation plan that provides for water conservation in name only. More specifically:
- 12-63 a. The City of Leavenworth's future water use demand projections are overly aggressive. The City's Water System Plan states that population will grow by

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- 12-63 0.47% per year while its water use will grow by 2.2% per year. The projected growth in water use of 2.2% is not supported by the historic growth of water demands for the City of Leavenworth.
- 12-64 b. Since 1990, water demands have varied from 850 to 1,165 acre-feet per year without a corresponding upward trend in water demand. At the same time, the City's population has increased from 1,692 to 1,990. Essentially, for 27 years water use has not grown while the City's population has increased. The City of Leavenworth's projections state that water use will begin to grow at a pace which is not supported by historical data.
- 12-65 c. If water use growth for the City of Leavenworth is estimated at 1% per year (rather than the 2.2% shown in the City's Water Plan) it will take until 2056 to exceed the temporary water right limitation of 1,465 acre-feet as imposed by the court ruling of Leavenworth vs. Ecology (Water System Plan, Figure B, p. 45).
- 12-66 d. The DPEIS states that the City of Leavenworth is considering reclaimed water to meet its demands. The City of Leavenworth's Water System Plan specifically states that it is not going to utilize reclaimed water. These statements are contradictory. Failure to plan for use of reclaimed water indicates the City's water plan is not aggressive.
- 12-67 e. The City of Leavenworth should not receive additional water supply until its water conservation plan in the City's Water System Plan aggressively promotes conservation as determined by the following factors:
- The City of Leavenworth is currently allocating only \$1,000 per year for water conservation.
  - The City of Leavenworth's unaccounted water (lost water) is 24%, grossly in excess of the statutory 10% mandate.
  - The City of Leavenworth's water conservation plan does not included leak detection to determine where unaccounted for water is going.
  - Approximately 70% of all water used is during the summer months. The City decided not to impose a conservation-based water rate due to the possible financial hardships imposed on its customers. While we understand this is politically difficult to do, the City could gradually impose a conservation-based rate over many years to minimize the shock of a sudden rate increase.
  - The City of Leavenworth water plan is designed to meet only the minimum Department of Health guidelines. This is very disappointing and should have been resolved prior to release of the DPEIS.
  - With a more aggressive conservation program, the City of Leavenworth will not need as much additional water by 2050. The Water System Plan guideline of 1,750 acre-feet of additional domestic supply should be revised to a lower number and the associated project(s) that is required to reach this goal should not be funded.
- 12-68 (f) Domestic Conservation (Section 2.5.4) – Rural Water Use. The DPEIS allocates 74 acre-feet of domestic water for the growth of 199 additional households in the watershed in Chelan County.

# ICICLE CREEK SUBBASIN PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

## Comment Letter 012

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- |                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12-69                             | a. Because Icicle Creek is over-appropriated, the basin should be closed for new growth. If new growth is to occur, new households should be required to purchase existing water rights via water right exchanges and water banks. This approach is similar to what is occurring in Kittitas and Yakima counties. Growth should pay for growth.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 12-70                             | b. Growth should occur in cities and towns according to the Growth Management Act. The guidelines in the DPEIS for water usage in Chelan County should be changed to reflect this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 12-71                             | (g) <u>Leavenworth National Fish Hatchery Conservation and Water Quality Projects (Section 2.5.9)</u> . The LNFH projects provide a good example of the flawed foundation of the Icicle Strategy. Virtually all of the LNFH projects identified in the DPEIS are required to be completed by other laws and on the initiative of the federal agencies that own and operate the Hatchery in order to meet Endangered Species Act, Clean Water Act, and U.S. treaty obligations. Using LNFH upgrades as a bargaining chip to justify other elements of the DPEIS projects is inappropriate. It is evident from the DPEIS that many LNFH projects have been or will be implemented by the Hatchery, including water supply piping, effluent pumpback, fish screening, streamflow augmentation, circular tanks and fish passage.                                                                                                                                                                                                      |
| 12-72                             | (h) <u>Water Markets (Section 2.5.12)</u> . The water market proposal artificially limits itself to discussion solely of providing water to interruptible water markets in the basin. If the City of Leavenworth or other municipalities do in fact require additional water supply for future growth, water markets could serve that purpose. One obvious example would involve transfer of water from IPID to Leavenworth for residences in the Ski Hill area. There appears to be substantial waste of water in that neighborhood (see RP Osborn, Conservation Memorandum, cited above, including photos), which largely converted from orchards at some time in the past. Bringing those properties into reasonably efficient water duties for residential properties could free up water to serve properties elsewhere in the City of Leavenworth water system. This is an example of how a water market might operate to serve new demand. The DPEIS should be amended to evaluate a larger range of options for this tool. |
| <b>8. Miscellaneous comments.</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 12-73                             | (a) <u>Inadequate Instream Flow Goals</u> . The proposed non-drought year 100 cfs flow target does not meet basic needs of Icicle Creek wild fisheries. Further, the 60 cfs drought goal is inconsistent with scientific consensus that fish must have adequate cold water in drought periods to avoid significant impacts caused by high water temperatures. The appropriate flow goal is 250 cfs, which represents not an “every year” flow, but the high water year flow that is necessary to ensure survival and healthy populations of wild fish. For more information, see “Analysis of Icicle Creek Instream Flow Benefits of Three ‘Base Projects’ During Low Flow Months” prepared by Mark Hersh, Wild Fish Conservancy, and Dick Reiman, Icicle Creek Project (16 pp., July 2013), transmitted to                                                                                                                                                                                                                       |

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- |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12-73 | the Icicle Work Group, and letter from Wild Fish Conservancy to Tom Tebb (14 pp., 12/19/13). These documents are incorporated herein by reference.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12-74 | (b) <u>IPID Full Piping &amp; Pump Exchange Project</u> . As is evident in Figures 2-6, 2-7 and 2-8, the Alternative 1, 2, 3 and 4 “Base Package” projects are unable to meet even the inadequate 100/60 cfs flow goals. Only the IPID full piping and pump exchange scenario (in Alternative 5) is able to come close to achieving the pre-development natural flows in Icicle Creek that are necessary to support healthy fisheries.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12-75 | (c) <u>Junior Water Users</u> . The DPEIS sets forth as a “guiding principle” agricultural reliability, with a specific goal of providing full water rights to the 56 interruptible water rights holders in the basin. While this principle is compassionate, it fails to recognize that these water users took their rights with an understanding that they were interruptible, and indeed the prior appropriation doctrine operates on the principle that junior users will be curtailed during low water years. The predicament of these users was deliberately created by Ecology when it chose to issue more water rights than there is sufficient water to fulfill each year, and by the water users when they chose to accept such rights. Because Ecology has not closed the basin, what is to prevent this cycle from repeating itself? As specifically contemplated in the DPEIS alternatives, Ecology will continue to issue junior water rights, which are then curtailed, leading to future water projects to make these juniors “whole.” The DPEIS fails to discuss the implications of this open-ended water management. |
| 12-76 | (d) <u>Easement Map</u> . The description of IPID’s easements in the Alpine Lakes Wilderness (DPEIS p. 2-44) should include maps, including the map that shows that IPID does not hold an easement for the entirety of Eightmile Lake.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12-77 | (e) <u>Section 2.5.7 Habitat Protection</u> . The discussion of land acquisitions through the Upper Wenatchee Community Land Plan appears to target lands outside the Icicle Creek basin. The DPEIS does not provide a basis for understanding how these land acquisitions benefit Icicle Creek. It appears the Icicle Work Group has evaded an issue by simply adopting the goals and priorities of another group. This approach does not support expansion of the Wenatchee basin instream flow reserve for the Icicle sub-basin.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12-78 | (f) <u>Section 2.5.7 Instream Flow Amendment</u> . As noted in discussion of City of Leavenworth water conservation above, the City has significantly overestimated future demand, and is underperforming on state mandated water conservation requirements. Expansion of the instream flow rule domestic reserve based on City demand and planning is not justified. The DPEIS fails to discuss this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12-79 | (a) <u>Section 2.5.9 LNFH Groundwater Augmentation</u> . The DPEIS fails to identify or analyze the problem of utilizing groundwater collectors to pump groundwater in direct hydraulic continuity with Icicle Creek. This proposal appears to propose improving reliability of LNFH groundwater supply at the expense of depleting flows in Icicle Creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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(b) The Cost of Water. The DPEIS provides a misleading and inappropriate comparison for developing water. Chapter 2 states five times that the cost of water in the Columbia Basin is \$500/acre-foot for projects developed by the Office of the Columbia River (OCR). OCR projects such as the Lake Roosevelt Drawdown or Sullivan Lake transfer represent heavily subsidized projects that were developed as “low hanging fruit,” and are not appropriate for comparison in the DPEIS. One problem is that this number does not appear to include infrastructure costs, thus creating an apples-to-oranges comparison. In contrast, the costs associated with providing water to, for example, the Odessa Subarea have been astronomical, but covered by programs such as the ARRA and other grants. We suspect these numbers are not included in the \$500/acre-foot “baseline.” The DPEIS at page 2-57 does, however, identify the previously completed IPID Canal to Pipeline Conversion as costing \$2 million to obtain 360 acre-feet of water, i.e., a \$5,555/acre-foot cost. The DPEIS is deficient in failing to provide appropriate and realistic cost comparisons for Columbia Basin water development.

#### Conclusion

Thank you for the opportunity to provide comments on the Icicle DPEIS. Our organizations support collaborative efforts to develop innovative and sound approaches to water and natural resource management for Icicle Creek and the greater Wenatchee River basin, and we appreciate the commitment of organizations, tribes, agencies, and individuals to this important endeavor. As we face a certain future of increased demands on limited water resources, such collaborative efforts will be required to balance the range of competing needs. Broad-based community involvement and support as well as transparency and trust are critical ingredients for success.

For all reasons described above, we request the Icicle DPEIS be withdrawn, revised, and re-released as a Revised Draft PEIS for public comment once the deficiencies detailed here are addressed.

Sincerely,

Rick McGuire, President  
Alpine Lakes Protection Society

Kitty Craig, Washington State Deputy Director  
The Wilderness Society

Trish Rolfe, Executive Director  
Center for Environmental Law & Policy

George Nickas, Executive Director  
Wilderness Watch

Gary Macfarlane, Ecosystem Defense Director  
Friends of the Clearwater

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Sharon Lunz, President  
Icicle Creek Watershed Council

Kurt Beardslee, Executive Director  
Wild Fish Conservancy

Art Campbell, President  
North Central Washington Audubon Society

Gus Bekker, President  
El Sendero Backcountry Ski & Snowshoe Club

John Spring, President  
Spring Family Trust for Trails

Mark Boyar, President  
MidFORC

Mike Town, President  
Friends of Wild Sky

Tom Uniack, Executive Director  
Washington Wild

Annie Cubberly, Broadband Leader  
Polly Dyer Cascadia Chapter  
Great Old Broads for Wilderness

Tom Hammond, President  
North Cascades Conservation Council

George Milne, President  
Federation of Western Outdoor Clubs

Doug Scott, Principal  
Doug Scott Wilderness Consulting

Lee Davis, Executive Director  
The Mazamas

William Campbell, President  
Friends of Lake Kachess

Tom Martin, Council Member  
River Runners For Wilderness

**ICICLE CREEK SUBBASIN**  
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John Brosnan, Executive Director  
Seattle Audubon Society

Kathi & Greg Shannon, Steering Committee members  
Friends of Enchantments

Lori Andresen, President  
Save Our Sky Blue Waters

Melissa Bates, President  
Aqua Permanente

Kirt Lenard, President  
Issaquah Alps Trails Club

Brian Hoots, President  
Spokane Mountaineers

Harry Romberg, National Forests Co-Chair  
Washington State Chapter  
Sierra Club

Chris Maykut, President  
Friends of Bumping Lake

Judy Hallisey, President  
Kittitas Audubon Society

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
American Whitewater

Denise Boggs, Executive Director  
Conservation Congress

cc: Governor Jay Inslee  
U.S. Senator Patty Murray  
U.S. Senator Maria Cantwell  
U.S. Representative Dave Reichert  
Okanogan-Wenatchee National Forest Supervisor Mike Williams  
Wenatchee River District Ranger Jeff Rivera

Comment Letter 013



July 30, 2018

Tom Tebb  
Director, Office of Columbia River  
Washington Department of Ecology  
1250 Alder Street  
Union Gap, WA 98903

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

*Re: Icicle Strategy Programmatic Environmental Impact Statement*  
*Submitted via email to: [nr.iciclesepa@co.chelan.wa.us](mailto:nr.iciclesepa@co.chelan.wa.us)*

Dear Directors Tebb and Kaputa,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (PEIS) for the Icicle Strategy. Access Fund, The Mountaineers and Washington Trails Association (WTA) - all human-powered recreation organizations in Washington State - come together to work on issues relating to recreation, access and conservation.

The Icicle Strategy is an expansive undertaking, aiming to implement a comprehensive water resource management plan in the Icicle Creek Subbasin. Its guiding principles are designed to create healthy streamflow, a sustainable Leavenworth National Fish Hatchery (LNFH), meet municipal demand for additional water, improve agricultural reliability, enhance the Icicle Creek habitat, and comply with state, federal, and tribal treaty rights. As organizations that represent hikers, climbers and mountain bikers in Washington state, our interest lies in ensuring that those who recreate in the Icicle Creek Subbasin can enjoy its trails and outdoor opportunities. This includes ensuring that any project's long and short-term impacts are analyzed and take effective steps to mitigate alterations to these outdoor opportunities. Furthermore, the PEIS should meet all of the guiding principles set forth for the Icicle Workgroup.

The Enchantments are a valued landscape to our organization's nearly 30,000 members. For example, since 1998, WTA has contributed 7,471 volunteer hours to trail work in the Enchantment Area Permit

## Comment Letter 013

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Zone. Collectively, hikers and climbers have filed over 1,100 trip reports for trails impacted by the Icicle Strategy, including the Enchantments Trail, Snow Lakes Trail, Eightmile Lake Trail and Klonauqua Lakes Trail. This equates to more than 11,500 miles hiked on these trails alone.

The vast lands of the Alpine Lakes Wilderness are of immense value to hikers and climbers in Washington state. This area is widely considered to be one of the most beautiful and cherished areas by those who recreate outdoors. Individuals from all walks of life and from areas of the Northwest travel to visit these lands each year. Changes proposed in this plan to this area could cause closures or permanently impair its environment, riparian ecosystem, and popular recreation areas.

- 13-1 | Our organizations support projects within the Icicle Strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. These projects could support the LNFH in meeting its goals and fall within the guiding principles of the Icicle Strategy. These conservation elements of the plan are foundational to the protection of this area and the outdoor experiences hikers and climbers enjoy.
- 13-2 | **Recommendations**  
We suggest that the following projects be removed from the Icicle Strategy:
- Eightmile Lake Storage Enhancement
  - Upper Klonauqua Lake Storage Enhancement
  - Upper and Lower Snow Lake Storage Enhancement
- 13-3 | We also suggest the following measures be taken to ensure all projects included in the Icicle Strategy meet its guiding principles:
- Conduct a formal NEPA for all projects taking place in the Alpine Lakes Wilderness
  - Ecology must perform a "Extent and Validity" determination for the three primary water rights holders in the Icicle Creek Subbasin
- 13-4 |
- Our organizations are concerned about the following projects:**
- 13-5 | **Eightmile Lake Enhancement:** We are concerned that the projects listed at Eightmile Lake could flood the trail and surrounding campsites. These projects could also create significant physical and visual impacts to the trail and area immediately surrounding it.
- 13-6 | Appendix B of the DPEIS title, "The Eightmile Lake Storage Restoration Feasibility Study", discusses possible strategies for accessing Eightmile Lake during construction of the projects. Table S-1 on Page 55 indicates that excavators would be used. Their use could create lasting negative impact on this heavily popular trail and wilderness area. This study does not address mitigation strategies for these impacts.
- 13-7 | The feasibility study also discusses the Eightmile Lake Trail as between the Eightmile Lake Trailhead and Eightmile Lake itself, but does not discuss the trail surrounding the lake, or campsites immediately surrounding it. These areas would likely be flooded if these projects are undertaken.

- 13-8 | Due to the possible permanent negative impacts to Eightmile Lake, we request the Eightmile Lake Enhancement project be removed from the Icicle Strategy. This project lacks key mitigation strategies for eliminating negative impacts to the trail, implementation and outdoor recreation and the wilderness.

- Upper and Lower Snow Lake Storage Enhancement:** Chapter 4 of the PEIS document outlines impacts and mitigation strategies for Icicle Strategy projects. Section 4.2.5.1 discusses the short-term impacts, which at Snow Lakes would require heavy construction equipment. As noted in section 4.2.5.2, *Long-Term Impacts*, the Upper and Lower Snow Lakes Storage Enhancement Project "would result in water levels that are higher than historical levels." As this lake is popular with campers and the trail follows around the lake itself, this project could flood the surrounding trail. The steep, rocky terrain surrounding this lake would make this trail difficult and costly to relocate.

- 13-9 | Without proper NEPA analysis or mitigation strategies for construction and given the possibility of trail flooding due to higher water levels, our organizations oppose this project and request it be removed from the Icicle Strategy.

- 13-10 | **Upper Klonauqua Lake Storage Enhancement:** At the Klonauqua Lakes, the PEIS (Chapter 4, Section 4.2.5.1) notes that the Upper Klonauqua Lake Storage Enhancement project is still at a conceptual stage. Given that, the impacts to these lakes remains unclear. Without a clear indication of the impacts to the trail and shoreline, this project should not continue. The long-term impacts from this particular project would "result in lake levels that are drawn down below the historical range." Not only would this create lasting negative visual impacts to the lakes, but they could result in increased natural resource erosion. As written in the PEIS, the impacts to the Upper and Lower Klonauqua Lakes are inadequately described and missing key information pertaining to construction, maintenance and impacts to trail.

- Without further information regarding this project and its implementation and impacts, this project is an incomplete proposal. Our organizations are concerned with the information provided on this project, its possibility for lasting negative visual and physical impacts and request it be removed from the Icicle Strategy.

- 13-11 | **Conduct a formal NEPA for all projects taking place in the Alpine Lakes Wilderness**  
Without sufficient NEPA provided, the range of alternatives presented in the Draft PEIS includes actions unprecedented in the Alpine Lakes Wilderness. These actions could set a model that allows for further new actions in wilderness area; an undesirable outcome for all those working to protect the beauty of these lands.

- 13-12 | Section 1.5.2.7 of the PEIS outlines the guiding principles of the IWG to "Comply with State and Federal Law, and Wilderness Acts". This section notes that the IWG actively identified and engaged with the US Bureau of Reclamation (USBR) and US Fish and Wildlife Service (USFWS) to create projects and alternatives for the Icicle Strategy. Yet the United State Forest Service (USFS) has jurisdiction over much of the land impacted by the aforementioned projects. Therefore, the USFS would be required to conduct a NEPA analysis before any projects could commence.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

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13-13

According to section 1.9.3.2 of the PEIS, the USBR and USFWS are reviewing "proposals on Snow Lake valve replacement and automation, screening and upgrading the intake structure, water conservation measures at LNFH and groundwater development." This section states that the USBR is considering additional EA and EIS work for the other projects, however does not provide further information about which projects are being considered for further EA and EIS work, nor does it provide a timeline for the dissemination of this information to community partners and members of the IWG.

A revised PEIS should provide further information regarding the NEPA status and process of all projects proposed to take place in the Alpine Lakes Wilderness.

**Ecology must perform an "Extent and Validity" determination for the three primary water rights holders in the Icicle Creek Subbasin**

13-14

To date, Ecology has made no extent and validity determination of either IPID or LNFH diversionary or storage water rights. Given the amounts of storage that are proposed to be diverted and the implementation of these projects, an extent and validity determination must be performed to certify IPID's correct amounts for any Storage and Diversion rights for primary water rights holders, which would determine the feasibility of the projects outlined in the Draft PEIS.

**Conclusion**

As a protected wilderness area, each project in the Alpine Lakes Wilderness must be carefully considered to follow the federal Wilderness Act of 1964. They also must follow the guiding principles as outlined in the Icicle Strategy documents and as determined by the IWG.

The Icicle Strategy's proposed Eightmile Lake Enhancement, Upper Klonauqua Lake Storage Enhancement and Upper and Lower Snow Lake Storage Enhancement projects should be removed from the draft PEIS provided by Chelan County. As they take place in a designated wilderness area, each project requires a sufficient NEPA analysis. As written, these projects could flood surrounding trail, campsites and create adverse wilderness area impacts -- while the Draft PEIS documents do not provide adequate measures to avoid these circumstances or mitigate these negative impacts.

Furthermore, IPID and LNFH's diversion and storage water rights are in question. An extent and validity determination must be performed by Ecology prior to subsequent actions on the Icicle Strategy.

While we recognize the need for enhanced water storage and increased efforts to support fish population and habitat in the Alpine Lakes Wilderness, these problems can also be solved without direct significant impacts to popular areas for the outdoor recreation community.

13-15

We appreciate the opportunity to comment on this process. As the Icicle Strategy continues, we hope that all stakeholders involved are actively included in planning and decision-making processes. Please add our organizations to further communications regarding this strategy.

Sincerely,

Andrea Imler  
Advocacy Director  
Washington Trails Association

Katherine Hollis  
Conservation & Advocacy  
Director  
The Mountaineers

Joe Sambataro  
Northwest Regional Director  
Access Fund



## Comment Letter 014

## Comment Letter 014

July 25, 2018

Mr. Mike Kaputa  
 Director, Chelan County Natural Resource Department  
 411 Washington Street, Suite 201,  
 Wenatchee, WA 98801

Re: Icicle Strategy DPEIS – comments

Dear Mr. Kaputa:

The Alpine Lakes Foundation is pleased to submit these comments on the Icicle Strategy Draft Programmatic Environmental Impact Statement (DPEIS).

**Who we are.** The Alpine Lakes Foundation is a duly-registered non-profit Washington corporation, that has been active for 25 years. Our mission is to educate the public, through information, study, advocacy and otherwise, on the Alpine Lakes Wilderness and surrounding lands, and to aid and support their preservation and stewardship. We are a separate organization from the Alpine Lakes Protection Society, although we share similar goals.

**Comments – Lack of legal authority** The DPEIS describes alternatives proposed by a working group of many organizations, but the only member of that group with any primary water rights is the Icicle Peshastin Irrigation District. All the alternatives assume that the irrigation district can exercise those rights or make its water available to the extent necessary to carry out the alternatives. Yet, the DPEIS assumes without discussion that the irrigation district has the legal right to do this, when in fact, for the following reasons, it does not:

- 14-1 | 1. The irrigation district has forfeited, relinquished, or never acquired the right to store or release more water from the lakes identified in the DPEIS than it has historically stored or released. The irrigation district never held or no longer holds the right to store or use the additional quantities of water envisioned by the various alternatives. Revised Code of Washington 90.14.160. Okanogan Wilderness League v. Town of Twisp and Department of Ecology, 133 Wn.2d 769, 947 P.2d 732 (1997). This decision is based on common law abandonment, which is independent of the foregoing statute.
- 14-2 | 2. Any water within the Alpine Lakes Wilderness that the irrigation district has not historically used now belongs to the federal government under the federal reserved water right doctrine. This doctrine stems from Winters v. United States, 207 U.S. 564 (1908). The U.S. Supreme Court has applied it more recently in U.S. v. New Mexico, 438 U.S. 696, 702 (1978); Cappaert v. U.S., 426 U.S. 128 (1976); and Arizona v. California, 373 U.S. 546, 601 (1963).
- 14-3 | 3. Any attempt by the irrigation district to store or release more water than it historically has used within the Alpine Lakes Wilderness would violate section 4 of the Wilderness Act, the Alpine Lakes Area Management Act of 1976, and the Alpine Lakes Wilderness Management Plan, pp 162-64 (1981).

- 14-3 | 4. These foregoing points also apply to the US Bureau of Reclamation and the US Fish & Wildlife Service with respect to Snow and Nada Lakes.
- 14-4 | 5. The easements, permits, or deeds granted by the US Forest Service to the irrigation district do not override the foregoing laws, nor do they address or affect the extent of the irrigation district's water rights.
- 14-5 | 6. The irrigation district has never had and currently does not hold any water rights at Upper Klonauqua Lake.

For the foregoing reasons, all the alternatives in the DPEIS are wishful thinking because they lack any legal basis.

14-6 | **Comments – How the Icicle Strategy could be improved.**

- 14-6 | 1. The Strategy should be revised to rely only on those quantities of water at specific lakes that the irrigation district has historically used and therefore has the right to use.
- 14-7 | 2. Moving the irrigation district's point of diversion downstream to the Wenatchee River, as proposed in Alternative 5, would greatly improve stream flows in Icicle Creek. However, the rest of Alternative 5 should be dropped. It suffers from the same lack of legal authority as already discussed.
- 14-8 | 3. Water conservation proposals in the DPEIS should be significantly expanded to reduce demands on Icicle Creek's water. This would allow the Icicle watershed to function more naturally, including enhanced stream flows.
- 14-9 | 4. The DPEIS should acknowledge the land management role and authority of the U.S. Forest Service on national forest lands, its special responsibilities to protect the wilderness character of the Alpine Lakes Wilderness, and the application of numerous federal laws to many of the actions proposed in the Icicle Strategy.

Thank you for the opportunity to submit these comments.

Very truly,

ALPINE LAKES FOUNDATION  
 s/David G. Knibb  
 By David G. Knibb, Vice President  
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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 015

Comment Letter 015



July 26, 2018

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

Re: Comment on Icicle Strategy Draft PEIS

Dear Mike,

The Chelan-Douglas Land Trust (CDLT) is a conservation-based non-profit representing over 1,700 households and 2,500 members (mainly local). The Land Trust strives to conserve, care for, and deliver access to the natural lands and waters that sustain North Central Washington. We focus first and foremost on preserving the ecological value of native habitats and natural lands.

Because of our focus as an organization and due to the breadth and broad scope of the PEIS, CDLT will limit its comments to the Habitat Protection section of the Alternatives. CDLT has worked for decades to protect the salmon streams and floodplain habitats of the most important tributaries in the Wenatchee and Entiat River watersheds. The Land Trust has successfully protected some 290 acres of important riparian salmon habitat on Icicle Creek, but there is much more to do. CDLT has developed relationships with a number of significant landowners who are willing to protect land along Icicle Creek and near the confluence with the Wenatchee River, if sufficient funds were available to pay them a reasonable portion of fair market value. Protection actions such as this should be the highest priority action in the Upper Columbia; it is always less expensive to protect in situ quality habitat than to try to restore altered habitat and mitigate for its loss.

15-1 CDLT strongly supports inclusion of a substantial budget for fee or conservation easement acquisition near the Wenatchee/Icicle confluence and along Icicle Creek between the confluence and the fish hatchery. The Natural Systems Design report discussed in Section 2-5-7 and incorporated into subsequent alternatives recommends protection for the benefit of endangered Chinook salmon, threatened steelhead and threatened bull trout throughout the lower reach, which is also used by sockeye salmon. Furthermore, once the land is acquired for conservation, restoration work can be facilitated with partners.

15-1 The proposed budget of \$2.5 million is definitely inadequate, however. Based on CDLT experience in the area, we recommend no less than \$8 million be allocated for acquisition actions. This would be funding well spent to protect over 200 acres and much of the riverfront on the lower Icicle.

Thank you for the opportunity to comment on the Icicle Strategy Draft PEIS. We understand the complex nature of this document and the challenges associated with the management of land and water in Icicle Creek. We also stand ready to assist with the implementation of permanent conservation measures in the future.

Sincerely Yours,

Curt Soper, Executive Director

CHELAN-DOUGLAS LAND TRUST

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PHONE: 509.667.9708 • 18 N. WENATCHEE AVE. • WENATCHEE, WASHINGTON 98801

## Comment Letter 016



July 16, 2018

Mike Kaputa,  
Chelan County National Resource Dept.,  
411 Washington St, Ste 201, Wenatchee, WA 98802

I am writing you as a leader of the Polly Dyer Cascadia Great Old Broads for Wilderness. We are part of a national grass roots organization, led by women that engages and inspires activism to preserve and protect wilderness and wild lands. In Washington alone we have over 300 members.

We are writing in staunch opposition to the "Farm Bill" as it is currently proposed. The bill will completely destroy environmental protections of our precious public forests. The bill falsely asserts that logging will reduce fires and reduce carbon losses from forests (**in fact it increases them!**) Science tells us that logging does not stop native beetles or disease and dead trees or snags do not burn more intensely than a green forest. The areas that burn more intensely are areas that are heavily logged!

Public forest lands are essential ecosystems which provide, clean water, clean air, and habitat for native species. These forests are also one of nature's best carbon storage and sequestration systems on the planet. They provide extraordinary opportunities for the multi-billion dollar recreation economy valuable to our Evergreen state economy. Protecting public forestlands from logging will also help diminish the effects of climate change.

The projects this bill is proposing to exempt from the Endangered Species Act (ESA) and the National Environmental Policy Act (NEPA) are short sighted and hazardous to our forests and native species. The most egregious provisions of Title VIII (Forestry) found on pages 464 thru 526 of the House Republican's Farm Bill. Please read closely and prevent this devastation.

We urge you to vociferously oppose these sections of the bill and resist any attempt to make any deal which includes these or any other similar provisions. **The time to stand up for our forests and the environment is now.**

Broad Regards,

*Annie Cubberly*  
Annie Cubberly Polly Dyer Cascadia Broad Band Leader  
[Anniecubberly@gmail.com](mailto:Anniecubberly@gmail.com)  
4039 Rainwood Drive NW Olympia, WA

## Comment Letter 017



North Central Washington Audubon Society  
P.O. Box 2934  
Wenatchee, WA 98807  
[www.ncwaudubon.org](http://www.ncwaudubon.org)

July 29, 2018

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

Re: Draft Programmatic Environmental Impact Statement for the Icicle Creek Water Resource Management Strategy, Chelan County, Washington

Dear Mr. Kaputa:

The North Central Washington Audubon Society appreciates the opportunity to provide comments to the DPEIS for the Icicle Creek Water Resource Management Strategy.

Minimizing impacts to in-stream and lake habitat in the Icicle watershed is necessary to preserve the healthy environment that underpins our region's economy and way of life. To minimize habitat impacts, the amount of water drawn from the Icicle must be minimized. To minimize water withdrawals while also providing sufficient water for downstream users, water use by all users must be as efficient as possible. This would require implementation of aggressive conservation measures, which should include conveyance infrastructure improvements to minimize water loss, increased metering, and pricing of water in combination with issuance of bonds to finance a substantial buy-down of agricultural water rights in the area served by the Icicle's water. Unfortunately, none of the alternatives under consideration appears to include this level of aggressive conservation. WAC 197-11-440(5)(b) states "Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." An alternative with aggressive conservation measures would be a reasonable alternative under SEPA as it could attain the proposal's objectives while resulting in less overall environmental impact than any of the alternatives analyzed in the DPEIS.

17-1

17-2

The introduction to Section 1.1 contains the statement "Additionally, the PEIS will serve as the basis for future project-level environmental review that may be required if additional adverse impacts not identified in this document are probable." Future project-level actions that are not exempt will require environmental review and a threshold determination as stated in WAC 197-11-310(1). The question is not whether review would be required but whether additional documentation will be required or whether the PFEIS can be adopted under WAC 197-11-630. The text should be modified to clarify this point.

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Comment Letter 017

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- 17-3 The introduction of Section 3.6 of the DPEIS states that the description of water rights in that section “does not represent an extent and validity review and is not intended to determine the validity of quantities of water available under these water rights”. We appreciate this acknowledgement, as we believe some of the water rights originally granted haven’t been tapped for decades and are now likely invalid.
- 17-3 Section 3.6 is titled Water Use whereas the entire section describes water rights. This highlights a semantic issue that propagates throughout the document and reveals a substantive underlying issue. In the DPEIS, the terms “use” and “demand” appear to be synonyms for water right rather than actual water use, the assumption apparently being that each user is actually using or has an actual demand for the full quantity of water allowed in the user’s presumed water right. For example, Table 3.10 lists claimed surface water rights on Icicle Creek, some of which apparently authorize only instantaneous quantities. The total annual quantities needed for the beneficial uses of water claimed under water rights authorizing maximum instantaneous withdrawals are not, but should be, provided.
- Also, the apparent assumption of actual water use or demand equaling a presumed water right, which is almost certainly invalid, highlights the need for comprehensive metering to understand actual water use. An understanding of actual water use would facilitate a rational system-wide water allocation that provides sufficient water to downstream water users while minimizing the amount of water extracted from the Icicle and minimizing or avoiding modifications to lakes in the upper Icicle drainage.
- 17-4 The extent to which claimed existing water rights would be used or new water rights obtained under each alternative is unclear. For example, Table 3.9 lists a water storage right for Eightmile Lake with an adjudicated annual quantity of 2,500 acre-feet. Section 2.3.5 describes Alternative 4 involving “increasing the useable storage [of Eightmile Lake] to approximately 3,500 acre-feet”. This increase in storage would presumably require acquisition of a water storage right for an additional 1,000 acre-feet assuming that the original water storage right remains valid. There is also a lack of clarity with respect to water rights claimed by the City of Leavenworth in relation to the amount of water that would be provided to the City under the various alternatives. Tables 3.9 and 3.10 provide a clear listing of claimed water rights. A similarly clear tabulation of new water rights required under the various alternatives, assuming claimed water rights are valid, would be useful to the reader.
- 17-5
- 17-6 Section 3.6.1.2 describes groundwater rights held by the City of Leavenworth with “points of diversion near RM 27.2 of the Wenatchee River”. This section further states: “the City of Leavenworth may be amenable to exercising water made available through the Icicle Strategy from their Wenatchee River well field rather than their Icicle Creek diversion.” Impacts and implications for reduced modification to the Icicle system as a result of using this groundwater by the City should be analyzed in the EIS. The statement that the City “may be amenable” is ambiguous as to the City’s actual willingness to draw from that groundwater source. The EIS should therefore also clarify under what conditions the City would use that source.

- 17-7 The DPEIS is unclear regarding to what extent actions implemented under the eventual approved Icicle Creek Water Resource Management Strategy would facilitate projected development of the City of Leavenworth to 2050. The text should be clarified on this point, and the impacts resulting from development that could not otherwise occur but for implementation of the Management Strategy described as indirect impacts in the PEIS as required under WAC 197-11-060(4).
- 17-8 We disagree with several conclusions reached in Section 4.28 regarding unavoidable adverse impacts. For example, impacts to Earth, Surface Water, Water Quality, Shorelines, and Fish and to Aesthetics, Recreation, and Wilderness from modifications to lakes in the upper Icicle drainage, for example, late summer drawdowns of Eightmile Lake under Alternative 4, would be significant. Sufficient detail is available at this programmatic stage of analysis to reach appropriate conclusions regarding significance of unavoidable impacts. Adequate consideration of environmental impacts during finalization of the management strategy requires that these conclusions be available to decisionmakers. If conclusions regarding the significance of unavoidable impacts are nonetheless postponed, project-level environmental review should be a supplemental environmental impact statement to adequately assess impacts.

Sincerely,



Arthur Campbell  
President

## Comment Letter 018

## Comment Letter 019

**From:** Donna Osseward <osseward@gmail.com>  
**Sent:** Monday, July 30, 2018 5:01 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on Icicle Creek Watershed Water Resources Management Strategy

Olympic Park Associates (OPA) appreciates this opportunity to comment on the Draft Programmatic Environmental Impact Statement (DPEIS) for the "Icicle Creek Watershed Water Resources Management Strategy."

While our mission is "to protect the wilderness and ecological integrity of Olympic National Park", OPA feels that harm to any American wilderness creates a precedence for harm to all wilderness areas. OPA considers wilderness to be the highest form of the multiple use of our lands.

18-1 In looking at the proposed Draft Programmatic Environmental Impact Statement (DPEIS) for the "Icicle Creek Watershed Water Resources Management Strategy", OPA considers the proposal, as written, would violate NEPA and the Wilderness Act of 1964.

18-2 Specifically, any actions that will change the flow of water within the Alpine Lakes Wilderness is a violation of the Wilderness Act. The Colchuck, Eightmile, Upper and Lower Snow, Nada, Lower Klonauqua, and Square lakes, and the Eightmile, French, Icicle, Klonauqua, Leland, Mountaineer, Prospect, and Snow creeks could all be negatively impacted by actions described in the DPEIS. Also, OPA contends IPID's easements do not supersede the Wilderness Act. OPA feels the DPEIS must be revised to address NEPA and Wilderness Act misunderstandings in its current version. OPA concurs with the North Cascades Conservation Council's concerns on the Icicle project's effects on the Alpine Lakes Wilderness.

18-3 From wilderness we get clean air and water. Both move beyond the wilderness area boundaries. Properly used wilderness provides a recreational sanctuary that can be enjoyed by many. Wilderness provides a place for wildlife far better than a zoo. It protects ecosystems that hold genes that have and will provide the basis for a great percentage of our medicines. Genes that have helped and will help to provide cures for agricultural ills. As environmental conditions change, new plant and animal genes may be needed to strengthen agricultural crops and animals. Wilderness is a library and laboratory for our Creator's genetic wonders. Wonders our scientists discover, not create.

The use of wilderness must be such that none of its gifts are sacrificed to one use or group of people. These federal lands belong to all the people of the United States. Their value belongs to all the people of the United States. With coming climate change, protecting these gifts will require our efforts to preserve and protect them for future generations. Without wilderness there will be less clean water, air, and its other gifts. Will this generation take from future generations or will it keep the benefits that cannot be bought later for any amount of money?

Before we, everywhere, use short term methods to increase water availability, we must conserve the water we take. We must develop methods for using water that:

- 18-4
- better holds it in the ground to produce our crops;
  - allows less evaporation in holding it, using it, and transporting it;
  - and keep it clean - not filling it with pollutants for the next user.

Taking wilderness and not cleaning the water we pollute is not a responsible use of water. We all must take more responsibility in using water wisely.

Sincerely,  
 Donna Osseward, President  
 Olympic Park Associates  
 13000 Linden Ave N, Apt 433  
 Seattle, WA 98133

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 Donna Osseward

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July 30, 2018

Mike Kaputa, director  
 Chelan County Natural Resource Department  
 411 Washington Street., Suite 201  
 Wenatchee, WA 98801

Dear Mr. Kaputa,

19-1 I am writing today to voice the Pacific Crest Trail Association's opposition to Chelan County's water resource management plan in the Icicle Creek Strategy. Please include this letter in your public comments.

19-2 While we have no comments on the project's goals, merits or various options, we are deeply concerned about its impact on the Alpine Lakes Wilderness and the precedent-setting potential it would have to weaken our nation's wilderness preservation system.

19-3 We voice these concerns because the Pacific Crest Trail crosses the Alpine Lakes Wilderness for 65.4 miles. While the proposed project would not directly affect the trail tread, it would significantly affect the experience of trail users.

As the longest hiking and equestrian trail in the United States, the 2,650-mile Pacific Crest Trail is often referred to as the crown jewel of the National Trails System. Designated as a National Scenic Trail by Congress with the passage of the 1968 National Trails System Act, the PCT passes through more federally designated wilderness than any of the country's 11 National Scenic Trails.

From the south, PCT hikers and horseback riders enter the Alpine Lakes Wilderness from Snoqualmie Pass, a popular recreation jumping off point for millions of annual visitors. The PCT is one of the primary ways into this great wilderness, and thousands of day hikers and weekend backpackers use the trail to fan out across the wilderness area's nearly 700 lakes. It is the character of these lakes in particular that is threatened by the proposed action.

Congress has designated 765 wilderness areas partly to ensure that they remain untrammeled, so generations can visit and experience them. For the thousands of Pacific Crest Trail Association members and volunteers who give their time and money to maintain and protect the trail, publicly owned wilderness areas are a great inherited treasure that should not be disturbed.

That's why the PCTA believes that any encroachment on designated wilderness would be a dangerous move. Wilderness protections ensure the longevity of places that provide clean air and water, preserve biological diversity and offer people much needed refuge from crowded cities.

19-4 The Wilderness Act is as clear as a mountain stream. It states: "...there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport..."

902 SE North Bend Way  
 North Bend, WA 98045  
 206 295 9359  
[www.pcta.org](http://www.pcta.org)



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Pacific Crest Trail Association

- 19-4 | There is no way to do the work proposed in the Alpine Lakes Wilderness without violating this basic tenant of the Wilderness Act. The disturbance to the landscape, to wildlife and to the experiences of those seeking quiet recreation would be significant.
- Opening up a beloved wilderness area for any development puts the entire wilderness preservation system in a compromised position. We ask that you eliminate parts of your proposed action that are incompatible with careful wilderness management. These actions have the potential to set dangerous precedents. For example, the proposed boring of a tunnel from Upper Klonauqua Lake to Lower Klonauqua Lake cannot be implemented in a manner that conforms to the intent of the Wilderness Act nor the Alpine Lakes Area Management Act of 1976. This action must be reconsidered.

Wilderness is the highest form of protection for our nation's public lands. This proposal, as written, would be a severe blow to what should be sacrosanct.

Sincerely,

Michael Hanley  
PCTA North Cascades Regional Representative

CC:  
Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator  
Justin Kooyman, PCTA, Associate Director of Trail Operations



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Paul J. Lawrence  
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July 30, 2018

VIA EMAIL

Tom Tebb  
Director, Office of Columbia River  
Washington Department of Ecology  
1250 Alder Street  
Union Gap, WA 98903

Mike Kaputa  
Director, Natural Resource Department  
Chelan County  
411 Washington Street, Suite 201  
Wenatchee, WA 98801  
(509) 670-6935  
[nr.iciclespa@co.chelan.wa.us](mailto:nr.iciclespa@co.chelan.wa.us)

Re: Icicle Creek Water Resource Management Strategy  
Comments on Draft Programmatic Environmental Impact Statement

Dear Directors Tebb and Kaputa:

We represent The Wilderness Society with regard to the Icicle Creek Watershed Water Resources Management Strategy ("Icicle Strategy"). The Wilderness Society has joined with other environmental organizations to submit comments highlighting the land and water conservation concerns raised by the Draft Programmatic Environmental Impact Statement ("DPEIS") for the Icicle Strategy. We write separately to identify legal issues raised by the DPEIS and to recommend how those issues should be addressed in a revised DPEIS. We appreciate the opportunity to comment on the DPEIS and look forward to working with you to ensure that the PEIS proposes a sustainable, lawful, and comprehensive solution to the complex and demanding issues the Icicle Strategy was convened to address.

- 20-1 | As a general matter, the legal deficiencies identified in this letter require that the DPEIS be revised and re-issued. Although there is a wealth of information in the DPEIS, its significant ambiguities and inadequate or nonexistent analysis of critical issues call into question whether the DPEIS is sufficient to meaningfully guide the government decision-making process and facilitate public engagement. In its current form, the DPEIS is suitable to serve only as an

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- 20-2 | improper “ex post facto justification” for government action, depriving the public of a meaningful opportunity to comment on and improve the important government decisions at issue.<sup>1</sup> We identify below the legal deficiencies in the DPEIS and suggest ways that those deficiencies can be remedied to move the decision-making process forward.

- 20-3 | **Consideration of Wilderness and Water Law Issues.** As environmental groups have noted throughout this process and we reiterated in our May 24, 2018 letter, the DPEIS must confront the critical federal wilderness and water law issues posed by the Icicle Strategy to ensure that it proposes and evaluates only alternatives that are lawful. As we described in our letter (attached as Exhibit A and incorporated by reference), the Icicle Strategy poses two main issues: (1) the scope and validity of the Icicle Irrigation District’s (the “District”) water rights, which determines if and how the Icicle Strategy may involve the dams in the Alpine Lakes Wilderness, and (2) if and how the District’s easements with the Forest Service impact federal wilderness protections. Those issues must be resolved now, before action is taken, not later, when it becomes difficult or impossible to change course. Although the DPEIS states that “[a]ll members of the Work Group agreed that a project cannot move forward if it is out of compliance with laws,”<sup>2</sup> the DPEIS does not analyze compliance with applicable laws and instead improperly punts these issues to project-level review.

- 20-4 | First, the DPEIS should be revised to evaluate the scope and validity of the District’s water rights, including whether all or part of those rights have been relinquished. Consistent with basic principles of water law, this analysis must be premised on data regarding the District’s use of its rights over time, not the scope of those rights when first certificated or adjudicated.<sup>3</sup> Although the DPEIS acknowledges that water rights must be put to beneficial use and may be relinquished otherwise,<sup>4</sup> it does not state the measure of the District’s rights here, nor does it include basic information about the District’s usage over time. Instead, the DPEIS notes only the rights that were adjudicated or certificated.<sup>5</sup> We are aware of neither a legal presumption in favor of certificated rights nor of a legal prerequisite for a third party to first submit a request before Ecology can conduct an extent and validity determination. It is unreasonable to propose and purport to analyze projects which involve the dams in the Alpine Lakes Wilderness without first determining the extent and validity of the water rights upon which those projects are premised. As the co-lead agency for this proposal under the State Environmental Policy Act (“SEPA”) and the agency with jurisdiction to determine water rights, Ecology must conduct that analysis now before moving forward with the decision-making process.

- 20-5 | Second, the DPEIS should not just summarize wilderness law and the terms of the easements and other agreements, but should also apply those principles to the alternatives proposed. Here, the DPEIS summarily concludes that “[n]on-wilderness uses that are authorized

<sup>1</sup> See *Mentor v. Kitsap Cty.*, 22 Wn. App. 285, 291, 588 P.2d 1226 (1978) (internal citation omitted).

<sup>2</sup> DPEIS, p. 1-22.

<sup>3</sup> Under both state and federal law, beneficial use is ‘the basis, the measure and the limit’ of the right to the use of water.” *State, Dep’t of Ecology v. Acquavella*, 131 Wn.2d 746, 755-56, 935 P.2d 595 (1997).

<sup>4</sup> DPEIS, p. 1-47.

<sup>5</sup> *Id.* at p. 2-105.

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- 20-5 | and do occur within the boundaries of the [Alpine Lakes Wilderness] include reservoir operations and use of motorized equipment for maintenance of these reservoirs and helicopter transport to and from the reservoirs” and notes that “[t]hese non-wilderness uses are permissible under various ownership structure and agreements, easements, and permits . . .”<sup>6</sup> As noted in our May 24, 2018 letter, that is simply not the case. The actions proposed in the DPEIS—including blasting a tunnel between two wilderness lakes, mechanizing infrastructure, and relying on regular and frequent helicopter flights to perform a widespread and significant construction project—are unprecedented intrusions into a protected wilderness area that are inconsistent with and go far beyond the limited rights granted in the easements.

- 20-6 | We also note a few discrepancies in your description and limited analysis of federal wilderness protections. In your description of the Wilderness Act, you state that “certain nonconforming uses are permitted as described within the act, including access to non-federal inholdings and for the maintenance and reconstruction of existing water infrastructure, such as dams.”<sup>7</sup> That is incorrect. Instead, the Wilderness Act permits only the President to authorize additional water resources and reservoirs to be constructed in wilderness.<sup>8</sup> Congress may also authorize nonconforming uses in designated wilderness areas but, although Congress has explicitly grandfathered in existing water rights and infrastructure in several acts designating wilderness areas, it did not do so here.<sup>9</sup> The DPEIS also fails to evaluate the impacts of the hundreds, if not thousands, of helicopter flights required for this proposal, based only on the fact that a 1981 Environmental Assessment found the District’s helicopter use then to be “permissible.”<sup>10</sup> That the District’s limited emergency helicopter usage almost 40 years ago was found permissible is irrelevant to whether the unprecedented and expanded helicopter use required for the projects proposed in the DPEIS would also be. Particularly where even just a couple of helicopter flights have been the subject of wilderness litigation,<sup>11</sup> it is imperative that those impacts be scrutinized here.

- 20-8 | The lead agencies committed to this level of analysis in response to scoping comments, including by reassuring stakeholders that “the PEIS will discuss the compatibility of projects proposed to meet the Guiding Principles with applicable state and federal laws,” “[e]xisting easements, in-holder agreements, and State water rights will be reviewed,” and “[t]he PEIS will include narrative of the current state of water rights in the basin.”<sup>12</sup> This thorough analysis must be done in a revised DPEIS, not just the final PEIS, to permit the public a meaningful opportunity to comment on it. Revising the DPEIS to address these deficiencies is necessary

<sup>6</sup> *Id.* at p. 3-139.

<sup>7</sup> *Id.* at p. 1-45, 3-139.

<sup>8</sup> 16 U.S.C. § 1133(d)(4).

<sup>9</sup> See, e.g., Colorado Wilderness Act of Dec. 22, 1980, Pub. L. No. 96-560, §102(a)(5), 94 Stat. 3265, 3266; California Wilderness Act of 1984, Pub. L. No. 98-425, §101(a)(25), 98 Stat. 1619, 1622; Wyoming Wilderness Act of 1984, Pub. L. No. 98-550, §201(c), 98 Stat. 2807, 2809-10.

<sup>10</sup> DPEIS, p. 3-148.

<sup>11</sup> See, e.g., *Olympic Park Assocs. v. Mainella*, No. C04-5732FDB, 2005 WL 1871114, at \*8 (W.D. Wash. Aug. 1, 2005) (rejecting proposal to airlift two deteriorated shelters out of wilderness by helicopter because “it is in direct contradiction of the mandate to preserve the wilderness character of the Olympic Wilderness”).

<sup>12</sup> See, e.g., DPEIS, Appendix A, p. 2.



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also to fulfill SEPA's stated purpose "to encourage the resolution of potential concerns or problems **prior** to issuing the final statement."<sup>13</sup>

20-8 In summary, the DPEIS identifies but does not analyze important legal constraints that impact the range of alternatives that should be considered. That analysis should be done at the programmatic level. It cannot be punted to the project level after determinative scoping decisions have already been made.

20-9 **Scope and Analysis of Alternatives.** The DPEIS also fails to appropriately select and analyze alternatives for the Icicle Strategy. SEPA requires that the DPEIS evaluate "reasonable alternatives," which "shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation."<sup>14</sup> At the very least, the alternatives considered must "be representative of the range of choices to permit intelligent comparative evaluation."<sup>15</sup> SEPA also requires that the DPEIS identify and evaluate a no-action alternative to serve as a benchmark from which the impacts of the other alternatives can be measured.<sup>16</sup> As described below, the scope of alternatives is improperly narrow, the amorphous descriptions of the selected alternatives preclude meaningful analysis or comment, and the DPEIS fails to properly identify and evaluate a true no-action alternative.

20-11 First, the DPEIS improperly limits the range of alternatives because it declines to consider any alternatives which include decommissioning or removing the dams.<sup>17</sup> The offered reasons for doing so are that removing the dams would (1) impede the operations of the District and the fish hatchery, (2) "reduce streamflow, decrease domestic and agricultural reliability," and make it "impossible" to meet the Guiding Principles for the Icicle Strategy due to climate change, and (3) impact private property rights.<sup>18</sup> The DPEIS does not offer the factual or legal basis for those unsubstantiated conclusions. Indeed, decommissioning dams in wilderness has proven to be an effective way to balance wilderness and federal protections in the Uinta wilderness, where similar concerns to those noted in this DPEIS were adequately addressed by moving water rights to a diversion point downstream and modifying other infrastructure outside wilderness.<sup>19</sup> Where the purpose of the Icicle Strategy is to "find collaborative solutions for water management within the Icicle Creek drainage," dam removal could feasibly achieve that goal (and indeed has proven to do so in the Uinta) and should be evaluated. The three reasons

<sup>13</sup> WAC 197-11-400(4) (emphasis added).

<sup>14</sup> WAC 197-11-786; *see also* RCW 43.21C.030(2)(c) (requiring government agencies to "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources").

<sup>15</sup> Richard Settle, *The Wash. State Env't Policy Act: A Legal and Policy Analysis*, § 14.01(2)(b) (2015); *see also* *Toandos Peninsula Ass'n v. Jefferson Cty.*, 32 Wn. App. 473, 483, 648 P.2d 448 (1982) (an EIS must "present[] sufficient information for a reasoned choice of alternatives.").

<sup>16</sup> *See* WAC 197-11-440(5)(b)(ii); Ecology, SEPA Handbook, Publication #98-114, at \*55 (2003), <https://fortress.wa.gov/ecy/publications/documents/98114.pdf>.

<sup>17</sup> *See* DPEIS, p. 2-120.

<sup>18</sup> *Id.*

<sup>19</sup> High Uinta Wilderness Area, High Mountain Lakes Stabilization Project, [https://www.mitigationcommission.gov/hmls/hmls\\_home.htm](https://www.mitigationcommission.gov/hmls/hmls_home.htm) (last accessed July 10, 2018).

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20-11 the DPEIS offers should more appropriately be included and expanded upon in the DPEIS to facilitate intelligent comparative evaluation of alternatives, not offered as a rationale for declining to evaluate dam removal in the first instance.

20-12 Second, the DPEIS should be revised to offer and evaluate a true "no-action alternative" to serve as a "benchmark" for evaluating the other alternatives proposed, as SEPA requires.<sup>20</sup> The no-action alternative is "typically defined as what would be most likely to happen if the proposal did not occur."<sup>21</sup> The no-action alternative here is far from a "benchmark" and is instead defined to include a significant amount of the "action" proposed by the Icicle Strategy. The DPEIS appears to distinguish the no-action alternative primarily on the basis that it would not be part of a coordinated effort, but argues that much of the activities proposed in the alternatives would still move forward independently.<sup>22</sup> For example, the DPEIS states that the no-action alternative could include "upgrading irrigation infrastructure at the Alpine Lakes and constructing diversion improvements, irrigation system upgrades, LNFH improvements, and fish passage work,"<sup>23</sup> and that "[the District] and USFWS would likely maintain and upgrade their storage facilities . . . and construction level impacts could be similar to those discussed in the Program Alternatives."<sup>24</sup> In comparing the benefit and impacts of the no-action alternative to the other alternatives, the DPEIS suggests that the no-action alternative would be less beneficial because there would be "no coordinated and integrated effort to ensure that the projects move forward in a well planned manner."<sup>25</sup> Puzzlingly, it also suggests that the no-action alternative may have **more** significant adverse impacts because the "project proponents may have less input or coordination with other stakeholders[.]"<sup>26</sup> By improperly conflating and confusing the no-action alternative with the other alternatives, the DPEIS obscures and precludes meaningful analysis of the impacts of its proposed actions. It also prejudices the alternatives analysis by assuming action will take place regardless of the DPEIS. Instead, the no-action alternative should include only those actions that are foreseeable with current zoning and approvals, not hypothetical actions which require extensive study, permitting, and approvals to move forward and are the subject of the government action being evaluated.

20-13 Third, the proposed alternatives are inadequately and amorphously described, which makes it almost impossible to comment on them, much less identify a preferred alternative. The DPEIS presents each alternative as a "package" of projects, but fails to identify the complete slate of projects each alternative will include. Specifically, each alternative lists its components, but qualifies that list with the statement that "[a]dditional projects may be pursued[.]"<sup>27</sup> The

<sup>20</sup> *See* WAC 197-11-440(5)(b)(ii); SEPA Handbook, at \*55.

<sup>21</sup> SEPA Handbook, at \*55.

<sup>22</sup> *See, e.g.*, DPEIS, p. 4-168 ("Under the No-action Alternative, various agencies and other entities would continue to undertake individual actions to restore and enhance fish and aquatic resources in the Icicle project area and maintain existing infrastructure, but those actions would not be part of a coordinated program implemented with the support of the Icicle Work Group.").

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at p. 4-391, ES-28.

<sup>25</sup> *Id.* at p. 4-380.

<sup>26</sup> *Id.* at p. 4-169.

<sup>27</sup> *Id.* at p. ES-9-12, 2-16, 2-23, 2-27, 2-32.



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- 20-13 | other projects that the qualification encompasses are significant and, in some instances, change completely the nature of the alternative. For example, the DPEIS characterizes Alternative 3 as a “response to SEPA scoping comments that expressed a desire for an alternative that excluded projects within the Alpine Lakes Wilderness Area,” and the description of that alternative explicitly “**except[s]**” the Eightmile Lake Storage Restoration Project.<sup>28</sup> However, it also ambiguously and contrarily states that “[a]dditional projects may be pursued outside of the Icicle Strategy if Alternative 3 is selected as the preferred alternative, such as the **Eightmile Lake Storage Restoration Project**,” but that “project beneficiaries may be different and project timelines are unknown.”<sup>29</sup> For the DPEIS to be more than just a “discarded hypothetical exercise,” it must clearly describe the parameters of each alternative.<sup>30</sup>
- 20-14 | Finally, if the lead agencies wish to consider emergency work at Eightmile Lake, that action must be identified and analyzed in the DPEIS, not just in the final PEIS. SEPA directs that “an environmental impact statement should not merely be an ex post facto justification of official action but should serve to inform lawmakers of the environmental consequences of the proposal before them.”<sup>31</sup> Here, the DPEIS states “[b]ecause of the timing of [the District’s] s emergency declaration, the draft PIES [sic] does not contemplate this action’s impacts on the proposed alternatives . . . [t]his may be evaluated further in the final PEIS.”<sup>32</sup> By deferring “contemplat[ion]” of this action until the final PEIS, the lead agencies are providing only the “ex post facto justification” that SEPA prohibits and precluding meaningful analysis and public comment. The DPEIS should be revised to identify and evaluate the emergency work at Eightmile.
- 20-15 | **Phased Review and Cumulative Impacts.** Punting to project-level review any meaningful analysis of the project components of the proposed alternatives is improperly piecemeal, precludes analysis of cumulative impacts, and threatens to create administrative inertia for the Icicle Strategy before its impacts are fully understood.
- SEPA requires that “[p]roposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document.”<sup>33</sup> Proposals are closely related if they: (i) “[c]annot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or (ii) [a]re interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation.”<sup>34</sup> Because the project components are interdependent parts of and depend on the Icicle Strategy for their implementation, phased review is inappropriate and they must be evaluated together. Further, “[p]hased review is not appropriate when: . . . [i]t would . . .

<sup>28</sup> DPEIS, at p. ES-101-11.

<sup>29</sup> *Id.* (emphasis added).

<sup>30</sup> *Lands Couinc. v. Wash. State Parks Recreation Comm’n*, 176 Wn. App. 787, 803, 309 P.3d 734 (2013).

<sup>31</sup> See *Mentor v. Kitsap Cty.*, 22 Wn. App. 285, 291, 588 P.2d 1226 (1978) (internal citation omitted).

<sup>32</sup> DPEIS, p. 2-65.

<sup>33</sup> WAC 197-11-060(3)(b).

<sup>34</sup> *Id.*

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- 20-15 | avoid discussion of cumulative impacts . . .”<sup>35</sup> The conclusory and limited discussion of cumulative impacts in the DPEIS underscores the importance of meaningfully evaluating the project-level impacts now.
- The impacts of the project components can and should be evaluated now because there is sufficient information to do so and any later environmental review of an individual project will be futile after an alternative is selected. Environmental review is required when “the principal features of a proposal and its environmental impacts can be reasonably identified” and “meaningfully evaluated.”<sup>36</sup> Importantly, SEPA requires agencies to complete environmental review “prior to the go-no go stage of the project, which is to say before any irreversible and irretrievable commitment of resources.”<sup>37</sup> In other words, environmental review must be completed early enough to inform and guide decision-makers, rather than to “rationalize or justify decisions already made.”<sup>38</sup> The concern is that permitting such piecemeal review “may begin a process of government action which can ‘snowball’ and acquire virtually unstoppable administrative inertia,” creating a situation where “[e]ven if adverse environmental effects are discovered later, the inertia generated by the initial government decisions . . . may carry the project forward regardless.”<sup>39</sup> Here, the selection of a preferred alternative at the culmination of years of effort and millions of dollars in resources is the prototypical “snowball,” and thus the DPEIS must be revised to evaluate project-level impacts now before its momentum becomes inexorable.
- Mitigation.** The DPEIS’s discussion of proposed mitigation measures is insufficient and incomplete. Although the DPEIS suggests vague mitigation measures for specific projects—such as designing structures to blend in to the surrounding environment, using local construction materials, and using an architect to design certain dam structures<sup>40</sup>—it explicitly declines to identify how those mitigation measures will be implemented or to address how mitigation measures can or will be coordinated across projects.<sup>41</sup> A thorough discussion of the extent and manner in which the DPEIS proposes to mitigate adverse environmental impacts of the alternatives is critical to determining if those impacts will be significant, and the DPEIS must be revised to include that discussion.
- 20-17 | These critical issues (in addition to those identified in the comment letter submitted by The Wilderness Society and other environmental stakeholders) must be addressed now, not in the final PEIS, to daylight government decision-making process and facilitate meaningful public

<sup>35</sup> WAC 197-11-060(5).

<sup>36</sup> WAC 197-11-055(2).

<sup>37</sup> *Int’l Longshore & Warehouse Union, Local 19 v. City of Seattle*, 176 Wn. App. 512, 522, 525, 309 P.3d 654 (2013) (internal citation omitted) (“The snowballing metaphor is powerful because it embodies the fundamental ideal of SEPA: to prevent government agencies from approving projects and plans before the environmental impacts of doing so are understood.”).

<sup>38</sup> WAC 197-11-406.

<sup>39</sup> *King Cty. v. Wash. State Boundary Review Bd.*, 122 Wn.2d 648, 664, 860 P.2d 1024 (1993).

<sup>40</sup> DPEIS, at ES 30-31.

<sup>41</sup> *Id.* (noting that “[t]hese impacts and specific mitigation measures would be addressed in project-level environmental review.”).

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20-17 | comment. Although it is impracticable to provide further comments on the alternatives or to identify which we prefer, we look forward to providing more detailed comments once the DPEIS has been revised and re-issued. If you have any questions or if we can be of any assistance to you as you move through the revision process, please let us know.

Thank you.

Sincerely,

PACIFICA LAW GROUP LLP



Paul J. Lawrence  
Alanna Peterson

Attachment

**EXHIBIT A**

## Comment Letter 020

## Comment Letter 020



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Paul Lawrence  
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May 25, 2018

Maia Bellon  
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Tom Tebb  
Director, Office of the Columbia River and Icicle Work Group Co-lead  
Washington State Department of Ecology  
1250 Alder Street  
Union Gap, WA 98903  
Email: thomas.tebb@ecy.wa.gov

Re: Icicle Creek Watershed Water Resource Management Strategy

Dear Directors Bellon and Tebb:

We represent The Wilderness Society, which for the last five years has been involved in the Icicle Work Group's ("IWG") efforts to develop a water resource management strategy for the Icicle Creek watershed (the "Icicle Strategy"). In the five years since the Department of Ecology ("Ecology") convened the IWG to address a variety of regional issues, including improving instream flows and increasing water supply for irrigation and municipal use, the IWG has focused on replacing, modernizing, and expanding several deteriorated, earthen dams on remote lakes in the Alpine Lakes Wilderness as its preferred solution, to the exclusion of all other alternatives. Despite the repeated and emphatic concerns voiced by The Wilderness Society and others in the conservation community about that solution, the IWG has not meaningfully considered whether that solution is consistent with and supported by applicable state and federal law. Those concerns are heightened now that the Icicle Irrigation District (the "District") seeks to potentially misuse the emergency situation at Eightmile Lake to not just stabilize, but to enlarge and completely reconstruct that dam. As the co-lead agency for the Icicle Strategy under the State Environmental Policy Act and the primary funder of the IWG, Ecology has an independent legal obligation to ensure that the actions IWG proposes are lawful. To assist Ecology in that effort, we write to provide an overview of the principles of federal wilderness law and Washington water law to which the Icicle Strategy must conform.

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Specifically, the IWG has failed to meaningfully consider two fundamental legal issues. First, the IWG has assumed without question that the District's easements with the Forest Service supersede and render irrelevant federal wilderness protections. That assumption is wrong. Federal wilderness protection must be considered. Second, it has failed to inquire into the scope and validity of the District's water rights. The limited nature of the District's water rights restricts what proposals are appropriate. As described below, the law requires that consideration of these issues be a guiding principle of the Icicle Strategy. Instead, it has been an afterthought, despite consistent advocacy by groups like The Wilderness Society.

Consideration of federal wilderness law is essential in determining the legality of the activities that the IWG proposes to do in designated wilderness. The activities at the heart of the Icicle Strategy—expanding and modernizing water infrastructure, using mechanized equipment and transport, and possibly building a road—are “strong[ly] prohibit[ed]” by the Wilderness Act.<sup>1</sup> There are only three relevant exceptions to that strong prohibition, which are strictly construed and none of which are applicable here. First, additional water resources and reservoirs may be constructed in wilderness if authorized by the President, which has never been done.<sup>2</sup> Second, federal agencies may allow exceptions “as necessary to meet minimum requirements for the administration of the area for the purposes of” the Wilderness Act, which include **only** the “public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”<sup>3</sup> IWG has never argued that the Icicle Strategy furthers the purposes of wilderness, and it is unclear on what basis it could do so. And third, Congress may authorize nonconforming uses in designated wilderness areas. Although Congress has explicitly grandfathered in existing water rights and infrastructure in several acts designating wilderness areas, it did not do so here.<sup>4</sup> Regardless of the “merits” or “validity” of a goal, the “mandatory language” of the Wilderness Act precludes any prohibited activities that do not fit within those exceptions.<sup>5</sup>

In granting easements to the District, the Forest Service did not broadly except the District from the Wilderness Act, nor did Congress authorize it to do so. At most, the Forest

<sup>1</sup> 16 U.S.C. § 1133(c); see also *Wilderness Watch, Inc. v. U.S. Fish & Wildlife Serv.*, 629 F.3d 1024, 1039 (9th Cir. 2010).

<sup>2</sup> *Id.* at § (d)(4).

<sup>3</sup> *Id.* at §§ (b),(c).

<sup>4</sup> See, e.g., Colorado Wilderness Act of Dec. 22, 1980, Pub. L. No. 96-560, §102(a)(5), 94 Stat. 3265, 3266 (“That no right, or claim of right, to the diversion and use of conditional water rights for the Homestead development projects by the cities of Aurora and Colorado Springs shall be prejudiced, expanded, diminished, altered, or affected by this Act.”); California Wilderness Act of 1984, Pub. L. No. 98-425, §101(a)(25), 98 Stat. 1619, 1622 (“nothing in this title shall be construed to prejudice, alter, or affect in any way, any rights or claims of right to the diversion and use of waters from the North Fork of the San Joaquin River, or in any way to interfere with the construction, maintenance, repair, or operation of a hydroelectric project similar in scope to the Jackass-Chiquito hydroelectric power project (or the Granite Creek-Jackass alternative project) as initially proposed by the Upper San Joaquin River Water and Power Authority.”); Wyoming Wilderness Act of 1984, Pub. L. No. 98-550, §201(c), 98 Stat. 2807, 2809-10 (protecting rights for water diversion and use, including construction, operation, maintenance, and modification, of specific water development projects).

<sup>5</sup> *Wilderness Soc’y v. U.S. Fish & Wildlife Serv.*, 353 F.3d 1051, 1067 (9th Cir. 2003); *Wilderness Watch, Inc. v. U.S. Fish & Wildlife Serv.*, 629 F.3d 1024, 1039 (9th Cir. 2010).

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Service agreed to permit the District to continue to use and maintain its existing earthen dams under specific and limited circumstances, and only in a “reasonable” manner “as not unreasonably to interfere with [the land’s] use by the United States . . . or cause substantial injury thereto.” A later easement related to the dams at Colchuck and Square Lakes “authorizes only the right-of-way and water conveyance facilities as constructed and operated on October 21, 1976,” when the Alpine Lakes Management Act was passed, and “does not authorize extensions or enlargements.”<sup>6</sup> Importantly, these rights are limited to use for agriculture and irrigation purposes only. The scope of those limited and specific rights—including the reasonableness of the District’s actions and the extent to which they injure or interfere with wilderness—must be construed with respect to, not in disregard of, federal wilderness protections.

This is consistent with the Forest Service’s management plan for the Alpine Lakes Wilderness (the “Plan”), which was adopted before the easements were granted. Although the Plan mentions the existence of several “unimposing,” “substantially unnoticeable” dams “constructed primarily of native materials,” it states that those structures “will not be expanded” and must “continue to be maintained by primitive means unless an environmental analysis indicates that the work cannot be accomplished without motorized equipment.”<sup>7</sup> The Plan also directs that, aside from Presidential authorization, “watersheds will not be altered or managed to provide increased water quantity, quality or timing of discharge.”<sup>8</sup> Contrary to those directives, the IWG has invested considerable time and resources in exploring alternatives that significantly expand, enlarge, and modernize the District’s existing and significantly deteriorated water infrastructure in wilderness, and has until recently declined to consider other alternatives to achieve its goals that do not interfere with or injure wilderness.<sup>9</sup>

The IWG has also improperly placed the cart before the horse in spending years and hundreds of thousands of dollars to determine how to help the District store and divert water without first determining the scope or validity of the District’s water rights. IWG has relied on and cited to the District’s water rights certificates, issued and adjudicated almost a century ago, in determining what the District’s rights are now. But that is not the law. Instead, “[u]nder both state and federal law, beneficial use is ‘the basis, the measure and the limit’ of the right to the use of water.”<sup>10</sup> If water rights are not used in whole or in part over any five-year period, they are relinquished to the state.<sup>11</sup> It is beyond dispute that the District is now seeking to, and the

<sup>6</sup> Agriculture Irrigation and Livestock Watering Easement, No. 1203-03, between the U.S. Department of Agriculture, Forest Service, and the Icicle Irrigation District (Jan. 6, 2000).

<sup>7</sup> Alpine Lakes Land Area Management Plan, 54-57 (1981).

<sup>8</sup> *Id.* at 57.

<sup>9</sup> See, e.g., *Wilderness Watch, Inc. v. U.S. Fish & Wildlife Serv.*, 629 F.3d 1024, 1039 (9th Cir. 2010) (“There is little question that improvements to the water supply likely will help the sheep recover. But, when the issue is a new *structure*, that conclusion is not good enough under this statute . . . It is beyond dispute that, if addressing other variables will lead to satisfactory sheep recovery, then a new structure is not “necessary.” The Service’s complete failure to address that key question is fatal to its conclusion.”).

<sup>10</sup> *State, Dep’t of Ecology v. Acquavella*, 131 Wn.2d 746, 755-56, 935 P.2d 595 (1997) (reversing the trial court’s decision to quantify a water right based upon the amount the irrigation district “could potentially divert, without requiring past beneficial use of that water.”).

<sup>11</sup> RCW 90.14.160

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alternatives in the Icicle Strategy would permit it to, store and divert more water than it ever has before.

To the extent the District argues that it had a statutory “good cause” for nonuse because the rights at issue are standby/reserve water rights, that argument is unsupported by the facts and would not justify using those rights to serve the primary and ongoing water needs of its constituents. The use of water for “standby/reserve rights” only provides “good cause” for nonuse where the “withdrawal or diversion facilities are maintained in good operating condition for the use of such reserve or standby water supply.”<sup>12</sup> The District’s dilapidated and deteriorating dams for decades have not (and likely have never) been in a condition to store or divert the full amount of the water right it was initially granted. Moreover, standby/reserve rights are characterized by intermittent use and may only be used to the extent a primary water right is unavailable in times of drought or low flow. Here, the District seeks to improperly convert a standby/reserve right to a primary water right, to be used to serve the ongoing, not merely reserve, needs of its constituents. The District cannot have it both ways.

The scope and validity of the District’s rights aside, there are equitable, efficient, and cost-effective options to ensure that the District is able to obtain that water without interfering with or injuring wilderness.<sup>13</sup> To that end, The Wilderness Society appreciates and encourages the IWG’s recent decision to consider moving the point of diversion for the District’s water rights outside of wilderness. This is appropriate because water rights run appurtenant to the land the rights are intended to benefit, **not** the point of diversion.<sup>14</sup> This strategy has successfully addressed similar issues in the Uinta Wilderness, in which state and federal agencies and water rights holders worked together to stabilize similarly deteriorated earthen dams that pre-existed wilderness designation.<sup>15</sup> They balanced stringent wilderness protections with public safety and water management issues by transferring the water rights to a diversion point downstream, removing and stabilizing the dams, and modifying other infrastructure outside wilderness, including constructing a new pipeline and enlarging another reservoir.

Meaningful consideration of applicable federal wilderness law and state water law is essential to developing a sustainable and enduring solution to the water resource management issues in the Icicle Creek watershed. While we appreciate the urgency and complexity of the issues that Ecology convened the IWG to address, the requirements of state and federal law are not open to compromise. We look forward to working with Ecology and other stakeholders to

<sup>12</sup> RCW 90.14.140(b).

<sup>13</sup> See RCW 90.03.380(1) (“The point of diversion of water for beneficial use or the purpose of use may be changed, if such change can be made without detriment or injury to existing rights. A change in the place of use, point of diversion, and/or purpose of use of a water right to enable irrigation of additional acreage or the addition of new uses may be permitted if such change results in no increase in the annual consumptive quantity of water used under the water right.”).

<sup>14</sup> See RCW 90.03.380(1) (“The point of diversion of water for beneficial use or the purpose of use may be changed, if such change can be made without detriment or injury to existing rights”).

<sup>15</sup> High Uinta Wilderness Area, High Mountain Lakes Stabilization Project, [https://www.mitigationcommission.gov/hmls/hmls\\_home.htm](https://www.mitigationcommission.gov/hmls/hmls_home.htm) (last accessed May 10, 2018).

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ensure that these state and federal laws serve as a guiding principle for the IWG's work going forward, not a mere afterthought.

Please do not hesitate to contact me if you would like to discuss these issues further.

Sincerely,

PACIFICA LAW GROUP LLP



Paul Lawrence  
Alanna Peterson

Cc:  
The Office of Governor Jay Inslee  
The Office of Senator Patty Murray  
The Office of Senator Maria Cantwell  
The Office of Representative Dave Reichert  
Jim Peña, Regional Forester, United States Department of Agriculture, Forest Service, Pacific Northwest Region  
Mike Williams, Forest Supervisor, Okanogan-Wenatchee National Forest  
Keith Goehner, Commissioner, Chelan County and Icicle Work Group Co-lead  
Tony Jantzer, Icicle and Peshastin Irrigation Districts

## Comment Letter 021



**Washington Native Plant Society**  
*Appreciate, Conserve, and Study Our Native Flora*

6310 NE 74<sup>th</sup> St., Ste. 215E, Seattle, Washington 98115  
(206) 527-3210

July 25, 2018

To:

G. Thomas Tebb, L.H.g., L.E.G.  
Director, Office of Columbia River  
Washington State Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009

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

Re: Draft Programmatic Environmental Impact Statement for the Icicle Creek Water Resource Management Strategy, Chelan County, Washington (PEIS)

Dear Directors,

21-1

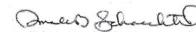
Plants are a fundamental and essential part of the human environment. NEPA requires evaluation of all environmental impacts that significantly affect the quality of the human environment. Consequently, NEPA requires evaluation of impacts to plants as part of planning for all projects subject to NEPA, such as those described in the PEIS.

Professional plant scientists must use current best plant science to determine these impacts. Any project that failed to professionally evaluate impacts to plants would fail to properly evaluate the impact on the quality of the human environment.

As part of its ongoing conservation program, the Washington Native Plant Society (WNPS) will evaluate subsequent environmental documents for these projects to ensure that impacts to plants are properly evaluated.

Please add the WNPS to the notification lists for all projects subsequently conducted pursuant to the PEIS.

Sincerely,



Don Schaeckhel  
WNPS President



Becky Chaney, Chair  
WNPS State Conservation Committee

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 022

Comment Letter 022



VIA EMAIL

July 30, 2018

Mike Kaputa  
Director, NRD  
Chelan County  
411 Washington Street, Suite 201  
Wenatchee, WA 98801  
nr.iciclesepa@co.chelan.wa.us

Dear Mr. Kaputa:

**GENERAL COMMENTS**

The Department of Ecology-Office of Columbia River (Ecology-OCR) professes to operate under RCW 90.38.005 (2013) "to promote the aggressive pursuit of water supply solutions."

22-1 Since 2006, when the Washington State Legislature gave Ecology-OCR \$200 million to "aggressively pursue" new water supplies, Ecology-OCR has continued to waste taxpayer money. The failure of Ecology-OCR has been amply documented in the attached Power Consulting, Inc., report "Department of Ecology Office of Columbia River: The Last Ten Years," (December 3, 2016). We request that this report be included along with these comments in any FPEIS.

22-2 The Wise Use Movement continues to strongly oppose any further storage alternatives within the Alpine Lakes Wilderness, when water conservation remains to be carried out, and other alternatives such as shutting the Leavenworth National Fish Hatchery (LNFH) have not been included. The Alpine Lakes Wilderness is a national treasure and it is shocking that Ecology-OCR does not view any area as off-limits to its aggressive and relentless pursuit of new environmentally damaging water supplies for dubious economic gain.

**More Specific DPEIS Comments Are As Follows:**

22-3 **Sec. 1.2 (p. 1-2+) Purpose and Need for Action.** Ecology-OCR has issued the DPEIS under the State Environmental Policy Act (SEPA). Under RCW 43.21C.030(c)(iii), agencies must include in a detailed statement for major actions significantly affecting the quality of the environment alternatives to the proposed action. WAC 197-11-440(5)(c) requires agencies to describe reasonable alternatives. Instead, the DPEIS, considered only an "Icicle Political Bargain" obtained from a small group of Ecology-OCR and Chelan County handpicked organizations engaged in political tradeoffs in the Icicle Basin. This "Icicle Political Bargain" stands out as the real "objective" of Ecology-OCR and Chelan County, not the purported purpose and need that is given to provide political cover for the impacts on the physical and human environment of the Icicle Basin and the Alpine Lakes Wilderness, demanded by the parties who negotiated the "Icicle Political Bargain" without consideration of a full range of alternatives. As the Executive Summary says, the Icicle Strategy was developed by a small stakeholders group, which determined "Guiding Principles," from which no deviation is allowed. This is not the SEPA process. The SEPA process is designed to provide information on potential significant adverse impacts of proposals to decisionmakers. Here, selected "stakeholders" determined that

- 22-3 the Alpine Lakes Wilderness should be assaulted and then designed "Guiding Principles" to make it happen. The DPEIS is merely the justification to carry out decisions that have already been agreed. See page ES-3.
- 22-4 **Sec. 2.5.2 IPID Irrigation Efficiencies Project; Sec. 2.5.3 COIC Irrigation Efficiencies and Pump Exchange Project; and Sec. 2.5.4 Domestic Conservation (pp. 2-55 through 2-61).** The Wise Use Movement supports irrigation efficiencies and domestic conservation. The figures given on page 2-61 for equivalent residential use of 304 gallon per day is shockingly high. By comparison, a two-story residence in Seattle housing four persons uses an average of 12-26 gallons per day. No further action should be taken to provide the City of Leavenworth any additional Icicle Basin water until the City has implemented an aggressive water conservation program.
- 22-5 **Sec. 2.11.2 (page 2-121) Removing Leavenworth National Fish Hatchery**  
The DPEIS does not adequately describe the failure of the LNFH at providing mitigation for the loss of natural fish production from the construction and operation of Grand Coulee Dam. In addition, this section straight out states that this alternative was rejected because it "does not align with the Guiding Principles." Again, SEPA does not recognize "guiding principles" set by an "Icicle Political Bargain," as a reason to reject an alternative from SEPA review. More specifically, Ecology-OCR is actively working to implement fish passage over Cle Elum dam in the Yakima Basin using Whooshh technology.  
<https://www.whooshh.com/>  
<https://www.usbr.gov/pn/programs/eis/cle-elum/index.html>
- 22-6 The WUM requests that the PEIS include an alternative of using Whoosh technology to provide upstream passage over Grand Coulee Dam. If successful, it could result in the removal of the problem plagued and problematic LNFH.
- 22-7 In summary the DPEIS fails to comply with SEPA, by failing to provide a range of alternatives because Ecology-OCR and Chelan County are already compromised by an Icicle Political Bargain. This failure to comply with the central mandate of SEPA will lead to adverse environmental impacts because alternatives were not included and not analyzed. WAC 197-11-442(4) provides that the lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures as part of an EIS's discussion of alternatives for a comprehensive plan, community plan, or other areawide zoning or for shoreline or land use plans. However, the "Icicle Political Bargain" is none of these things. Rather, WAC 197-11-442(2) requires Ecology to:  
  
... discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3)). Alternatives including the proposed action should be analyzed at roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative). [underline added]
- 22-8 The DPEIS does not of this. The Washington Supreme Court has found that "The environmental significance of the nonproject action creates the obligation to examine alternatives to the nonproject action. . . SEPA requires an examination of reasonable alternatives to the nonproject action." *Citizens Alliance to Protect Our Wetlands v. City of Auburn*, 126 Wn.2d 356, 366 (1995). In *Blair et. al. v. City of Monroe*, CPSMHB 14-3-0006c, Final Decision and Order (Sept. 19, 2014), the Central Puget Sound Regional Growth Management Hearings Board considered the scope of review under WAC 197-11-442(4). There the Board found that the City of Monroe had failed to adequately comply with SEPA review requirements (SEPA is to function "as an environmental full disclosure law," *Blair at 22*. "[t]he range of alternatives considered in an EIS must be sufficient to permit a reasoned choice." *SWAP v. Okanogan County*, 66 Wn. App. 439, 444 (1992). For the FEIS to be adequate, the City must consider alternative designations for the Property and/or alternative locations within the City for additional GC development. *Citizens Alliance v. City of Auburn*, 126 Wn.2d 356, 365 (1995). *Blair at 23*.
- 22-9 In *City of Shoreline et. al. v. Snohomish County*, CPSMHB Coordinated Case Nos. 09-3-0013c and 10-3-0011c, Corrected Final Decision and Order (May 17, 2011), the Board entered a determination of invalidity due to an inadequate analysis of reasonable alternatives to a proposed action. The Board found that "The record provided in this case contains a number of plans which, though not perhaps formally proposed, might have formed the basis for one or more EIS alternatives resulting in lower environmental costs." *City of Shoreline at 56-57*. ("[L]imiting the

## Comment Letter 022

## Comment Letter 023

- 22-9 | analysis only to (a) the land use and zoning requested by the Intervenor and (b) the no action alternative, without considering any alternative scenarios, deprived County officials of the information necessary to determine whether a reasonable change in use of Point Wells could be achieved with less environmental impact." *City of Shoreline at 57 (emphasis added)*. SEPA does not excuse failing to consider alternatives beyond the Icicle Grand Bargain itself.

In this DPEIS, Ecology-OCR (and Chelan County) considers the decision (to proceed with the single Icicle Political Bargain) to have already been made.

**CONCLUSION**

- 22-10 | This DPEIS is inadequate because it fails to provide a range of alternatives and should be withdrawn. An EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process. This will ensure that the EIS provides the public and the decisionmaker with information that sharply defines the issues and identifies a clear basis for choice among alternatives as required by SEPA. This applies even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS for the proposed actions.

Finally, Ecology-OCR, Chelan County, and Governor Inslee would be well advised to keep new storage projects out of the Alpine Lakes Wilderness. Please send us a copy of any FEIS that is released.

Sincerely,

**John de Yonge**

John de Yonge  
President  
540 Main St, Apartment 5C  
Chatham NJ 07928  
[jdeyonge@gmail.com](mailto:jdeyonge@gmail.com)

Attachment – "Department of Ecology Office of Columbia River: The Last Ten Years," Power Consulting Incorporated, December 3, 2016



Written Comment Sheet  
Icicle Strategy Draft Programmatic Environmental Impact  
Statement (PEIS) Public Hearing

June 27, 2018; 4-8pm

Leavenworth, WA



Please provide comments on the Icicle Strategy Draft PEIS, including content and what you support as a preferred alternative.

Comments will be accepted through July 30, 2018. Written comments can be submitted with this form or sent to Mike Kaputa at 411 Washington Street, Suite 201, Wenatchee, WA 98801, [nr.iciclesepa@co.chelan.wa.us](mailto:nr.iciclesepa@co.chelan.wa.us)

Oral comments can also be submitted to the Court Reporter at this meeting.

**Contact Info (required)**

Name: ANNE BRIDGES Date: 6/28/18  
Address: 2119 Sunrise Circle, Wenatchee WA 98801  
Telephone: 802-291-3008 Email: aaabridges@comcast.net

23-1

**Your Comments**

*We learned of the Icicle Strategy public meeting by way of a Sierra Club notification. (We are members).  
The information at this meeting was clearly and thoroughly presented, showing the options in understandable detail.  
Upon returning home I read the brief, but started summary of the situation in THE CREST, the publication of the Washington State Sierra Club.  
The concern was all about preserving the Alpine Lakes area for hiking, climbing,*



ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 023

23-1

and backpacking for tourists from "around the world." No opinions were stated regarding local needs or issues such as fish preservation, native American treaties, or better water management for human consumption and irrigation for agriculture. Planning for climate change in water strategy was not addressed either. I was embarrassed that I had signed Sierra Club after my name yesterday. I have no arguments with any of the options presented.

Rene Bridges

Comment Letter 024



Written Comment Sheet  
Icicle Strategy Draft Programmatic Environmental Impact  
Statement (PEIS) Public Hearing

June 27, 2018; 4-8pm

Leavenworth, WA



Please provide comments on the Icicle Strategy Draft PEIS, including content and what you support as a preferred alternative.

Comments will be accepted through July 30, 2018. Written comments can be submitted with this form or sent to Mike Kaputa at 411 Washington Street, Suite 201, Wenatchee, WA 98801, [mr.iciclesepa@co.chelan.wa.us](mailto:mr.iciclesepa@co.chelan.wa.us)

Oral comments can also be submitted to the Court Reporter at this meeting.

Contact Info (required)

Name: Kathleen Ward (Framin) Date: June 27, 2018

Address: 644 E. Leavenworth Rd Leavenworth

Telephone: 509 433-8770 Email: kathywardsmail@gmail.com

Your Comments

- 24-1 I applaud the collaboration. Many thanks to many people. You would be good to get the wilderness advocates on board (important voices but that there aren't many wilderness advocates in the group.)
- 24-2 Some concern about larger season of heavy recreational use.
- 24-3 Interested in all impacts on lake erosion. Appreciate
- 24-4 Don's insight on value of storage. "Habitat Protection +
- 24-5 Enhancement" of major interest



## Comment Letter 025

## Comment Letter 026



Written Comment Sheet  
Icicle Strategy Draft Programmatic Environmental Impact  
Statement (PEIS) Public Hearing



June 27, 2018; 4-8pm  
Leavenworth, WA

Please provide comments on the Icicle Strategy Draft PEIS, including content and what you support as a preferred alternative.

Comments will be accepted through July 30, 2018. Written comments can be submitted with this form or sent to Mike Kaputa at 411 Washington Street, Suite 201, Wenatchee, WA 98801, [mr.iciclespa@co.chelan.wa.us](mailto:mr.iciclespa@co.chelan.wa.us)

Oral comments can also be submitted to the Court Reporter at this meeting.

Contact Info (required)

Name: Natalie Williams Date: 6/27/18  
Address: 5227 47th Ave SW  
Telephone: 206-937-1166 Email: nataliesces@gmail.com

Your Comments

- 25-1 1) A legal alternative needs to be offered.  
Either Alt-3 with Full Pump added,  
or Alt-5 without Alpine lakes  
wilderness violations.
- 25-2 2) Bureau of Reclamation is in a critical  
risk situation and should declare  
an emergency to get priority funding  
for deferred maintenance (which has  
already caused treaty non-compliance),  
and circular tank upgrades to  
achieve treaty compliance.

STATEMENT ON RECORD

CHAD SPIES, 6/27/18

(STATEMENT ON RECORD NO. 1 - 6/27/18)

\* \* \*

MR. SPIES: Okay. I just wanted to say that

I've been hiking the Icicle Valley for 40 years of my life  
and hiked specifically a lot, several hundred trips in the  
Eightmile and Stewart Lake and Colchuck drainages and

Snow Lakes drainages, and that there's no downside to any of  
these proposals for water storage; that they're all upside  
benefits that are going to improve instream flows and  
improve water for fish, and with no downside that's going to  
impact in any negative way anything in these areas that are  
going to have the extra water flow, and that the Eightmile  
Lake would in no way impact any of the campsites or the  
trail.

I've hiked this 40 years, and these trails and  
campsites are well above any water level that would ever be  
from a dam. They're all high and dry. So I just want to  
say that I think it's a good proposal, and I think they all  
should be continued.

Alternative 4 is my choice.

\* \* \*

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PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 027

STATEMENT ON RECORD

JAN PETRIE, 6/27/18

1 (STATEMENT ON RECORD NO. 2 - 6/27/18)  
2 \* \* \*  
3 MS. PETRIE: I just want to say that I think a  
4 27-1 whole lot of thought has gone into this plan. And I'm from  
5 the area, and I appreciate everything that is trying to be  
6 accomplished to satisfy the needs of the area. That's all  
7 I'm going to say.  
8 I think Alternative 4 seems to cover everything,  
9 27-2 and depending on how efficient or expensive it is, that  
10 would be my vote.  
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Comment Letter 028

STATEMENT ON RECORD

JEROME "JERRY" SCHNEIDER, 6/27/18

1 (STATEMENT ON RECORD NO. 3 - 6/27/18)  
2 \* \* \*  
3 MR. SCHNEIDER: I live on Wilson Street. I  
4 will be part of this Cascade Orchard Irrigation Company  
5 irrigation project, the new pumping project that's going to  
6 add about 12 cubic feet of water to Icicle Creek, to the  
7 lower reaches of Icicle Creek.  
8 What happens now -- I don't know if you know, but  
9 what happens now is we're taking water from Icicle Creek up  
10 above the hatchery, and it comes down our canal and down our  
11 28-1 laterals, and the overflow spills into the Wenatchee River.  
12 But in order to increase the flow in Icicle Creek, we're  
13 going to take our water from Lower Icicle or the Wenatchee,  
14 preferably the Wenatchee River, and pump it up so that water  
15 that we've been taking from up there won't be taken from up  
16 there and it increases that streamflow, which is really good  
17 for the fish mostly, and we get a nice irrigation system,  
18 and that's great. Everybody wins for a change, you know.  
19 And that's about it.  
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## Comment Letter 029

## Comment Letter 029

STATEMENT ON RECORD

WILL HENSON, 6/27/18

1 (STATEMENT ON RECORD NO. 4 - 6/27/18)  
 2 \* \* \*  
 3 MR. HENSON: My biggest worry about this whole  
 4 adding water and all this is the creek used to be a  
 5 29-1 nonnavigable stream in 1889 when Washington became a state.  
 6 When Washington became a state the creek used to dry up, and  
 7 in 1920 they added lake reservoirs to add flow of water to  
 8 the stream. And this is exactly what they're doing right  
 9 now, but they did this back in 1920.  
 10 They're adding more water to the creek for fish  
 11 hatchery, salmon, and by doing that they've taken the land  
 12 away from the people that are living on the river. We used  
 13 to own the river to the thread of the river, and now the  
 14 state, because they've added more water -- the ordinary  
 15 high-water mark is what they're going by, but there is no  
 16 ordinary high-water mark because there is no ordinary river.  
 17 Everything's reservoirs and enhanced waterway. It's all  
 18 been altered. It's all unnatural, every bit of it.  
 19 So by adding more water, they're creating more of a  
 20 29-2 problem for me on the lower reach because they're adding  
 21 more people. By adding more water adds more tubing  
 22 activity, which is pollution, because there's no bathrooms  
 23 on the river, there's no facilities whatsoever to dump  
 24 garbage, and so these fish are not going to get any better  
 25 because they're just adding more garbage and more pollution.

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STATEMENT ON RECORD

WILL HENSON, 6/27/18

1 And what killed the fish in the river originally  
 2 29-3 was the fish hatchery. They dumped their pollutants in the  
 3 river, their antibiotics, and that's what killed all the  
 4 bull trout and the rainbow trout back in the seventies or  
 5 eighties.  
 6 And so I don't know if this whole -- I think they  
 7 29-4 just ought to leave it as it is, rebuild the dams just like  
 8 it was back when they built it originally. There's seven  
 9 dams up there, and they built them all between the twenties  
 10 and the forties, and by doing that, there is no ordinary  
 11 high-water mark. There is nothing ordinary.  
 12 29-5 They need to leave it as it is. People need to  
 13 start drilling wells, maybe eliminate a lot of shareholders  
 14 that use the irrigation water that don't really need it, you  
 15 know.  
 16 And the biggest concern to me is just the amount of  
 17 29-6 people that are going on the river now, the lower reach, on  
 18 a private river that was nonnavigable at one time but now  
 19 the state thinks it's navigable. And so now everybody has a  
 20 right to use it and, like I said, there's no facilities to  
 21 control pollution, bathrooms, defecating everywhere,  
 22 garbage, sunken beer bottles, cans.  
 23 If they want to save the fish, they need to start  
 24 thinking about that, the amount of people that are on the  
 25 river, that they're allowing on the river. And that's all

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PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 029

STATEMENT ON RECORD

WILL HENSON, 6/27/18

1 I've got to say.  
2 I think they need to bring the dams up to code so  
3 29-7 they're safe and leave it at that; no extra water in the  
4 creek; control the tubing. That's what most people want.  
5 Control the pollution on the river, not so much adding more  
6 water, because if you add more water, you're going to add  
7 more people.

8 \* \* \* \* \*

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Comment Letter 030

STATEMENT ON RECORD

GRO BUER, 6/27/18

1 (STATEMENT ON RECORD NO. 5 - 6/27/18)  
2 \* \* \*  
3 MS. BUER: So I have a considerable concern  
4 30-1 about the IWG, because there's to be 75 to \$100 million of  
5 taxpayer money and there doesn't seem to be a focus on how  
6 it's going to be spent and whether it's well spent.

7 It seems like conservation is low priority to most  
8 of the remaining members, especially since the  
9 30-2 conservationists have left, environmentalists have left,  
10 because they feel like the group isn't being honest about  
11 what they can do.

12 So I'd like to know what conservation efforts or  
13 plans is the Icicle Peshastin Irrigation District proposing,  
14 and where is it written? Have the County and city of  
15 Leavenworth written a conservation plan that they agreed  
16 earlier to write?

17 I'm with the Cascade Orchard Irrigation District,  
18 and we are encouraged to use our water so that we don't lose  
19 our right, so conservation is not an issue. We're told to  
20 use as much water as possible. I think we need an  
21 independent, outside expert panel to look at possible  
22 options, including conservation, for spending money to  
23 enhance the streamflow in Icicle.

24 \* \* \* \* \*

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Comment Letter 031

Comment Letter 032

STATEMENT ON RECORD

NORM STODDARD, 6/27/18

1 (STATEMENT ON RECORD NO. 6 - 6/27/18)  
 2 \* \* \*  
 3 MR. STODDARD: I'd like to see them go with  
 4 31-1 the no action alternative except adding storage. That would  
 5 increase water, make it a lot more stable through the whole  
 6 season if you do that, and that's the best option.  
 7 That's my comment.  
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STATEMENT ON RECORD

GREG SHANNON, 6/27/18

1 (STATEMENT ON RECORD NO. 7 - 6/27/18)  
 2 \* \* \*  
 3 MR. SHANNON: My only comment is that I think  
 4 32-1 the response period of 60 days is too short. It should be  
 5 at least 90 days for a response period to examine a long  
 6 document. That's it.  
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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 033

Comment Letter 033

July 29, 2018

Mr. Mike Kaputa  
Director, Chelan County Natural Resource Department  
411 Washington Street, Suite 201,  
Wenatchee, WA 98801

Re: Icicle Strategy DPEIS – comments

From:  
Alan F Hunt July 29, 2018  
510 Dempsey Road, Leavenworth, WA 98226  
509-470-8587 a\_f\_hunt@hotmail.com

Dear Mr. Kaputa,

33-1 | I support the option of No Action in your DPEIS.

33-2 | The city has some control and influence over the growth rate in ERU's. At this point, ERU's for commercial demand are twice that for residential demand. Since the city's only industry is tourism, that demand can be influenced by the level of promotion of tourism. ATP, the City receives millions of dollars in lodging tax and spends at least 80% of it on promotion of tourism. The level of demand that is forecast is more speculative than for many cities in that the economy of the city is not diversified and is essentially completely dependent on tourism. The underlying assumption in projecting the growth rate in ERU's is that the Bavarian tourist town concept will have growing appeal indefinitely into the future. The growth rate may be less than forecast if that assumption is not true or if the city changes its current policy of growing as fast as it possibly can.

33-3 | Another consideration is that the Seattle area has enjoyed unprecedented growth in the past 20 years due to growth in the tech industries in the area. Historically, such growth does not carry forward at high rates into the indefinite future. That growth has had a tremendous influence on tourism in Leavenworth. Inevitably, lower growth in the Puget Sound region will lower the growth of tourism in Leavenworth.

33-4 | Leavenworth's Water System Plan shows that the city will have enough water rights, at the current growth rate to meet demand for another 50 years. It is not reasonable to encroach upon the Alpine Lakes Wilderness at this time in order to meet speculative demand 50 years into the future.

33-5 | In addition to my discussion of economic reasons for my position, I fully accept the Alpine Lakes Foundation's arguments that all of the suggested plans for using more water from the Alpine Lakes Wilderness or regulating the flows of the water in the Wilderness to enhance usability of said water are illegal.

There are alternatives, as specified in the comment letter dated July 25, 2018 from the Alpine Lakes Foundation, that would not require degradation of the Icicle Creek drainage.

33-6 | 1. The Strategy should be revised to rely only on those quantities of water at specific lakes that the irrigation district has historically used and therefore has the right to use.

33-7 | 2. Moving the irrigation district's point of diversion downstream to the Wenatchee River, as proposed in Alternative 5, would greatly improve stream flows in Icicle Creek. However, the rest of Alternative 5 should be dropped. It lacks legal authority.

33-8 | 3. Water conservation proposals in the DPEIS should be significantly expanded to reduce demands on Icicle Creek's water. This would allow the Icicle watershed to function more naturally, including enhanced stream flows.

33-9 | 4. The DPEIS should acknowledge the land management role and authority of the U.S. Forest Service on national forest lands, its special responsibilities to protect the wilderness character of the Alpine Lakes Wilderness, and the application of numerous federal laws to many of the actions proposed in the Icicle Strategy.

Thank you for the opportunity to submit these comments.



Alan F. Hunt  
510 Dempsey Road  
Leavenworth, WA 98226  
509-470-8587  
a\_f\_hunt@hotmail.com



## Comment Letter 034

## Comment Letter 035

From: Bill Burwell [bburwell@dcusa.com]  
 Subject: Fwd: Icicle Creek Watershed Water Resources Management Study, Draft PEIS  
 Date: July 25, 2018 at 4:41 PM  
 To:

July 25, 2018

Dear Chelan County and Washington State Department of Ecology,

Thank you for the opportunity to comment on the Icicle Creek Work Group Draft Programmatic Environmental Impact Statement (DPEIS) known as the Icicle Creek Watershed Water Resources Management Strategy. Considerable effort has gone into the work over the past several years with significant input by the Icicle Peshastin Irrigation District (IPIID).

Review of the document develops of number of concerns:

- 34-1 | 1. The document assumes IPIID has current water rights on Eightmile Lake with the current dam and water rights to raise the dam. There are indications that IPIID has not put into use the water behind the current dam on the Lake for decades. Washington water law has a fundamental "use it or lose it" requirement. Looks like IPIID likely has relinquished part of the water rights. Raising Eightmile Lake dam would require added water rights and these have not been demonstrated. Increasing the dam height will require approval by the US Forest Service and likely extensive permitting and a NEPA process, which will be problematic as the land is designated wilderness. Use of such wilderness public lands for the benefit of a few irrigators takes away from the citizens of this country that own the wilderness. Use of the Lake as a bowl to fill and flush by the district seems not in the public interest. The filling and flushing also has negative impact on downstream fisheries.
- 34-2 | 2. The dam raising neglects the statutory authority of US Forest Service on these National Lands maintained for use by the people as designated Wilderness. The water rights on the Lake belong to the Federal Government under the federal reserved water rights doctrine. The DPEIS does not include maintaining the current dam height as the only current legal basis, a significant document omission in range of alternatives.
- 34-3 | 3. IPIID has water rights for irrigation purposes. The DPEIS implying the District has rights for domestic water use and for fish hatchery use, which it does not. Alternative 4, has even worst invasions of water rights and public domain of Wilderness with tunneling the Klonauqua Lakes, high dam on Snow Lake, Eightmile high dam and other intrusions into water right and Wilderness use. The citizens were not allowed to comment on these actions during the scoping in 2016 and was not a part of the proposed actions. Alternative 4 should reset the process back blocking the Draft PEIS until fully scoped and citizen input on Alternative 4.
- 34-4 | 4. The IPIID Pump Station found in Alternative 5 seems the best solution will greatly improve flow in Icicle Creek resolving a problem. An alternative should be added looking at more fundamental improvements since the concerns are water availability and global warming. This added alternative would push hard on water conservation with irrigators since the crop lands are the vast users of the basin's water and push to control CO2 and methane emission. Reducing global warming emissions is the most fundamental need. Rearranging water withdrawals does not solve the fundamental problem of global warming.
- 34-5 | 5. Public input could be improved. The vast number of Washington owners (citizens) and users of the Alpine Lakes Wilderness live on the Puget Sound side of the Cascades. No formal hearing was set where these people live. The only formal hearing was in Leavenworth. Yes, a hearing in Leavenworth in the basin with a small population was appropriate. Missing a formal hearing on the West Side of the Cascades was a fundamental flaw in public input.
- 34-6 | 6. My Great Grand Parents, the Hatfields, homestead in Central Washington in 1874, obtaining one of the first water rights to their farm. At that time, the Territory of Washington was a vast wilderness with a few islands of farms and towns within the wilderness. We now have a few island of wilderness among the vast farms and cities in the State. The Alpine Lakes Wilderness give a place for my Grandchildren and Great Grandchildren to see a beautiful gift that could endure seven generations and more. Much of the proposals tear apart and damage the beautiful gift of the Wilderness. The wilderness basis being maintaining the land by non-motorized access and use of hand tools. Building dams in the Alpine Lakes Wilderness is fundamental destruction of the gift and the responsibility we have to future generations.
- 34-7 | Please go back and redevelop the PEIs addressing these and concerns of others.

Sincerely,



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

Dear Mike,

I have read all of the PEIS Impacts and Mitigation Chapters from Chapter 1 through Chapter 7.0. I have also read the Appendixes from Appendix (A), to the Appendix C followed with another Appendix (A) in a new series of Appendix's extending to Appendix F. The chapters and Appendix's are full of detailed information which I fully appreciate. However, there are PEIS actions that can be improved, one of which is to ensure that the streams and lakes will not be harmed as a result of the proposed wilderness action.

The PEIS fails to adequately assure the public that the proposed projects will not harm wilderness streams and lakes. When discharging water from Square Lake, Klonauqua Lake, Eightmile Lake, Colchuck Lake and both Snow Lakes, the task of assuring no harm would normally rest with the Department of Ecology (DOE). DOE developed an advanced multi-metric index model of biotic integrity in 2012 for the Cascades Region which allowed DOE to determine the health of reaches along the Wenatchee River up to South of Plain and ending at the Railroad Bridge. DOE also determined the health of Icicle Creek up as far as Ida Creek Campground.

Appendix A of the PEIS does identify the Washington Department of Fish and Wildlife (WDFW) to gather base-line data for the proposed project. However, the results from 2016 and 2017 analyze only two wilderness streams (Leland Creek and French Creek). "Grab" samples were taken once at each creek. The analysis of both streams is not detailed enough to determine the health of either Leland Creek or French Creek. There was no analysis's of the Wilderness lakes.

When releasing water from a Wilderness lake to improve the Historic Channel in lower Icicle Creek, the language used in the PEIS to describe impacts on a stream resulting from the release of water from a lake is either that impacts on the stream are found to be insignificant or are found to be within the naturally occurring flow range of the stream. The language usually goes on to identify the release of water as a benefit for the affected riverine system.

The PEIS ignores the natural flow regimes of each stream as having a characteristic pattern of flow magnitude, timing, duration, frequency, and rate of change. All of these patterns play a critical role in supporting the chemical, physical, and biological integrity of each receiving stream.

Changes to stream chemical and physical conditions following flow alteration can lead to the reduction, elimination, or disconnection of optimal habitat for aquatic biota. The PEIS fails to recognize that "human-induced alteration of the natural flow regime can degrade a stream's physical and chemical properties, leading to loss of aquatic life and reduced aquatic

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 035

35-1 biodiversity. Protecting aquatic life from the effects of flow alteration involves maintaining multiple components of the flow regime within their typical range of variation". (Refer to (Final EPA-USGS Technical Report: Protecting Aquatic Life from Effects of Hydrologic Alteration)

Altered flows can fail to provide the cues needed for aquatic species to complete their life cycles. For example, Pale Morning Dun (Order Ephemera Danica) will not emerge until stream water temperatures reach 60 degrees Fahrenheit. The emergence will also avoid emerging until July when timing gives the signal.

Altered Flows can also encourage the invasion and establishment of non-native aquatic species. Alteration of the quantity and timing of river or stream flows can significantly affect fisheries resources.

The ability of a stream to support aquatic life is attached to the maintenance of key flow-regime components. For example, altering the regime by increasing flows brought about by releasing relatively high water velocities from a lake during mid-summer causes stream surface water, rich in oxygen, to bypass the sub-surface environment. The typically low summer flows and corresponding low velocity allow oxygen to be pulled into the sub-surface environment. The typically low summer flows and corresponding low velocities allow oxygen to be pulled into the sub-surface environment which is in need of oxygenated water this time of year to support invertebrates living in sub-surface environments. Invertebrates are a source of food for other aquatic life, including fish, and tend to live in a subsurface zone (hyporheic Zone).

Complicating these challenges further is the expected changes to historic hydrologic conditions as a result of climate change, which adds additional complexity to the task of estimating acceptable levels of hydrologic variation.

DOE chairs the Icicle Working Group. If the proposed project moves forward, DOE will discharge water from wilderness lakes to improve the last four miles of Icicle Creek. The health of Prospect Creek, the last mile of Leland Creek, the last five miles of French Creek, all of Eightmile Creek, the last five miles of Mountaineer Creek and the Upper 20 miles of Icicle Creek are all affected by the proposed project, and since DOE has developed a model to determine stream health, DOE is the department to take the lead and determine the health of both lakes and streams that are part of the proposed project.

With this scant summary of hydrological alteration in mind, and the importance of stream and lake health, it would be prudent to avoid activating Alternatives 1, 2, 3, 4 or 5, until a team of scientists, educated in matters associated with stream and lake health, are ready to share their findings. A study of this quality would hopefully assure that the Alpine Lakes Wilderness would remain a healthy wilderness. It would hopefully assure that if one of the proposed Alternatives was activated, none of the targeted wilderness streams and lakes would be harmed.

Sincerely,

  
Dick Rieman

Comment Letter 036

July 30, 2018

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

Hello Mike,

36-1 I have just become aware of the ramifications of outlet streams from Eightmile, Snow and Square Lakes. Eightmile lake engineers, if I am reading the PEIS correctly, are planning to discharge water from Eightmile Lake 50 feet below Lake Surface which places the inlet pipe in the Hypolimnion strata. Square lake discharge remains where it always has, (at 30 feet below surface of the lake) which places it in the upper part of the hypolimnion in Square Lake and Snow Lake discharges water from lake bottom via a tunnel at 150 feet below the surface.

My research indicates that, "when water is released from the hypolimnion in stratified reservoirs/lakes, anoxic water can result in poor water quality since it might contain dissolved iron, manganese, sulfide, ammonium and phosphate (Dortch 1997)".

A recognized disadvantage of hypolimnetic withdrawal is the impact on downstream waters, temperature increase, and oxygen depletion. It appears that, "the most controversial and problematic effect of hypolimnetic withdrawals is the impact on downstream water and stream habitat" (Gertrud K. Nurnberg, Freshwater Research)".

An example of what could happen to outlet streams when Eightmile dam is in full operation is what happened in Southwest Wisconsin. Numerous earthen dams were built in Southwest Wisconsin during the 1960's and early 1970's. Hypolimnetic water was released from two of the lakes (White Mound Lake and Twin Valley Lake) to create downstream trout habitat. However, the organic loads from the discharges overwhelmed the assimilative capacities of the streams while de-stratification and



## Comment Letter 036

36-1 | entrainment fueled algal blooms in both lakes. Even a small hypolimnetic release was enough organic loading to stimulate abundant filamentous bacteria below the dam. Continuous bottom-water releases destabilized thermal stratification and phosphorous entrainment resulted. "The organic loading from the bottom discharges were likely the reason that trout stream habitat was not successfully created below the dams as originally intended". Hypolimnetic withdrawal issues were not limited to White Mound and Twin Valley Lakes.

My concern is that the DEIS completely ignores lake ecology and how it might affect outlet streams from lakes that are discharging water from the hypolimnetic zone. The focus is mostly aimed at discharging 100 cfs of water from five Wilderness Lakes with the goal to increase flow at Dam 2 as soon as possible to improve lower Icicle Creek habitat.

I would think it would be important to evaluate hypolimnetic lake withdrawal water residing in Upper Snow, Eightmile and Square Lakes. The three lakes are targeted because the infrastructure built in all three lakes was designed to withdraw hypolimnetic water from each lake. An analysis of each lake's hypolimnetic water would be informative before committing these lakes to any of the proposed DEIS projects.

I am aware that Snow Lakes have been operating since 1939. All of the water in Snow Creek is hypolimnetic water from a depth of 150 feet usually at a flow rate of 50 cfs. I am also aware that Snow Lake water is in Icicle Creek for only one mile before it is diverted to the Hatchery. A small amount of Snow Lake water flows over Dam 1 to flow into the Wenatchee River, most of which, is hypolimnetic water from Snow Lake. Once below the Hatchery, Snow Lake water is discharged into lower Icicle Creek along with hatchery well water. This situation occurs in mid-summer and early fall and could be one of the reasons why lower Icicle Creek below the Hatchery retains poor fish habitat and large amounts of phosphorous.)

Sincerely



Dick Rieman

## Comment Letter 037

Director Kaputa

Chelan County Natural Resource Department and State Department of Ecology  
411 Washington Street, Suite 201, Wenatchee, WA 98801

Drew Meyers

5908 SE 20th St

Mercer Island, WA 98040

Hi Mike,

37-1 | I write to you in hope that you reconsider the implementation of the State Environmental Policy Act and the Enchantments water resource management plan. The proposals negative implications simply out way the positives. Having grown up in these mountains and now raising my kids in them, I am devastated to hear that Chelan County is considering disrupting such an extraordinarily beautiful and unique ecosystem. I felt compelled to write the message for the sake of my kids having the opportunity to connect with nature the same way I did.

37-2 | I'll keep it brief but restricting the natural flow of the river has numerous potentially harmful outcomes that I'm sure you're aware of but encourage you to remind yourself of. One of the most worrying issues is the organic materials that collect from inside and out of the river that would usually naturally get washed down the river... don't. This creates oxygen starved dead zones which kill and then restrict any river life from ever growing in for my kids to enjoy. I'm sure the science will be brought up but it's the untouched

37-3 | beauty that I worry about, the Enchantments are one of the most competitive areas to get a permit in the country for a reason. As one of the last untouched wilderness areas it offers an experience nowhere else in the country can, I plead with you to not disrupt any further the natural balance of both wilderness areas.

My family appreciates you listening to comments and concerns and we hope you reconsider your new energy strategy. Families across Washington deeply care about the health of these areas and keeping them pristine for generations to come.

Thanks so much,



ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 038

Comment Letter 038

Edward M. Henderson, Jr.  
407 Smith Street  
Seattle, Washington 98109  
edhenderson57@comcast.net  
(206) 285-6497

July 28, 2018

Mike Kaputs  
Director, Natural Resource Department  
Chelan County  
411 Washington Street, Suite 201  
Wenatchee, WA 98801  
[mr.iciclespa@co.chelan.wa.us](mailto:mr.iciclespa@co.chelan.wa.us)

G. Thomas Tebb  
Director, Office of the Columbia River  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, Washington 98903-0009  
[thomas.tebb@ecy.wa.gov](mailto:thomas.tebb@ecy.wa.gov)

RE: Comments on the Draft Programmatic Environmental Impact Statement (DPEIS)  
for Icicle Creek Watershed Resources Management Strategies.

Dear Mistis Kaputs and Tebb,

I am a hiker, backpacker and climber. I have been enjoying recreation in the Alpine Lakes since the early 1980's, shortly after this spectacular mountain region was designated a Congressionally protected Wilderness in 1976. I count myself extremely lucky to live in Washington State with close and easy access to the Alpine Lakes. Many of my fellow citizens are not so fortunate and travel many miles to visit these wonders. Recreational visitation to the Alpine Lakes is a major economic godsend to the surrounding mountain communities. I have relaxed and enjoyed many cold beers and Ortega Burgers at Gustav's in Leavenworth after a hike down from the Enchantments or a hot dusty day's rock practice on the granite slabs up Icicle Creek.

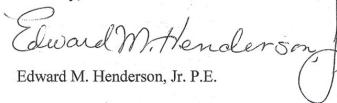
38-1 I am shocked and appalled by the sloppy, self-serving DPEIS that you are attempting to pass off on a gullible public. The DPEIS is incomplete and fails utterly to adequately address many important issues raised by anticipated work in protected Wilderness. The missing issues include but are not limited to: enumeration of the necessary permits and waivers which may be required; relationship with the Forest Service, the administrator of this public land; how the physical work will be carried out in the Wilderness. The DPEIS should be withdrawn until you can answer these and many other questions.

38-4 I am aware that the Icicle Peshastin Irrigation District (IPID) has water rights in the Icicle Creek watershed that pre-exist designation of the Alpine Lakes Wilderness in 1976. The IPID has a right and indeed an obligation to maintain the facilities associated with those rights. However those rights do not extend to increasing withdrawal of water for purposes not originally specified. IPID's water rights were granted for the designated purpose of irrigation. The DPEIS now proposes to use IPID water for other purposes, such as the fish hatchery and real estate development in Leavenworth, but IPID has no right to use water for these additional purposes. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's remaining water rights, which limit several proposals.

38-6 The DPEIS must be revised to eliminate proposals to raise the height of the dams at Upper Snow Lake and Eight Mile Lake thus increasing the size of these Lakes in the Wilderness and draining Upper Klonauqua Lake into Lower Klonauqua Lake.

- 38-7 The DPEIS fails to address the means and methods of construction in the Wilderness. For the multitude of projects proposed in the Alpine Lakes Wilderness, what construction activity can be expected to complete the proposed projects? How many helicopter flights will be required for all of the projects proposed in each alternative? How will that impact wilderness values, including the opportunity for solitude, recreational access and infrastructure? How will automation and optimization and proposed changes to the natural hydrology of the basin impact the invertebrate community? The Wilderness Act limits the use of power mechanical tools and requires the use of manual powered hand tools. The original irrigation structures, the dams and spillways at Upper Snow and Eight Mile Lakes were built with non-mechanized tools in the early twentieth century. Such restoration work as required for safety and necessary operations should be carried out with the same hand tools.
- 38-8
- 38-9
- 38-10
- 38-11 The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which will alter stream hydrology.
- 38-12 The Alpine Lakes Wilderness is one of the most iconic and treasured natural resources in the entire National Wilderness Preservation System. These lands are of national interest, owned by everyone in the nation and protected by Congress to preserve their wilderness character. As detailed in the DPEIS, thousands of hikers explore and visit this area each year and a myriad of wildlife species depend on the critical habitat it provides. I have great personal interest in the management and stewardship of these lands, and am committed to working to ensure wilderness, recreation, scenic, and other natural resource values are protected into the future.
- 38-13 The DPEIS is woefully inadequate and must be withdrawn. It fails to address many important issues and lacks sufficient details on many others. Because of these and many other deficiencies an evaluation can't be reasonably made of the probable environmental impacts. Because many of the projects proposed in the DPEIS occur in the National Forest, i.e. on federal land, I believe a NEPA evaluation is required.
- 38-14
- 38-15 Thank you for this opportunity to make these comments. Please inform me when a new, revised and corrected DPEIS is ready and available for public scrutiny and comment.

Sincerely,

  
Edward M. Henderson, Jr. P.E.

cc: Governor Jay Inslee  
U. S. Senator Patty Murray  
U. S. Senator Maria Cantwell  
U.S. Representative Pramila Jayapal  
Okanogan-Wenatchee National Forest Supervisor Mike Williams  
Wenatchee River District Ranger Jeff Rivera

## Comment Letter 039

## Comment Letter 039

Mike Kaputa, Director :  
Chelan County  
211 Washington St. Suite 201  
Wenatchee, WA 98801

James Woods  
P.O. Box 1837  
Penn Valley, CA  
95946

Friday, July 27, 2018

7-27-2018

Dear Mr. Mike Kaputa:

- 39-1 Concerning the Alpine Lakes Wilderness, Chelan County and Washington State Department of Ecology Draft Programmatic Environmental Impact Statement (DPEIS), proposed Icicle Creek watershed strategy and accompanying alternatives. Consider suspending this DPEIS. Please make every effort to better understand Wilderness Act law and National Environmental Policy Act (NEPA) full disclosure requirements before proceeding.
- 39-2 I strongly oppose Chelan County water resource planning that would in any way manipulate the natural flow of water within and without Alpine Lakes Wilderness. Doing so would significantly alter and harm treasured wilderness characteristic in ways large and small.
- 39-3 Avoid all proposals that reduce or increase the watershed's natural historic flow pattern and overall water table depth so critically important to plant, fish and wildlife survival.
- 39-4 Please consider revising or withdrawing the current DPEIS.
- 39-5 On a separate note we must recognize climate change is happening. Wildfires, record breaking heat waves and drought are commonplace events. The United States west is experiencing rapid desertification. Today's efforts in water management may be an exercise in futility? Priorities will change.

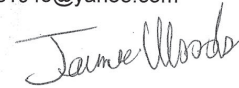
Thank you for reading this letter and carrying out the above request.

Sincerely,

James Woods  
PO Box 1837  
Penn Valley, CA 95946

Phone: 530 432 1969

jwoods1945@yahoo.com



ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 040

Comment Letter 041

July 27, 2018

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

RE: Icicle Creek Watershed Resource Management strategy DPEIS

Dear Mr. Kaputa,

- 40-1 As a US citizen and long-term Washington resident, I am disappointed with the DPEIS as released in its current form; it needs radical revision. Many of the alternatives do not appear to have a legal way to be implemented. This is a cause for grave concern; any Watershed strategy developed must comply with all State and Federal Laws and in particular water rights law; at the present only some elements across alternatives maybe feasible, which contributes to this effort as a flawed strategy.
- 40-2 The Alpine Lakes Wilderness (ALW) is a priceless resource. The Alpine Lakes is the largest wilderness area near the population centers of Puget Sound (414,161 acres following the 2014 expansion) is an important contributor to the regional economy likely to become more important judging from the increased number of recreational enthusiasts in the Cascades. The expectation of Washington citizens is that the values of the Alpine Lakes Wilderness, protected since 19767 will be held in perpetuity. The ALW has seen increased pressure from both population growth and climate change. These pressures will continue to grow.
- 40-3 I support repairing/replacing in-kind of existing structures; any repairs and replacements should have sound justifications with a full analysis of the environmental impacts. However, there should be no expansion, increased withdrawal or impoundment of water as a result of these maintenance activities.
- 40-4 Therefore, I do not support any of the alternatives as presented. None are acceptable. The DPEIS fails to even have a valid No-Action because it includes actions that could be pending. It is questionable if the No-Action alternative complies with SEPA or NEPA in its current form. I am particularly concern about
- 40-5 the proposed water storage and use for which there are no rights. Specifically, the IPID relinquished its right to store more water than is historically taken. Relinquished water rights are exactly that; the right is no longer available to exercise and it is my understanding that the water rights now belongs to the Federal
- 40-6 Government. Water conservation proposals in the DPEIS should be significantly expanded. The
- 40-7 watershed's ability to maintain a functional ecosystem is required.
- 40-9 Finally, after reviewing the members of the Icicle WG I find it very interesting that all of the stakeholders are well represented with one exception. I could not find a representative from recognized environmental organizations involved with the Alpine Lake Wilderness Area on the list of IWG membership. This is an alarming oversight given the experience that both Chelan County and the Department of Ecology have in pulling together stakeholder groups to work on tough issues. It would be my hope that this oversight be corrected.

Please keep me apprised of this process.

Best Regards,  
  
Janet Thompson  
11331 Alton Ave NE  
Seattle, WA 98125  
[thomp527@yahoo.com](mailto:thomp527@yahoo.com)

July 24, 2018

Chelan County Natural Resources  
411 Washington Street  
Suite 201  
Wenatchee, WA 98801

RE: Icicle Strategy

To Whom It Concerns:

41-1

My first backpacking trip was to the Enchantments. The beauty of this part of the Alpine Lakes Wilderness was beyond my comprehension but led me to a deep love of our earth.

Subsequently, I hiked and climbed in many parts of the world. However, the natural beauty of the Enchantments was unmatched in any of the backpacking trips I have taken in Europe, Asia North and South America.

Please do not in any way alter the magnificent beauty of the Enchantments which I have visited on numerous occasions and can only hope that it will be visited by many others in the future and continue to engender a love for the beauty of our earth.

Sincerely,

  
Janiese A. Loeken, MD  
6535 Seaview Ave NW  
#605B  
Seattle, WA 98117



## Comment Letter 042

## Comment Letter 043

Mike Kaputa

Chelan County Natural Resource Department and State Department of Ecology

411 Washington Street., Suite 201, Wenatchee, WA 98801

Dear Mike,

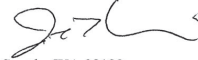
42-1 I am writing to urge you against the implementation of the State Environmental Policy Act and to reconsider the new water resource management plan for the Icicle Creek Sub basin. Generations upon generations have enjoyed the trails in the enchantments and we hope many more will. My passion first started when I learned about the alpine lakes there, amazed by their complexity and diversity I knew I wanted to spend my life doing this.

42-2 Something I've worked on in the past and an everlasting passion of mine is marine life. To keep it simple, natural temperature cycling plays a huge role in the life of marine animals. As reservoirs are built the temperatures begin to differ greatly between the surface and depths, this can change mating seasons and threaten the food sources of many of these animals. On top of that when the water is then released downstream it has been oxygen deprived and further induces unnatural temperatures through the stream and disrupts the ecosystems down streams. Dammed rivers lack the natural transport of sediment crucial to maintaining healthy organic riparian channels. Throughout the years as the Olympics have been damned, hundreds of species have suffered.

I plan to share the same passion with my children one day and want to teach them to care about the animals that inhabit our earth. These are incredibly delicate ecosystems and so much can be learned from them!

Thank you for reading this through and I hope you reconsider your decision.

All the best,  
Jeffrey Currier  
4450 46<sup>th</sup> Ave SW Seattle, WA 98122



Dear Mike,

I have heard that you are a part of a team of people making a decision on altering the Enchantments for public gain. I'd like to try to persuade you otherwise.

It has taken millions of years to create the Enchantments and other areas of beauty, solace + thousands of life forms - many of which we can not see. As more people populate the earth, areas like these are getting smaller + smaller every day. To disturb land and water ways in such fragile areas like these is to destroy what has taken millions of years to create.

There must be better alternatives - where will the next generation go to see our world the way it was made without our interference?

We do not even know all of the life forms that would be dishonored or altered - only God can know that.

43-1

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 043



I please with you make, to  
please consider other alternatives that  
do not disturb such fragile areas and  
do not take away the ability to  
experience God's world as he made it.

Best to you and your  
family!  
Julie Beggs

917 Pine St  
Seattle WA 98101

SEATTLE WA 980  
18 JUL 2018 PM 7:11

Comment Letter 044

350 NW 82<sup>nd</sup> Street  
Seattle WA 98117

Chelan County Natural Resources Department  
411 Washington Street, Suite 201  
Wenatchee WA 98801

Public Comment: Icicle Strategy

July 28, 2018

Dear Director Kaputa,

- 44-1 | I would like to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands of outdoor enthusiasts each year. As a lifelong Washington resident who has thoroughly enjoyed her hikes and climbs in the Enchantments and other parts of the Alpine Lakes Wilderness during the past 25 years, I ask that elements of the strategy that threaten wilderness be removed from the draft plan.
- 44-2 | The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trails and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua
- 44-3 | Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them. I ask that Chelan County and the Washington State Department of Ecology
- 44-4 | revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers and climbers who gain solace from time spent in this treasured alpine valley.

Thank you for your consideration.

*Julianne Lamsek*  
Julianne Lamsek

## Comment Letter 045

## Comment Letter 046

45-1

Dear Mr. Kaputa,

I am very concerned about the proposed dams within the Alpine Lake Wilderness.

The Enchantment Basin is a world class tourist & wilderness destination. The area is much loved by recreationists & is an important draw to the regional economy. It has been protected since 1976 & I strongly oppose building plans.

Sincerely,

LAURIE COLARETO  
1700 15th Ave # 405  
Seattle WA 98122

Mike Kaputa

Chelan County Natural Resource Department and State Department of Ecology

411 Washington Street., Suite 201, Wenatchee, WA 98801

Dear Mr. Kaputa,

46-1

My name is Ryan Jones, I'm a 20 year old college student living abroad and am writing to tell you that there is no place like the PNW and specifically its crown jewel, the Icicle Creek Sub Basin Area. I grew up in the evergreens and would travel hours out just to spend a single moment hanging my body off Icicle creeks rocks. I speak for my friends and the generation who were shaped by these mountains when I say that we support the quest for more sustainable sources of energy but the resources used to create such a project could be put to much better use.

The trip down to Leavenworth is made worth it not by the climbing and hiking but when I can stop for a second just to take in the silence. Stop by the river for lunch and share the rock with whatever wild life might be skirting on by. I miss these moments desperately. It's hard to truly appreciate the natural beauty until you leave, what the enchantments and all of Icicle Creek has is something special. Spending time in nature and the back country teaches you to care about our earth, how to be preserve it and what's truly important. You feel against your skin just how powerful the breeze and sun can be for one person as well as providing for all of us. The moments, that these dams run the risk of destroying, teach us what it means to be human and see everything in perspective. The ecosystems that make up the peaks and valleys are incredibly unique and can't be found everywhere, it's hard to appreciate just how incredible they are. You may be numb to just what these animals, ecosystems and areas can offer and might have forgotten just how beautiful the views are but that's not why I'm writing you. I'm writing to remind you the incredible impact they can all have on a young boy.

Again, I speak for my friends and the generation that gained meaning in their lives from the moments spent near the mountain lakes. We support the quest for more sustainable sources of energy but the resources used to create such a project could be put to much better use where they don't put so much beauty in danger.

I genuinely appreciate you taking the time to read through this as this issue is incredibly close to so many of our hearts. We look forward to hearing your response.

All the best,

Ryan Jones  
07/10/2018



ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 047

William B. and Margaret L. Beyers  
7159 Beach Drive SW  
Seattle WA 98136

(206) 935 6282

Mr. Mike Kaputa  
Director, Natural Resource Department  
Chelan County  
411 Washington St., Suite 201  
Wenatchee WA 98801

Dear Mr. Kaputa:

47-1

We strongly support the letter dated July 25, 2018 from David Knibb, Vice President of the Alpine Lakes Foundation, with regard to the Icicle Strategy Draft Programmatic Environmental Impact Statement (DPEIS). This document fails to establish a basis for water rights related to the various proposals in the DPEIS.

47-2

As also suggested by Karl Forsgaard of ALPS, this DPEIS must be replaced with another document that speaks to these fundamental issues of water rights, and another period of public comment needs to be offered on it.

Please officially withdraw this DPEIS as inadequately drafted under SEPA, and after issuance of a revised DPEIS that has appropriate water rights defined, please publish the required public comment period on this revised document.

Sincerely,

William B. and Margaret L. Beyers



Comment Letter 048

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**From:** Allison Ostrer <aostrer21@gmail.com>  
**Sent:** Friday, June 22, 2018 8:51 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Project

48-1

I am a taxpayer and I OPPOSE any new or larger dams in the Alpine Lakes Wilderness.

Allison Ostrer  
Seattle, WA

Sent from my iPhone



## Comment Letter 049

## Comment Letter 050

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**From:** Ansel Wald <anselwald@gmail.com>  
**Sent:** Tuesday, June 26, 2018 9:47 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Public comments- Alpine lakes water piracy

Dear Chelan County,

49-1 | You guys can jolly well keep your long tentacles out of the Alpine Lakes. This area was set aside for preservation and as it is there is so much pressure on it that one has to get a permit just to visit it the area from which Chelan County proposes to steal- that's right, steal- the water: The Enchantment Lakes and certain nearby lakes.

How dare Chelan County try to steal water out of an area which the people have worked for decades to preserve, which was finally set aside by the Congress of the USA. I have been up there many times and I have an intimate knowledge of the area. It can barely serve it's purpose- preservation of an alpine ecosystem- and still provide for the recreational needs of people on both sides of the Cascades. Recreation is putting enough pressure on this wilderness preserve, and the water pirates have no business up there. One of the tenets of the Wilderness act is that no permanent developments, including dams, which are essentially commercial developments, are allowed to be built.

49-2 | If Chelan county has any humility, they can stay out of the alpine lakes and manage the water after it has left the boundaries of the wilderness. If that isn't enough water for rich folks to water their lawns and farmers to irrigate their crops then they can jolly well pump water out of the Columbia river. It has plenty to go around.

Sincerely, Ansel Wald

P.S.: Similar letter also sent to Mary Jo Sanborn.

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**From:** brynne koscianski <brynne.koscianski@gmail.com>  
**Sent:** Monday, June 25, 2018 5:58 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] DPEOS Icicle Creek

Chelan county,

50-1 | I am writing to express strong concern for the DPEIS. All alternatives seek to construct dams and related structures on lakes within the Alpine Lakes Wilderness. In my family, each member has a favorite area of our beautiful PNW. Mine is the Apline Lakes Regional Wilderness. In my mind, this land is some of the most beautiful in our entire nation. We must do everything in our power to protect and preserve these beautiful wild places. The annual enchantments permit process is a great indication of how many others love this place too. Please enforce the protections that keep the Alpine Lakes beautiful. I stand with the Seirra Club, and all who stand with our wild places.

Sincerely,

Brynne koscianski

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 051

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**From:** Chris Murray <chrismurray92@gmail.com>  
**Sent:** Wednesday, June 27, 2018 1:54 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Water Resource Management Strategy

To Whom it May Concern,

51-1 I'd like to register my opposition to the proposed Icicle Creek Water Resource Management Strategy, especially as it impacts the Alpine Lakes Wilderness. I live in Central Washington, and my wife and I thoroughly enjoyed our hikes in the Alpine Lakes wilderness area. During our visits, we stay in hotels in the Leavenworth area and eat in the restaurants there, so our visits contribute to the vibrant tourism and outdoor recreation economy of the area.

51-2 I am very concerned about any activity that is going to jeopardize the Alpine Lakes Wilderness, and the proposed alternatives in the Management Strategy look likely to have a significant impact. I strongly encourage the working group to give greater weight to wilderness preservation in the EIS and the final plan. I think much greater weight also needs to be given to water conservation and trading of water rights in taking care of the legitimate water needs of irrigators and the public before any activities that will modify the water budget in the Alpine Lakes Wilderness, let alone lead to construction activities there.

Thanks for your consideration.

Chris Murray /s/

--  
Chris Murray  
1909 Dogwood Place  
Richland, WA 99354

Comment Letter 052

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**From:** Darrel Martin (dsence@hotmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Wednesday, June 27, 2018 11:52 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Damming Alpine Lakes Wilderness?

Dear WA Department of Ecology and Chelan County Officials,

52-1 Many of the DPEIS proposals for Icicle Creek do not conform to the fundamental ideal that Wilderness should remain undeveloped.

The Wilderness Act defines wilderness as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain."

If these standards are not upheld, you will be violating a legal designation and undermining a crucial and sensitive mountain habitat where tens of thousands of like minded people recreate each year.

Please uphold higher standards of Wilderness preservation, even at the expense of whatever economical benefit it may provide. With over 300 million and counting, Homo Sapiens have done enough damage to this beautiful country.

Thank you,  
Darrel Martin

Sincerely,

Darrel Martin  
517 Pine Ave Apt 2  
Snohomish, WA 98290  
dsence@hotmail.com  
(425) 387-8813

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## Comment Letter 053

## Comment Letter 054

**From:** Deanna Pumplin <deepumplin@gmail.com>  
**Sent:** Tuesday, June 26, 2018 11:58 AM  
**To:** NR Icicle SEPA  
**Cc:** Deanna Pumplin  
**Subject:** [Icicle SEPA] Draft Icicle Strategy EIS

Mike Kaputa, Director, Chelan County Natural Resource Department

Dear Mr. Kaputa,

- 53-1 I'm opposed to the Icicle Creek watershed project being proposed to enhance water flow in the summer for fish, agriculture, human consumption, for all the reasons stated in the letter to you available at: [http://www.waterplanet.ws/pdf/Icicle\\_SEPA\\_scoping\\_comments\\_5-11-16.pdf](http://www.waterplanet.ws/pdf/Icicle_SEPA_scoping_comments_5-11-16.pdf).
- 53-2 I am a resident of Washington and have lived in this state since 1975. I have backpacked in the Alpine Lakes Wilderness area, particularly in The Enchantments. It is wilderness. It is sacred. The Icicle Creek strategy will adversely impact this Wilderness area.
- 53-3 I implore you, on behalf of generations to come, on behalf of the rest of the living world, to oppose this EIS. We humans should be exercising a united effort to conserve water as the first and most important step in dealing with water flow for fish, with water for agriculture, with water for people. Climate change requires that we as a people change our ways, change our habits, change our mistaken belief in the supremacy of humans. Water flow for fish should be the priority. Let the orchards and farms find more ways to improve their care of their soil, of its water holding capacity. Let's not turn to the technologies of dams, which we should be removing, not building, to solve a problem of human misuse of the living systems that make our world.

Sincerely,

Deanna Pumplin  
 400 35th Street  
 Port Townsend, WA 98368  
 (360) 379-1553  
 deepumplin@gmail.com

**From:** Dick Fiddler <fiddler.dick@gmail.com>  
**Sent:** Wednesday, June 27, 2018 9:49 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on Icicle Strategy PEIS

Mike Kaputa  
 Director, Chelan County Natural Resource Department

Dear Mr. Kaputa:

The Icicle watershed is a major portion of the Alpine Lakes Wilderness, an area greatly valued by citizens of Chelan County, Washington State, and the entire nation. In my view, the PEIS does not adequately consider the wilderness values which inspired the successful campaign to enact Wilderness legislation in 1976, it does not adequately discuss the conflicts in the Working Group which caused several major environmental groups to be forced out of the Working Group, and it does not include a full range of practical alternatives which could do a better job of protecting all the environmental and water supply values in play.

- 54-1 The PEIS seems to assume that mere compliance with the Wilderness legislation serves to do the job of assessing wilderness values. This is simply wrong. The legislation provides for a management framework to protect certain wilderness values but is not dispositive as to future decisions. The discussions leading up to the 1976 Act did include an understanding that existing dams within the wilderness boundaries would not have to be removed. As a participant in those discussions, I know that there was no detailed consideration of future changes to the management of lake levels or of dam upgrades or repairs. These issues were not definitively decided and alternate approaches to protecting and enhancing wilderness values must be analyzed in an open manner today. This can only be done by a detailed assessment of additional alternatives. Asserting simply that the alternatives considered are sufficient because they comply with the wording of the legislation does not even begin to suffice.
- 54-2 The PEIS implies that the Working Group was a consensus process including environmental groups. This is far from adequate as a discussion. While a few groups were included which might claim some right to the term 'environmental', the simple fact is that the major environmental groups who have long been stakeholders in Alpine Lakes issues were forced out by the process. The document is misleading on this point.
- 54-3 Finally, a full range of alternatives, including water conservation alternatives and alternatives which do a more rigorous job of wilderness protection, must be considered in depth.

The PEIS is inadequate.

Sincerely,

Richard Fiddler  
 1708 N 35th St  
 Seattle, WA 98103  
 206-420-8865

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 055

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**From:** Jeff Lambert <ecojeff@me.com>  
**Sent:** Monday, June 25, 2018 7:04 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Project

**To Whom it May Concern:**

- 55-1 | *I recommend that projects to increase the dam size and adding a tunnel should be removed from the Icicle Strategy. The adverse effects to the ecosystems in this sensitive area will not recover. The harm to recreation use will also be harmed.*
- 55-2 | *As a licensed civil engineer who has considerable experience on large and small hydroelectric projects, the ecological and recreation costs far outweigh the benefits of this project.*
- 55-3 | *I endorse the proposed habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies.*

*Jeff Lambert, PE  
16 E 39th Avenue  
Spokane, WA 99203  
(509) 999-5100*

Comment Letter 056

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**From:** John Russell (jvrussell85@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Wednesday, June 27, 2018 10:07 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 56-1 | These dams should be removed. Let wilderness be wilderness. We build dams and dikes to control nature, and when things fall apart, we build more. Take the dams out!

Sincerely,

John Russell  
818 32nd Ave  
Seattle, WA 98122  
jvrussell85@gmail.com  
(206) 329-7489

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## Comment Letter 057

## Comment Letter 058

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**From:** Snow Cat <kristikt7@gmail.com>  
**Sent:** Monday, June 25, 2018 6:30 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Project

57-1 | Great project idea go for it. It wont effect the area enough to destroy the environment. Looks like a very well thought out idea.

Sincerely, M. Johnson

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**From:** Mark Shipman (shipman@nwi.net) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 5:32 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Dams in the Alpine Lakes

Dear WA Department of Ecology and Chelan County Officials,

58-1 | The Sierra Club, Alpine Lakes Protection Society, and several other environmental organizations are dead wrong on this one! I personally live in Chelan County, and I have recreated in the Alpine Lakes probably more than most other environmentalists....and I do consider myself an environmentalist.  
Eight Mile Lake is a good example. There are no beaches at Eight Mile Lake, nor are there any camp grounds along the shore. Raising the lake level even ten feet would make little difference to those who recreate there including myself. With environmental warming, we will need to hold more water in the Alpine Lakes than in previous years do to decreasing snow pack.  
Please consider me strongly in favor of repairing and enhancing the existing dams in the Alpine Lakes Wilderness. I am happy to provide much more discussion on this issue!

Sincerely,

Mark Shipman  
1221 Madison St  
Wenatchee, WA 98801  
shipman@nwi.net  
(509) 670-4606

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 059

Comment Letter 060

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**From:** mattparker770@gmail.com on behalf of Matt Parker <mattparker@kw.com>  
**Sent:** Friday, June 22, 2018 2:09 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Watershed Public Comment

Hello,

59-1 | I wanted to let you know I am against damming anything in the Enchantments, a truly one-of-a-kind natural  
WV | treasure. Please take my thoughts into consideration.

Sincerely,

Matt Parker, Burien, WA



(206) 226-8323 - 455 SW 152nd, Seattle, WA 98166

Keller Williams Puget Sound - [Luxury Site](#) - [Residential Site](#)  
[Amazon](#) - [LinkedIn](#) - [Facebook](#) - [Zillow](#)

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**From:** be <brightm33@gmail.com>  
**Sent:** Wednesday, June 20, 2018 2:38 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Alpine Wilderness

**Categories:** EIS Comment

60-1 | As a frequent visitor to the pristine Alpine Wilderness area, I  
implore you to leave the area untouched. We are no struggling  
with holding onto areas such as this where no industry has tread.  
I have hiked extensively throughout the region for 48 years. Water  
taken from this area to support tourist trade in Leavenworth is a  
ridiculous venture.

60-2 | As for as agriculture, the lack of water can't be addressed by  
this venture for long. It is Climate warming that is to blame, over  
use of land for agriculture, dense developments of recreational  
homes in the area...these are the culprits.

This plan is not going to solve the deeper problems. You are  
opening a Pandora's box by removing waters coming from snow  
packs and glaciers, building larger dams, drilling between lakes  
and reconstruction in a very fragile and pristine environment...in  
60-3 | the long run, it is going to cascade into more problems. It is this  
sort of impact that drives the acceleration of climate warming.

60-4 | Learn how to clean up the larger rivers that have been polluted by  
bad planning and over use and use them for human consumption.

60-5 | We need to protect our wilderness areas not open them up for  
water sales.

Michelle Bright  
321 W Niagara Ave  
Astoria OR 97103

## Comment Letter 060

## Comment Letter 061

503 298 0929



"Climb the mountains and get their good tidings. Nature's peace will flow into you as sunshine flows into trees. The winds will blow their own freshness into you, and the storms their energy, while cares will drop away from you like the leaves of Autumn."

- John Muir

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**From:** Natalie Williams <nataliesees@gmail.com>  
**Sent:** Monday, June 25, 2018 9:57 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Strategy Draft PEIS

61-1 | The alternatives are packaged in such a way, that even the moderate conservationist is pushed to choose the 'No Action'  
 61-2 | alternative. The BEST solution is the *long term* solution, and that includes the Full IPID Pump Station. The BEST solution  
 61-3 | must be compliant with the Wilderness Act, and so must not include Modernization or Enhancement. So why not offer  
 an Alt3 with the Full Pump Station? Or an Alt 5 without the illegal Lake/Dam mechanization?

61-4 | It may not be the cheapest or fastest path, but it will be a LOT cheaper if we can avoid lawsuits.  
 Best wishes to all who are working this problem/solution.

-- Natalie Williams  
 "The best way to predict the future is to create it." -Peter Drucker

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 062

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**From:** Peter Fiddler <epfriddler@q.com>  
**Sent:** Tuesday, June 26, 2018 8:05 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please do not build dams or divert water from Alpine Lakes Wilderness

To: Mike Kaputa, Director, Chelan County Natural Resource Department

Subject: Draft Programmatic Environmental Impact Statement for the Icicle Creek Basin

Dear Mr. Kaputa,

62-1 I believe that the Alpine Lakes Wilderness, including the Icicle Creek, should be preserved as wilderness.

Therefore please consider including a "Wilderness Preservation" option that would prevent dams and water diversion in this important natural area.

Thank you for your consideration.

Sincerely yours,

Peter Fiddler  
5744 28th Ave. NE  
Seattle, WA 98105  
206-779-0309

Comment Letter 063

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**From:** smiths1946@outlook.com  
**Sent:** Tuesday, June 26, 2018 9:21 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] lake name error

63-1 In chapter 3, affected environment, Figure 3-1 map) the labeling of Eight Mile Lake and Colchuck Lake is backwards or reversed.

63-2 Also, is there an illustration of what changes are being proposed for the lakes in and around the Alpine Lakes Wilderness?

Thank you,  
Sam Smith  
Sent from [Mail](#) for Windows 10



## Comment Letter 064

## Comment Letter 065

**From:** Thor Thompson (tthompsonseattle@aol.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Sunday, June 24, 2018 7:32 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

64-1 Please leave the wilderness and lakes alone.

Sincerely,

Thor Thompson  
10302 14th Ave NW  
Seattle, WA 98177  
tthompsonseattle@aol.com  
(206) 679-7574

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**From:** Timothy R. Gartland <timgartland@centurytel.net>  
**Sent:** Monday, June 25, 2018 5:08 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Draft Programmatic Environmental Impact Statement (PEIS) for the Icicle Strategy

Dear Mike Kaputa, Chelan County Natural Resource Department,

- 65-1 Please receive our message that I and my family being property owners on the Icicle River will stand with the Alpine Lakes Wilderness Society in their opposition to the Icicle Strategy as outlined in the Society's first edition of the 2018 newsletter. The summary of its text is included as follows:  
• ...The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. It is one of the nation's more popular wilderness destinations and attracts people from around the world, particularly to the Enchantments Basin, known for its competitive permit lottery.
- 65-2 • The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes IPID's easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- 65-3 • Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. These projects are unprecedented in the National Wilderness System. These projects were not part of the proposed action in the SEPA scoping conducted by IWG in 2016, so the public was not provided an opportunity to comment on them during scoping. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- 65-4 • Alternative 5 is the least harmful alternative. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek, especially in future decades when climate change will reduce flows in the Icicle watershed. However, Alternative 5 also includes the defective Eightmile "Restoration" project to make Eightmile dam higher than it has been since 1990, i.e., to enlarge Eightmile Lake.
- 65-5 • The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the U.S. Forest Service and must comply with the National Environmental Policy Act (NEPA) and other federal and state laws.
- 65-6
- 65-7
- 65-8 • The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the DPEIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the DPEIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides. IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- 65-9
- 65-10 • For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 065

- 65-10 management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National
- 65-11 Environmental Policy Act (NEPA). SEPA is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- 65-12 • Because the projects are in Wilderness, non-motorized access and non-motorized equipment (i.e. hand tools) and traditional skills should be required whenever feasible. Since the dams were originally built that way, the exceptions should be rare.
- 65-13 • The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed unnaturally timed releases of water from lakes, which alters stream hydrology. The DPEIS generally fails to recognize that altering the natural flow regime can degrade a stream's physical and chemical properties, leading to loss of aquatic life and reduced aquatic biodiversity. We are concerned that IWG has not done adequate sampling and monitoring of impacts from past releases into these wilderness streams, including cumulative impacts.
- 65-14 • Conservation components in the DPEIS are simply insufficient. They need to be expanded to significantly reduce demands on Icicle Creek's water, thereby allowing its watershed to function more naturally. This will better support our region's livability and economy over the long-term. • While we appreciate the goal to improve instream flows in Icicle Creek, it is contradictory to exploit one natural area under the guise of enhancing another, particularly when other options are available.
- 65-15
- 65-16 • The DPEIS should be revised to address the above deficiencies. A Revised Draft PEIS should be released for public comment.

Very sincerely,  
Tim Gartland and the Gartland Family, 86 Mountaineering Creek Lane, Leavenworth WA 98826

2

Comment Letter 066

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**From:** Will Henson (willtcrane@yahoo.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 7:46 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 66-1 take the dams out, not needed anymore, take out the fish hatchery as well let the river go back to normal before 1928
- 66-2 let the creek rebuild itself from commissioners that rely on the benefit, icicle creek use to dry up in late summer the
- 66-3 creek is non navigable owned by to people that have property next to the creek, if you want to help the fish ! Stop the
- 66-4 commercial river tubing, floating, it's like a drunk water park, people pissing and shiting everywhere, garbage, trespassing, underage drinking, it's out of control

Sincerely,

Will Henson  
12386 shore st Leavenworth WA 98826-9324 United States Leavenworth, WA 98826 willtcrane@yahoo.com  
(907) 230-9341

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## Comment Letter 067

## Comment Letter 068

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**From:** Will T Henson <willtcrane@yahoo.com>  
**Sent:** Wednesday, June 20, 2018 8:05 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle creek

**Categories:** EIS Comment

67-1 To whom it concerns  
Need to put regulations on the commercial tubing industry the thousand people a day floating walking on private property stepping all over baby reds, drinking getting drunk in public in front of families, sinking beer cans and bottles ,defecating all over in the river and on private property, dumping garbage screaming and yelling has disrupted the community neighborhoods, commercial tubing is violating my property rights, degrading my property values and creating a nuisance and hurting the environment, where do all these people go to the bathroom? We can't even use our property in the summer days because we have drunk trespassers on our property every day, Sheriff's department needs to patrol the icicle creek and ticket people for breaking Washington laws including drinking in public and trespassing Will henson property owner tax payer

Sent from my iPhone

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**From:** Fisher (US), Andrea M <Andrea.M.Fisher@boeing.com>  
**Sent:** Friday, July 06, 2018 1:11 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] PEIS comment for the Icicle Strategy

68-1 | No DAMS!

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 069

Comment Letter 069

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**From:** Charles and Nancy Bagley <c12n35.h.bagley@comcast.net>  
**Sent:** Monday, July 09, 2018 3:23 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] DPEIS Icicle Creek Project 120045  
**Attachments:** COMMENTS -- DPEIS Icicle Creek Project.docx

Thank you for your and your staff's work on preparing this thorough DPEIS, a massive document. I have studied it extensively and prepared the above comments.

69-1 I have endorsed Alternative 2, as having the greatest chance of providing water security for the Icicle Creek, Leavenworth and Dryden areas, and avoiding the serious wilderness impacts that the Alpine Lakes Optimization ... Project would cause, especially Alts. 4 and 5.

69-2 What legacy does your Department and Staff want to look back at? Surely it must be that water supply was assured, taking of Icicle Creek water was reduced, and the majestic Wilderness around Icicle Creek remains beautiful and enjoyed by your grandchildren and their descendants.

Thank you,

Charles Bagley  
Seattle  
206-282-1578

COMMENTS ON THE:

**Draft Programmatic Environmental Impact Statement for the Icicle Creek Water Resource Management Strategy, Chelan County, Washington Project 120045**

**SUBMISSION DATE JULY 9, 2018**

69-3

I prefer **Alternative 2.**

As shown in the report by the University of Washington Climate Impacts Group, May 12, 2017, Alternative Two will supply adequate minimum water flow of 100 cfs under all climate forecast and drought conditions scenarios (see CIG report Appendix).

The Dryden Pump in low water months will be able to remove water directly from the Wenatchee River. Thus, Dryden will be happy, always having enough water, and removals from Icicle Creek will never be needed when flows are low.

Further, Alternative Two will not require installation in the Alpine Lakes Wilderness of Optimization equipment, which despite its small footprint will be obvious to the hikers.

The cost of Alt. Two at \$91 million is only 11% more than Alt. One, a modest extra cost considering the much greater security it provides to the fish and irrigators.

69-4

I oppose Alternatives 4 and 5.

We must never forget that these federal Wilderness lands belong to ALL Americans. Americans flock to the Leavenworth region -- 150,000 visitors in 2017, "... to enjoy the wilderness" (3.11.1). Backcountry camping in the Enchantment Lakes area is famous nation-wide. In 2015 there were 12,034 applications for camping permits, but only 1946 permits were available! (See tables 3-24 and 3-25) The USFS must restrict camping to preserve the quality of the experience now and for future generations, as mandated by the Wilderness Act. So, getting backcountry camping permits is a matter of luck; most applicants reapply yearly until lightning strikes, as it finally did for my wife and me at the ranger station one morning decades ago, resulting in one of the most memorable hiking trips we ever shared.

69-5

What would be the impacts of Alpine Lakes optimization on visitors' experience in the Enchantments? The view impacts would be stunning! In Section 4.11, Aesthetics, Alt. One figures show thousands of acres of land from which the "bathtub rings" of the fluctuating reservoirs would be visible. The DPEIS deceptively shows these effects as seen from selected "viewpoints", but actually, all of the lake shores are viewpoints. E.G.: the diagram for Upper Snow Lake (Fig 4-4) is faulty, as the entire south shore trail will also reveal the ring.

For Alt. 4 and 5, section 4.11.5.2 reveals that the water level in Upper Snow Lake may vary by up to 8 feet, (!) creating a massive ring of dead trees and mud in peak hiking season of late July to early September, when hiking season peaks. What a tourist attraction for the thousands of hiker visitors to the Leavenworth area! The supposed "existing and proposed" photos of Upper Snow Lake (fig 4-64) actually are the same. Deceptive!

## Comment Letter 069

## Comment Letter 070

69-6 | Also, for Alt 4 and 5 peak water levels are expected to create “seasonal inundation of existing trails, campsites ... at maximum capacity.” And of course, “maximum capacity” will be the plan for every spring. This not only blocks access in the early summer, but will leave a layer of silty mud all over the beautiful campsites by the Lake outlet for the rest of the year.

69-7 | AN ADDITIONAL IDEA:  
There was a suggestion that the Fish Hatchery could be moved. This was not analyzed. But given the importance of the Hatchery, water piped from the Wenatchee should be considered. This will assure perpetual water supply, and further reduce demand from Icicle Creek.

---

**From:** Mike Kaputa  
**Sent:** Wednesday, June 27, 2018 9:56 AM  
**To:** Mary Jo Sanborn  
**Subject:** FW: Environmental Review Comments

**From:** Christopher Barchet [mailto:christopherbarchet@gmail.com]  
**Sent:** Wednesday, June 27, 2018 9:41 AM  
**To:** Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>  
**Subject:** Environmental Review Comments

Dear Mike Kaputa -

I realize that the water management of the Icicle Creek is complicated and difficult. I can also see that a huge effort has gone into sorting out how to allocate a limited resource. Thank you for your work in finding solutions.

70-1 | Please understand that myself and so many others in the Puget Sound believe that the wilderness is a an equally valuable resource and infringing on it is unacceptable. The Alpine Lakes is to be "untrammelled by man, where man himself is a visitor who does not remain." Surely any infrastructure built in the wilderness violates the definition described in the Wilderness Act.

70-2 | Please consider alternative solutions proposed in the 40-organization comment letter. [http://www.waterplanet.ws/pdf/Icicle\\_SEPA\\_scoping\\_comments\\_5-11-16.pdf](http://www.waterplanet.ws/pdf/Icicle_SEPA_scoping_comments_5-11-16.pdf)

Thank you for your consideration.

Chris Barchet

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 071

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**From:** James Donaldson <olyaqua@gmail.com>  
**Sent:** Wednesday, July 04, 2018 1:02 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Water project DPEIS

71-1 I am very concerned that there could be further water project development in the Icicle Creek watershed. I have hiked this area many times and it is a truly special place that should not be developed in any way that harms the wilderness character of this area.

Thank you for allowing me to comment.

James Donaldson  
740 Quincy street  
Port Townsend, WA 98368

Sent from [Mail](#) for Windows 10

1

Comment Letter 072

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**From:** Mark Curtis <Mark.Curtis@mossadams.com>  
**Sent:** Tuesday, July 10, 2018 8:53 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comment – Icicle Strategy Draft PEIS

72-1 Long before settlers were in the Icicle Valley, the natural stream flows were adequate to support large number of salmon. I believe this was possible in part to the large number of beavers and beaver dams in the Icicle watershed. These beaver dams slowed the down stream flow of water, shifting the time of the water flows. The work of these natural dam builders allowed greater stream flows in mid to late summer and into the fall. More flow than we see today.

Of course the beaver population in the Icicle watershed was decimated by hunters seeking their valuable fur.

All the alternatives presented in the draft PEIS are expensive human-made alternatives. Perhaps we need to be more humble about our wisdom and abilities and look to nature for the answer.

I suggest we investigate reintroducing breeding pairs of beavers throughout the Icicle watershed, in an attempt to return it to its pre-settler state, and thus support the ecosystem outcomes we desire – more stream flows in summer and early fall to support fish.

I believe this approach would be dramatically less expensive, and more sustainable than the other alternatives presented, and poses no conflicts with the Wilderness Act

Sincerely,

Mark Curtis  
Issaquah, WA

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## Comment Letter 073

## Comment Letter 074

**From:** Melinda Mueller [mailto:mmueller@seattleacademy.org]  
**Sent:** Tuesday, July 10, 2018 7:59 AM  
**To:** Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>  
**Subject:** EIS for Alpine Lakes Wilderness projects

To: Mike Kaputa, Director, Chelan County Natural Resources

Sir:

I am a Washington State resident (since 1960), a biology teacher, and a long-time hiker and backpacker. I am deeply concerned about the draft EIS regarding proposed dam and tunnel projects within the Alpine Lakes Wilderness Area.

As outlined by *Washington Wild*, the draft EIS has the following serious issues:

- 73-1 | ◦ Contains projects that are illegal and do not comply with either federal or state laws
  - 73-2 | ◦ Contains many elements that are in direct conflict with the Wilderness Act and set a dangerous precedent for all wilderness areas in the nation
  - 73-3 | ◦ Has wildly inaccurate cost estimates and timelines for projects, ignoring the National Environmental Policy Act
  - 73-4 | ◦ Does not include nearly enough water conservation elements
  - 73-5 | ◦ Ignores the fact that the water rights to the areas involved do not belong to the group
  - 73-6 | ◦ Does not provide a sufficient range of alternatives. For example, the EIS does not include a "No Action" alternative with no new dam construction
  - 73-7 | ◦ Has projects that would have negative impacts to watersheds natural functions.
- 73-8 | Alpine Lakes Wilderness Area is one of our State's greatest treasures. The draft EIS does not show the care this resource deserves.
- Sincerely,  
 Melinda Mueller

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**From:** Pete Fry <petefry@gmail.com>  
**Sent:** Monday, July 09, 2018 12:45 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on Draft Programmatic Environmental Impact Statement for Icicle Creek Watershed Water Resources Management Strategy

My Name: Peter Fry

My Address: 2013 NE Rainbow Drive, Ridgefield, WA 98642

My Comments

- 74-1 | Having investigated the options that your department is offering it seems that only "no change" offers a future without additional dams and structures, notwithstanding the apparent bias in the report which suggests that "no change" is a bad option.
  - 74-2 | Any dams and structures will have environmental impacts that will not be reversible. Much of this area is pristine wilderness which should not be exploited for short term financial gain at the expense of the long term.
  - 74-3 | The problem with developments for short term financial gain is that they don't take into account the long term impacts and costs of development. The interests of parties that seek financial gain that will externalize the costs of their activities should not be given any great weight in the decision.
- On a recent hiking vacation in the Redwoods Region of Northern California what struck me was not so much the beauty and majesty of the surviving trees but the the large areas that had been deforested. Plenty of people had, in the past, made money from destroying the forests - but at what long term cost?
- 74-3 | Don't pick an option that will have a deleterious effect on the environment in the long term. Don't let the Icicle Creek Watershed be yet another region that is destroyed by unnecessary development.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 075

**From:** Rebecca Caulfield <caulfier@gmail.com>  
**Sent:** Monday, July 09, 2018 7:36 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comment on Icicle Strategy

Good evening,

As a concerned Washington citizen, I would like to provide a comment on the DPEIS written by the Icicle Work Group (IWG) for the Icicle Creek Watershed Water Resources Management Strategy. Even though I do not live or work in Chelan County, I know that any minor or major alteration to the environment has far reaching effects on the planet as a whole. Our wild lands must be treated with the utmost care and respect. I would sincerely hope that IWG will take all possible steps to thoroughly examine this strategy and consider alternative options that have no negative impact on the Alpine Lakes Wilderness. There are three points that I would like IWG to consider:

75-1

75-2

**Point one:** What practices have been exercised to attempt water conservation in Chelan County? Before building higher dams and drilling tunnels, what can this region do to reduce demands on Icicle Creek's water? For example, in the Ski Hill area of Leavenworth former orchard lands have converted to residential areas but are still afforded irrigation water duties for their lawns. Policy around this needs to change first. Even if projects within the DPEIS are implemented, it will only be a matter of time before drought becomes a repeated issue with the imminent effects of climate change. We must take steps to conserve water starting now.

75-3

**Point two:** What research has been done to address fundamental legal issues that will determine which proposals can and cannot be built? For example, how does increasing storage in Eightmile Lake meet regulations under the Wilderness Act and land management authority of the U.S. Forest Service? The Icicle and Peshastin Irrigation District's easements do not supersede federal wilderness law. An updated DPEIS would be required with these considerations since they would greatly impact the scope and validity of the proposals within.

75-4

**Point three:** Alternative four should be nixed as an option altogether. Building a tunnel between Upper and Lower Klonaka Lakes and building a higher dam at Upper Snow Lake and Eightmile Lake are egregious attacks on our wilderness. The damage created by transporting and using heavy duty equipment, habitat loss, and major impacts to riparian ecosystems would be irreversible. Again, we must do everything we can to protect what we have left of our wilderness. If water cannot be conserved, it is concerning that Chelan County wants to build even more homes where water is already over-appropriated and the impacts of climate change are taking their toll.

75-5

75-6

Thank you very much for taking the time to read my feedback about the IWG's DPEIS. I look forward to hearing about the next steps taken on this resources management strategy. I hope that the IWG will strongly consider environmental, conservation, and legal ramifications of their project proposals and develop an DPEIS that will better reflect these ramifications.

Best regards,

Rebecca Caulfield

Comment Letter 076

**From:** Allison Kutz <Allison.Kutz.123967723@p2a.co>  
**Sent:** Friday, July 20, 2018 8:12 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

76-1

Last week, my brother and I were experiencing one of the most incredible places in our state. The Alpine Lakes Wilderness is awe-inspiring. It is truly a breathtaking, unique place. To negatively alter this area would be stealing this experience from everyone who has dreamed of hiking/backpacking this area since laying eyes on the pictures shared by many who have had the privilege to walk amongst the majestic granite peaks and stunningly clear lake waters.

76-2

I attempted to read through the Icicle Creek strategies. Environmental impact is not a topic I understand to any great degree. However, I can speak to my recent trip passed the Colchuck Lake area and through to Snow Lakes Trailhead. A good portion of the trail along the lakes would be effected by a change in the level of the lake waters. Higher water of only a few feet would place sections under water. Quite a few of the Snow Lakes campsites would find themselves under water or greatly encroached upon by the lake water. It is imperative that recreationalists like myself impact the areas we visit in a manner which preserves the environment in as natural a state as possible. Changes to the lake water levels would force reroutes, planning of new camp sites, or could result in the loss of this recreation area entirely in order to protect it.

Please consider finding an alternative to your areas water concerns.

Regards,  
Allison Kutz



## Comment Letter 077

## Comment Letter 078

**From:** Anastasia Christman <Anastasia.Christman.93336538@p2a.co>  
**Sent:** Monday, July 23, 2018 9:48 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

77-1 I am deeply distressed to learn of the proposals to flood Eightmile, Upper Snow, and Lower Snow lakes as part of the Icicle Creek water strategy. Having just spent last week hiking on these very trails in the Enchantments, I believe it is critical to preserve these resources. Please remove the detrimental projects from the draft plan.

77-2 My concerns are two-fold. On the one hand, I believe that now more than ever it is important to save access to our natural lands for future generations. Climate change and the removal of other protections mean that future generations could grow up never experiencing the awe of a clear glacial lake, the beauty of delicate and improbable mountain wildflowers, or the power that comes with moving one's own body up a steep trail in clean crisp air. These lands are our patrimony, and they tell a critical story about our region and our landscape. Our children, and their children, deserve to have access to these lands.

77-3 On the other, outdoor recreation is a critical economic contributor and by flooding trails and campsites you are proposing to diminish that revenue stream. More than \$21 billion is spent in our state annually on outdoor recreation, and the non-economic benefits of land conservation are estimated to be another \$134 to \$238 billion (see this: <https://www.rco.wa.gov/documents/ORTF/OutdoorEconomicsFactSheet.pdf>). It supports tens of thousands of jobs. Last week, we paid for a camp site at the EightMile Campground, which goes to the Forest Service, but which employs people for maintenance and operations. I bought food and supplies at a local grocery store. I purchased gas and ice from a local gas station. I bought sunscreen and other incidentals at a local pharmacy. I spent one night in a hotel in Leavenworth before leaving the area, and in conjunction with that my partner and I ate three meals in local restaurants. We paid to do a float down Icicle Creek. I estimate that we spent roughly \$600 while in the area, and we had intended to make another trip in the Fall. Our visit contributed consumer dollars and tourist tax dollars, and supported jobs in retail, hospitality, food service, farming, logistics, construction, and outdoor maintenance. As of March, 2018, Chelan County still had an unemployment rate of 6%, significantly higher than the 4.8% of Washington State as a whole. It seems critical for you to protect the economic benefits of outdoor recreation using all means at your disposal.

Please reconsider these damaging parts of your plan, and protect the beauty and magnificence of the Enchantments for generations to come.

Regards,  
 Anastasia Christman

**From:** barbaragamrath@everyactioncustom.com on behalf of Barbara Gamrath  
 <barbaragamrath@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 6:58 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

78-1 I oppose it.  
 Barbara Gamrath

Sincerely,  
 Ms Barbara Gamrath  
 15001 59th Pl NE Kenmore, WA 98028-4355 barbaragamrath@frontier.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 079

Comment Letter 080

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**From:** Brian Telfer <brian.telfer@gmail.com>  
**Sent:** Thursday, July 19, 2018 6:11 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on proposed Icicle Creek water strategy

Director Kaputa,

As a active recreational backcountry user, I wanted to express my opinion with the proposed Icicle Creek water strategy. I've visited every lake mentioned in this report, and I was just at Upper and Lower Klonauqua Lakes on Jun 6th of this year.

79-1 While I understand the need to improve water access for the area, I am opposed to the projects proposed at Eightmile, Snow, and Klonauqua lakes. I've traveled to wilderness areas all over the world, and what we have preserved in the Pacific North West, specifically the area around the Icicle Basin and the Alpine Wilderness, is unique in a way that is hard to quantify. Expanding the existing man made structures that these lakes, especially the proposed tunnel at Klonauqua, would permanently change that.

Thank you for your time.

Brian Telfer  
[brian.telfer@gmail.com](mailto:brian.telfer@gmail.com)  
1321 Seneca St #1103,  
Seattle WA 98101  
6198503281

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**From:** blvanderlinden@everyactioncustom.com on behalf of Brianne Vanderlinden  
<blvanderlinden@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 11:46 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:

80-1 Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.  
Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.  
Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

80-2 I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
Ms. Brianne Vanderlinden  
2410 NW 63rd St Apt 2 Seattle, WA 98107-2481 blvanderlinden@gmail.com

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## Comment Letter 081

## Comment Letter 082

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**From:** brittany.granger@everyactioncustom.com on behalf of Brittany Granger  
<brittany.granger@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 11:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

81-1 | Please consider the negative impacts that implementing this plan could have on the environment, plants, and animals surrounding the Enchantments.

Sincerely,  
Ms. Brittany Granger  
701 15th Ave E Seattle, WA 98112-4525  
brittany.granger@icloud.com

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**From:** thealls@everyactioncustom.com on behalf of William All <thealls@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 10:12 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

82-1 | Please vote no on the proposed changes to dams and the creation of a tunnel to transfer water in the Enchantments. I have hiked and camped in this watershed and the preservation of this precious resource is critical to the enjoyment of future generations.

Sincerely,  
Mr William All  
1452 Woodland Dr Port Townsend, WA 98368-2590 thealls@hotmail.com

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 083

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**From:** Carol A. Sund <carolasund@hotmail.com>  
**Sent:** Sunday, July 22, 2018 12:04 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Strategy proposal

83-1 Please note, myself, along with other people are STRONGLY against the actions proposed.  
Please do NOT proceed – it's very detrimental to our health, well-being, and our earth.  
Thank you,  
Carol A. Sund  
Seattle, WA

Comment Letter 084

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**From:** graham\_carolyn@everyactioncustom.com on behalf of Carolyn Graham  
<graham\_carolyn@everyactioncustom.com>  
**Sent:** Tuesday, July 24, 2018 7:14 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

84-1 [The Alpine Lakes Wilderness, specifically the Enchantments, includes some of my most beloved areas for hiking, climbing, scrambling, and backcountry skiing. The wilderness designation protects the wildlife habitat that makes outdoor adventures so special for me and many many other people who recreate in the outdoors.

84-2 I oppose increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.  
I oppose increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.  
I oppose boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

New, enlarged dams and water diversions, which could flood nearby trails and campsites, are not appropriate actions in a protected wilderness area.

Sincerely,  
Ms. Carolyn Graham  
3045 127th Pl SE Bellevue, WA 98005-5141 graham\_carolyn@hotmail.com

## Comment Letter 085

## Comment Letter 086

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**From:** Administrator <cedarhyde44@gmail.com>  
**Sent:** Saturday, July 21, 2018 8:31 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposals for Dams in Alpine Lakes Wilderness

Dear People in Charge of this Proposal,

85-1 I am distressed, appalled and deeply concerned about placing dams on several lakes in the designated wilderness and most especially in the Enchantment Lakes .  
 For the sake of this spectacular land, the enjoyment of the people hiking there, and the flora and fauna whose home this is, I beg you to not move forward on this plan!

85-2 Please consider other alternatives that are not in Designated Wilderness!

Thank you for considering my comments.

Sincerely,

Cedar Hyde  
 747 N 135thSt #715  
 Seattle, Wa. 98133

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**From:** cnchabot@everyactioncustom.com on behalf of Christian Chabot  
 <cnchabot@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 9:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

86-1 We oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:

Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.

Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.

Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

86-2 We support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
 Mr. Christian Chabot  
 2517 E Helen St Seattle, WA 98112-3617  
 cnchabot@gmail.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 087

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**From:** seajai\_mermaid@everyactioncustom.com on behalf of CJ Beegle  
<seajai\_mermaid@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 11:47 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 87-1 I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts like my family:
- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
  - Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
  - Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 87-2 I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. I believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
Ms CJ Beegle  
1246 NW 120th St Seattle, WA 98177-4637 seajai\_mermaid@hotmail.com

Comment Letter 088

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**From:** conny.anderton@everyactioncustom.com on behalf of Constance Anderton  
<conny.anderton@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 8:44 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

- Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:
- 88-1 | Strategy: The enchantments is a beautiful area that should not be ruined by more dams and more building. There has  
88-2 | to be an alternative over changing and possibly destroying a protected area. Do not alter the landscape in any way.

Sincerely,  
Ms Constance Anderton  
13522 SE 173rd Pl Renton, WA 98058-7024 conny.anderton@gmail.com

## Comment Letter 089

## Comment Letter 090

**From:** CRAIG MABIE <craigdoug15@msn.com>  
**Sent:** Wednesday, July 18, 2018 8:35 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comment on proposed Icicle Strategy

Dear Mr. Kaputa:

89-1 I oppose the following projects included in the proposed Icicle Strategy:

- Increasing the size of the dam on [Eightmile Lake](#), which could flood the Eightmile Lake trail and some campsites around the lake.
- Increasing the size of the dams on [Upper and Lower Snow Lakes](#), which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
- Boring a tunnel from [Upper to Lower Klonauqua Lakes](#), which would likely have significant negative impacts to the land surrounding the lakes.

Thank you,

Craig Mabie  
 Cle Elum, WA

**From:** pedergraham@everyactioncustom.com on behalf of Danielle Graham  
 <pedergraham@everyactioncustom.com>  
**Sent:** Tuesday, July 24, 2018 8:03 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

90-1 I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:

Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.  
 Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.  
 Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

90-2 I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
 Ms. Danielle Graham  
 2181 NE Natalie Way Issaquah, WA 98029-3669 pedergraham@gmail.com

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 091

Comment Letter 092

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**From:** David Panozzo <david.panozzo@gmail.com>  
**Sent:** Thursday, July 19, 2018 11:01 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Strategy

Wanted to voice my concern regarding the proposed icicle strategy. A few of my concerns are below.

91-1

- Flood the trail and some campsites around the Eightmile Lake.
- Raise the water levels at Upper and Lower Snow Lakes and flood the surrounding trail and campsites.
- Have significant negative impacts to Upper to Lower Kionaqua Lakes because of the proposed tunnel connecting the two.

91-2 | I am against this and hope enough negative feedback is presented to change your minds.

David Panozzo  
xxx xxxx xxx Road  
xxxxxxxxxx, IL 60565

(xxx) xxx-xxxx

Address and Telephone Number have been redacted to avoid being made public via FOIA requests. Thanks.

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**From:** David Van Cleve <dvancleve100@gmail.com>  
**Sent:** Sunday, July 22, 2018 1:33 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] PEIS Comments  
**Attachments:** Domestic Comment Letter.docx

Dear Sir

Attached are my comments for the Icicle Creek PEIS document.

David Van Cleve



## Comment Letter 092

## Comment Letter 092

July 22, 2018

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

Dear Sir,

This letter contains comments regarding the Icicle Strategy Programmatic Environmental Impact Statement (PEIS). These comments concern the domestic supply portion of the plan.

The PEIS states that one of the goals of the Strategy is to improve domestic supply for the City of Leavenworth and Chelan County by supplying 1,750 acre-feet of reliable year-round supply with 2.5 to 5 cubic feet per second (cfs) for peaking. To accomplish this goal the plan intends to utilize the projects of an Instream Flow Rule Amendment and the Eightmile Lake Storage Restoration.

The first four comments in this letter are based on my review of the City of Leavenworth's 2018 Water System Plan in conjunction with the PEIS. I am a Professional Civil Engineer with 22 years experience in developing water system plans for cities in Central and Eastern Washington.

92-1

Comment 1: A new project should be added to the PEIS, which is to replace the existing City's diversion and water treatment plant with a ground water well located in the City. This project would add 1.5 CFS of flow to the lower 5.7 miles of Icicle Creek. This project would be similar to the pump exchange projects for the irrigation districts. Based on the 2018 water system plan this project is feasible as follows:

- The City's existing three wells can supply the ultimate build out demands (existing well capacity 3,250 gallons per minute (gpm) is greater than ultimate build out maximum day demands of 2,860 gpm).
- The existing wells are in the sands and gravels next to the Wenatchee River and existing water rights should be able to be transferred downstream to the existing wells.
- To meet reliability requirements (meet maximum day demands with the largest source out of service), the City would need to drill a new well of approximately 1,000 gpm. The new well can also be added as an additional point of withdrawal for the existing wells water rights.
- A typical cost of a new municipal well of this size is in the range of \$1.5 to 3 million dollars.
- The Water System Plan indicated that the City is going to complete an engineering study of the water treatment plant because the water treatment plant requires many improvements. Twenty year total costs for a new well is

92-1

typically less expensive than operating a Water Treatment Plant for twenty years. The City should include the well alternative in the engineering report for the water treatment plant.

- A new well will not require the improvement to the City's fish screen.

This improvement will not require raising the Eightmile Lake water level and the associated negative environmental impacts on the Alpine Lake Wilderness.

92-2

Comment 2: The PEIS states that the City is considering reclaimed water to meet its demands. The Water System Plan specifically states that the City is not going to utilize reclaimed water. These statements are contradictory; remove the reclaimed water statement from the PEIS.

92-3

Comment 3: The City of Leavenworth's future water use projections are very aggressive. The City's Water System Plan states that population will grow by 0.47% per year while its water use will grow by 2.2% per year. This projected water use growth, in turn, will cause a higher demand on water from Icicle Creek.

The projected growth in water use is not supported by the historic growth of water demands in the City of Leavenworth. Since 1990, water demands have varied from 850 to 1,165 acre-feet per year without a positive upward trend in water demand. At the same time, the City's population has increased from 1,692 to 1,990. Essentially, for 27 years water use has not grown while population has been increasing. Now the City of Leavenworth's projections state that water use will start to grow at a fast pace. Historical data does not support this projection.

If water-use growth is estimated at 1% per year (rather than the 2.2% shown in the City's Water Plan) then it will take until 2056 to exceed the temporary water right limitation of 1,465 acre-feet as imposed by the court ruling of Leavenworth vs. Ecology (Figure B page 45 Water System Plan).

The City will not need as much additional water as shown per the City's Water System Plan by 2050 and the guideline of 1,750 acre-feet of additional domestic supply should, in-turn, be revised lower. Also the associated project that is required to reach this goal should not be funded. Because of this, the Eightmile Lake Storage Restoration should not be funded.

92-4

Comment 4: The City's water conservation plan in the Water System Plan does not promote conservation aggressively as determined by the following factors:

- The City is only allocating \$1,000 per year for water conservation.
- The City's unaccounted water (lost water) is 24%.
- The City's water conservation plan does not include leak detection to determine where the unaccounted for water is going.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 092

Comment Letter 093

- 92-4
- Approximately 70% of all water used is during the summer months, most likely for irrigation. The City decided not to impose a conservation-based water rate due to the possible financial hardships imposed on its customers. I understand that this is politically difficult to do. However, the City could gradually impose a conservation-based rate over many years to minimize the shock of a sudden rate increase.
  - I have written many water conservation plans for cities in Central and Eastern Washington and this conservation plan is designed to meet only the minimum Department of Health guidelines.

With a more aggressive conservation program, the City will not need as much additional water by 2050. The guideline of 1,750 acre-feet of additional domestic supply should be revised to a lower number and the associated project that is required to reach this goal should not be funded. Specifically the Eightmile Lake Storage Restoration should not be funded.

- 92-5
- Comment 5: The PEIS is allocating 74 acre-feet of domestic water for the growth of 199 additional households in the watershed in Chelan County. The main reason for the PEIS is that the Icicle Creek basin is over allocated and Icicle Creek does not have sufficient water flows. Since the Icicle Creek basin is over allocated, the basin should be closed for new growth. If new growth is to occur, new household(s) should buy existing water rights. This is similar to what is currently being done in Kittitas and Yakima counties. Growth should pay for growth. Also, growth should occur in cities and towns according to the Growth Management Act. The guidelines in the PEIS for water usage in Chelan County should be changed to reflect this.

Sincerely Yours

David Van Cleve P.E.  
Dvancleve100@gmail.com

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**From:** dlgill1@everyactioncustom.com on behalf of Deanna Gill <dlgill1@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 9:13 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 93-1
- Please do not let this pass. We need to preserve our lands for future generations. Once the damage is done it can never be repaired. Too many people are enjoying this area.

Sincerely,  
Ms Deanna Gill  
6012 48th St NE Marysville, WA 98270-7525 dlgill1@yahoo.com

## Comment Letter 094

## Comment Letter 095

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**From:** deloaparrish@everyactioncustom.com on behalf of Deloa Dalby  
<deloaparrish@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 9:01 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle  
94-1 Strategy: I oppose this plan and it's wilderness impacts.

Sincerely,  
Ms Deloa Dalby  
19915 330th Ave NE Duvall, WA 98019-9751 deloaparrish@hotmail.com

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**From:** Elizabeth Vu <Elizabeth.Vu.123966733@p2a.co>  
**Sent:** Friday, July 20, 2018 7:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

I would like to submit my concerns about the proposed Icicle Creek water strategy. I understand that there are many factors and voices in this conversation, and I am a regular citizen who would like to speak on behalf of hikers and hopeful hikers to the area. We must protect our natural resources so they may last many generations into the future.

95-1 I understand according to the WTA, the proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them. Chelan County and Ecology  
95-2 should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Elizabeth Vu

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 096

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**From:** ghoule636@everyactioncustom.com on behalf of Gabriel Houle <ghoule636@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 10:49 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

96-1 | Please don't proceed with these plans! I love the icicle creek area as it is. I have many fond memories backpacking and climbing from this area that I hope I can share with my children and their children someday. This environment is only special when it is a wilderness area as it is right now.

Sincerely,  
Mr. Gabriel Houle  
3555 Market Pl W Apt 207 Tacoma, WA 98466-4480 ghoule636@gmail.com

Comment Letter 097

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**From:** Greg Wellman <Greg.Wellman.124164985@p2a.co>  
**Sent:** Tuesday, July 24, 2018 4:42 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

97-1 | The Alpine Lakes are a Wilderness area. There's no point in having wilderness areas if as soon as non-wilderness areas need water we go and flood the wilderness. I get that there are important uses for that water. I certainly want the fish hatchery to have enough and the farmers in the area to get as much as they have historically. It seems to me the problem is the growth of Leavenworth. If there's not enough water, then Leavenworth needs to stop growing. We need to preserve the wilderness more than we need Bavarian-themed restaurants.

97-2 | Chelan County and Ecology should revise and re-release the PEIS to remove the projects at Eightmile Lake, Upper and Lower Snow Lakes, and Upper and Lower Kionaqua Lakes. The new PEIS should provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this beloved alpine valley.

Regards,  
Greg Wellman

## Comment Letter 098

## Comment Letter 099

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**From:** hhalpern1@everyactioncustom.com on behalf of Harvey Halpern <hhalpern1@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 7:51 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

98-1 | You should be leaving Wilderness alone, that's why it's designated Wilderness. Don't increase the size of the dam at 8 Mile lake, or Upper and Lower Snow lakes. Certainly do NOT bore a tunnel from Upper to Lower KLONAQUA LAKE!

Sincerely,  
Mr. Harvey Halpern  
73 Tremont St Cambridge, MA 02139-1345  
hhalpern1@gmail.com

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**From:** janey Erickson@everyactioncustom.com on behalf of Jane Erickson <janey Erickson@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 10:40 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

99-1 | Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: Leave the Enchantments enchanting.

Sincerely,  
Ms Jane Erickson  
241 Dungeness Mdw's Sequim, WA 98382-7715 janey Erickson@yahoo.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 100

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**From:** Jeanne Poirier <jeannepoirier@yahoo.com>  
**Sent:** Friday, July 20, 2018 11:03 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Water EIS comment

100-1 Water is one of the most important resources in our world.  
Areas of such beauty as the Alpine Lakes and Icicle Creek Watershed are valuable.  
We need to learn to live with less water in the future.  
I seriously question the value of impacting such sensitive areas for irrigation.  
While you have worked long on this, please try alternatives.

1

Comment Letter 101

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**From:** jeffwhittall@everyactioncustom.com on behalf of Jeffrey Whittall  
<jeffwhittall@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 9:33 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

101-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: The Enchantments area is one of the most stunning landscapes in our country. I would encourage you to hike from the Snow Lake Trailhead to the Stuart Lake Trailhead to see for yourself. If you allow this proposal to go thru without seeing the area for yourself, you cannot in good conscience appreciate the impact it would have.

Sincerely,  
Dr. Jeffrey Whittall  
1166 Hyak Pl Fox Island, WA 98333-9648  
jeffwhittall@gmail.com

1

## Comment Letter 102

## Comment Letter 103

**From:** julietlina7@everyactioncustom.com on behalf of Juliet Maurer <julietlina7@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 10:17 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

I am writing to you in deep concern over the terms of the Icicle Strategy being proposed within the boundaries of the Enchantments wilderness zone.

- 102-1 The Enchantments are one of the most serene, magical, and still accessible areas of pure wilderness in Washington State. They are already under tight management as protected wilderness with limited visitors during the busy season. Entering the lottery for a pass is a huge part of my year, every year. The Enchantments changed my life as my first ever backpacking trip after years of bed rest after a back injury. A huge part of my heart lives there, and I know that MANY other people feel the same way.
- 102-2 I am concerned that the dam enlargement being proposed will flood trails in this area, destroying back country access and natural habitat for protected wildlife. I urge you to consider other natural resource options that will not be of hazard to the symbiotic eco system that includes us humans that are passionate about outdoor access.
- 102-3 Please, please do not allow this bill to be passed. It will forever change the landscape and the access to this magical realm within our state. The Enchantments are literally our alps, lets please not throw that away.

Sincerely,  
 Ms Juliet Maurer  
 2548 Gravelly Beach Loop NW Olympia, WA 98502-8825 julietlina7@gmail.com

**From:** Karen P. Thomas <karen.p.thomas@gmail.com>  
**Sent:** Thursday, July 19, 2018 11:02 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Strategy

Regarding the proposed Icicle Strategy:

- 103-1 As a user of the Icicle Creek area and Stuart range hiking, I oppose the following projects included in the proposed strategy:
- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
  - Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
  - Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 103-2 I do support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies.

Thank you,

Karen Thomas  
 Seattle, WA 98117

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 104

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**From:** KR Nerenberg <gardenrow@gmail.com>  
**Sent:** Saturday, July 21, 2018 5:50 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Strategy

Mr Kaputa

104-1 We are writing to register our opposition to the proposed Icicle Strategy. As frequent hikers in the Alpine Lakes area, we are opposed to any action under any of the Alternatives that would have negative impact on existing trails and campsites, or would allow any new facility construction, or modification to existing water systems within the Wilderness area.

Thank you

Kathleen and Robert Nerenberg

2032 179th CT NE, Redmond, WA 98052

425 747 0627

gardenrow@gmail.com

Comment Letter 105

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**From:** Katrina Kok <Katrina.Kok.124034222@p2a.co>  
**Sent:** Saturday, July 21, 2018 3:16 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

I am writing to you to regarding the proposed Icicle Strategy in the alpine lakes wilderness of the Enchantments. Please remove the detrimental projects from the draft plan.

105-1 The proposed projects will alter this iconic landscape in a way that cannot be repaired. People from all over the world travel to see, experience and photograph this landscape and bring tourist business to the state. Taking away the trails and camp sites will severely restrict access to what should be protected wilderness.

The proposal should be revised to alternate solutions that preserve trails, campsites and accessibility to this popular and iconic area for all to enjoy.

Regards,  
Katrina Kok



## Comment Letter 106

## Comment Letter 107

**From:** kstegner@everyactioncustom.com on behalf of Kendra Stegner  
<kstegner@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 7:00 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

I oppose the following projects included in the proposed strategy:

- 106-1 1. Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
2. Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
3. Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

- 106-2 However, I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening, and water conservation efficiencies. I wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
Mrs. Kendra Stegner  
6860 Holly Park Dr S Seattle, WA 98118-3501 kstegner@comcast.net

**From:** kimberly.stachowski@everyactioncustom.com on behalf of Kimberly Stachowski  
<kimberly.stachowski@everyactioncustom.com>  
**Sent:** Tuesday, July 24, 2018 4:27 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.

- 107-1 Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.

Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

Sincerely,  
Ms. Kimberly Stachowski  
408 19th Ave SE Puyallup, WA 98372-4526 kimberly.stachowski@outlook.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 108

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**From:** laneaasen@everyactioncustom.com on behalf of Lane Aasen <laneaasen@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 10:11 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

108-1 The dam on Upper Snow Lake already feels out of place in an otherwise pristine area of the Cascades. When the water level is low, it is a scar on the landscape easily visible from Lake Viviane in the Enchantments. Please do not enlarge the Upper Snow Lake dam or any other dams in the vicinity. This is one of the most majestic areas of the Cascades, and its relative accessibility makes it an excellent place for people to bond with nature. Preserving its wild character is vital.

Sincerely,  
Mr. Lane Aasen  
1715 32nd Ave Seattle, WA 98122-3319  
laneaasen@gmail.com

Comment Letter 109

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**From:** lshauger@everyactioncustom.com on behalf of Laura Shauger <lshauger@everyactioncustom.com>  
**Sent:** Tuesday, July 24, 2018 9:35 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

109-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy. Wilderness areas are precious places that the harried citizens of the overpopulated Puget Sound region need as a place to clear their minds. Building more dams and/or enlarging existing dams is unacceptable. Haven't we already altered the environment enough as a species?

I wholeheartedly support protections that encourage healthy environments for fish. However, I do not think that we should pursue several proposed projects in this water management proposal.

Sincerely,  
Ms. Laura Shauger  
617 Thomas St NW Olympia, WA 98502-4783 lshauger@gmail.com

## Comment Letter 110

## Comment Letter 111

**From:** folkie1@everyactioncustom.com on behalf of Lawrence Lewin <folkie1@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 12:22 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 110-1 I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:
1. Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
  2. Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
  3. Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 110-2 I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
 Dr. Lawrence Lewin  
 11545 16th Ave NE Seattle, WA 98125-5101 folkie1@earthlink.net

**From:** leannarend@everyactioncustom.com on behalf of Leann Arend  
 <leannarend@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 8:48 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 111-1 I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:
- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
- Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
- Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 111-2 I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
 ms Leann Arend  
 3828 Interlake Ave N # A Seattle, WA 98103-8130 leannarend@gmail.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 112

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**From:** ldsuhr@everyactioncustom.com on behalf of Louise Suhr <ldsuhr@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 9:16 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

112-1 Please do not approve this proposal. It's effects on the surrounding wilderness are too detrimental for the small benefits that it would bring.  
Thank you, Louise Suhr

Sincerely,  
Ms. Louise Suhr  
4033 47th Ave SW Seattle, WA 98116-3731 ldsuhr@gmail.com

Comment Letter 113

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**From:** rentonrph@everyactioncustom.com on behalf of Mary Eve <rentonrph@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 4:50 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

113-1 Due to longer summers, dryer years and the expanding population I think we need to start using water conservation techniques in agricultural irrigation. Moving more water out of the mountains and forest leads to more wildfires, erosion and a dryer mountain climate with less spring snow available for irrigation. The US policy of building more dams for agriculture is not working. The Southwest now has many irrigation projects where storage capacity greatly exceeds recharge ability leading to low water pool levels, dry rivers and sinking ground.

Sincerely,  
Ms. Mary Eve  
15621 SE 178th St Renton, WA 98058-9003 rentonrph@hotmail.com

## Comment Letter 114

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**From:** mlbusch@everyactioncustom.com on behalf of Matthew Busch <mlbusch@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 8:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: Please see the following reasons why building dams in the enchantment areas would be so devastating for myself, the students I work with and the general population.

- 114-1 Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.  
Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.  
Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

It makes me sick to think about losing what little recreational space we have in Washington,

Matt

Sincerely,  
Dr. Matthew Busch  
18115 Campus Way NE Bothell, WA 98011-8246 mlbusch@uw.edu

## Comment Letter 115

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**From:** Mattias Huhta <Mattias.Huhta.124022928@p2a.co>  
**Sent:** Saturday, July 21, 2018 8:34 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 115-1 Please reject the Icicle Creek Strategy. Tired of politicians and corporations putting their noses in. Leave the untouched untouched. The land is more important than the idiots that live near it. You are not doing the greater good.

Regards,  
Mattias Huhta

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 116

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**From:** Michael Schemmel <Michael.Schemmel.94096930@p2a.co>  
**Sent:** Saturday, July 21, 2018 7:47 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

Hi Sir-

116-1 | I have issues with your office's proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is a special place for my family and I where we hike and camp annually. I'd hate to see it changed for the worse and to see trail access lost and camping access decreased for all of us now and for those who have not had a chance to visit yet. Please think about the detrimental projects from this plan.

116-2 | I would like Chelan County and Ecology to revise and re-release the PEIS to remove any projects, like the boring between Kionaqua lakes and increasing dam size on Snow Lakes and Eightmile, and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Thank you for your time and consideration!

Regards,  
Michael Schemmel

Comment Letter 117

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**From:** Carol or Mike Wyant <cmwyant@charter.net>  
**Sent:** Thursday, July 19, 2018 5:11 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Public Comment Regarding Icicle Strategy Draft PEIS

Comment submitted by:

Michael Wyant  
12125 Emig Drive, Leavenworth, WA 98836  
(509) 548-7747  
cmwyant@charter.net

117-1 | I support Alternative 1 from the Icicle Strategy PEIS draft document. My second choice is to support Alternative 2. I am  
117-2 | adamantly opposed to Alternative 4 because it appears to suggest violating the Wilderness Act by adding new  
117-3 | infrastructure to the existing wilderness dams. I believe Alternative 4 would result in prompt and vigorous legal challenge, a measure that I would fully support.

117-4 | In addition to supporting Alternative 1, I would like to see effort put into changing the diversion point for some or all of  
117-5 | the Icicle/Peshastin Irrigation water. Additionally I support a vigorous effort to implement conservation measures for the irrigation diversions, particularly in the form of canal lining or piping.

## Comment Letter 118

## Comment Letter 119

**From:** m.obermeyer@everyactioncustom.com on behalf of Michelle Privat Obermeyer  
<m.obermeyer@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 8:02 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

118-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: I am in alignment with WTA and the mountaineers in their concerns about aspects of the icicle plan. Please consider the strong economic voice of the outdoor industry and impacts on recreational locations in the alpine wilderness and remove related portions of the plan.

Sincerely,  
Ms. Michelle Privat Obermeyer  
12815 NE 4th Pl Bellevue, WA 98005-3310 m.obermeyer@hotmail.com

**From:** mitakuoyasinn@everyactioncustom.com on behalf of mike Gundlach  
<mitakuoyasinn@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 9:01 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

I oppose the following projects in the proposed strategy, as they would negatively impact the environment, the eco-system and landscapes valued by outdoor enthusiasts.

- 119-1 1) Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
- 2) Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
- 3) Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 119-2 It's very likely the above actions will impact trails and campsites and more importantly they would also have a negative impact on the environment and eco-system. Over decades of history we have hundreds of examples of damage that dams cause to the environment and surrounding eco-system. The damage that has already been done in this area will be increased by the proposed project. The fundamental problem we need to address is finding ways to live within the limits of what the environment provides for us already instead of trying to manipulate it and take more from it and in the process continue to damage the environment that we need to support all life. Simply building bigger dams is only a stop-gap measure for people's insatiable desire for taking more than the surrounding land can provide.
- 119-3 There are a plethora of other options to address the need for additional water. First and foremost is conservation. While some water conservation measures are in place, this is only the tip of the iceberg. Secondly, the Pacific NW receives high levels of precipitation. Although the Eastern area of the state doesn't receive as much as the West, it does receive plenty to have water collection on roofs and open areas that would not cause additional impact to these beautiful mountain areas.
- 119-4
- 119-5 I do support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. I wholeheartedly believe that these conservation elements are critical to protecting these landscapes.

Sincerely,  
Mr. mike Gundlach  
122 Upper Lakeview Rd White Salmon, WA 98672-8103 mitakuoyasinn@gmail.com

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 120

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**From:** misaheat@everyactioncustom.com on behalf of Misa Heater <misaheat@everyactioncustom.com>  
**Sent:** Tuesday, July 24, 2018 9:09 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

120-1 | As a hiker and climber, I would be very disappointed if the campsites and trails along Eight Mile and Snow lakes were rendered unusable. It would also be a great tragedy if Snow Creek Wall or Pearly Gates (rock climbing areas) were rendered inaccessible by your proposed water management strategy. Please do not ruin our recreation environment! Thank you.

Sincerely,  
Mrs. Misa Heater  
816 NE 53rd St Seattle, WA 98105-3607  
misaheat@gmail.com

Comment Letter 121

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**From:** psandjt@everyactioncustom.com on behalf of Pat Siggs <psandjt@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 1:27 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

121-1 | The Enchantments are a famous and world renowned part of the Alpine Lakes Wilderness. It's very important to keep this area free of construction and alteration projects. This is the people's wilderness, I oppose raising three dams and boring a tunnel in our wilderness.

121-2 | There are adequate water resources in the Cascade Mountains and Chelan County that are not part of a wilderness area. Please consider other water sources.

Sincerely,  
Ms Pat Siggs  
233 14th Ave E Apt 403 Seattle, WA 98112-5259 psandjt@comcast.net



## Comment Letter 122

## Comment Letter 123

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**From:** podenski@everyactioncustom.com on behalf of Patrick Podenski  
<podenski@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 6:17 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

122-1 | Let's keep the Enchantments Wilderness wild. Do not pursue non-wilderness compliant construction projects in the Enchantments.

Sincerely,  
Mr. Patrick Podenski  
3802 NE 91st St Seattle, WA 98115-3747  
podenski@me.com

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**From:** peterd@everyactioncustom.com on behalf of Peter Dunau <peterd@everyactioncustom.com>  
**Sent:** Friday, July 20, 2018 5:05 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

123-1 | I am opposed to any action that would raise the level of lakes in the Enchantments. Changing the water level would hurt  
123-2 | recreation, and it's not compatible with management practices in a Wilderness area.

Sincerely,  
Mr. Peter Dunau  
3606 Woodland Park Ave N Seattle, WA 98103-7948 peterd@mountaineers.org

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 124

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**From:** Peter Polson <peter@polsons.com>  
**Sent:** Monday, July 23, 2018 7:07 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Water Project

124-1 The Alpine Lakes is a wilderness area we love, we enjoy with our family, and we look forward to sharing for future  
124-2 generations. Please do not proceed with the project to increase the size of the dams on Eightmile Lake and both Snow  
124-3 Lakes, as well as the tunnel project. This land is too unique to tamper with. I appreciate the water needs of the county,  
but conservation combined with other sources are a better answer.

Peter Polson  
206.669.0130  
PO Box 727, Winthrop, WA 98862



Comment Letter 125

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**From:** pevans@everyactioncustom.com on behalf of Philip Evans <pevans@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 8:04 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

125-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle  
Strategy: The proposed plan includes alterations in water levels of lakes that are very important to me and thousand of  
other hikers and backpackers who love this area. These higher water levels will affect trails and campsites as well as  
further worsen the already unsightly bathtub rings when water is drawn off. Please reconsider this aspect of the  
proposal as it is potentially devastating to recreation in this wilderness area, and also to the income hikers and  
backpackers bring to the Leavenworth area.

Sincerely,  
Mr. Philip Evans  
100 Ski Blick Strasse # D-203 Leavenworth, WA 98826 pevans@nwi.net

## Comment Letter 126

## Comment Letter 127

**From:** sprithvi@everyactioncustom.com on behalf of Prithvi Shylendra <sprithvi@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 1:04 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 126-1 | I am with the outdoor enthusiasts and community in their opposition to certain sub projects under the broader proposal, like,
1. Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
  2. Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
  3. Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 126-2 | I am with them in supporting the following sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
 Mr. Prithvi Shylendra  
 ALKI Ave SW Seattle, WA 98116  
 sprithvi@hotmail.com

**From:** razw14@everyactioncustom.com on behalf of Rebecca Walton <razw14@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 1:05 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 127-1 | Increasing dam sizes for the Eightmile Lake, and Upper and Lower Snow Lakes dams will flood acres of land important for its recreational and ecological value. Please do not increase the sizes of these dams.
- 127-2 | Tunnel boring and other practices similar to mining have proven negative effects on water quality and ecosystem health. Please do not bore a tunnel from the Upper to Lower Klonauqua Lakes.
- 127-3 | Continue to support wildlife protection through habitat enhancement and protection, including fish passage opportunities. Conservation of our remaining wild places is important in an era where ecosystems are already stressed by climate changes. Preserving the natural systems of adaptation and maintaining large areas of uninterrupted habitat are critical for the survival of many species as weather and climate affect their habitats and lives.

Sincerely,  
 Ms. Rebecca Walton  
 15849 34th Ave NE Lake Forest Park, WA 98155-6542 razw14@hotmail.com

# ICICLE CREEK SUBBASIN

## PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

### Comment Letter 128

**From:** Rebecca <leiterbec@gmail.com>  
**Sent:** Thursday, July 19, 2018 10:45 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Wilderness Areas | Washington State Parks and Recreation Commission

128-1 | The time is past to alter the preservation of designated wildernesses!

128-2 | Conservation of water usage starting with the individual, moving into home water conservation, moving up to commercial conservation is the key to wise water abundance for all of our state, for all of our country, for all of the World that is all of Our's!

Take a hike, take a cool drink from the streams, take in the fresh air, take a moment in a wilderness that you may believe you are the first to have discovered it, then leave, leaving no trace behind for the next explorer.

128-3 | You have the power to do the most wonderful act of upholding the designation already given this area, this WILDERNESS!

<https://parks.state.wa.us/144/Wilderness-Areas>

## Wilderness Areas



To protect untouched areas of our wild lands, Congress passed the Wilderness Act, creating designated Wilderness Areas within national forests, national parks, and certain other federal lands. Motorized equipment is prohibited in these areas.

Established by Congress through the Wilderness Act of 1964, "Wilderness" is a special land designation within USDA National Forests and certain other federal lands. These areas were designated so that an untouched area of our wild lands could be maintained in a natural state. Also, they were set aside as places where people could get away from the sights and sounds of modern civilization and where elements of our cultural history could be preserved.

### Snowmobiles

Wilderness, as defined by the act, "has outstanding opportunities for solitude or a primitive and unconfined type of recreation." The law prohibits the use of mechanized or motorized

### Comment Letter 128

equipment, including snowmobiles, in Wilderness Areas (36CFR261.16a). Local managers have no latitude in this matter, except in emergencies. The law states that possession or use of motorized equipment in Wilderness Areas is punishable by up to \$500 and/or six months in jail (36CFR261.1b). Unfortunately, each year more and more people are riding snowmobiles into designated Wilderness Areas, which is a major concern for land managers, the public, and many snowmobile groups. This may be for a variety of reasons; many snowmobile riders may not know where the Wilderness boundaries are or may not realize that an area is closed.

### Invasive plants

Invasive plants, including noxious weeds, are a serious threat to natural areas. They out-compete native plants, degrade wildlife habitat, and reduce soil and water quality. They also cause economic losses in natural areas by reducing aesthetics and recreational opportunities. While these weeds can be extremely difficult to remove once they've established anywhere - cropland, rangeland, yards, abandoned lots - they are especially hard to detect and then eradicate in Wilderness Areas. The Forest Service passed an order [36 CFR 261.58(t)] to help prevent the introduction of new weed seeds into designated Wilderness Areas. Effective January 1, 2007, forage transported into all Wilderness Areas and adjacent trailheads in a national forest is required to be commercially processed feed pellets or certified weed-free hay or straw. Recreational stock users, dog-sledders, cross-country skiers, and road contractors must be aware of the requirements and of Wilderness boundaries. For additional information, visit the [Washington State Noxious Weed Control Board website](#).

### Join us in safeguarding winter recreation

Respecting Wilderness boundaries helps everyone. When recreationists take responsibility, they help ensure continued support of winter recreation programs and opportunities, rather than potential closures and stronger enforcement. Here is how you can help:

- Familiarize yourself with National Forest Service and Wilderness boundaries.
- When snowmobiling, obtain a map and don't cross Wilderness boundaries.
- Know the laws and requirements related to your recreational activity.
- Do not trespass on privately owned property or gated areas.

## Comment Letter 128

## Comment Letter 129

- Pack it in - pack it out. Keep our forests clean!
- Carry these messages to clubs, groups and friends.



## Wilderness boundaries

Maps showing [Wilderness Areas](#) are posted on bulletin boards at trailheads in all snowmobile Sno-Parks.

For information on how to volunteer to put up / maintain Wilderness Area boundary markers, call your local U.S. Forest Service Ranger District.

This information is made available through the USDA Forest Service, Washington State Parks and Recreation Commission, and the Washington State Snowmobile Association.

## Contact information

For more information about snowmobiling opportunities or Wilderness Areas, please contact:

- Colville National Forest: [\(509\) 684-7000](#)
- Gifford Pinchot National Forest: [\(360\) 891-5000](#)
- Mount Baker-Snoqualmie National Forest: [\(425\) 783-6000](#)
- Mount Rainier National Park: [\(877\) 270-7155](#)
- North Cascades National Park: [\(360\) 854-7245](#)
- Okanogan-Wenatchee National Forest: [\(509\) 664-9200](#)
- Olympic National Forest: [\(360\) 956-2402](#)
- Umatilla National Forest: [\(541\) 278-3716](#)
- Washington State Parks and Recreation Commission: [\(360\) 902-8500](#)
- Washington State Snowmobile Association: [\(800\) 784-9772](#)

Sent from my iPad

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**From:** Robert Werth <robwerth@gmail.com>  
**Sent:** Saturday, July 14, 2018 9:28 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] DPEIS Icicle Creek Watershed

Please accept my comment on this matter, as follows:

129-1 I am deeply concerned that the subject DPEIS will allow construction of dams and other man made structures in the Alpine Lakes Wilderness and the Enchantments. Please reject all such intrusions into these areas, which should instead be preserved as they are for the future.

Thanks you,

Robert Werth  
 PO Box 3073  
 Leavenworth, WA 98826

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 130

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**From:** rby2@everyactioncustom.com on behalf of Robert Yates <rby2@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 11:07 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

130-1 | As a frequent patron of the amazing wilderness that WA state has to offer, I would be incredibly disappointed if the plan to change the current water management is implemented. This plan will have devastating effects on the wilderness that we all enjoy. Earlier this summer, I was in the Enchantments and covered the entire region from Snow Lakes trailhead to Colchuk lake in one day -- it is an amazing region, and it should not be negatively impacted by this water management plan.

Sincerely,  
Dr. Robert Yates  
8519 14th Ave NW Seattle, WA 98117-3431 rby2@uw.edu

Comment Letter 131

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**From:** rderegt@everyactioncustom.com on behalf of Roberta de Regt <rderegt@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 8:12 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

I support The Mountaineers and Washington Trails Association concerns about the proposed Icicle Strategy water plans.  
131-1 | Enlargement of the dams would have far reaching effects on a pristine wilderness that needs to remain protected. The proposals sound extremely expensive in terms of the concrete changes but my concern is that the effect will be priceless  
131-2 | upon lands that can never be brought back to Wilderness state. I strongly oppose this Strategy.

Sincerely,  
Dr. Roberta de Regt  
10930 250th Ave NE Redmond, WA 98053-6236 rderegt@eastsidemfm.com

## Comment Letter 132

## Comment Letter 133

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**From:** robinb411@everyactioncustom.com on behalf of Robin Buxton <robinb411@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 8:10 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

132-1 I whole-heartedly concur with the statement that designated Wilderness is a core tool in protecting pristine natural habitat and the outdoor experience. What this means is "hands-off" in terms of development, habitat disruption, or changes in the natural order of these areas, as well as "hands-off" in terms of any mechanized or motorized access to these areas.

132-2 Instead, to enhance water levels for fish passage, and provide needed water for agriculture and homes in the Leavenworth area, concerted conservation that protects habitat and emphasizes water conservation efficiencies should be employed. These conservation should be foundational in protecting the outdoor experience.

132-3 I am adamantly opposed to any action that would negatively impact the Alpine Lakes wilderness area.

Sincerely,  
 Ms. Robin Buxton  
 19825 SE 296th St Kent, WA 98042-5912  
 robinb411@comcast.net

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**From:** hardenrr@everyactioncustom.com on behalf of Ronald Harden <hardenrr@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 4:02 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

133-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Basin Strategy: The water management plan proposed, for the Enchantments in Washington state, is inappropriate. It would mean the extreme loss of the natural values of the area. It is not way a compromise, it would just be a compromising away of the values that should be preserved. Its only valid measures are those that provide for habitat conservation a restoration. I urge the plan's make over, or barring that, its rejection.

Sincerely,  
 Dr. Ronald Harden  
 3125 Elevado Ct Loveland, CO 80538-9482 hardenrr@msn.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 134

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**From:** sciske@everyactioncustom.com on behalf of Sandra Ciske <sciske@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 3:51 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy.

- 134-1 | I am opposed to the following elements of the draft:
- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
  - Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
  - Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 134-2 | I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening, and water conservation efficiencies. In my opinion and many other, these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
Ms Sandra Ciske  
1717 Sunset Ave SW Seattle, WA 98116-1943 sciske@drizzle.com

Comment Letter 135

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**From:** sara.papanikolaou@everyactioncustom.com on behalf of Sara Papanikolaou  
<sara.papanikolaou@everyactioncustom.com>  
**Sent:** Saturday, July 21, 2018 9:38 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 135-1 | As someone who has enjoyed the Enchantments and Icicle River valley for over 3 decades, and now bring my children to enjoy them as well, I find it deeply troubling that such disregard is being taken in considering these projects in such a fragile area. I strongly urge you to maintain the existing dams and not bore a hole between the Klonauqua Lakes. This is protected lands, and these actions are wholly inappropriate. The essence of wilderness will be lost in these locations if the construction projects are undertaken, and there is no getting it back. Please, for future generations, keep these wild places wild, and look to resources elsewhere to fill gaps.
- 135-2 |

Sincerely,  
Mrs Sara Papanikolaou  
23024 57th Ave SE Woodinville, WA 98072-8640 sara.papanikolaou@gmail.com



## Comment Letter 136

## Comment Letter 137

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**From:** sarahleyrer@everyactioncustom.com on behalf of Sarah Leyrer  
<sarahleyrer@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 9:58 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

136-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: protecting our most unique and precious wilderness areas must be a priority. Do not adopt a strategy that will harm the Enchantments, Washington's most prized gem in the Cascades.

Sincerely,  
Ms. Sarah Leyrer  
2216 13th Ave S Seattle, WA 98144-4119  
sarahleyrer@gmail.com

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**From:** Stefanie Dirks <Stefanie.Dirks.96391093@p2a.co>  
**Sent:** Sunday, July 22, 2018 10:56 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

137-1 I am writing to you regarding the proposed Icicle Creek water strategy, which proposes to flood the trail and campsites around Eightmile Lake and Upper/ Lower Snow Lakes and to bore a tunnel between Upper and Lower Klonauqua Lakes. This seems to be a hastily composed plan that would have lasting effects on a The Alpine Lakes Wilderness area. There must be a better solution that achieves the same intent but that does not involve marring such a pristine, undeveloped natural region. These areas are frequently used by backpackers, through hikers, climbers, and skiers, people who pay for recreation permits. It's reasonable to assume this revenue stream could be negatively affected by the proposed projects.

137-2

137-3 Once these wilderness areas are opened for development of any kind, they are permanently changed, and once one project is begun, many more typically follow. This could permanently alter the beauty of the Alpine Lakes Wilderness, which I have personally enjoyed many times. What drew me to the Northwest is how cities and towns are very close to wild areas. I only need to drive 30-60 minutes to feel reconnected to nature and to escape the urban environment. Please do not take this key component of the region away from us.

137-4 Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley. There are already numerous studies of how dams negatively affect wildlife and the natural environment. In other parts of the Northwest, dams are even being removed to restore habitat. Why would this new understanding be embraced in parts of the Northwest, and completely ignored in others?

137-5

Regards,  
Stefanie Dirks

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 138

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**From:** swenson.s@everyactioncustom.com on behalf of Steve Swenson  
<swenson.s@everyactioncustom.com>  
**Sent:** Monday, July 23, 2018 9:47 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

138-11 It's inappropriate to be raising the dams on lakes within a designated wilderness area. I'm very opposed to this idea and 138-21 the negative impacts it would have on recreation in this stunningly beautiful area of the Cascade Mountains.

Sincerely,  
Mr. Steve Swenson  
6407 Brooklyn Ave NE Seattle, WA 98115-6732 swenson.s@comcast.net

Comment Letter 139

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**From:** stevecox68114@everyactioncustom.com on behalf of Steven Cox <stevecox68114@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 11:32 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

139-1 I oppose increasing the dams on Eightmile Lake and Upper and Lower Snow Lakes and boring a tunnel from Upper to Lower Klonauqua Lakes. Thank you for considering my comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

Sincerely,  
Mr. Steven Cox  
607 21st Ave Seattle, WA 98122-5909  
stevecox68114@gmail.com

## Comment Letter 140

## Comment Letter 141

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**From:** Steven Jones <stdojo@gmail.com>  
**Sent:** Sunday, July 15, 2018 2:52 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Aline Lakes & Icicle Creek

140-1 | Please save this valuable natural resource from development, destruction and any other changes which would alter it's natural state and incredible beauty.  
Thank you!  
Steven Jones

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**From:** scribones@everyactioncustom.com on behalf of Timothy Hall <scribones@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 11:06 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

141-1 | Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: The Alpine Lakes Wilderness and in particular Icicle Creek and Enchantment area have been special to me for over 50 years of visits (as permits allow now). Human influx and the endless cycle of more people=more development (water etc.)= allowing more people=more development (water, floral and fauna disruption)= etc., has to be limited. Yes, limits must be set as much as people think we can keep drawing down Nature's resources. Get a backbone, take a deep breath and disappoint a few "more development" people for the sake of the natural world and future generations' enjoyment of the small bits that can be saved.

Sincerely,  
Mr. Timothy Hall  
6811 21st Ave NE Seattle, WA 98115-6949 scribones@earthlink.net

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 142

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**From:** Tina Thompson <Tina.Thompson.123971737@p2a.co>  
**Sent:** Friday, July 20, 2018 9:38 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- As a multi-time hiker of the Eightmile, Upper, and Lower Snow Lakes I beg you NOT to proceed as planned with the proposed projects which will flood the trail and campsites. I often cajole friends from the West side of the mountains and as far away as California to come hike the awesome Alpine Lakes Wilderness, and this trail in particular. One of my fondest hiking memories is having a cup of tea at a Lower Snow Lakes campsite and watching a bear swim across the lake to an island, walk over the rocky resting spot, and continue swimming to the other shore. It was amazing. Please work hard to find other alternatives to your proposal. Don't rob future generations of these kinds of magical experiences.
- 142-1  
142-2  
142-3
- Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this TREASURED alpine valley.

Regards,  
Tina Thompson

Comment Letter 143

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**From:** alanmoen@nwi.net  
**Sent:** Saturday, July 28, 2018 10:37 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Wenatchee Watershed Plan

Hi Mike,

- 143-1 I'd like to comment on Chelan County's plan to dam and otherwise augment streamflow from seven lakes in the Alpine Lakes Wilderness to make more water available for irrigation.
- I've lived in the Wenatchee region for over 25 years, and operate a small winery in the Entiat Valley. Having my own vineyard, I realize the importance of irrigation, especially as hotter summers and lower stream flows from snowmelt due to climate change reduce the amount of water available to farmers here. So seven years ago, we worked out a deal with the Cascadia Conservation District to stop taking our irrigation water from the Entiat River in exchange for a well. This has made more water available for fish when stream flows are low, helping to restore fish habitat.
- 143-2 However, I have also seen how much water is simply wasted by orchardists here, such as overhead spraying for 12 hours on 90-degree days, when so much water evaporates before it even gets to tree roots. The easy availability of river water has encouraged this common abuse.
- I believe the same practice certainly goes on in the Wenatchee watershed. While orchardists have drawn water from some alpine lakes for nearly 100 years, now several of these lakes have been included within the Alpine Lakes Wilderness, which is, by definition, a place "where man is a visitor and does not remain." As you know, this a very special region, one where I have been hiking and climbing for over 50 years. I was involved in the fight to protect this area at the outset, and I think public involvement helped save one of the state's true environmental treasures from human development.
- 143-3 And so, I don't believe the current Wenatchee watershed plan adequately addresses the intrinsic value of this wilderness. I think that enlarging or adding new dams in the wilderness would significantly damage the land and its value - recreationally, ecologically, and spiritually.
- 143-4 Furthermore, water resources in the plan should be earmarked for irrigation only, not development of any kind. Realtors here typically use "water rights" as bait for home sales and suburban development. Although water use by people in the county will inevitably increase in the future as our population grows, it should not be at the expense of the very areas we ought to protect - in fact, those areas are why many of us live here in the first place. Conservation of our water resources should be a paramount issue in this plan. and preservation of our wilderness areas as well.
- 143-7 Like the Entiat watershed plan - an excellent model for the region - monitoring water use is vitally important as we look to the future. I hope the county will seriously consider no further action to interfere with the lakes in the Alpine Lakes Wilderness simply in order to obtain more irrigation water from them. These lakes are much more than current and potential reservoirs; they are an essential part of the wilderness that surrounds them.
- 143-8

Thank you for your attention to my comments.

Sincerely,

Alan Moen

Comment Letter 143

Comment Letter 144

Snowgrass Winery  
6701 Entiat River Road  
Entiat, WA 98822  
509-784-5101

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**From:** Alex Bond <Alex.Bond.14797264@p2a.co>  
**Sent:** Monday, July 30, 2018 12:57 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

144-1 | The Enchantments and the Alpine Lakes Wilderness are iconic and beautiful parts of Washington state that bring joy to many thousands of people every year. A water plan that impacts recreation opportunities in the Icicle area would have colossal impacts on many categories of outdoor enthusiasts and the local Leavenworth economy they support. You must not take action that could cause permanent negative impacts on recreation in the ALW. Thank you for reading.

Regards,  
Alex Bond

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 145

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**From:** Zandercharles@everyactioncustom.com on behalf of Alexander Phillips  
<Zandercharles@everyactioncustom.com>  
**Sent:** Friday, July 27, 2018 9:31 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

145-1 | Cut the junk and let my backyard thrive. Get a job

Sincerely,  
Mr. Alexander Phillips  
11930 30th Ave SW Burien, WA 98146-2421 Zandercharles@gmail.com

Comment Letter 146

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**From:** Alison Shaw <Alison.Shaw.124233230@p2a.co>  
**Sent:** Thursday, July 26, 2018 9:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Don't sacrifice wilderness for flawed Icicle Strategy

Dear Director, Chelan County Natural Resource Dept. Mike Kaputa,

My family frequently hikes in the Alpine Lakes Wilderness.

I am sick and tired of trying to protect valuable nature preservers, used and enjoyed by thousands of taxpayers, from industrial exploitation.

146-1 | Sufficient, pristine water is a challenge that the entire country will face as our climate changes, but let's not leap to the most destructive policies as our first course of action, ignoring the value of our wilderness areas for recreation, personal serenity, and - it apparently has to be pointed out - the economic value of the tourism and recreation industries.

Regards,  
Alison Shaw  
328 9th Ave  
Kirkland, WA 98033

## Comment Letter 147

## Comment Letter 148

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**From:** Andrea Riley <andreariley@hotmail.com>  
**Sent:** Thursday, July 26, 2018 10:09 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Project

147-1 Millions have been spent tearing down dams and you these public officials want to spend millions more building new ones. Idiocy prevails. Hope to vote all of you developers out of office

Sent from my iPad

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**From:** Ann Crosby <seasmilecros@gmail.com>  
**Sent:** Monday, July 30, 2018 10:29 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comment on DPEIS released May 30, 2018

148-1 The DPEIS is a start, but only the beginning, of exploring the complexities that occur when a shared public Wilderness Area is proposed to provide and serve as an on-demand reservoir system, in effect becoming a public water utility in order to build new private homes downstream.

148-2 The five Alternatives would dramatically change eight lakes within the Alpine Lakes Wilderness Area and the streams they feed - causing fluctuating water levels, dead zones along the shore and negative impacts on the riparian ecosystems downstream.

148-3 The proposed projects in the five Alternatives are unprecedented in the National Wilderness System.

148-4 Underlying all these complexities is the more fundamental question of whether it would be cheaper and more sustainable to adopt conservation measures rather than further damming and diverting the Alpine Wilderness lakes.

148-5 There are many procedural issues, fundamental legal issues, historic and existing water storage rights, and conservation issues that must be addressed but are not considered in the DPEIS. For example there is little or no consideration of fundamental legal issues arising from federal wilderness law, from state water law, from the

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148-5 | protections of the Wilderness Act, from the land management role and authority of the U.S. Forest Service on these National Forest lands, from the National Environmental Policy Act (NEPA), from the Endangered Species Act, and finally from the total lack of legal precedent of turning a protected wilderness area into an on-demand public utility.

Until these deficiencies and inadequacies are thoroughly researched and transparently presented in a revised DPEIS, this current DPEIS (released May 30, 2018) is a useless document and a useless expense of public funds. It does not begin to provide the extensive information needed to consider the legality or environmental consequences of the five Alternatives. It does not begin to consider the enormous consequences of plundering protected, wild public lands for the sheer economic benefit of a few private parties.

148-6 | We urge that a Revised Draft PEIS that addresses all the above issues should be released for public comment.

148-7 | We further recommend that instead of draining these protected, beautiful alpine lakes which thousands of visitors enjoy and contribute to our economies - that we adopt reasonable conservation alternatives instead.

Sincerely,

The Crosby Family

Cascade St., Leavenworth 98826

509-548-1544



## Comment Letter 149

## Comment Letter 149

**From:** Bruce Williams <bwiseattle@gmail.com>  
**Sent:** Monday, July 30, 2018 11:47 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle PEIS

My name is Bruce Williams. I live on Icicle Creek. I began attending Icicle Work Group meetings in July 2017.

149-1 | Regretfully, I am writing to oppose all of the alternatives proposed and I am requesting that this process be done over. I know that many well-meaning people have put a lot of time into this. However, based on my attendance at the IWG meetings and reading of documents it appears to me that there are fundamental flaws in the process which have led to fundamental flaws in the proposals.

In summary, the fundamental flaws in the process are:

1. lack of methodical, rigorous focus on wise use of the public's money (either taxpayer or ratepayer);
2. lack of methodical, rigorous and objective focus on the best ways in which to conserve water;
3. lack of a priority to minimize additional intrusions into the Alpine Lakes Wilderness.

149-2 | Lack of methodical rigorous focus on wise use of the public's money

It is my perception that all or almost all of the money proposed to be spent is public money, funded either by taxpayers or ratepayers. In general, those proposing how the public's money will be spent should view themselves as having a fiduciary duty to ensure that the public's money is spent in the most cost effective ways to best serve the public's interest and to not spend any more than is reasonably necessary. Unfortunately, sitting in the meetings did not give me the sense that the participants had that perspective.

The first time I heard that the IWG was contemplating spending in the order of \$100 million of public money I was astounded. When I mentioned that to an IWG member he replied that at first he also had thought it was an enormous amount of money but now he was used to the idea of spending that much. I am concerned that getting "used to" the idea of spending that much of someone else's money results in less care than one would have in spending one's own money. I didn't hear anyone voicing concerns about this, or raising questions as to the amount that should be spent.

Lack of methodical, rigorous and objective focus on the best ways in which to conserve water

149-3 | In a project contemplating \$100+ million dollars of public money on water projects, I would have expected a methodical, rigorous, objective, and world-class focus on conservation: ways in which existing users of Icicle water could achieve their purposes while using less water. The goals of such a focus would include reducing use of water from the Icicle and possibly reducing the amount of public money to be spent.

Such an approach would be consistent with government funding in general. Those who benefit from government funding usually have to meet criteria developed to insure that public objectives are achieved.

149-4 | Of course, if the main users of the water, including the Icicle Peshastin Irrigation District ("IPID") and the Leavenworth National Fish Hatchery ("LNPH"), were using their own money to fund these projects, there would be an argument that they could spend their own money as they wanted and needn't consider spending it on conservation or an outside expert's view of appropriate conservation. But for a publicly funded project, a strong, rigorous and objective review of conservation opportunities would be an obvious starting point.

But that wasn't at all what I observed. Instead, I saw:

1

- 149-5 | • The IWG seemed to think it was fine to only consider conservation projects that the users suggested they were interested in. For example, rather than an objective look at IPID's use of water, the IWG seemed content to let IPID decide what conservation projects were on the table. I don't recall ever hearing an IWG member suggest that IPID should consider other alternatives.
- 149-6 | • When I started attending the meetings in the summer of 2017, the IWG process had been going 5 years. But it appeared that IPID had not yet developed their conservation plan. That certainly gave the impression conservation wasn't a high priority.
- 149-7 | • Similarly, I heard at an IWG meeting that the City of Leavenworth and Chelan County had agreed to jointly consider conservation. But 5 years into the IWG process, they hadn't started yet.
- 149-8 | • The longest discussion in an IWG meeting regarding conservation was about how to increase the public's perception that the IWG was serious about conservation, not about actual efforts to conserve.
- 149-9 | • There is no alternative that is focused on what is possible with just conservation.

Lack of a priority to minimize additional intrusions into the Alpine Lakes Wilderness:

149-10 | I expected that because of the legal, policy and political concerns about protecting wilderness areas, a project like this would have put a high priority on coming up with alternatives that would not increase impacts on the Alpine Lakes Wilderness. But I didn't sense that was a priority in the meetings I attended and I don't see that as a priority in the alternatives proposed.

149-11 | After observing those fundamental flaw in the process, I believe that the proposed alternatives are not the best options for spending public money, for conservation or for avoiding unnecessary impacts to the wilderness.

The process needs to be done over in a way that addresses and eliminates these fundamental flaws.

Thank you.

Bruce Williams  
[bwiseattle@gmail.com](mailto:bwiseattle@gmail.com)

2

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 150

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**From:** cwedel@everyactioncustom.com on behalf of Carina Wedel <cwedel@everyactioncustom.com>  
**Sent:** Friday, July 27, 2018 12:50 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

150-1 | I am a recent outdoor recreation graduate from Eastern Washington University. I love the state of WA and often recreate in it whenever I get the chance. Please keep the Enchantments wild, rugged, and beautiful without the advancement of dams and other water constrictors.

Sincerely,  
Ms Carina Wedel  
2528 N Normandie St Spokane, WA 99205-3152 cwedel@eagles.ewu.edu

Comment Letter 151

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**From:** Carolyn Waldow <waldow.carolyn@gmail.com>  
**Sent:** Sunday, July 29, 2018 10:10 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Public Comment - Draft Programmatic Environmental Impact Statement (PEIS) for the Icicle Strategy

Dear Sir,

151-1 | No dams in the Alpine Lakes Wilderness. The Icicle Creek Watershed Water Resources Management Strategy should improve protections for this world class wilderness. The Enchantments and the greater Alpine Lakes Wilderness is an attraction for outdoor enthusiasts from around the world.

151-2 | I fell in love in the wild and majestic beauty of this pristine wilderness. Pristine wildness is an asset in which we should continue to invest as a return in which the heart and soul may be renewed and flourish. Please help me to save this amazing place for my children and future generations.

Sincerely,  
Carolyn Waldow (98136)

## Comment Letter 152

## Comment Letter 153

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**From:** ccraver15@everyactioncustom.com on behalf of Cathy Craver <ccraver15@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 3:32 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy. I support the position outlined by the Mountaineers, as follows:

- 152-1 "We oppose the following projects included in the proposed strategy:
- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
  - Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
  - Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 152-2 The Mountaineers supports the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening, and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes."

Sincerely,  
Ms. Cathy Craver  
2828 Franklin St Bellingham, WA 98225-2604 ccraver15@gmail.com

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**From:** Charles Raymond <cfr98115@gmail.com>  
**Sent:** Monday, July 30, 2018 4:57 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on DPEIS for Icicle  
**Attachments:** Icicle\_DPEIS\_comments-Raymond.pdf

Please accept the attached comments concerning the Icicle DPEIS. Thanks for the opportunity to comment.

Charles Raymond

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Charles Raymond

ICICLE CREEK SUBBASIN  
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[30 July, 2018](#)

Tom Tebb  
Director, Office of Columbia River  
Washington Department of Ecology  
1250 Alder Street  
Union Gap, WA 98903

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

Submitted via email to: [nr.iciclesepa@co.chelan.wa.us](mailto:nr.iciclesepa@co.chelan.wa.us)

**Comments on the Icicle Creek Water Resource Management SEPA-DPEIS**

Dear Directors Tebb and Kaputa,

I appreciate the opportunity to comment on the Draft Programmatic Environmental Impact Statement (DPEIS) concerning Icicle Creek Water Resource Management.

153-1 | I have been visiting the Alpine Lakes on a regular basis since 1969. Over these decades I have been to all of the lakes modified for storage except Square Lake. The Alpine Lakes have been an important refuge for me both summer and winter and a focal point for recreation in a peaceful, quiet setting. The Alpine Lakes Wilderness Area presents an extraordinary landscape of national importance, and is one of the most heavily visited Wilderness Areas. It can't be replaced or rebuilt.

I recognize the importance for fish, agriculture and domestic uses that longstanding management of the Icicle watershed has afforded to a diverse range of stakeholders in the local Icicle drainage, the Wenatchee Valley and the Columbia River. As well I recognize that management and related infrastructure needs to be improved.

153-2 | The concern that I would most like to highlight is that all new actions comply with the 1964 Wilderness Act, 1976 Alpine Lakes Area Management Act, and the 1981 Alpine Lakes Wilderness Management Plan without engaging unprecedented exceptions. These legal requirements are mentioned as part of the "Guiding Principles", but all of the offered Alternatives have project components that are not clearly established to be consistent with these laws. Important issues include constraints on access for new construction / maintenance in the Wilderness. Furthermore, the planing has proceeded  
153-3 | without legal findings about present-time, actual water rights with regard to amount of  
153-4 | storage and purpose of use for those rights.

I would like to start my comments focusing on specific "Projects" without regard to how they combine in the various Alternatives.

153-5 | I **definitely oppose** the following components of Projects:  
• **New Storage** in the ALWA beyond traditional, actual use (as in the Eightmile Lake, Upper Klonauqua Lake and Upper/Lower Snow Lakes Storage Enhancements and some aspects of the Eightmile Lake Storage Restoration), which are inconsistent with recognized water rights and wilderness management. Furthermore, I oppose maintenance/operation of existing dams using methods incompatible with wilderness requirements.  
153-6 |  
153-7 | I **support** the following components of Projects:  
• **Pump Exchange** (as in IPID Full Piping and Pump Exchange, IPID Dryden Pump Exchange, COIC Irrigation Efficiencies and Pump Exchange) that shift the positions of water withdrawal downstream of critical sections of Icicle Creek where in-stream flow is identified as most problematic with present management practices. These shifts in withdrawal location should be highest priority with regard to maintaining in-stream flow of Icicle Creek. They provide double use for providing in-stream and out-stream use.  
153-8 | • **Conservation measures** (as in IPID Irrigation Efficiencies, COIC Irrigation Efficiencies Pump Exchange, Domestic Conservation Efficiencies and LNFH Conservation and Water Quality Improvements). They should be general practice in the real world of limited water and are already, in part, required by Municipal water law. These conservation measures should be highest priority for any expectation of long-term success.

I could **provisionally support** some elements of the following Projects:  
153-9 | • **Modification/Restoration of Existing Storage** (as in Alpine Lakes Reservoirs Optimization, Modernization, and Automation, ) as long as design max/min lake levels are consistent with recent practice and that all actions including means of implementation and on-going maintenance are compatible with requirements of the National Wilderness Act and other relevant law in a spirit that holds impacts on wilderness values to a minimum. Subject to that reservation, I support  
153-10 | installation of remote-control valves, which could provide beneficial fine tuning for water release and retention. I am concerned that the impact on the lakes and creeks that drain them receive little mention, as if they are only reservoirs and supply lines. There note mention that the high discharges during the discharge phases (late summer when down-stream water needs are highest) do not cause erosion in the creeks. There is a lot more to think about. I have not seen  
153-11 | discussion of the beheading of creek drainages when valves are closed for lake recharge (fall and winter until lakes refill). In fact both valve open and closed phases impose very large, unnatural seasonal fluctuations that must affect ecological balance of the lakes, creeks and potentially the Icicle that they feed.

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- 153-12 | I find it difficult to comment on Alternatives. **I firmly oppose Alternative 4**, because  
 153-13 | of large impacts in the ALWA. **Alternative 5 is least problematic**, given that it  
 153-14 | includes Full IPID Pump Station along with the COIC Pump Exchange without new  
 153-15 | storage. However, all Alternatives include project elements that are based on un-  
 founded legal assumptions about water rights and to some extent ignore wilderness law  
 and the critical role and authority of the US Forest Service that apply where water is  
 stored. I believe that a the DPEIS needs revision in the context of clear legal findings  
 concerning actual water rights and recognition of already clear constraints from the  
 National Wilderness Act.

Sincerely,

Charles Raymond  
 3798 NE 97<sup>th</sup> St.  
 Seattle, WA 98115

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**From:** Chris Lish <lishchris@yahoo.com>  
**Sent:** Sunday, July 29, 2018 8:24 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Protect the Alpine Lakes Wilderness. Revise the DPEIS for the Icicle Creek Watershed Water Resources Management Strategy.

Sunday, July 29, 2018

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

Subject: Protect the Alpine Lakes Wilderness. Revise the DPEIS for the Icicle Creek Watershed Water Resources Management Strategy.

Dear Mr. Kaputa,

- 154-1 | I strongly urge the Chelan County Natural Resource Department to revise the Draft Programmatic  
 Environmental Impact Statement (DPEIS) for the Icicle Creek Watershed Water Resources Management  
 Strategy to address the following deficiencies and then release a revised DPEIS for public comment.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."  
 -- Theodore Roosevelt

- 154-2 | The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must also be protected.

"If future generations are to remember us with gratitude rather than contempt, we must leave them with more than the miracles of technology. We must leave them with a glimpse of the world as it was in the beginning, not just after we got through with it."  
 -- Lyndon B. Johnson, upon signing the Wilderness Act in 1964

- 154-3 | The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes the Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of the IPID's water rights, which would limit several proposals.

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- "Wilderness is a resource that can shrink but not grow--the creation of new wilderness in the full sense of the word is impossible"  
-- Aldo Leopold
- 154-4 | I strongly object to Alternative 4. It includes: drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. The IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- "I hope the United States of America is not so rich that she can afford to let these wildernesses pass by, or so poor that she cannot afford to keep them."  
-- Margaret "Mardy" Murie
- 154-5 | Of the five alternatives presented in the DPEIS, Alternative 5 is best. It includes the "Full IPID Pump Station," which would move the IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- "It is imperative to maintain portions of the wilderness untouched so that a tree will rot where it falls, a waterfall will pour its curve without generating electricity, a trumpeter swan may float on uncontaminated water—and moderns may at least see what their ancestors knew in their nerves and blood."  
-- Bernard De Voto
- 154-6 | The IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use the IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but the IPID has no right to use water for these additional purposes.
- "Something will have gone out of us as a people if we ever let the remaining wilderness be destroyed. Without any remaining wilderness, we are committed wholly, without chance of even momentary reflection and rest, to a headlong drive into our technological termite-life, the Brave New World of a completely man-controlled environment."  
-- Wallace Stegner
- 154-7 | For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely to be much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- 154-8 |
- "As we peer into society's future, we—you and I, and our government—must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not

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- to become the insolvent phantom of tomorrow."  
-- Dwight D. Eisenhower
- 154-9 | The DPEIS also repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- "Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish—indeed, all the living creatures of prairie and woodland and seashore—from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."  
-- Theodore Roosevelt
- 154-10 | Again, I strongly urge the Chelan County NRD to revise the DPEIS for the Icicle Creek Watershed Water Resources Management Strategy to address the above deficiencies and then release a revised DPEIS for public comment.
- "A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."  
-- Aldo Leopold
- Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.
- Sincerely,  
Christopher Lish  
San Rafael, CA

## Comment Letter 155

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**From:** Claire Giordano <clairegio9@gmail.com>  
**Sent:** Sunday, July 29, 2018 9:49 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comment on the Icicle Creek DPEIS

Dear Department of Ecology,

The Alpine Lakes Wilderness is a treasured area that deserves our protection and care. As a hiker, the Enchantments region of the wilderness is one of the most spectacular and most popular. I attended the information session in Bellevue and appreciated all the information and the professionalism of everyone involved.

155-1 | While I recognize the complexity of the issue facing the valley with water shortages and the variety of stakeholders, I am deeply concerned that some of the alternatives presented in the DPEIS for the Icicle Creek Strategy either violate the wilderness act and/or will have very significant impacts on the landscape.

155-2 | Specifically, I strongly oppose Alternative four due to the irreparable damage the new construction would cause at Upper Klonoqua lake, Snow Lakes, and Eightmile lake.

155-3 | In addition, I would prefer that the dam at Eightmile is fixed but not expanded, as expanding the dam (even to its original height) would sink and eliminate some of the key recreation areas around the lake.

155-4 | Of the alternatives present, I advocate that you choose options that do not involve any new storage and have minimal modification or modernization to the existing dams. (Of the alternatives, this support extends to the no action alternative and to Alternative 3, if the Eightmile dam was fixed but not increased in height).

155-5 | Thank you for taking the time to read my letter, and for taking my feedback into consideration. The few wilderness areas we have preserved need our protection and stewardship so they can continue to inspire people for generations to come.

I look forward to following along with the rest of the process!  
 Claire Giordano

## Comment Letter 156

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**From:** Cliff Leight <cliffleight@gmail.com>  
**Sent:** Friday, July 27, 2018 9:05 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Project

Hi,

I am a backcountry user and have been hiking, camping in the proposed areas that are being considered for dam expansion. I have recreated in these areas for 45 years. They have also been important areas to photograph for my photography business. As you may know The Enchantment Lakes region is world renowned and attracts visitors worldwide.  
 156-1 | Please do not alter these very unique lakes and surrounding land with any new construction.

Sincerely

Cliff Leight  
 Bow WA

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 157

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**From:** dave.foster@everyactioncustom.com on behalf of David Foster  
<dave.foster@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 8:44 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

157-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle  
Strategy: I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage,  
fish screening and water conservation efficiencies. I wholeheartedly believe that these conservation elements are  
157-2 foundational to the outdoor experience and in protecting these landscapes. I do NOT support larger dams and water  
diversion

Sincerely,  
Mr. David Foster  
8306 Sunset Vista Ln Clinton, WA 98236-8925 dave.foster@northdesignllc.com

Comment Letter 158

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**From:** diana.rosenberg@everyactioncustom.com on behalf of Diana Rosenberg  
<diana.rosenberg@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 4:40 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

158-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle  
Strategy: I discovered my love of the greater Leavenworth and Icicle areas due to this amazing wilderness. Over my time  
living in Seattle, I must have visited the area nearly every single weekend for months. My day through-hiking the trail is  
forever one of my most treasured memories. This is one of the most wild, most accessible areas imaginable. Please help  
it remain so.

Sincerely,  
Diana Rosenberg

Sincerely,  
Ms. Diana Rosenberg  
329 41st St Oakland, CA 94609-2610  
diana.rosenberg@gmail.com



## Comment Letter 159

## Comment Letter 160

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**From:** diana.timpson@everyactioncustom.com on behalf of Diana Timpson  
<diana.timpson@everyactioncustom.com>  
**Sent:** Friday, July 27, 2018 11:29 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

159-1 UNACCEPTABLE AND DISGRACEFUL.  
UNDER NO CIRCUMSTANCES SHOULD THE WATERS WITHIN THIS DELICATE AND UNIQUE ECOLOGICAL SYSTEM BE DAMMED DRAINED DRILLED OR OTHERWISE MANIPULATED. THANK YOU MOUNTAINEERS FOR BRINGING THIS TO MY ATTENTION. I WILL READ THE REPORTS AND PROVIDE ADDITIONAL COMMENTS

Sincerely,  
M Diana Timpson  
1507 Western Ave Apt 103 Seattle, WA 98101-1504 diana.timpson@gmail.com

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**From:** Donald Mazzola <dmazz1952@gmail.com>  
**Sent:** Monday, July 30, 2018 5:05 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Alpine Lakes DPEIS comments

*Mike Kaputa: Director, Chelan County Natural Resource Department*

*411 Washington Street., Suite 201, Wenatchee, WA 98801*

I have backpacked and day hiked in Wilderness Areas for over 40 years. I spent many years in Montana as a volunteer for Wilderness designation and protection organizations and was employed as a Federal Wilderness advocate for 10 years.

160-1 The Alpine Lakes Wilderness Area is protected by Federal Law. The DPEIS is flawed in that it fails to meaningfully consider fundamental legalities. There are no easements that supersede Federal Wilderness Act protections. The fact  
160-2 that Alternative 4 includes drilling a tunnel between Upper and Lower Klonauqua Lakes and a bigger dam at Eightmile Lake is incredulous.

160-3 According to the Wilderness Act, Federally protected Wilderness Areas are "untrammeled by man" and should remain so. The Wilderness character of the Alpine Lakes Wilderness Area must be protected and respected. For this reason  
160-4 alone I am opposed to any and all dam construction, lake draining, etc. Any man-made structures that were present when the area was designated Wilderness should be removed rather than enhanced or reconstructed so as to re-create as closely as possible, natural, unaltered Wilderness characteristics.

160-5 I am in favor of "no action" in the Alpine Lakes Wilderness Area.

Donald Mazzola  
543 Q Street  
Port Townsend, WA 98368  
360.344.2946 (home)  
406.220.1707 (cell)

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 161

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**From:** Donald Potter <donpotter@earthlink.net>  
**Sent:** Monday, July 30, 2018 10:25 AM  
**To:** NR Icicle SEPA; donpotter@earthlink.net  
**Subject:** [Icicle SEPA] Icicle Strategy Draft PEIS

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

Re: Icicle Strategy Draft PEIS

Dear Mr. Kaputa

161-1 I would like to comment on the Icicle Strategy Draft PEIS. I have been studying this issue for some time, and I did attend the full meeting at the Department of Ecology on the evening of 27 June 2018. Chelan County and the Washington State Department of Ecology nicely gave a detailed presentation of the plan, the meeting lasting a full 2 hours or a bit more. Thanks for that informative meeting. But I am disappointed that this was not an official Public Hearing, with ability to have Oral Comments accepted, such as was held at the Leavenworth Festhalle 2 nights later

161-2 I am mostly concerned that Chelan County and the Washington State Department of Ecology do not seem to recognize and acknowledge that much of the plan actions occur within the Alpine Lakes Wilderness, which has inherent/legislated rights which seem to be violated as a result of the DPEIS (specifically building the Eight Mile Dam higher). The Draft DPEIS should be revised, taking Wilderness into account

161-3

161-4 Also, water conservation should be an increased factor in the plan. I was a water rights owner in a small irrigation district, the DeWeese-Dye Ditch in Canon City, Colorado for a number of years. So I know the potential causes of waste of water, and the need to improve the system with water conserving solutions

I have other grave concerns about this plan, but I know others will be bringing these issues forth

Thank you for your time and consideration in receiving and taking into account these comments and recommendations

Donald Potter, MD  
3823 140th Ave NE  
Bellevue, WA 98005  
Phone: 425-885-9269  
E-mail: donpotter@earthlink.net

Comment Letter 162

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**From:** Edward Henderson <edhenderson57@comcast.net>  
**Sent:** Saturday, July 28, 2018 9:53 PM  
**To:** NR Icicle SEPA; thomas.tebb@ecy.wa.gov  
**Subject:** [Icicle SEPA] Comments on IWG DPEIS  
**Attachments:** Icicle DPEIS.docx

Attached please find my comments on the IWG DPEIS.

## Comment Letter 162

Edward M. Henderson, Jr.  
407 Smith Street  
Seattle, Washington 98109  
edhenderson577@comcast.net  
(206) 283-6497

July 28, 2018

Mike Kaputs  
Director, Natural Resource Department  
Chelan County  
411 Washington Street, Suite 201  
Wenatchee, WA 98801  
[nr.iciclesepa@co.chelan.wa.us](mailto:nr.iciclesepa@co.chelan.wa.us)

G. Thomas Tebb  
Director, Office of the Columbia River  
Washington Department of Ecology  
1250 West Alder Street  
Union Gap, Washington 98903-0009  
[thomas.tebb@ecy.wa.gov](mailto:thomas.tebb@ecy.wa.gov)

RE: Comments on the Draft Programmatic Environmental Impact Statement (DPEIS)  
for Icicle Creek Watershed Resources Management Strategies.

Dear Mistrs Kaputs and Tebb,

I am a hiker, backpacker and climber. I have been enjoying recreation in the Alpine Lakes since the early 1980's, shortly after this spectacular mountain region was designated a Congressionally protected Wilderness in 1976. I count myself extremely lucky to live in Washington State with close and easy access to the Alpine Lakes. Many of my fellow citizens are not so fortunate and travel many miles to visit these wonders. Recreational visitation to the Alpine Lakes is a major economic godsend to the surrounding mountain communities. I have relaxed and enjoyed many cold beers and Ortega Burgers at Gustav's in Leavenworth after a hike down from the Enchantments or a hot dusty day's rock practice on the granite slabs up Icicle Creek.

I am shocked and appalled by the sloppy, self-serving DPEIS that you are attempting to pass off on a gullible public. The DPEIS is incomplete and fails utterly to adequately address many important issues raised by anticipated work in protected Wilderness. The missing issues include but are not limited to: enumeration of the necessary permits and waivers which may be required; relationship with the Forest Service, the administrator of this public land; how the physical work will be carried out in the Wilderness. The DPEIS should be withdrawn until you can answer these and many other questions.

I am aware that the Icicle Peshastin Irrigation District (IPID) has water rights in the Icicle Creek watershed that pre-exist designation of the Alpine Lakes Wilderness in 1976. The IPID has a right and indeed an obligation to maintain the facilities associated with those rights. However those rights do not extend to increasing withdrawal of water for purposes not originally specified. IPID's water rights were granted for the designated purpose of irrigation. The DPEIS now proposes to use IPID water for other purposes, such as the fish hatchery and real estate development in Leavenworth, but IPID has no right to use water for these additional purposes. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's remaining water rights, which limit several proposals.

The DPEIS must be revised to eliminate proposals to raise the height of the dams at Upper Snow Lake and Eight Mile Lake thus increasing the size of these Lakes in the

## Comment Letter 162

Wilderness and draining Upper Klonaka Lake into Lower Klonaka Lake.

The DPEIS fails to address the means and methods of construction in the Wilderness. For the multitude of projects proposed in the Alpine Lakes Wilderness, what construction activity can be expected to complete the proposed projects? How many helicopter flights will be required for all of the projects proposed in each alternative? How will that impact wilderness values, including the opportunity for solitude, recreational access and infrastructure? How will automation and optimization and proposed changes to the natural hydrology of the basin impact the invertebrate community? The Wilderness Act limits the use of power mechanical tools and requires the use of manual powered hand tools. The original irrigation structures, the dams and spillways at Upper Snow and Eight Mile Lakes were built with non-mechanized tools in the early twentieth century. Such restoration work as required for safety and necessary operations should be carried out with the same hand tools.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which will alter stream hydrology.

The Alpine Lakes Wilderness is one of the most iconic and treasured natural resources in the entire National Wilderness Preservation System. These lands are of national interest, owned by everyone in the nation and protected by Congress to preserve their wilderness character. As detailed in the DPEIS, thousands of hikers explore and visit this area each year and a myriad of wildlife species depend on the critical habitat it provides. I have great personal interest in the management and stewardship of these lands, and am committed to working to ensure wilderness, recreation, scenic, and other natural resource values are protected into the future.

The DPEIS is woefully inadequate and must be withdrawn. It fails to address many important issues and lacks sufficient details on many others. Because of these and many other deficiencies an evaluation can't be reasonably made of the probable environmental impacts. Because many of the projects proposed in the DPEIS occur in the National Forest, i.e. on federal land, I believe a NEPA evaluation is required.

Thank you for this opportunity to make these comments. Please inform me when a new, revised and corrected DPEIS is ready and available for public scrutiny and comment.

Sincerely,

/s/ Ed Henderson

Edward M. Henderson, Jr. P.E.

cc: Governor Jay Inslee  
U. S. Senator Patty Murray  
U. S. Senator Maria Cantwell  
U.S. Representative Pramila Jayapal  
Okanogan-Wenatchee National Forest Supervisor Mike Williams

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 162

Wenatchee River District Ranger Jeff Rivera

Comment Letter 163

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**From:** elaine.badejo@everyactioncustom.com on behalf of ELAINE BADEJO  
<elaine.badejo@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 5:07 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

163-1 | I would like you to leave the Enchantments the way they are. It is such a beautiful and unique place to be able to visit. I would be as numerous people will be devastated if this land is transformed and not approachable. Please consider preserving this beautiful piece of our state.

Sincerely,  
Mrs. ELAINE BADEJO  
21717 104th Ave E Graham, WA 98338-7718 elaine.badejo@gmail.com

## Comment Letter 164

## Comment Letter 165

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**From:** ehagstrom13@everyactioncustom.com on behalf of Erik Hagstrom <ehagstrom13@everyactioncustom.com>  
**Sent:** Saturday, July 28, 2018 10:31 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

164-1 The enchantments and Icicle drainage are one the few higher elevation watershed/high mountain environments to be found in the state of Washington that offer unparalleled recreational experiences as well as unique ecological life-zones to be found. I can't conceive of any reason to alter this priceless area which serves all of the citizens of Washington state in order to benefit a select few.

The pressures upon the limited resources of our country continue to be subject to over-use, exploitation, and short term monetization with destructive results. Wild lands like the Icicle should continue to be protected, preserved and treated as the special priceless properties for ALL citizens. Studies have shown time and again that the public wants more areas to experience what nature has to offer. Flooding campgrounds, draining water courses and damming rivers is not conducive to the public's wishes.

Please, do not proceed with the proposed water plans in the Icicle Basin.

Sincerely,  
 Mr. Erik Hagstrom  
 23515 82nd Ave SE Woodinville, WA 98072-9565 ehagstrom13@gmail.com

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**From:** ourstuff3@everyactioncustom.com on behalf of Evan Schelter <ourstuff3@everyactioncustom.com>  
**Sent:** Saturday, July 28, 2018 12:00 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

165-1 I have backpacked all through the Enchantment Lakes area over the decades and love it just as it is. I do not want new or  
 165-2 bigger dams, no tunnels. The problem is too many people living there, not a lack of resources.

Sincerely,  
 Mr. Evan Schelter  
 2017 166th Ave SE Bellevue, WA 98008-5321 ourstuff3@hotmail.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 166

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**From:** Fabian Frank (fabian.m.frank@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Monday, July 30, 2018 3:03 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

166-1 Alpine Lakes Wilderness is one of the most valuable environments in the Washington natural resources, and the damage  
done by these projects will be irreversible. It is a wilderness, and should be treated as such - not developed. It  
166-2 significantly detracts from the recreational value of an environment when dams, pipes, and other devices are used. We  
166-3 must preserve this wilderness for generations to come, and therefore we cannot allow "just one little change" every so  
often... eventually that will end up completely changing the environment.  
-Fabian Frank

Sincerely,

Fabian Frank  
6002 147th Ave SE  
Bellevue, WA 98006  
fabian.m.frank@gmail.com  
(425) 614-8712

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 167

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**From:** Frances and Gerald Conley (fran@roanokecap.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Friday, July 27, 2018 5:59 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Stop effort to Undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

167-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and because of its ease of access to Seattle and  
major highways is a highly used wilderness area. It already has great pressure from such use. Wilderness rules should be  
adhered to and there should be no expansion of dam building or dam expansion, or further violation of Wilderness  
167-2 limited access and use regulations.  
Please halt this proposed adverse use of the current state of Enchantment basin!  
Don't sacrifice this wilderness area to commercial use of any type. Do not manipulate water flows or otherwise tamper  
with watershed runoff. Flows will be declining anyway and other solutions will need to be found. Leave the Wilderness  
area alone! No expansion of any lakes in the Wilderness Area period.

Sincerely,

Frances and Gerald Conley  
2636 10th Ave E  
Seattle, WA 98102  
fran@roanokecap.com  
(206) 322-0427

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 168

## Comment Letter 168

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**From:** GW Shannon <gwshannon@gmail.com>  
**Sent:** Monday, July 30, 2018 8:44 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on Icicle Strategy Draft PEIS

July 30, 2018

Mike Kaputa  
 411 Washington St., Ste. 201  
 Wenatchee, WA 98801  
 % [nr.iciclesepa@co.chelan.wa.us](mailto:nr.iciclesepa@co.chelan.wa.us)

Re: Icicle Strategy Draft Programmatic EIS Comments

Dear Mr. Kaputa:

168-1 In reviewing the limited number of alternatives that were presented in the Icicle Strategy Draft PEIS, I find that  
 168-2 wilderness issues and values, including ecosystem overviews in the Alpine Lakes Wilderness were not  
 168-3 adequately reviewed and discussed, including the U.S. Forest Service's role and laws for proposals in  
 168-4 wilderness.

168-3 Those proposals include dam optimization, modernization and automation, storage enhancement at Eightmile  
 Lake, Upper Klonauqua Lake and Upper/Lower Snow Lakes, all in wilderness that the U.S. Forest Service  
 manages and must follow certain wilderness laws. For example, Section 4(c) of the 1964 Wilderness Act  
 relates to the concept of minimum tool requirements, as far as I know that issue was not addressed in the  
 DPEIS.

168-4 Furthermore, IPID Irrigation District has never had or at least not used water rights at Upper Klonauqua Lake;  
 and as pointed out by others, the current water rights at Eightmile Lake based on historical use have not even  
 been ruled on yet by the Department of Ecology.

168-5 The DPEIS does not consider basic issues (legal) in regard to federal wilderness laws in the Alpine Lakes  
 Wilderness and state water law. It seems that the document is pushing the cart in front of the horse. It  
 168-6 appears costs associated with wilderness area projects are not adequately addressed for most alternatives  
 (note the exorbitant cost to fly the small piece of equipment into Eightmile Lake this spring), and for that  
 reason I would support Alternative 5 with the full IPID pump station without dam optimization, modernization  
 and automation.

1

168-7 Other issues not fully addressed include changes in stream flow and those impacts to the riparian ecosystems;  
 168-8 climate change and overall effect on the lower Icicle drainage; alternatives that address aggressive  
 168-9 conservation measures for the City of Leavenworth and their water rates for residents and commercial  
 168-10 businesses; and finally impacts to recreation users in the Alpine Lakes Wilderness.

Thank you for this opportunity to comment on the Icicle Strategy Draft Programmatic EIS.

Sincerely,

Greg Shannon  
 313 Olive Street  
 Cashmere, WA 98815

2

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 169

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**From:** sheehangregory@everyactioncustom.com on behalf of Gregory Sheehan  
<sheehangregory@everyactioncustom.com>  
**Sent:** Tuesday, July 31, 2018 7:54 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:

169-1

Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.  
Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.  
Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

Sincerely,  
Mr. Gregory Sheehan  
6045 3rd Ave NW Apt 5 Seattle, WA 98107-2103 sheehangregory@gmail.com

Comment Letter 170

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**From:** heffneh@everyactioncustom.com on behalf of Heather Heffner <heffneh@everyactioncustom.com>  
**Sent:** Saturday, July 28, 2018 12:12 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

We oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:

170-1

Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.  
Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.  
Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

170-2

We support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
Mrs. Heather Heffner  
13307 117Th Street Ct E Puyallup, WA 98374-5049 heffneh@gmail.com



## Comment Letter 171

## Comment Letter 172

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**From:** Howard Nebeck <henebeck@uw.edu>  
**Sent:** Monday, July 30, 2018 5:01 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Draft Programmatic Environmental Impact Statement (PEIS) for the Icicle Strategy

Dear Director Kaputa,

171-1 I would like to express my strong support for maintaining the wilderness and recreational aspects of the Icicle Creek Subbasin as Chelan County evaluates water resource projects in this area.

I appreciate the need of the county to utilize the water resources of the area and to construct sound infrastructure to access these resources. I hope proposed projects will preserve the beautiful wilderness and recreational access to it.

Thank you,  
 Howard Nebeck  
[henebeck@uw.edu](mailto:henebeck@uw.edu)  
 14921 NE 72nd Ct.  
 Redmond, Wa 98052  
 425-881-1280

---

**From:** Isaac Gundersen <Isaac.Gundersen.124208986@p2a.co>  
**Sent:** Wednesday, July 25, 2018 3:10 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

172-1 I know that most of this email is a form letter, I used to work in government. These trails are one of the great wonders of our state. Please don't move forward with a project that would change that. Please remove the detrimental projects from the draft plan.

172-2 The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

172-3 Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
 Isaac Gundersen

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 173

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**From:** aengdoo.shin@everyactioncustom.com on behalf of Jacqueline Shin  
<aengdoo.shin@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 6:15 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

173-1 Please don't do this! Please help preserve the wildlife as it is!!! Please reconsider an alternative to what you are trying to achieve! There has to be a different way.

Sincerely,  
Ms. Jacqueline Shin  
2200 E Ball Rd Anaheim, CA 92806-5201  
aengdoo.shin@gmail.com

Comment Letter 174

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**From:** Janka Hobbs <urtica@frontier.com>  
**Sent:** Thursday, July 26, 2018 8:32 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] [Possible Spam] Icicle Creek DPEIS

Dear Director Kaputa,

174-1 There are several aspects of the Icicle Creek DPEIS that I find disturbing. One is its cavalier disregard for protection of the Alpine Lakes Wilderness, especially in Alternative 4. In a time of increasing water scarcity, this proposal is based on a wish-list expansion of water rights, mostly to junior irrigation permits and to presumed municipal expansion.

174-2 The proposal to raise Eightmile Lake (and increase its drawdown) will essentially destroy any riparian habitat along its banks, and ensure that it becomes a lifeless reservoir. The Snow Lake and Klonauqua proposals are equally egregious.  
174-3 Modernization of existing facilities also needs to happen with habitat impacts in the forefront.

174-4 While Chelan County has conveniently failed to list any plant or invertebrate species on its priority species list, (have vegetation surveys even been done for the affected areas?) amphibians, fish and waterfowl are dependent on riparian habitat.  
174-5

174-6 In this time of water shortages, I understand the irrigation district's wish for reliable sources, but damming and drilling in a protected wilderness is both unlawful, and counterproductive. The town of Leavenworth prides itself on being a gateway to the Alpine Lakes, and has many tourism dependent businesses.  
174-7

174-8 If the area's water needs cannot be met with water conservation strategies (which are barely given a hand wave in the DPEIS), then look into building the full IPD pump station.  
174-9

174-10 People come from around the world to visit the Alpine Lakes. Salmon depend on water from up stream, quality, quantity, and timing. Icicle creek deserves better than being treated as an irrigation canal.  
174-11

Thank you for your consideration,

Jana Hobbs  
13506 NE 66th St  
Kirkland, WA 98033

## Comment Letter 175

## Comment Letter 175

**From:** Janna Treisman <janna.treisman@gmail.com>  
**Sent:** Monday, July 30, 2018 9:58 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments: Icicle Strategy PEIS Alternatives

Box 1167  
 Fall City, WA 98024  
[janna.treisman@gmail.com](mailto:janna.treisman@gmail.com)  
 30 July 2018

Mike Kaputa  
 Director, Natural Resource Department Chelan County  
 411 Washington St, Ste. 201  
 Wenatchee, WA 98801  
 (509) 670-6935/ [nr.iciclesepa@co.chelan.wa.us](mailto:nr.iciclesepa@co.chelan.wa.us)

Dear Mr. Kaputa:

I attended the informational meeting in Bellevue and the June 27 Public Hearing in Leavenworth, asked questions, studied exhibits at the Festhalle and read through IWG information online as well as the Draft PEIS.

I live and work on a 60 acre farm in the Snoqualmie Valley. I have a grasp of the complexity and thorniness of water issues and fish issues. I am an avid hiker and backpacker and over the years (I am 71) have spent many weeks in the Alpine Lakes Wilderness. I've camped at many lakes in the Icicle Creek basin, including Upper Snow Lake, Eightmile and a week at Lower Klonauqua (also hiking to Upper Klonauqua). I am a user of the resource and familiar with it.

175-1 I'd like to preface my comments with my puzzlement: storage water rights originate within the Alpine Lakes Wilderness, but I am not finding a clear determination by Ecology of the extent and validity of diversionary or storage water rights for the IPID or the Leavenworth National Fish Hatchery. Wilderness is a very special type of public land, and the extent and validity of water rights is the heart of the issue at hand. Ecology needs to make the determination, public comment should then be taken on a revised PEIS.

175-2  
 175-3 It is misleading to refer to the lakes - lakes in the Alpine Lakes Wilderness!!! - as reservoirs. They are lakes within a national treasure of public lands, and must be considered as such, with protection for riparian areas and respect for Wilderness, which makes a huge contribution to the economy of the area.

175-4 Federal Wilderness law likely supersedes and may even extinguish certain IPID easements. State water law will play a role in determining what proposed projects can and cannot be built. As it stands the PEIS does not adequately analyze limitations on the scope and validity of IPID's water rights. It is my understanding that IPID's water right were granted for irrigation. IPID does not have the right to use the water for other purposes such as the fish hatchery and Leavenworth's domestic and commercial needs due to projected growth.

175-5  
 175-6 The proposals in Alternative 4 are unacceptable, given that all of the lakes are inside the Alpine Lakes Wilderness (Upper and Lower Klonauqua - no tunnel!!!) (Upper Snow Lake an Eightmile- no higher dams to artificially enlarge the lakes!!) I've walked across the old yet functional dam on Lower Klonauqua, but the idea of a tunnel or connection to Upper Klonauqua Lake is nuts - for starters, the IPID has no water rights on the upper lake, it would detrimentally alter the integrity of the lake environment... and the view! the incredible view in the heart of the Alpine Lakes Wilderness! no tunnel, no siphon, no drawdown!!

1

175-7 Optimizing releases from the lakes, which also function as reservoirs because of being dammed, is a great idea, and I support modernization and automation, use of remote sensors and controlled seasonal releases. Because the projects are in Wilderness, they are required to be done with the least impact to the Wilderness (not the least expensive way). This includes non-motorized access and largely non-motorized equipment. Hiring hiker/runners or scheduling volunteers to regularly visit the dams and make adjustments to release and monitor water levels and conditions is feasible. I was told that such a plan is being piloted this year. Good idea.

175-8

175-9 The cumulative impact of altering natural flow regimes of the riparian ecosystems in the Alpine Lakes Wilderness has not been adequately addressed and needs further study.

175-10 Aside from the plan to make the dam at Eightmile Lake higher and thus unnaturally enlarge the lake, I support the projects outlined in Alternative 5, the Full IPID Pump Station. For the long term it is the best solution. With the costs on the other alternatives likely underestimated (given restrictions of Wilderness ) and the bright future of cheaper alternative energy that could run the project, this one clearly makes sense.

175-11

175-12 Additionally, it was interesting to learn of efficiencies in hatchery management, the round pens and other innovations. Since the hatchery is such a huge user of the water, these changes are critical to meeting future water needs in the basin.

Thank you for your consideration.

Janna Treisman

--  
 Janna M. Treisman

"We simply need that wild country available to us, even if we never do more than drive to its edge and look in. For it can be a means of reassuring ourselves of our sanity as creatures, a part of the geography of hope."  
 - Wallace Stegner, the Wilderness Letter

2

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 176

Comment Letter 176

**From:** Jena Gilman <jena.gilman1@gmail.com>  
**Sent:** Saturday, July 28, 2018 10:01 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Water Resources Management Strategy Draft Programmatic Environmental Impact Statement  
**Attachments:** PastedGraphic-1.tiff

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

Dear Mike,  
I would like to offer the following comments on the Icicle Creek Water Resources Management Strategy (Icicle Strategy) Draft Programmatic Environmental Impact Statement (DPEIS):

- 176-1 • The fundamental problem with the DPEIS is that the Icicle Peshastin Irrigation District (IPID) simply does not retain the water rights necessary for implementing most of the projects listed in the DPEIS. By failing to exercise water rights over and above that which are already being used at places like Snow Lake, the irrigation district has forfeited the right to store or release more water from the Wilderness Area.
- 176-2 • With regard to the Eightmile Lake Storage Restoration impacts, the DPEIS pretty much skips over what will be the habitat, biological, recreation and aesthetic impacts from mobilizing heavy equipment to the site via a route parallel to Eightmile Trail. This must be addressed in the DPEIS because of the implications that allowing haul roads to be built in designated Federal Wilderness has for other projects in the DPEIS.
- 176-3 • With regard to Aesthetics, I object to the following statement in the DPEIS: "For example, if the Alpine Lakes Optimization, Modernization, and Automation project or the Eightmile Lake Storage Restoration project were to move forward as individual projects without input from a coordinated IWG, there might be less emphasis placed on making sure the infrastructure blends in aesthetically with the environment." Why would an individual agency's projects or actions be subject to any less professional execution AND public scrutiny as the projects envisioned by the IWG? You have made absolutely no case for this, thus there is no negative impact associated with the No Action alternative with regard to the Aesthetics criterion.
- 176-4 • In Alternative 1 - Eightmile Lake Storage Restoration, the statement that "...long-term aesthetic impacts associated with lake level changes are considered to be moderate but not significant." is just ridiculous. Whether the IPID still retains the right to raise the lake to "historical" highs is one thing, but the resulting re-established bathtub ring up to the "historical" high water mark and down to the new low water mark proposed will be aesthetically displeasing to recreational users of the lake and surrounding mountains. This is also true for Snow Lake in Alternative 4 where the desertified lakefront will be increased by eight feet overall (plus five and minus three feet over existing conditions). I find the statement, "...the view would largely remain intact and have the same natural character." to be highly questionable. How does the Snow Lake bathtub ring have any "natural character"? Even at 30,000 ft. the bathtub ring around Upper Snow Lake is just plain ugly. And the IWG proposes to make it uglier.
- 176-5 • The aesthetics issue should also be addressed in the Recreation section, since obvious artificially-induced features such as the bathtub rings will reinforce to hikers that they are not making their way through a true wilderness, as envisioned in the Wilderness Act.
- 176-6 • As a global comment on the proposed mitigation measures for alternatives, you cannot include compliance with the terms and conditions of local, state, and federal regulations as mitigation. Regulations are established baseline requirements, not something to be counted as mitigation to justify the Icicle Strategy.

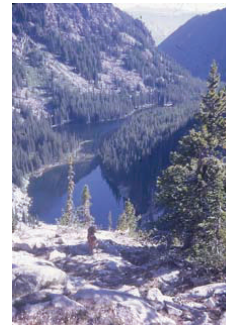
1

- 176-7 • Finally, the DPEIS Chapter 4.0 Impacts and Mitigation Measures is very difficult to read and poorly organized. Rather than organizing the impacts by category (i.e. Earth, Water Quality, etc) this chapter should be organized by Alternative and project/program within that alternative. In that way, the reader can more easily assess the overall and cumulative impacts of each of those projects/programs to Earth, Water Quality, etc. This would still be in compliance with SEPA and be more transparent.
- 176-8 • Because so much of the Icicle Strategy is focused on future domestic water supply for the City of Leavenworth and rural residents, it would make sense in a Programmatic EIS to address some fundamental questions about why a Federal Wilderness area, with significant national recreation and habitat values, should be negatively impacted when the local governments (Chelan County, in particular) have done such a poor job of land use and water resources planning. By allowing the proliferation of residential development in what were heretofore valuable timber and agricultural production areas, the County has engaged in rural sprawl to the detriment of the timber and agricultural industries as well as to the ability of local, State and Federal agencies to prevent and control wildfires. The Icicle Strategy is a formula for the rest of the state to subsidize the rural and suburban sprawl of Chelan County. It is not too late for Chelan County to address these problems, thus significantly reducing the 2050 residential water usage projections at the heart of the Icicle Strategy.

- 176-9 In conclusion, the best alternative by far is the No Action alternative. Under the No-action Alternative, various agencies and other entities may continue to undertake individual actions to restore and enhance fish and aquatic resources in the Icicle Creek Watershed project area, and those actions would not have to be part of an unwieldy over-sized program sponsored by the IWG. Actions implemented by individual agencies and entities could include construction of diversion improvements, irrigation system upgrades, LNFH improvements, and fish passage work and would be subjected to knowledgeable and enthusiastic public-spirited examination.

Thank you,  
Jena F. Gilman  
1480 SW 10th Street  
North Bend, WA 98045

Larry the Dog enjoying a view of Nada and Hart Lakes, July 1970



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## Comment Letter 177

## Comment Letter 178

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**From:** jjostad@everyactioncustom.com on behalf of Jeremy Jostad <jjostad@everyactioncustom.com>  
**Sent:** Thursday, July 26, 2018 5:21 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

177-1 | Please do not increase the size of any dams that would affect the Enchantment Wilderness. Increasing the size of these dams will not solve the ultimate problem in which you are proposing to try and solve. People need these lands for much more valuable assets. Thank you!

Sincerely,  
Mr. Jeremy Jostad  
211 W 6th St Cheney, WA 99004-1426  
jjostad@ewu.edu

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**From:** lilwolfj@everyactioncustom.com on behalf of Jessica O'Sell <lilwolfj@everyactioncustom.com>  
**Sent:** Tuesday, July 31, 2018 7:42 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

178-1 | I do not support this plan. The enchantments are an invaluable natural area that need to be preserved for future generations.

Sincerely,  
Ms Jessica O'Sell  
7602 NE 197th Ct Kenmore, WA 98028-2076 lilwolfj@yahoo.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 179

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**From:** james.michael.perkins@everyactioncustom.com on behalf of Jim Perkins  
<james.michael.perkins@everyactioncustom.com>  
**Sent:** Friday, July 27, 2018 2:10 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

179-1 [The Alpine Lakes Wilderness is a unique and fragile wilderness area. Infrastructure development is vital to the growth of our nation, but we need to be judicious about how and where those projects take place. The current proposal does not appear to balance the needs of the public with the protection, management, and recreational use of the important wilderness area at the Enchantments.

179-2 I strongly encourage you to thoroughly explore other options.

Sincerely,  
Mr. Jim Perkins  
9058 Eagle Point Loop Rd SW Lakewood, WA 98498-1055 james.michael.perkins@gmail.com

Comment Letter 180

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**From:** Joan Frazee <je\_frazee@hotmail.com>  
**Sent:** Monday, July 30, 2018 1:01 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] comment on Draft PEIS for the Icicle Strategy

180-1 After reviewing the Draft PEIS, I am concerned that these proposed projects reflect the bias of demand for water and are less responsive to the natural resource side of the equation.

180-2 Certainly, there are efficiencies to be gained by proposed upgrades to antiquated systems e.g. installing pump stations and operating head gates remotely. However, it is a bit naive to assume that humans would no longer be needed for in situ trouble-shooting and quality control.

180-3 I am alarmed at the proposals in Alternative 4 which include construction of a new dam at Eightmile Lake, resulting in larger storage capacity and the inundation of 13.6 acres of wilderness with water, impacting shoreline vegetation and more at Eightmile Lake. This inundation would only occur for 1 month of the year but it seems the impacts would be longer lasting. The proposed enhancements for Snow Lakes, Square Lake, Colchuck Lake, Kionaqua Lakes — all in wilderness do not seem respectful to wilderness character.

180-4 The sections on wildlife and vegetation make no mention of noxious weeds which is a huge omission. The SEPA checklist under 4. Plants e. reads, "List all noxious weeds and invasive species known to be on or near the site." The response to this suggests that the PEIS includes the issue of noxious weeds, "The PEIS will provide information from Ecology's Aquatic Plant Monitoring GIS datasets and Chelan County's Noxious Weed Control Board's weed list."

Working as a professional botanist for the U.S. Forest Service for 18 years has made me painfully aware of the threat posed to native ecosystems by the invasion of noxious weeds. To analyze impacts of further disturbance to vegetation and wildlife habitat without mention of this threat seems radically remiss. My 9.5 years on the Wenatchee River District included partnering with the Wilderness Manager to address infestations of Canada thistle present in the Eightmile Lake area, likely spread/and perhaps introduced after the fires of 1994.

Thank you for this opportunity to comment.

## Comment Letter 181

## Comment Letter 182

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**From:** budgetcyclerepairs@everyactioncustom.com on behalf of John Pollock  
<budgetcyclerepairs@everyactioncustom.com>  
**Sent:** Tuesday, July 31, 2018 7:49 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

181-1 | I think this project can have wide ranging impacts on the wilderness areas. Please consider an alternative, or just leaving it be.

Sincerely,  
Mr John Pollock  
1919 Rucker Ave Everett, WA 98201-2215  
budgetcyclerepairs@yahoo.com

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**From:** mkathleenhurley@everyactioncustom.com on behalf of Kathleen Hurley  
<mkathleenhurley@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 7:41 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

182-1 | The size and scope of these projects contraindicates the Wilderness Act of 1964, which prohibits roads, vehicles or permanent structures are allowed in designated wilderness. The proposed activities will undermine the recreational value of this unique place in the Cascades.

182-2 | We oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:

- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
- Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
- Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

182-4 | We support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes.

Sincerely,  
Ms. Kathleen Hurley  
5329 46th Ave S Seattle, WA 98118-2315  
mkathleenhurley@gmail.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 183

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**From:** Kathi Rivers Shannon <kathirshannon@gmail.com>  
**Sent:** Monday, July 30, 2018 7:13 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Comments on Icicle Strategy Draft EIS

Thank you for the opportunity to comment on the alternatives proposed by the Icicle Work Group concerning dams in the Alpine Lakes Wilderness.

183-1 I have attended several meetings during the course of the group's work, including the public meeting in Leavenworth that presented five alternatives. From input the group has received, I had expected at least one alternative that seriously addressed wilderness concerns. Protecting wilderness should be part of the guiding principles, not just a statement stating work should comply with wilderness acts. The environmental review, as presented at the public meeting, does not include an assessment of how any of the alternatives will affect wilderness. Legal questions remain, as noted in comments submitted by conservation groups.

183-2 Alternative 4 is the least acceptable, as it includes drilling a tunnel to drain water from Upper Klonoka Lake and enhancements to Eightmile Lake, the Snow Lakes, and upper Klonoka Lake.

183-3 Because there is not a viable alternative, no action should be taken until a full review has been completed and legal questions addressed.

Kathleen Shannon  
313 Olive Street  
Cashmere, WA 98815

Comment Letter 184

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**From:** Mike Kaputa  
**Sent:** Friday, July 27, 2018 10:29 AM  
**To:** Mary Jo Sanborn  
**Subject:** FW: Public comment

**From:** Kathleen Ward [mailto:kathywardsmail@gmail.com]  
**Sent:** Thursday, July 26, 2018 11:48 PM  
**To:** Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>  
**Subject:** Public comment

184-1 It's quite a challenge for the average citizen to get a thoughtful handle on IWG's proposed alternatives. The benefits of more water in the Icicle are numerous and compelling; not as clear are potential negative outcomes. Particularly, just what would be the "costs" to the wilderness areas? How valid are the objections of the ALPS? What would it take for the good minds in that group to work with the good minds in IWG? I feel certain you have not failed to consider the many state and federal regulations, agencies, hoops, etc., as suggested by ALPS, but also suspect some of their concerns are legitimate. My overall view is that the public needs more assurance of "no harm done" to the Alpine Lakes and involved waterways before backing any of the alternatives.

184-2 It is difficult for me to support any alternative that makes way for more tourism buildup in Leavenworth. What would having access to more water mean? I'm sure there is a tipping point at which "bigger and more" reduce the appeal and economic success of our community. Perhaps we are already there. Even with traffic problems managed--and we are a long way from that--Leavenworth decision-makers would be wise to focus on quality over quantity. (And they could talk to Dick Rieman about a fascinating idea he once had for growth management.)

Best wishes. Kathleen Ward



## Comment Letter 185

## Comment Letter 186

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**From:** Kathy Haviland <kmhaviland@fastmail.com>  
**Sent:** Friday, July 27, 2018 8:40 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] DPEIS Icicle Creek

185-1 | I am opposed to any alteration of the wilderness area addressed on  
the DPEIS in question.

185-2 | The Alpine Lakes – particularly the Enchantments Basin, is one of the  
nation's more popular wilderness destinations and attracts people  
from around the world. With 615 miles of trail (including a section of  
the Pacific Crest Trail), world-class climbing, hiking and backpacking,  
and 400,000 acres of spectacular mountain scenery and lakes, the  
area is beloved by recreationists and is an important contributor to the  
regional recreation economy.

It is essential we keep this wilderness area preserved as it is.

I am not a user of the wilderness as many of my friends are yet I  
understand the importance of keeping this area as a preserved  
natural wilderness that contributes to the health of the eco-system and  
the wildlife in the region. Once the area is altered, the consequences  
will be multiple to health of the landscape over time.

Thank you,

Kathy Haviland

Olympia, WA

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**From:** kelsiemaney@everyactioncustom.com on behalf of Kelsie Maney  
<kelsiemaney@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 9:47 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

186-1 | Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle  
Strategy: Please maintain a wild and scenic alpine in the Enchantments and abort dam proposals that would impact this  
Washington State recreation treasure.

Sincerely,  
Ms Kelsie Maney  
1401 SW 120th St Burien, WA 98146-2626  
kelsiemaney@gmail.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 187

Comment Letter 187

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**From:** kevin@team-farrell.com  
**Sent:** Friday, July 27, 2018 1:17 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Written Comments: Icicle Strategy PEIS

From:  
Kevin Farrell  
July-27, 2018  
7496 Icicle Rd, Leavenworth, WA 98826  
509-548-0815  
[kevin@team-farrell.com](mailto:kevin@team-farrell.com)

Comments:

- 187-1 The goal of the Icicle Creek sub basin strategy should be to prioritize optimal in-stream flow for the benefit of aquatic and riparian habitat so the natural state of flora and fauna remain healthy for years to come. A side benefit is that recreation would benefit from reliable flow, though recreation is less important than creek health. It is okay for out-of-stream water use to suffer occasionally to ensure the creek itself remains vitally healthy.
- I live on 5 acres on Icicle Road, near the fish hatchery, and I visit Icicle Creek year-round. I'm aware of the diversion dams, water mains, and irrigation ditches that crisscross this area. Like my neighbors, I get all my water from a private well even though city water main and irrigation water are only about 100 feet from my house. I consider myself a stakeholder in this environmental review, and I've followed issues with domestic water, irrigation, and dams in the Icicle Creek basin for a long time. My interest in the footprint areas of this environmental review goes back decades. Also, my dad helped design the Wenatchee River irrigation dam at Dryden, and we've discussed the perspectives and traditions from his era and before.
- 187-2 Many traditions are based on people's memories, beliefs, and customs, and they aren't always correct. It's worthwhile to understand those traditions, but for the sake of this environmental review, it's necessary to break from tradition in order to ensure the future water draw on the Icicle watershed is sustainable. The changes need to be done with purpose and care and backed by science, not tradition.
- 187-3 At this time, I do not favor or oppose any of the 5 alternatives, with the exception of alternative 4, which I completely oppose.
- 187-4 I support Alpine Lakes reservoir automation, but only if implemented with hand tools. It makes sense to add modern remote equipment that will allow efficient release of water, but only if it can be done in the same ethic that all other wilderness work is done, without bringing in mechanized construction equipment or making dramatic changes in the wilderness.
- 187-5 The Alpine Lakes Wilderness (or any designated wilderness lands) should not be used as a source for additional (new) water storage in keeping with the purpose for lands that have been set aside to remain wild. Thousands of people hike up there every summer and are completely unaware that the lakes are altered. Let's not ruin their experience. These lakes are in the heart of a very desirable wilderness, so whatever happens there will get a lot of attention. It is a place where nature is supposed to take its own course. A bulldozer there would make everyone agitated, as the excavator did in the Spring of 2018 at Eight Mile Lake. Additional water volumes can be taken elsewhere.
- 187-6 Furthermore, it is not necessary to increase reservoir volumes in the Alpine Lakes Wilderness. The reports show other ways to increase domestic and agricultural water supplies. Pumping water up and into the irrigation ditches is an example.

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- 187-7 The plan to draw from downstream rivers and pump water to the irrigation canals seems good, however, that plan needs further development. I would like to see a developed plan that identifies the fine details about where, when, and how the water will be moved. The plan shouldn't add new dams because that would defeat the purpose of the project, which is to increase in-stream flow. Removing existing dams needs to be considered, because removing dams is in-line with the purpose of the project.
- 187-8
- 187-9 The effects of global warming and increasing domestic water demand will come slowly, so there is no need to construct in haste. It is more beneficial to wait for more data to arrive and vindicate the alternatives than to rush into construction. I am delighted to see the environmental data, and I hope there is ongoing data collection. Ongoing studies would confirm the baselines and justify the changes that are occurring to water volumes and habitat. Efforts to share this data with the laymen (public outreach) is beneficial for community appreciation of the creek and fosters a culture of understanding in the project.
- 187-10

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## Comment Letter 188

## Comment Letter 189

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**From:** kylekohlwes@everyactioncustom.com on behalf of Kyle Kohlwes  
<kylekohlwes@everyactioncustom.com>  
**Sent:** Saturday, July 28, 2018 10:58 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

188-1 | Don't touch The Enchantments or it's water! Wilderness areas are special and further human actions in them  
perminately alters the landscape and the animals that live in it. We need to look at other solutions to the water problem  
in the area.

Sincerely,  
Mr Kyle Kohlwes  
7345 NE 175th St Kenmore, WA 98028-3560 kylekohlwes@gmail.com

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**From:** Lael White <laelcwhite@gmail.com>  
**Sent:** Monday, July 30, 2018 12:43 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] PROTECT ALPINE LAKES

189-1 | Please protect the Alpine Lakes Wilderness area. Best option: Leave it alone. This area is a shared natural resource that  
must be protected. It is one of our nation's popular wilderness destinations and attracts people form around the world,  
especially to the Enchantments Basin.

Lael White  
WA State  
32nd LD  
Environment and Climate Caucus

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 190

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**From:** Laurence Leveen <Laurence.Leeven.92535961@p2a.co>  
**Sent:** Friday, July 27, 2018 6:42 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

190-1 | Please remove the projects from the Icicle Creek water strategy plan that might harm the Alpine Lakes Wilderness.

190-2 | Specifically, the plan's projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake, and projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

190-3 | Everything practical should be done to reduce water consumption rather than rely on projects to increase the water supply. Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide  
190-4 | alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Laurence Leveen

Comment Letter 191

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**From:** Lisa Bellefond <Lisa.Bellefond.124312115@p2a.co>  
**Sent:** Friday, July 27, 2018 4:02 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

191-1 | Please re-evaluate and later this project to not impact the Enchantments and wilderness areas I visit Chelan County for vacations and to engage in outdoor recreation including the areas in the Enchantments that could be affected by this water project. I visit friends, shop and dine in Chelan which brings income to local businesses. Please value the input of visitors like me when you make decisions for this project.

Regards,  
Lisa Bellefond

## Comment Letter 192

## Comment Letter 193

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**From:** Marjorie Fields <mvfields@me.com>  
**Sent:** Monday, July 30, 2018 5:14 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] protect Alpine Lakes and the Enchantments

192-1 | PLEASE protect this special place. Do NOT let the lakes be damaged for any reason.  
Marjorie Fields

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**From:** mgricken@everyactioncustom.com on behalf of Mathias Ricken  
<mgricken@everyactioncustom.com>  
**Sent:** Sunday, July 29, 2018 8:23 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 193-1 | I am concerned about the large changes being proposed for the Enchantments area. This area is a true gem for thoughtful outdoor recreation. It needs to be managed carefully, and I wholeheartedly support the protections already in place, as part of being a Wilderness, as well as the sections of the proposed strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening, and water conservation efficiencies.
- 193-2 |
- 193-3 | The increased sizes of the Eight Mile and Snow Lakes dams trouble me, though. The camp sites and trails along these lakes are gateways to the experiences of the Core zone, an area of unparalleled beauty; and provide a reprieve from the highly trafficked trails in the state.
- 193-4 | I cannot support actions that put these trails and camp sites at risk. I urge you to reconsider those destructive portions of your plan.

Sincerely,  
Dr. Mathias Ricken  
407 B NW 101st St Seattle, WA 98177-4936 mgricken@gmail.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 194

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**From:** meg.johnson815@everyactioncustom.com on behalf of Megan Johnson <meg.johnson815@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 5:52 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

194-1 | This is a wilderness area and should be protected as such. Increasing the size of the dams will alter the landscape significantly, which is an unprecedented action in a wilderness area. Why designate something as wilderness if the protections mean nothing? I'm sure another solution can be reached to get enough water to the Leavenworth area without destroying the protections of a wilderness area. I've camped on the shore of Upper Snow Lake and it was one of the most beautiful places I've ever been. I would hate for it to be gone in the near future.

Sincerely,  
Mrs. Megan Johnson  
1344 SE Boise St Portland, OR 97202-3945 meg.johnson815@gmail.com

Comment Letter 195

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**From:** missmeghanyoung@everyactioncustom.com on behalf of Meghan Young <missmeghanyoung@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 4:15 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

195-1 | I urge against this plan. It will destroy pristine sites that allow folks to experience this wild place in a unique way. It has the potential to damage the local habitat beyond repair. It will set a dangerous precedent. We can't let this happen here.

Sincerely,  
Ms Meghan Young  
4430 Phinney Ave N Seattle, WA 98103-7104 missmeghanyoung@gmail.com

## Comment Letter 196

## Comment Letter 197

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**From:** weinberg4@everyactioncustom.com on behalf of Michael Weinberg <weinberg4@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 11:05 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

196-1 | The Enchantment lakes region is one of the most iconic and incredible natural places in the Pacific Northwest. Any plan to alter or destroy this area would be terrible for the generations to come who will be robbed of the chance to enjoy this beautiful area.

Please do not execute any plan to alter or destroy this area. Please consider other solutions to this issue that would not include further flooding of the enchantment lakes area.

Sincerely,  
Mr Michael Weinberg  
813 N Steele St Tacoma, WA 98406-7813  
weinberg4@gmail.com

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**From:** crimbo19@everyactioncustom.com on behalf of Mitchell McCommons <crimbo19@everyactioncustom.com>  
**Sent:** Saturday, July 28, 2018 8:06 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

197-1 | As resident of this state, an avid user of our public lands, and a lover of designated wilderness areas I believe this proposals to be very much in the wrong direction. I understand the need for water supplies tongrowing communities, especially during this period of climactic uncertainty, but imperially the single most popular wilderness in the state is the wrong solution. I urge you to consider alternate means of achieving the desired water planning. Thanks for your time.

Sincerely,  
Mr Mitchell McCommons  
9715 S 248th St Kent, WA 98030-4834  
crimbo19@excite.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 198

**From:** mcharpentier@everyactioncustom.com on behalf of Monica Charpentier  
<mcharpentier@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 5:40 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

I am concerned that several of these measures could have a horrific and lasting impact on this pristine environment:

- 198-1 Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
- Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
- Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.

Please do NOT allow the above measures to pass.

Sincerely,  
Dr. Monica Charpentier  
436 NE Maple Leaf Pl Unit C Seattle, WA 98115-8615 mcharpentier@gmail.com

Comment Letter 199

**From:** Nancy Zahn <zahngoat@gmail.com>  
**Sent:** Tuesday, July 31, 2018 10:45 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] alpine lakes wilderness area

- 199-1 I am writing to insure that the Alpine Lakes Wilderness is maintained in its current, beautiful condition. There should be no further damming or water removal from any of these valuable lakes.
- The Alpine Lakes Wilderness is a region of unparalleled beauty that must be protected. It is one of Washington's most popular wilderness areas and attracts people from all around the world, this is particularly of the Enchantments Basin, known for its competitive permit lottery system. This popularity supports the strong tourism and outdoor recreation industries that support the economies of communities throughout the region.
- 199-2 The DPEIS does not consider legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes IPID's easements supersede federal wilderness law, which is incorrect. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- 199-3 Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. These projects are unprecedented in the National Wilderness System. These projects were not part of the proposed action in the SEPA scoping conducted by IWG in 2016, so the public was not provided an opportunity to comment on them during scoping. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to ALPINE enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- 199-4 All of the proposals are too harmful, even the least harmful (alternative 5) includes the harmful and defective "Eightmile Restoration Project". An alternative needs to be included that includes the good parts of alternative 5 (the full IPID pump station) and discards the "Eightmile Restoration Project"
- 199-5 The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the U.S. Forest Service and must comply with the National Environmental Policy Act (NEPA) and other federal and state laws.
- 199-6
- 199-7 The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the DPEIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the DPEIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides. An alternative should also be included that includes the complete removal of the Eightmile dam.
- 199-8 IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.



## DPEIS COMMENTS & RESPONSES

### Comment Letter 199

### Comment Letter 200

- 199-9 For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). SEPA is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- 199-10 Because the projects are in Wilderness, non-motorized access and non-motorized equipment (i.e. hand tools) and traditional skills should be required. Since the dams were originally built that way, no motorized equipment or access methods should be used.
- 199-11 The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed unnaturally timed releases of water from lakes, which alters stream hydrology. The DPEIS generally fails to recognize that altering the natural flow regime can degrade a stream's physical and chemical properties, leading to loss of aquatic life and reduced aquatic biodiversity. I am concerned that IWG has not done adequate sampling and monitoring of impacts from past releases into these wilderness streams, including cumulative impacts.
- 199-12 Conservation components in the DPEIS are insufficient. They need to be expanded to significantly reduce demands on Icicle Creek's water, thereby allowing its watershed to function more naturally. This will better support our region's livability and economy over the long-term.
- 199-13 an alternative should be added that includes the complete removal of removal of structures at the lakes so that they can be restored to a completely natural state.
- 199-14 The DPEIS should be revised to address the above deficiencies. A Revised Draft PEIS should be released for public comment.

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**From:** neteolsen@olsenviolins.com  
**Sent:** Sunday, July 29, 2018 11:59 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Water Resource DPEIS Comment  
**Attachments:** IWG DPEIS Comment Letter 072918 Olsen.pdf

Director Kaputa,

Please see my attached comment letter regarding the Icicle Creek Water Resource DPEIS.

Regards,

Nete Olsen

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 200

Comment Letter 200

	<p>Nete Olsen 836 NW 61<sup>st</sup> St Seattle, WA 98107</p> <p>July 29, 2018</p> <p>Mike Kaputa Director, Chelan County Natural Resources Department 411 Washington Street, Suite 201 Wenatchee, WA 98801</p> <p>RE: <u>Comments on Draft Programmatic Environmental Impact Statement (DPEIS)</u> <u>for the Icicle Creek Water Resource Management Strategy</u></p> <p>Dear Director Kaputa:</p> <p>Thank you for the opportunity to provide comments on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Icicle Creek Water Resource Management Strategy. Having followed this process since the scoping process in 2016, I am disappointed to see that the concerns that were brought up in the scoping process have not been suitably addressed in this stage of the process, and that additional (and more egregiously damaging) elements have been introduced since scoping that were specifically and deliberately not included in the scoping process. My specific comments are presented below.</p> <p>The Alpine Lakes Wilderness Area is a natural treasure for Washington State residents. The Alpine Lakes are a travel destination for people on a local, national, and international scale. They are protected through federal law, to be managed for the benefits of future generations to continue to experience and enjoy. I have been an avid hiker into the Alpine Lakes Wilderness throughout my entire life, and have spent an innumerable amount of time in the Icicle Creek valley: hiking, camping, backpacking, and spending my travel dollars in the cities in the area, particularly Leavenworth. This place is precious, unique, and irreplaceable. Changes made through human impacts are clearly seen and felt, and losses of the wild lands due to these impacts are irreversible. The arrogance of man to make changes to this natural system has led to the challenges currently encountered in the basin, and it is only with a clear and fully developed plan that we should be considering additional changes. The DPEIS in its current form is not a clear and fully developed plan.</p>	<p>200-3</p> <p>200-4</p> <p>200-5</p> <p>200-6</p> <p>200-7</p> <p>200-8</p> <p>200-9</p>	<p><b>Water Rights:</b> It is not clear how the Icicle Working Group thinks that they have the rights to reallocate water rights within the Icicle Creek basin from the IPID to other water users in the area, or even to increase the water “take” after a clear relinquishment of unused water. Under Western water law, water rights holders must use the water or risk to lose it, simply phrased as “use it or lose it.” The condition of IPID’s water infrastructure in the Icicle basin shows that in its near 80 years of operation, IPID has not maintained its facilities to actually store and use its full water right. Therefore, if the Eightmile Lake dam is rebuilt, it should remain at its current elevation, where it has been since at least 1990. Furthermore, any dam rebuilding must be approved by the U.S. Forest Service and must comply with the National Environmental Policy Act (NEPA) and other federal and state laws. These points also apply to the U.S. Bureau of Reclamation and the U.S. Fish &amp; Wildlife Service in connection with new storage proposed at Snow and Nada Lakes.</p> <p>Additionally, it is unclear how these water rights are something that IPID can alter and/or “hand off” to other users. The IPID has water rights for irrigation—they can’t just change the water rights from irrigation water to residential water, let alone hand it off to the City of Leavenworth or the Hatchery.</p> <p>It is clear for these exact same reasons that IPID has no rights to the water in the Upper Klonauqua Lake, and it is ridiculous for the DPEIS to even present this as a valid alternative. And as a matter of fact, during the initial presentations given to concerned citizens in the Seattle area on March 30, 2016, I specifically asked about the inclusion of the Upper Klonauqua into the project as well as the raising of the dam at Eightmile Lake, and the presenters told the group that NEITHER of these elements were going to be included in the project. For that reason, the Upper Klonauqua and the increase in dam height of Eightmile were not included in any of the objections that I presented during the scoping phase of the project. This illustrates the absolute inadequate (and potentially deliberately misleading) process that this project has undergone, and that the DPEIS process is wholly insufficient to this point.</p> <p><b>Alternatives Inadequate:</b> The alternatives presented in the DPEIS are inadequate, and do not present a wide enough range of valid alternatives from which to draw from.</p> <p>Alternative 4 is not a valid alternative. For the reasons described above (Water Rights), the act of drilling a tunnel between Lower and Upper Klonauqua Lakes absolutely invalidates this as a reasonable alternative. The additional consideration of increasing the height of the dam at Eightmile only reinforces this position. Again, as discussed above, the IPID has never maintained its facilities to use the water rights to Eightmile, relinquishing their rights by this time. Additionally, IPID has no rights to hand off this water to other users in the basin.</p> <p>None of the alternatives include the alternative scenario where a new dam built at Eightmile remains the same height as the current dam. This lack of a reasonable consideration of such a concept illustrates that the alternatives presented were not fully developed. This option of “restoration” at Eightmile must be included in the alternatives.</p>
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## Comment Letter 200

## Comment Letter 201

200-10 | **Costs:** The alternatives presented in the DPEIS do not fully consider the associated costs. Clearly, construction work within a Wilderness Area will be expensive and time-consuming. Non-motorized access and equipment should be the norm, and these methods generally cost more and take longer time. The costs presented also do not take into account any potential litigation costs associated with the most egregious alternatives. There is a strong sense of protectionism that is evident in the environmental community towards this area, and any alternative that does not take this into strong consideration is barreling towards litigation. This takes time and money as well.

200-11 | **Conservation:** The conservation components in the DPEIS are absolutely insufficient. The water usages of the basin, both in irrigation but specifically in residential use, needs to be metered, measured, and reduced. What are the current daily uses in the district? What are the targets? How will these targets be met?

200-12 | **Conclusions:** The DPEIS in it's current condition is insufficient. For all reasons described above, I would request the Icicle DPEIS be withdrawn, revised, and re-released as a Revised Draft PEIS for public comment once the deficiencies detailed here are addressed.

Sincerely,

Nete Olsen

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**From:** Patrick Conn <Patrick.Conn.31569736@p2a.co>  
**Sent:** Thursday, July 26, 2018 2:36 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Don't sacrifice wilderness for flawed Icicle Strategy

Dear Director, Chelan County Natural Resource Dept. Mike Kaputa,

201-1 | This "TRUMP-FACED-REPUBLICAN PARTY CULTISH FRAUD OF AN "ADMINISTRATION" continues its UNCONSCIONABLE, SYSTEMATIC ASSAULT ON AMERICA'S PUBLIC PARKS, WILDERNESS, LANDS, WATERS, and AIR BY ITS UNRELENTING RAPING, PILLAGING, PLUNDERING, and OUTRIGHT THEFT BY 1%'er PRIVATE PARTIES AND CORPORATIONS IS SOCIALLY SICK and OUTRIGHT DOMESTIC TERRORISM, IF NOT TREASONOUS. DO NOT CONTINUE TO ALLOW THIS SELF-SERVING REPUBLICAN ANTI-SOCIAL, ANTI-AMERICAN, ANTI-ANYTHING THAT AIN'T WHITE, RICH, AND ALREADY THEIRS.

Regards,  
 Patrick Conn  
 22018 126th Ct SE  
 Kent, WA 98031

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 202

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**From:** re.re.heitz@everyactioncustom.com on behalf of Rachel Nunez  
<re.re.heitz@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 5:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 202-1 | I believe designated Wilderness is a core tool in protecting the outdoor experience. Wilderness areas include some of our most beloved areas for hiking, climbing, scrambling, and backcountry skiing. The designation protects the wildlife habitat that makes our outdoor adventures so special.
- 202-2 | I oppose the following projects in the proposed strategy, as they would impact landscapes valued by outdoor enthusiasts:
- Increasing the size of the dam on Eightmile Lake, which could flood the Eightmile Lake trail and some campsites around the lake.
- Increasing the size of the dams on Upper and Lower Snow Lakes, which would raise the level of the lakes and will likely flood the trail and campsites around the lake.
- Boring a tunnel from Upper to Lower Klonauqua Lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- 202-3 | I support the sections of the strategy pertaining to habitat protection and enhancement projects, fish passage, fish screening and water conservation efficiencies. We wholeheartedly believe that these conservation elements are foundational to the outdoor experience and in protecting these landscapes

Sincerely,  
Mrs. Rachel Nunez  
9205 139th Ave NE Lake Stevens, WA 98258-8855 re.re.heitz@gmail.com

Comment Letter 203

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**From:** rachel.youngberg@everyactioncustom.com on behalf of Rachel Youngberg  
<rachel.youngberg@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 1:24 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

- 203-1 | I do not believe that the proposed expansion of dams on Eightmile, and Lower and Upper Snow Lakes should occur. I also do not believe that the tunnel between upper and lower Klonauqua lake should take place. These operations would
- 203-2 | negatively impact the flora, fauna and water quality of the area. These operations would also negatively damage the North Central Washington economy that is largely dependent upon wilderness tourism. The expansion of the dam
- 203-3 | system and the tunnel in the Enchantments would negatively impact the Leavenworth and Wenatchee economy. I live in the Methow Valley and our economy is intricately intertwined with Leavenworth, Wenatchee and Chelan. These dams and the tunnel system would devastate our economy.

Sincerely,  
Hon. Rachel Youngberg  
291 MARMOT BENCH Ln Twisp, WA 98856  
rachel.youngberg@gmail.com

## Comment Letter 204

## Comment Letter 204

**From:** Richard Curtis <rlc314@peoplepc.com>  
**Sent:** Sunday, July 29, 2018 10:29 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Alpine Lake Wilderness and the Enchantment Lakes

Mike Kaputa  
 Chelan County Natural Resource Department  
 411 Washington St., Suite 201  
 Wenatchee, WA 98801

Dear Mr. Kaputa:

The Enchantment Lakes and the Alpine Lakes Wilderness Area are one of the most spectacular natural areas in Washington State. In fact the area is so popular with tourists and heavily visited that the number of visitors in the backcountry is controlled by a permit system. The area is graced with outstanding scenic and compelling natural features that rival those anywhere on earth. There are pristine crystal clear blue lakes with a spectrum of colors only hoped for by the most creative artists. The lakes are surrounded by sheer walls of granite and snow filled couloirs. The forests are composed of fir, pine and larch, the latter turning to golden towers in the fall. The streams and waterfalls are unmatched and provide a peaceful oasis for anyone who visits this magnificent Wilderness Area.

- 204-1 The Alpine Lakes Wilderness is a very special place created by God and can not be improved by installing an unsightly man made plumbing system to serve a remote industrial/agricultural complex, golf courses and residential development. The Enchantment Lakes and the Alpine Lakes Wilderness were preserved for a reason and that was to specifically protect the area from development. Wilderness areas were set aside to remain "untrammelled" by civilization. However the once beautiful Snow Lakes are now an eyesore and the poster child for careless development due to the dams and tunneling activities. Replacing the natural Wilderness characteristics with concrete dams, rebar and spillways, fluctuating water levels and devastated shorelines, alternating drowned or mud flat landscapes and tunnels and pipes that create hazards and scar the land is a Faustian fantasy that has no place in Wilderness Areas. The resulting drained lakes are not only ugly but impact fish, birds and other wildlife and are an abomination to the observer and have no place in Wilderness Areas.
- 204-2 The very real outcome of developing the Alpine Lakes Wilderness and Enchantments will be to kill the goose that lays the golden egg of tourism. No one travels miles just to see another man made concrete hulk blocking or diverting a natural waterway. While tourism is increasing and becoming more economically rewarding every year, agriculture and development are limited by the resources available to support them. For example when all the lakes are drained to support agriculture and development, where will more lakes be found to support continued agriculture and development growth. If we are unable to live within the available resources, how will we survive when those resources are used up?
- 204-3 Climate change is already having a detrimental effect on the existing natural resources and we cannot plan on those resources being replenished once they are depleted. We must start looking forward to the future with thoughtful minds and put away the dream of yesterday's unending frontiers. We are unlikely to find Nirvana on earth with unlimited resources for never ending growth and development simply by tapping into and draining the small lakes and streams in our Wilderness Areas. Just like cancer, growth on a finite planet must and will come to an end. It is up to us to ensure we live within the bounds of our environment and surroundings and use wisely the resources with which we are blessed if we hope to be successful in fulfilling not only our dreams but those of our children and all future generations of humans. It is unconscionable for our generation to despoil

204-3 one of God's finest creations to satisfy our greed. Industrializing the Enchantment Lakes and the Alpine Wilderness Area is not just killing the goose but destroying the eggs and the nesting habit to ensure that it will never again produce another golden egg. Leavenworth will be just another tourist trap once the surrounding Wilderness is plundered and reshaped to conform to the desires of greedy developers.

204-4 While I support habitat protection, fish passage, screening and water conservation projects, I am strongly  
 204-5 opposed to more and larger dams and tunneling projects in the Alpine Lakes Wilderness on Snow, Eightmile  
 and Klonauqua Lakes. The adverse environmental impact of previous projects is clearly visible to the most  
 204-6 casual observer. However these areas are far more valuable to support the economy based on tourism and  
 recreation than a limited source of irrigation water continued urban development.

Thank you for considering my comments.

Richard Curtis  
 PO Box 451  
 Ethel, WA 98542



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[www.avast.com](http://www.avast.com)

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 205

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**From:** Richard Forbes (rhforbes24@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Monday, July 30, 2018 8:20 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Save the Alpine Lakes Wilderness!

Dear WA Department of Ecology and Chelan County Officials,

205-1 In response to the potential plans to in the Enchantment Basin and greater Alpine Lakes Wilderness - I understand that Icicle Creek's flows need to addressed, but we cannot degrade or undermine our public lands in any way.

205-2 I treasure the Alpine Lakes Wilderness as a precious part of the greater Cascades, and I urge you to avoid, if at all possible, any actions that would damage it. The draft Environmental Impact Statement lays out five options for dam repair and operation in the established Wilderness area, and I urge you to revise these options until there are none that impact the functioning of the watershed, enlarge wilderness lakes, or involve invasive tunneling/large- scale construction.

205-3 I also would like to call into question the Leavenworth Hatchery, which has been cited as a reason for the increased water flow - hatcheries have been empirically proven to be pseudoscientific and contribute to native fish population decline. Let's look there before we start talking about messing with our Wilderness areas.

205-4 We must continue to protect the Alpine Lakes Wilderness, as it is an essential part of our American heritage and provides important wildlife habitat and essential ecosystem services. Please contact me if you have any questions.

Sincerely,

Richard Forbes  
1613 N 54th St  
Seattle, WA 98103  
rhforbes24@gmail.com  
(719) 231-4868

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 206

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**From:** Richard Forbes <rhforbes24@gmail.com>  
**Sent:** Monday, July 30, 2018 8:27 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] In response to the Enchantment Basin plans

Dear Mike Kaputa,

In response to the potential plans in the Enchantment Basin and greater Alpine Lakes Wilderness - I understand that Icicle Creek's flows need to addressed, but we cannot degrade or undermine our public lands in any way.

I treasure the Alpine Lakes Wilderness as a precious part of the greater Cascades, and I urge you to avoid, if at all possible, any actions that would damage it. The draft Environmental Impact Statement lays out five options for dam repair and operation in the established Wilderness area, and I urge you to revise these options until there are none that impact the functioning of the watershed, enlarge wilderness lakes, or involve invasive tunneling/large- scale construction.

I also would like to call into question the Leavenworth Hatchery, which has been cited as a reason for the increased water flow - hatcheries have been empirically proven to be pseudoscientific and contribute to native fish population decline. And to top it off, the Leavenworth Hatchery has been formally found in violation of unlawfully discharging pollutants, and whose facilities have not been updated in decades. Let's address those concerns (and potentially decrease the Hatchery's water use) before we look to the Wilderness areas to put extra water into a flawed system.

We must continue to protect the Alpine Lakes Wilderness, as it is an essential part of our American heritage and provides important wildlife habitat and essential ecosystem services. Please contact me if you have any questions.

Best,  
Richard Forbes

## Comment Letter 207

## Comment Letter 207

**From:** Rich Haydon <richhaydon@hotmail.com>  
**Sent:** Sunday, July 29, 2018 10:07 AM  
**To:** NR Icicle SEPA  
**Cc:** wild@wildernesswatch.org  
**Subject:** [Icicle SEPA] RE: Comment on DPEIS

*To: Mike Kaputa, Director  
 Chelan County Natural Resource Department.*

Mr. Kaputa:

I am writing in regards to the proposed actions in the Icicle Creek drainage.

As a resident of Chelan County and the Wenatchee River Watershed, as a person who recreates in the Alpine Lakes Wilderness, and as someone who has personally visited and camped at Snow, Nada, Colchuck, Eightmile, Klonauqua, and Square Lakes, I am a person directly impacted by the proposed action.

207-1 The DPEIS as written is clearly inadequate and only superficially addresses potential impacts of the proposed action, and is therefore insufficient as an analysis under the requirements of the National Environmental Policy Act.

207-2 (1) The DPEIS should be revised and greatly expanded in scope and detail to address its deficiencies as an environmental impact analysis. An adequate analysis must include actual field surveys and the backing of data and analysis done to a professional scientific standard not met by the draft document as released. Impacts to wildlife, forest health, riparian health, and impacts to the wilderness character of the area as defined by federal law are all lacking in necessary site specific detail.

207-3 (2) The document is also fundamentally flawed in the vagueness of the proposed action: until more detailed geotechnical surveys and concrete engineering designs are

207-3 completed, it is impossible to adequately assess the potential impacts of this proposed action in terms of long term public safety and environmental consequences.

207-4 (3) The DPEIS fails to conform with the Alpine Lakes Area Land Management Plan of 1980, and therefore conflicts with a completed Environmental Impact Statement which did fully meet the established standards of NEPA and all other applicable Federal and State laws. It also broadly fails to meaningfully consider fundamental legal issues that should determine which proposals can and cannot be pursued, including Federal wilderness, environmental policy, and forest management law. The draft analysis also  
 207-5 fails to conform to state water right laws and to established legal rights held by the Yakama and Wenatchee tribes.

207-6 (4) As written, only Alternative 5 is somewhat legally defensible, and the Alternatives in the current document can hardly be considered to constitute consideration of a full range of alternatives as required under NEPA. Even Alternative 5 would need modification were it to be considered for implementation, as it is erroneous in its consideration of historic water levels, established water rights, and Federal wilderness legislation relative to Eightmile Lake.

207-7 I urge you to withdraw the current DPEIS, and to develop a proposed action and analysis that conforms to Federal and State law and properly addresses the environmental, social, and public safety issues that such a project is legally required to consider.

Thank you.

Richard J. Haydon  
 PO Box 632  
 Leavenworth, WA 98826

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 208

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**From:** Richard Korry <Richard.Korry.98192317@p2a.co>  
**Sent:** Monday, July 30, 2018 10:19 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 208-1 | I want to make raise concerns with the sections of the proposal that irrevocably impact and degrade the iconic areas of wilderness in the Central Cascades. The Enchantments is an amazing and unique high alpine area that I've been hiking since 1983. This is not just another forested area that you one can find anywhere. The other areas affected: 8 Mile Lake and Upper and Lower Klonagwa Lakes are also very special locations. Please remove the projects that degrade these treasures from the draft plan.
- 208-2 | The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonagwa Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.
- 208-3 | Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Richard Korry

Comment Letter 209

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**From:** Richard Noll <Richard.Noll.53600024@p2a.co>  
**Sent:** Friday, July 27, 2018 10:58 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Don't sacrifice wilderness for flawed Icicle Strategy

Dear Director, Chelan County Natural Resource Dept. Mike Kaputa,

209-1 | 9543

Regards,  
Richard Noll  
124 Trafalgar Dr  
Port Townsend, WA 98368



## Comment Letter 210

## Comment Letter 210

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**From:** RICHARD RUTZ <richardr1066@comcast.net>  
**Sent:** Friday, July 27, 2018 10:19 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] comments on the Icicle Strategy DPEIS

Richard Rutz

6121 NE 175th Street, #A303

Kenmore, WA 98028

July 27, 2018

Mike Kaputa, Director

Chelan County Natural Resource Department

411 Washington Street., Suite 201

Wenatchee, WA 98801

RE: Comments on the Icicle Strategy (Icicle Creek Water Resource Management Strategy) draft Programmatic EIS

Sir:

I visit and use the Alpine Lakes Wilderness, and lands in the Alpine Lakes Management Unit and other nearby lands. I have also worked with land use and environmental review, and the protection of the Alpine Lakes Wilderness and its surrounding lands from adverse developments of various sorts. I wish to comment on the Icicle Strategy DPEIS.

210-1 The Alpine Lakes Wilderness is one of Washington State's most scenic areas, and an extremely valuable and irreplaceable fish and wildlife and recreational area. I can understand the goal to improve instream flows in

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210-1 Icicle Creek, but I cannot accept doing this at the expense of this unique and irreplaceable local, state, and national resource, wilderness and public land.

210-2 The DPEIS lays out five alternatives to address instream flows in the Icicle Creek. The goals in developing the alternatives leave out most environmental considerations: they only address downstream fisheries and compliance with existing laws. There is no goal, and nothing said, about protecting the integrity of the Alpine Lakes Wilderness, and reducing the impact of nonconforming uses. Even though this is one of the highest responsibilities for lands protected under the Wilderness Act. No wonder that all of the alternatives greatly increase the significant environmental impacts of the existing irrigation facilities in the wilderness.

210-3 In Chapter 2, section 2.11.1, for example, "Reservoir Removal", the DPEIS states that:

During the SEPA scoping, some commenters recommended removing all of the reservoirs within the Icicle Creek Subbasin to restore the area to a more natural state. The IWG did not further consider this proposal in the DPEIS for several reasons.

The reservoirs in the Alpine Lake Wilderness Area support LNFH and IPID operations. IPID serves approximately 85 percent of the irrigated land in the Wenatchee Valley from Cashmere up to the Cascade Range (USFS, 1981). These lands are primarily in commercial orchard production and are the foundation of the local economy. Without the drought year supply provided by these reservoirs, orchard production would likely be significantly impacted. Additionally, this proposal does not align with the Guiding Principles. Removing the reservoirs from the Alpine Lakes Wilderness would reduce streamflow, decrease domestic and agricultural reliability, and would make meeting the Guiding Principles nearly impossible in the future as climate change predictions call for less snowfall and more rainfall in the Icicle Subbasin. Additionally, taking away private property rights would not align with the Guiding Principle that calls for complying with state and federal laws.

"Property rights" is a term that has been used many times to attempt to override all manner of other rights and legalities. It is improperly being used in the DPEIS to summarily dismiss this legitimate concern and valid alternative for reducing or removing the existing facilities. By so abjectly dismissing this proposal to reduce or remove projects and facilities, the DPEIS is completely fails the responsibilities of the State Environmental Policy Act to fully evaluate alternatives and to consider full the impacts of proposed actions.

210-4 Moreover, the DPEIS does not properly evaluate significant adverse environmental impacts to the wilderness resource, the significant adverse impacts to the water resources of the wilderness and to the fish and wildlife and recreational and scenic resources and values that depend on them.

2

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 210

- 210-4 I do not see how significant adverse impacts to these and other resources could have been missed by the developers of this DPEIS. The Alpine Lakes Management Act, Section 5, includes:
- the Enchantment Area of the Alpine Lakes Wilderness, taking into consideration its especially fragile nature, its ease of accessibility, its unusual attractiveness, and its resultant heavy recreational usage. (90 Stat. 908, Sec. 5)
- And yet it is missed by this DPEIS. The document materially fails to address significant impacts to fragile resources specifically identified in the Alpine Lakes Management Act.
- 210-5 There is no proper "No Action" alternative. The alternative posed as such is more like a "Current Direction" alternative, with many additional projects added on as if they are a foregone conclusion. Again, the DPEIS fails to meet the basic requirements of a SEPA analysis.
- 210-6 Regarding the DPEIS and the whole "Icicle Strategy", the wilderness was established subject to valid existing rights. That consists of the projects as they existed in 1976. Any expansion or extension is not an existing right. And under the Wilderness Act, such expansions or extensions are prohibited. I see no discussion of this overriding legal compliance issue in the DPEIS. Before this, "property rights" fades away.
- 210-7 Clearly, the DPEIS is designed to cause significant adverse environmental impact to the wilderness and the public, to benefit a select few people. The DPEIS fails to disclose this, and seeks to hide it behind "property rights".
- 210-8 Also behind this is apparently another attempt to use water rights to do any and every thing that someone wants to do, regardless of laws or rights of others. There is no proper evaluation of this topic, and no proper discussion of the limits on water rights at each lake.
- 210-9 Of the many proposed improvements and expansions, three proposed projects in particular are of concern:
- Increasing the size of the dam on Eightmile Lake, which could flood the trail and campsites around the lake.
- Increasing the size of the dams on Upper and Lower Snow lakes, which would raise the level of the lake and will likely flood the trail and campsites around the lake.

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- 210-9 - Boring a tunnel from Upper to Lower Klonauqua lakes, which would likely have significant negative impacts to the land surrounding the lakes.
- These projects should be removed from the Icicle Strategy.
- 210-10 Several elements of the strategy, including habitat protection, fish passage, fish screening and especially water conservation efficiencies, all fit with the requirements and should be implemented.
- 210-11 The DPEIS reads like a document that has been prepared to support a previously decided approach. It should be revised to properly include all significant impacts, and to properly discuss them. It must discuss how it shall properly comply with all state and federal laws. It must properly ensure that there is no impact on watershed function, offer aggressive water conservation options, and fully recognize, describe and discuss the limits on water rights at each lake. It should offer additional alternatives that do not enlarge any wilderness lakes, and that fully consider removal of some or all of the existing nonconforming facilities. And a proper No-Action alternative must be prepared, which only repairs/replaces in-kind the current facilities, with no expansion or increased withdrawal or impoundment.
- 210-12
- 210-13
- 210-14 Again, not all reasonable and feasible alternatives have been considered. A full alternative must be developed that proposes and evaluates reduction of operations, and/or removal of some or all of the facilities: this absolutely must be developed and considered. Failure to do so is a violation of the responsibilities required for the protection of the lands and resources of wilderness areas under the Wilderness Act.
- 210-15 The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. As required by the Wilderness Act, we must not allow one natural area to be exploited under the guise of enhancing another. This DPEIS does not meet its responsibilities under SEPA, the Alpine Lakes Management Act, the Wilderness Act, and in protecting our public heritage, which is the responsibility of every citizen.
- 210-16

Sincerely,

(s)

Richard Rutz

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## Comment Letter 211

## Comment Letter 212

**From:** rmetzger7@everyactioncustom.com on behalf of robert metzger <rmetzger7@everyactioncustom.com>  
**Sent:** Friday, July 27, 2018 10:31 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

211-01 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy. I am strongly opposed to any new dams, enlargement of dams, or water diversions that would impact the Alpine Lakes Wilderness. I value the Federally designated wilderness and oppose any developments that would alter or create negative impacts to the designated wilderness area.

Sincerely,  
 Mr. robert metzger  
 7106 Foothill Loop SW Olympia, WA 98512-2028 rmetzger7@aol.com

**From:** spresho@everyactioncustom.com on behalf of Scott Presho <spresho@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 3:07 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

212-01 Everyone agrees that the irrigation district is entitled to as much water for irrigation purposes as it was using for those purposes when Congress created the wilderness in 1976. But this does not mean the district can use more now than it used before—even if it claims that its water right gave it more. No matter what the original water right said, the irrigation district cannot take more water now than it did in the past. The Wilderness Act protects existing private rights, but that does not grant permission to expand those rights.

212-02 The Icicle Strategy is an effort to solve water-supply problems with new and/or extended structures. This is the traditional supply-side answer to water shortages, but doesn't take into account the potential for conservation efforts to reduce the need for water, and therefore these new/additional structures being built in a wilderness zone.

212-03 The work group has been asked to consider conservation measures, such as restrictions on watering lawns, which have worked in the Seattle area to reduce total water consumption even as the population grew. But the work group offers no analysis of how much water could be saved by various conservation measures or by promoting water markets that facilitate selling and trading water rights. Domestic water conservation efforts are mentioned in the IWG plan, but such phrases as "if funding were available" and "funding may be more limited if not included as part of an integrated water resource management plan" speak to the lack of effort in finding these funds as part of the plan.

The Icicle Strategy is preoccupied with new structures designed to produce more water, rather than conservatively using available resources, and seems ignorant of what the existing water rights provide.

Sincerely,  
 Mr. Scott Presho  
 3361 224th Pl SW Brier, WA 98036-8017  
 spresho@comcast.net

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

Comment Letter 213

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**From:** Steve Uyenishi <Steve.Uyenishi.16447891@p2a.co>  
**Sent:** Thursday, July 26, 2018 4:09 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Don't sacrifice wilderness for flawed Icicle Strategy

Dear Director, Chelan County Natural Resource Dept. Mike Kaputa,

213-1 | 4327

Regards,  
Steve Uyenishi  
12425 74th Ln S  
Seattle, WA 98178

1

Comment Letter 214

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**From:** tamirust@everyactioncustom.com on behalf of Tami Rust <tamirust@everyactioncustom.com>  
**Sent:** Sunday, July 29, 2018 8:04 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

214-1 Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy: please keep The Enchantments pristine for our children and grandchildren. Let that be your legacy.

Sincerely,  
Ms Tami Rust  
1006 N Washington St Tacoma, WA 98406-5523 tamirust@icloud.com

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## Comment Letter 215

## Comment Letter 216

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**From:** Teresa Catford <teresacatford@gmail.com>  
**Sent:** Monday, July 30, 2018 2:01 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please protect the Alpines Lake Wilderness Area

Dear Mr. Kaputa,

I have enjoyed many beautiful hikes in this area and am so concerned that this wilderness is threatened.

215-1 The Alpine Lakes Wilderness is a shared natural resource that must be respected. This area is very popular - not just with me - and it would be a devastating loss for Washington State, the mountain lakes and streams ecosystems, and the outdoor recreation economy if the lakes' water levels were manipulated.

Leave the wilderness alone.

Teresa Catford  
Shoreline, WA

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**From:** Terri Jones <terrijoneswatercolors@gmail.com>  
**Sent:** Monday, July 30, 2018 3:26 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Watershed Water Resources Management Strategy

216-1 We strongly oppose the proposal to construct dams and related structures on seven lakes within the Alpine Lakes Wilderness. This pristine national treasure is valued world wide as a recreational wonder. We have hiked and back packed in the Enchantments Basin and Alpine Lakes multiple times. Its unparalleled beauty must be preserved for our future generations and the economic welfare of the region.

Teresa and Ronald Jones

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 217

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**From:** Tessa Rue (tessarue@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Saturday, July 28, 2018 7:36 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Protect Alpine Lakes Wilderness

Dear WA Department of Ecology and Chelan County Officials,

To Washington State DOE and Chelan County,

217-1 | I have a life goal of through hiking the enchantments. Imagine my dismay on learning this area is under threat. I have two daughters, ages 2 and 5. Will I or my daughters be able to experience this special place? Please, preserve this area for all Washington residents for now and for future generations.

Thank you,  
Tessa Rue

Sincerely,

Tessa Rue  
5116 27th Ave NE  
Seattle, WA 98105  
tessarue@gmail.com  
(206) 331-9118

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 218

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**From:** Bill Burwell <bburwell@riousa.com>  
**Sent:** Wednesday, July 25, 2018 4:38 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Creek Watershed Water Resources Management Study, Draft PEIS

Dear Chelan County and Washington State Department of Ecology,

Thank you for the opportunity to comment on the Icicle Creek Work Group Draft Programmatic Environmental Impact Statement (DPEIS) know as the Icicle Creek Watershed Water Resources Management Strategy. Considerable effort has gone into the work over the past several years with significant input by the Icicle Peshastin Irrigation District (IPID).

Review of the document develops of number of concerns:

1. The document assumes IPID has current water rights on Eightmile Lake with the current dam and water rights to raise the dam. There are indication that IPID has not put into use the water behind the current dam on the Lake for decades. Washington water law has a fundamental "use it or lose it" requirement. Looks like IPID likely has relinquished part of the water rights. Raising Eightmile Lake dam would require added water rights and these have not been demonstrated. Increasing the dam height will require approval by the US Forest Service and likely extensive permitting and a NEPA process, which will be problematic as the land is designated wilderness. Use of such wilderness public lands for the benefit of a few irrigators takes away from the citizens of this country that own the wilderness. Use of the Lake as a bowl to fill and flush by the district seems not in the public interest. The filling and flushing also has negative impact on downstream fisheries.
2. The dam raising neglects the statutory authority of US Forest Service on these National Lands maintained for use by the people as designated Wilderness. The water rights on the Lake belong to the Federal Government under the federal reserved water rights doctrine. The DPEIS does not include maintaining the current dam height as the only current legal basis, a significant document omission in range of alternatives..
3. IPID has water rights for irrigation purposes. The DPEIS implying the District has rights for domestic water use and for fish hatchery use, which it does not. Alternative 4, has even worst invasions of water rights and public domain of Wilderness with tunneling the Klonaka Lakes, high dam on Snow Lake, Eightmile high dam and other intrusions into water right and Wilderness use. The citizens were not allowed to comment on these actions during the scoping in 2016 and was not a part of the proposed actions. Alternative 4 should reset the process back blocking the Draft PEIS until fully scoped and citizen input on Alternative 4.
4. The IPID Pump Station found in Alternative 5 seems the best solution will greatly improve flow in Icicle Creek resolving a problem. An alternative should be added looking a more fundamental improvements since the concerns are water availability and global warming. This added alternative would push hard on water conservation with irrigators since the crop lands are the vast users of the basin's water and push to control CO2 and methane emission. Reducing global warming emissions is the most fundamental need. Rearranging water withdrawals does not solve the fundamental problem of global warming.
5. Public input could be improved. The vast number of Washington owners (citizens) and users of the Alpine Lakes Wilderness live on the Puget Sound side of the Cascades. No formal hearing was set where these people live. The only formal hearing was in Leavenworth. Yes, a hearing in Leavenworth in the basin with a small population was appropriate. Missing a formal hearing on the West Side of the Cascades was a fundamental flaw in public input.

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6. My Great Grand Parents, the Hatfields, homestead in Central Washington in 1874, obtaining one of the first water rights to their farm. At that time, the Territory of Washington was a vast wilderness with a few islands of farms and towns within the wilderness. We now have a few island of wilderness among the vast farms and cities in the State. The Alpine Lakes Wilderness give a place for my Grandchildren and Great Grandchildren to see a beautiful gift that could endure seven generations and more. Much of the proposals tear apart and damage the beautiful gift of the Wilderness. The wilderness basis being maintaining the land by non-motorized access and use of hand tools. Building dams in the Alpine Lakes Wilderness is fundamental destruction of the gift and the responsibility we have to future generations.

Please go back and redevelop the PEIs addressing these and concerns of others.

Sincerely,

Henry William Burwell

**From:** antje fray <elaan2@yahoo.com>  
**Sent:** Monday, July 23, 2018 9:09 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 219-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- Add a personalized message.
- 219-2 Why do you want to put UP dams when the movement has been to TAKE DOWN dams??? A possibility could be a

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Comment Letter 219

Comment Letter 220

219-2 | MODIFIED dam system with salmon LADDERS so fish can still go upstream to spawn.

219-3 | Don't ruin this beautiful wilderness

Sincerely,  
antje fray

,

**From:** Christine Clum <nalugirl07@yahoo.com>  
**Sent:** Monday, July 23, 2018 1:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

220-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

220-2 | Dams, especially large ones, have the potential to cause a lot of problems for the surrounding area, especially the area behind the dam where the water flows toward the blockage. There are disadvantages for both the nature and any



## Comment Letter 220

## Comment Letter 221

220-2 | people living in the area.  
 There are many negative effects on nature. Since dams block up flowing bodies of water, such as rivers, any animals that depend on the flow to reproduce or as part of their life cycle are put in danger. Migratory fish that mate in a different location than they live the rest of their lives, for example, are unable to mate and may decline in population. The buildup of water is also dangerous for plant life that grows on the natural shoreline of the water. The plant life is submerged and dies. In addition, the beneficial sediment that normally is washed down the river is blocked, which decreases the fertility of the soil downriver from the dam.  
 Many humans are displaced due to dams. Humans who live in an area that is to be flooded due to a new dam have to relocate and lose their homes to the rising water.

Sincerely,  
 Christine Clum

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**From:** Dawn Serra <dawn\_serra@hotmail.com>  
**Sent:** Monday, July 23, 2018 12:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

221-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

221-2 | I support finding new water sources and improving stream flows outside the Wilderness. Chelan County should facilitate buy-back of private water rights so dams and other other structures could be removed and the Wilderness restored.

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Comment Letter 221

Thank you.

Sincerely,  
Dawn Serra

Comment Letter 222

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**From:** jennifer schultz <firls4eva@roadrunner.com>  
**Sent:** Tuesday, July 24, 2018 1:18 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

222-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

222-2 It is extremely important to protect waterways especially those that are important ones that provide safe drinking water for various communities.

## Comment Letter 222

## Comment Letter 223

Sincerely,  
jennifer schultz

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**From:** Joe McPhee <jgmcphoe8750@yahoo.com>  
**Sent:** Tuesday, July 24, 2018 8:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

223-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

223-2 Such a beautiful area should be left alone. That is what Wilderness is all about. Building dams means roads and big heavy machinery. You need to enact water conservation measures and uses and live with what you have.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 223

J. G. McPhee

Sincerely,  
Joe McPhee

Comment Letter 224

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**From:** LD Anderson <linda@ucsc.edu>  
**Sent:** Monday, July 23, 2018 1:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

224-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

224-1 The west is always going to be in a water deficit. We need to think of creative strategies such as increased wetland recharge and waste water recycling that do not change the critical ecological functions of our rivers.

## Comment Letter 224

## Comment Letter 225

Sincerely,  
LD Anderson

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**From:** linda berd <lberd@cox.net>  
**Sent:** Monday, July 23, 2018 1:38 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

225-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

225-2 First of all, NO MORE DAMN DAMS! In fact, we need to demolish most of the old dams that exist and DO DAMAGE.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 225

225-3 | Secondly, you have no sure way to evaluate CLIMATE CHANGE.

224-4 | Just stop, think, re-evaluate...and remember NEPA & the Wilderness Act.

Sincerely,  
linda berd  
,

2

Comment Letter 226

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**From:** Linda Yow <jandlyow@gmail.com>  
**Sent:** Thursday, July 26, 2018 10:29 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

226-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

226-2 | The cabins on the islands in the river should be required to have septic systems, rather than releasing raw sewage into the river. Please repair/improve enough dams to prevent the river going dry in summer thus killing all of the fish, etc.

226-3 |

1

## Comment Letter 226

## Comment Letter 227

Sincerely,  
Linda Yow

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**From:** M. Lou Orr <youandmekid@comcast.net>  
**Sent:** Thursday, July 26, 2018 10:08 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

227-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

227-2 This plan goes against the fishing rights of the Wenatchi Tribe (part of Colville Confederated). Have they been notified? Treaty rights!!

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 227

Sincerely,  
M. Lou Orr

Comment Letter 228

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**From:** N Refes <maughter2@gmail.com>  
**Sent:** Saturday, July 28, 2018 6:47 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 228-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 228-2 Dams have are known at a threat to both living beings and the land. An in depth study must be done along with research of all dams created along with the dangers inherent therein.



## Comment Letter 228

## Comment Letter 229

Sincerely,  
N Refes

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**From:** Noel Orr <tepeefortwo@comcast.net>  
**Sent:** Thursday, July 26, 2018 11:10 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 229-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 229-2 The Wenatchi Tribe (Colville Confederated) has treaty rights for fishing in the Icicle so great care has to be taken! Were tribes notified? Don't destroy the natural wonders of Mother Earth!

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 229

Comment Letter 230

Sincerely,  
Noel Orr

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**From:** Sherry L. Olson, Ph.D. <olson\_shery@hotmail.com>  
**Sent:** Monday, July 23, 2018 8:55 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 230-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 230-2 Please re-analyze the plan for the use of the water that the DPEIS has submitted. It fails to fully analyze limitations on the scope and validity of IPID's water rights.

## Comment Letter 230

## Comment Letter 231

Sincerely,  
Sherry L. Olson, Ph.D.

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**From:** singgih tan <unojodelacara@gmail.com>  
**Sent:** Friday, July 27, 2018 11:47 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 231-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 231-2 The DPEIS must also address future flows, considering climate change impacts on weather patterns & the snow pack.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 231

Sincerely,  
singgih tan

Comment Letter 232

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**From:** Aimee Polekoff <aimeechan.polekoff@gmail.com>  
**Sent:** Monday, July 23, 2018 8:42 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

232-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

232-2 Is irrigation even necessary? If the state encouraged greater water efficiency strategies in agriculture, maybe no dam would be needed at all.

Comment Letter 232

Comment Letter 233

Sincerely,  
Aimee Polekoff

**From:** Al Kisner <alkisnerforthewild@gmail.com>  
**Sent:** Monday, July 23, 2018 2:23 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 233-1
- The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:  
  
The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.  
  
The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.  
  
Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.  
  
Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.  
  
IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.  
  
For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.  
  
The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.  
  
Thank you.
- 233-2
- The only dam construction in this area should be carried out by beavers. Their ecological engineers are superior to ours and thousands of other creatures benefit from their expertise.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 233

Sincerely,  
Al Kisner

Comment Letter 234

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**From:** alice nguyen <medicilorenzo@yahoo.com>  
**Sent:** Wednesday, July 25, 2018 2:43 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 234-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 234-2 Dam construction and maintenance harm the area's wilderness character, in contradiction to the Wilderness Act. Reduction of flow would place additional stresses on already seriously affected species.

## Comment Letter 234

## Comment Letter 235

Sincerely,  
alice nguyen

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**From:** Amy Davis <a.jdavis@yahoo.com>  
**Sent:** Tuesday, July 24, 2018 10:34 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

235-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

235-2 As a now informed adult about the unbelievable damage that dams do, I am adamantly opposed to any dam project. Period. Even more so when the land is public land and should be preserved in its natural state in perpetuity for future

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 235

generations.

Sincerely,  
Amy Davis

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Comment Letter 236

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**From:** Andrew Fisher <fanof2012@gmail.com>  
**Sent:** Monday, July 23, 2018 6:54 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

236-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

236-2 The video "Secrets Police Don't Want You To Know" at <http://youtu.be/B3nok7Cby28> is 2.5 hours long but it's totally worth your time to watch the whole entire thing because it exposes how the cops, judges, prosecution attorneys,



## Comment Letter 236

## Comment Letter 237

236-2 | politicians, and car insurance salesmen have stolen BILLIONS from the common people as well as the secrets that anyone can follow to prevent them from stealing that money. Also check out the scripts related to the video at <http://logosradionetwork.com/tao/>  
This video can help put a stop to tyranny and in turn bring freedom and higher consciousness to all! So please help me in my crusade to spread this info like wildfire on a global scale.

Sincerely,  
Andrew Fisher

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**From:** Ann Rogers <a-rogers@charter.net>  
**Sent:** Monday, July 23, 2018 1:15 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

237-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

237-2 | We, in Grand Traverse County, are taking out our dams on the Boardman River. Dams serve no purpose anymore. Green Renewable energy should replace hydro.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 237

Sincerely,  
Ann Rogers

Comment Letter 238

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**From:** antje fray <elaan2@yahoo.com>  
**Sent:** Thursday, July 26, 2018 7:17 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 238-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 238-2 I think you are going backwards.... Other groups are taking dams DOWN to improve river HEALTH and allow salmon and other fish to go back to their breeding grounds.

## Comment Letter 238

## Comment Letter 239

Sincerely,  
antje fray

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**From:** Arrie Hammel <mykabird@gmail.com>  
**Sent:** Monday, July 23, 2018 5:17 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

239-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

239-2 | I'm no expert but it seems to me anything that degrades our environment or the wildlife or human security or ownership needs to be struck down.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 239

Comment Letter 240

Sincerely,  
Arrie Hammel

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**From:** Barbara Trudell <bltrudell@comcast.net>  
**Sent:** Monday, July 23, 2018 1:27 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

- 240-1 | The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

- 240-2 | No dams. Period.

Comment Letter 240

Comment Letter 241

Sincerely,  
Barbara Trudell

**From:** Beth Stanberry <rdtrtle@gmail.com>  
**Sent:** Tuesday, July 24, 2018 5:03 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 241-1
- The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:  
  
The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.  
  
The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.  
  
Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.  
  
Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.  
  
IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.  
  
For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.  
  
The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.  
  
Thank you.
- 241-2
- Please do not build the dam! It ruins things that will never be the same once the folly of building it is realized.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 241

Sincerely,  
Beth Stanberry

Comment Letter 242

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**From:** BILL PARKER <stigausa@aol.com>  
**Sent:** Monday, July 23, 2018 8:15 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

242-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

242-2 No dams or tunnels ....please.

## Comment Letter 242

## Comment Letter 243

Sincerely,  
BILL PARKER

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**From:** Billy Angus <wizardofhamilton@hotmail.com>  
**Sent:** Monday, July 23, 2018 6:19 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

243-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

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The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

243-2 NO DAMS.....PERIOD!!!  
WATER IS LIFE!!!!

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 243

Sincerely,  
Billy Angus

Comment Letter 244

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**From:** Bonnie Macraith <bmacraith@reninet.com>  
**Sent:** Tuesday, July 24, 2018 11:32 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

244-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

244-2 | The dams on the Klamath River in northern CA where I live are going to be dismantled because they are blocking salmon spawning, and impacting riparian ecosystems- take note!



## Comment Letter 244

## Comment Letter 245

Sincerely,  
Bonnie Macraith

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**From:** Carol Ann Brady,R.N. <carolannbrady@comcast.net>  
**Sent:** Wednesday, July 25, 2018 3:15 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

245-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

245-2 Add a personalized message As nurse, I ask that you protect the health of our waterway which needs to flow freely.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 245

Sincerely,  
Carol Ann Brady,R.N.

Comment Letter 246

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**From:** Carol Hatfield <chatfield@uindy.edu>  
**Sent:** Monday, July 23, 2018 12:55 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

246-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

246-2 We most certainly do not survive without protected waterways. Protection of life, health, and our ecosystems (wilderness, wildlife, water, air, land) is paramount! We cannot survive without these intact.

## Comment Letter 246

## Comment Letter 247

Sincerely,  
Carol Hatfield

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**From:** Carol Hatfield <chatfield@uindy.edu>  
**Sent:** Tuesday, July 24, 2018 5:37 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

247-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

247-2 The protection of our waterways, our ecosystems, and our wildlife comes first! Stop the plans for such devastating destruction!

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 247

Sincerely,  
Carol Hatfield

Comment Letter 248

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**From:** Carol Jackson <cjackson@lanterngroup.org>  
**Sent:** Tuesday, July 24, 2018 1:48 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 248-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 248-2 DAMS ON UPPER RIVERS AND LAKES BURST AND KILL THOUSANDS OF PEOPLE LIVING OR WORKING DOWNSTREAM; WITH CLIMATE CHANGE FLOODS ARE WORSE.

## Comment Letter 248

## Comment Letter 249

248-2 BUILDING DAMS IN MOUNTAINOUS AREAS CONDEMNS THE RESIDENTS OF THE VALLEYS AND LOWLANDS TO CONTINUOUS THREAT.

Sincerely,  
Carol Jackson

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**From:** Carolyn Wacaser <cjspirit2000@yahoo.com>  
**Sent:** Tuesday, July 24, 2018 6:32 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

249-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

249-2 We'll have all the water we need if we leave it alone! Protecting wildlife, wilderness and the integrity of the earth is important. Quit trying to manipulate everything natural.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 249

Sincerely,  
Carolyn Wacaser

Comment Letter 250

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**From:** Cheryl Lechtanski <paboxies@hotmail.com>  
**Sent:** Wednesday, July 25, 2018 10:37 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

250-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

250-2 I believe the proposed projects have the ability to seriously affect the integrity of this watershed area.

Comment Letter 250

Comment Letter 251

Sincerely,  
Cheryl Lechtanski

**From:** Cris Smith <xtynita\_sonoma@earthlink.net>  
**Sent:** Monday, July 23, 2018 5:15 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 251-1
- The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:  
  
The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.  
  
The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.  
  
Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.  
  
Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.  
  
IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.  
  
For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.  
  
The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.  
  
Thank you.
- 251-2
- From around the world we have already learned of the destructive effects of dams. We no longer see them as a desirable sign of "progress." Please don't build another environmentally destructive dam.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 251

Sincerely,  
Cris Smith

Comment Letter 252

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**From:** Darlene Marley <djmarley@gmail.com>  
**Sent:** Monday, July 23, 2018 12:55 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

252-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

252-2 As a tax-paying US citizen, I demand that national water resources be governed by long-term and sustainable water management practices.



## Comment Letter 252

## Comment Letter 253

Sincerely,  
Darlene Marley

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**From:** Donna Greathouse-Neel <deegeemail@comcast.net>  
**Sent:** Monday, July 23, 2018 9:33 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

253-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

253-2 I support the information as stated herein so well by Wilderness Watch. They have the expertise to be followed and the best interests of the area as a priority.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 253

253-3 | We are supposed to be removing and reducing dams not adding and increasing them.

Sincerely,  
Donna Greathouse-Neel

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Comment Letter 254

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**From:** Echo Mitchell <shortyegm@comcast.net>  
**Sent:** Tuesday, July 24, 2018 1:16 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

254-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

254-2 | It seems that dam building has passed its usefulness in this country. We no longer need to use it for electrical power and it damages the water supply in the entire course of rivers. Silting makes these dams limited in their lifetime of healthy

## Comment Letter 254

## Comment Letter 255

254-2 | eff

Sincerely,  
Echo Mitchell

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**From:** Edson Rood <perkybeer2@gmail.com>  
**Sent:** Monday, July 23, 2018 9:03 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

255-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

255-2 The construction of dams to manipulate water levels often has unintended consequences. Always take the least intrusive means to accomplish ends, especially in areas near our wilderness reserves.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 255

Sincerely,  
Edson Rood

Comment Letter 256

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**From:** Elizabeth Lynch <lizybabe127@yahoo.com>  
**Sent:** Monday, July 23, 2018 12:46 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] [Possible Spam] RE: "Icicle Creek Watershed Water Resources Management Strategy,"

Dear Mike Kaputa,

256-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

256-2 Why and I would like a very good answer to this ! Are you doing this ???????

## Comment Letter 256

## Comment Letter 257

Sincerely,  
Elizabeth Lynch

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**From:** Gayle Areheart <gareheart@comcast.net>  
**Sent:** Tuesday, July 24, 2018 1:11 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

257-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

257-2 We do not need anymore damn dams!!! Please consider solar & wind power to meet the regions electrical needs. :/

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 257

Sincerely,  
Gayle Areheart

Comment Letter 258

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**From:** George Wuerthner <gwuerthner@gmail.com>  
**Sent:** Monday, July 23, 2018 1:17 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

258-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

258-2 All water in Washington is owned by the people of the state. It does not belong to the irrigation company. Removing water from streams, rivers, and lakes is a privilege. Washington has a legal obligation under Public Trust to protect

## Comment Letter 258

## Comment Letter 259

258-2 | public interest

Sincerely,  
George Wuethner

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**From:** gita barbezat <gita\_barbezat@yahoo.com>  
**Sent:** Monday, July 23, 2018 1:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

259-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

259-2 All manipulations of nature, like dam constructions, widening of water ways etc will inevitably cause changes, environmental and ecological, which cause a chain of reactions that are often unexpected. It is best not to perturb

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 259

Comment Letter 260

259-2 | nature.

Sincerely,  
gita barbezat

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**From:** Helga Oestreicher <helga420@att.net>  
**Sent:** Tuesday, July 24, 2018 6:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

260-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

260-2 | Please do not do this. There has to be an alternative for the dam. Like the the Cooley Dam there will be unintended consequences for years to come that will affect everything in that area and beyond. Please re-think this.



## Comment Letter 260

## Comment Letter 261

Sincerely,  
Helga Oestreicher

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**From:** Jeffrey Christo <jeffreychristo@yahoo.com>  
**Sent:** Thursday, July 26, 2018 8:10 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

261-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

Sincerely,  
Jeffrey Christo

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 261

Comment Letter 262

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**From:** Jessica McGeary <camwyn@megaloceros.net>  
**Sent:** Monday, July 23, 2018 12:43 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

262-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

262-2 The plan as stated is wide open to more federal litigation than I think this or any other administration really wants to deal with. Please give serious consideration to revision before implementation. Thank you.

## Comment Letter 262

## Comment Letter 263

Sincerely,  
Jessica McGeary

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**From:** Joseph Breazeale <brezebra@yahoo.com>  
**Sent:** Monday, July 23, 2018 1:20 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

263-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

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The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

Dear Mr. Kaputa,

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 263

Comment Letter 264

263-2 Please pause and consider that the trend as been, for good reasons, the removal of dams, not the construction of more.

Thank You

Joseph H. Breazeale

Sincerely,  
Joseph Breazeale

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**From:** Joy Keithline <jkeithline@msn.com>  
**Sent:** Monday, July 23, 2018 3:59 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

264-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

264-2 Nature and habitat first especially amidst global warming.

## Comment Letter 264

## Comment Letter 265

Sincerely,  
Joy Keithline

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**From:** Kathy, Mark, Chris & Jessie Groth <kgroth@comcast.net>  
**Sent:** Tuesday, July 24, 2018 11:08 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

265-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

265-2 Dams have already been shown to be an outdated, destructive and inefficient way to manage resources.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 265

Sincerely,  
Kathy, Mark, Chris & Jessie Groth

Comment Letter 266

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**From:** Kevin Spelts <kevinspelts@live.com>  
**Sent:** Tuesday, July 24, 2018 7:40 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

266-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

266-2 | I oppose any man made changes that adversely affect the natural operation of water in most watersheds.

## Comment Letter 266

## Comment Letter 267

Sincerely,  
Kevin Spelts

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**From:** Lisa Dahill <ldahill@gmail.com>  
**Sent:** Monday, July 23, 2018 2:18 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

267-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

267-2 Please act to minimize impact on the surrounding watershed and water flow.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 267

Sincerely,  
Lisa Dahill

Comment Letter 268

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**From:** Loren Amelang <loren@pacific.net>  
**Sent:** Monday, July 23, 2018 4:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 268-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 268-2 | I'm not familiar with this issue, but I am part owner of a regulated dam in California. The legal and safety issues are now so complex as to be prohibitive. Removing our dam would cost even more. But it is probably the future. Best not to build



## Comment Letter 268

## Comment Letter 269

268-2 | them!

Sincerely,  
Loren Amelang

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**From:** Louise Wallace <lfdw4@aol.com>  
**Sent:** Monday, July 23, 2018 1:40 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

269-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

269-2 | It is way past the time to remove all dams. They do more damage than good and are no longer needed. We do need healthy rivers, which means removing all dams. Please don't build any more or enlarge any. That is like thinking in the

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 269

Comment Letter 270

269-2 | dark ages.

Sincerely,  
Louise Wallace

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**From:** Lynn Welch <lwelch1990@comcast.net>  
**Sent:** Monday, July 23, 2018 6:12 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 270-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 270-2 Natural water systems left unaltered create the most abundance for us, the environment, and wildlife. There are volumes of documentation on the adverse effects of dams on the environment and ecosystems. The best approach is

## Comment Letter 270

## Comment Letter 271

270-2 | preservation.

Sincerely,  
Lynn Welch

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**From:** Maggie Frazier <mfrazier74@hotmail.com>  
**Sent:** Wednesday, July 25, 2018 7:03 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

271-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

271-2 | It appears theres still much ignorance as to the damage that dams cause! Seems to me since many have had to be destroyed due to their limiting salmon spawning & creating problems where none existed before - the people in

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 271

Comment Letter 272

271-2 | "charge" would do research.

Sincerely,  
Maggie Frazier

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**From:** Maija Dravnieks <ladeekittee@aol.com>  
**Sent:** Monday, July 23, 2018 7:00 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

272-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

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The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

272-2 | I will suggest you keep your trees and stop sprawl instead of damaging the ecosystem with a dam.

## Comment Letter 272

## Comment Letter 273

Sincerely,  
Maija Dravnieks

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**From:** Martha Jo Willard DVM MD <mjw@ctlca.com>  
**Sent:** Tuesday, July 31, 2018 9:39 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

273-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

273-1 We must maintain biodiversity for the survival of the human species. Ecosystem health is just that important. Stop burning dinosaurs. Use the sun and the wind as these provide better jobs, with a future. Dinosaurs gave us the start,

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 273

Comment Letter 274

273-1 | now change.

Sincerely,  
Martha Jo Willard DVM MD

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**From:** Martha Stevens <martystevens.55@gmail.com>  
**Sent:** Monday, July 23, 2018 9:18 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

274-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

274-2 | Putting in more dams isn't progress, it is moving backwards. Choose better alternatives.

## Comment Letter 274

## Comment Letter 275

Sincerely,  
Martha Stevens

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**From:** Mary A Leon <leon3@twc.com>  
**Sent:** Sunday, July 29, 2018 3:05 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

275-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

275-2 Building dams has caused more problems with water flow than almost anything.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 275

Sincerely,  
Mary A Leon

Comment Letter 276

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**From:** Marya Bradley <mabstream@gmail.com>  
**Sent:** Wednesday, July 25, 2018 1:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 276-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 276-2 I am very concerned about the effort to exclude the public from these decisions that will effect our land and water and all future generations. Such exclusion is a violation of the basis of our democracy. The least harm is the best plan.



## Comment Letter 276

## Comment Letter 277

Sincerely,  
Marya Bradley

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**From:** Maryann Foss <mobf1118@yahoo.com>  
**Sent:** Wednesday, July 25, 2018 3:23 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

277-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

277-2 Older dams have proven harmful to the ecosystem and destructive to the land and waterways around and below.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 277

Sincerely,  
Maryann Foss

Comment Letter 278

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**From:** Maureen Knutsen <maureen.knutsen@gmail.com>  
**Sent:** Tuesday, July 24, 2018 12:10 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

278-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

278-2 Clean water is a most precious, irreplaceable resource and needs the highest level of protection. We cannot continue compromising our pristine sources of water if we want to have a planet that is livable for future generations.

## Comment Letter 278

## Comment Letter 279

Sincerely,  
Maureen Knutsen

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**From:** Michael and Barbara Hill <theelbehills@gmail.com>  
**Sent:** Monday, July 23, 2018 1:12 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

279-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

279-2 NO DAMN DAMS! SOLAR AND WIND INSTEAD.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 279

Sincerely,  
Michael and Barbara Hill

Comment Letter 280

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**From:** Michelle Rice <shellaroo@yahoo.com>  
**Sent:** Tuesday, July 24, 2018 9:26 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 280-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 280-2 Dams are adversely affecting the salmon runs and Orca's are starving. We need less dams, not more.

## Comment Letter 280

## Comment Letter 281

Sincerely,  
Michelle Rice

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**From:** Mike Hemphill <mikehempmjc@yahoo.com>  
**Sent:** Wednesday, July 25, 2018 2:23 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

281-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

281-2 Let's correct the legion of mistakes made in the past by taking the action that is the best fit for everyone for the future.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 281

Sincerely,  
Mike Hemphill

Comment Letter 282

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**From:** Nina Council <babunina10@mind.net>  
**Sent:** Monday, July 23, 2018 9:34 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

282-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

282-2 Some dams in Oregon have come down, and that greatly improves the fish situation. Man and our so called progress too often destroys rather than enhances situations or productions and so on.

## Comment Letter 282

## Comment Letter 283

Sincerely,  
Nina Council

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**From:** Pamela Nelson <pamela05n@yahoo.com>  
**Sent:** Friday, July 27, 2018 11:30 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

283-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

283-2 Destructive dam construction over the last century has shown that this method of flood control and water storage is detrimental to all. Americans expect that Wilderness should be a refuge, permanently; don't create more apathy by

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 283

Comment Letter 284

283-2 | changing the rules.

Sincerely,  
Pamela Nelson

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**From:** Patricia Always <bikerpat@mindspring.com>  
**Sent:** Monday, July 23, 2018 9:52 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 284-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
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- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 284-2 | Dams are often more destructive than helpful & often flood native lands & sacred areas.



## Comment Letter 284

## Comment Letter 285

Sincerely,  
Patricia Always

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**From:** randall potts <randallpotts@hotmail.com>  
**Sent:** Monday, July 23, 2018 1:09 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

285-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

285-2 The DPEIS must act lawfully and to the benefit of wilderness ecosystems that belong to the people not the DPEIS. There is a huge body of scientific evidence that shows the negative impact of dams on waterways, fish, wildlife and

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 285

Comment Letter 286

285-2 | ecosystems.

Sincerely,  
randall potts

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**From:** Robert Bauer <backfrdead@yahoo.com>  
**Sent:** Monday, July 23, 2018 6:12 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

286-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

286-2 | Isn't our history of making terrible decisions about manipulating the environment enough to make us look much deeper into the realities of ecosystems before we start imposing our usual wrong thinking. THIS IS OUR HOME AND WE DON'T

## Comment Letter 286

## Comment Letter 287

286-2 | TAKE PROPER CARE!

Sincerely,  
Robert Bauer

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**From:** Robert Fritsch <rfritsch1@myfairpoint.net>  
**Sent:** Monday, July 23, 2018 5:22 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

287-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

287-2 | Dams and tunnels built to mitigate or alter the containment or movement of water are the dreams of engineers and over the long term rarely, if ever solve hydrology problems. And they are exceedingly destructive in their

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 287

Comment Letter 288

287-2 | implementation.

Sincerely,  
Robert Fritsch

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**From:** Rose Jenkins <plasma@brick.net>  
**Sent:** Tuesday, July 24, 2018 3:54 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

288-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

288-2 | While some damaging dams have been scheduled for demolition, allowing the earth's riparian system to do its job, here is another damaging proposal for another dam -- to repeat all the errors of the past with NO saving "grace." I say NO! to

## Comment Letter 288

## Comment Letter 289

288-2 | this one.

Sincerely,  
Rose Jenkins

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**From:** Ruth Parcell <raparcell@ucdavis.edu>  
**Sent:** Monday, July 23, 2018 12:52 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

289-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

289-2 | I was raised fishing in this area and would hate to see it destroyed by dams.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 289

Comment Letter 290

Sincerely,  
Ruth Parcell

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**From:** Scott Elliott <scott@mountainlogic.com>  
**Sent:** Monday, July 23, 2018 1:13 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 290-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.
- Thank you.
- 290-2 Wilderness is a key driver of the outdoor recreation economy in the state of Washington. Please do not take the proposed actions that will destroy our local, state and national jobs by directly or indirectly impinge on the wilderness.

## Comment Letter 290

## Comment Letter 291

Sincerely,  
Scott Elliott

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**From:** Teresa Hayes <anyahayes@aol.com>  
**Sent:** Thursday, July 26, 2018 6:23 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

291-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

291-2 Haven't we seen enough of the more serious problems caused by human interference with the water systems that took nature millennia to evolve? Water dammed and diverted now would come at the price of worse and more widespread

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 291

Comment Letter 292

291-2 | drought in the future.

Sincerely,  
Teresa Hayes

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**From:** Thelma Nelson <teriwn@optimum.net>  
**Sent:** Tuesday, July 24, 2018 8:27 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

292-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

292-2 | dams have been proven to provide no really lasting benefit. Please reconsider your plans for building more of them



Comment Letter 292

Comment Letter 293

Sincerely,  
Thelma Nelson

**From:** Theo Giesy <tedslioness@yahoo.com>  
**Sent:** Monday, July 23, 2018 7:46 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 293-1
- The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:  
  
The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.  
  
The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.  
  
Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.  
  
Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.  
  
IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.  
  
For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.  
  
The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.  
  
Thank you.
- 293-2
- We must be very careful to protect our resources so that we still have them in the future. Ignoring or hiding negative effects form an assessment to gain a favorable ruling is not a practice that can be allowed.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 293

Sincerely,  
Theo Giesy

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Comment Letter 294

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**From:** Amy Derocher (amyderocher@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, July 27, 2018 4:54 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 294-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 294-2 | The proposed Eight mile lake storage restoration (chapter 2.5.5) is particularly onerous. This lake is in a wilderness area. Replacing the existing small dam with a structure that allows a 50 foot change in the lake water level is fundamentally incompatible with its wilderness designation.
- 294-1 | Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Amy Derocher  
1409 237th Pl SW  
Bothell, WA 98021  
amyderocher@gmail.com  
(425) 736-4489

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

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## Comment Letter 295

**From:** Larry Oneil (wa.native1@juno.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, July 27, 2018 8:01 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 295-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 295-2 | Realize and adapt to the fact that changing climate will continue to give us less snow pack, less rain, thirstier soils; we need to learn to adapt to living with what we have and sacrificing additional wants, you can't win against mother nature!
- 295-1 | Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Larry Oneil  
 321 NW 51st St  
 Seattle, WA 98107  
 wa.native1@juno.com  
 (206) 784-4303

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 296

**From:** Catherine Buchanan <cathie.clbuch@gmail.com>  
**Sent:** Sunday, July 22, 2018 1:19 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

- 296-1 | I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

- 296-2 | Please address all of these concerns in accordance with the NEPA requirements.

Sincerely,  
 Catherine Buchanan

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 297

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**From:** Cheyenne Lively <cheyenne.r.dennis52@gmail.com>  
**Sent:** Monday, July 23, 2018 11:56 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

297-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

297-2 The majestic Columbia river, the middle fork Nooksack, the Skagit, Baker River, these are just a tiny fraction of the areas that are already dammed. Fish already are inhibited, tribes have already been flooded out of ancient homes. Please, no more.

Sincerely,  
Cheyenne Lively

1

Comment Letter 298

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**From:** christina Durtschi <christinadurtschi@yahoo.com>  
**Sent:** Wednesday, July 25, 2018 10:36 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

298-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

298-2 Before any decisions are made I'd like a thorough environmental impact study that covers everything from how this will impact the Alpine Lakes Wilderness area to Salmon runs. I'd also like to see projections on water usage and how it could be reduce

Sincerely,  
christina Durtschi

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## Comment Letter 299

## Comment Letter 300

**From:** Courtney Carlisle <carlisle1396@yahoo.com>  
**Sent:** Sunday, July 22, 2018 7:52 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

299-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

299-2 As an economics student, I've learned that public lands and associated activities contribute billions of dollars to our country's GDP each year. Public lands also protect unique natural features, which make WA, WA. Protect the Enchantments.

Sincerely,  
 Courtney Carlisle

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**From:** Jace Bylenga <jace.b27@gmail.com>  
**Sent:** Monday, July 23, 2018 12:06 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

300-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

300-2 Please follow the law, and avoid the courts.

Sincerely,  
 Jace Bylenga

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 301

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**From:** Mary Gallagher <marywillardgallagher@live.com>  
**Sent:** Wednesday, July 25, 2018 10:45 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

301-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

301-2 We moved to Chelan County because of the bounty of recreational areas, especially Wilderness areas. Please do everything in your power to not weaken Wilderness.  
Please let me know what I and other concerned residents can do to stop this.

Sincerely,  
Mary Gallagher

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Comment Letter 302

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**From:** Nicole Marcotte <6nicolemarie6@gmail.com>  
**Sent:** Sunday, July 22, 2018 10:10 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

302-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

302-2 These beautiful places like the alpine lakes wilderness are keystones to our region. They don't only provide a place for people to enjoy and recreate, but they are critical in holding our ecosystems intact, and curbing the effects of climate change.

Sincerely,  
Nicole Marcotte

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## Comment Letter 303

## Comment Letter 304

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**From:** Carlie Miller <Carlie.Miller.124157596@p2a.co>  
**Sent:** Tuesday, July 24, 2018 3:00 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

303-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. I recently drove through the Leavenworth area and was deeply concerned with the amount of wasteful water practices I witnessed. What is needed is not simply more water, but a more sustainable approach with mandatory water conservation projects and educational programs. More importantly, the proposed Icicle Creek project should be tabled until further environmental studies have been conducted.

303-2 The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
 Carlie Miller

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**From:** David Johnshoy <David.Johnshoy.101361260@p2a.co>  
**Sent:** Saturday, July 28, 2018 11:01 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

304-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

304-2 Other water saving opportunities exist, e.g., reduce golf course water usage, mandatory low flow toilets in every residence and hotel, minimize occupancy expansion through stricter developmental rules, closely evaluate agricultural use for wasteful practices that could be changed...

Thanks,

Regards,  
 David Johnshoy

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 305

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**From:** Douglas Hedrick <Douglas.Hedrick.98264821@p2a.co>  
**Sent:** Friday, July 20, 2018 7:00 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

305-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

305-2 Unless these projects are removed, the damage will be twofold - the impact to the natural resource as detailed above AND the negative economic impact to the area. Within my office of only 65 people, I estimate that there are at least 2 trips/year to the enchantment area. Often with family members, these trips include visiting and staying in the local area for a day or two before or after the hike. I've been to the Enchantments and will go back. If your proposed changes go through, I won't bother to come out to see the impact, I'll just plan trips to other areas.

Regards,  
Douglas Hedrick

Comment Letter 306

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**From:** Fit cahall <Fit.cahall.54747175@p2a.co>  
**Sent:** Friday, July 20, 2018 10:16 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

306-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

306-2 This plan feels like robbing peter to pay paul. I understand the need for water for the fish and the community, but altering one ecosystem (bringing in heavy machinery to what is essentially a wilderness area) to restore another that is almost completely broken, seems short sighted. I have no doubt that this probably feels like an intractable problem, but this doesn't seem like the proper solution.

Regards,  
Fit cahall



## Comment Letter 307

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**From:** Inga Walker <Inga.Walker.90289741@p2a.co>  
**Sent:** Saturday, July 28, 2018 10:12 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

307-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

307-2 I have camped along the shore of Eightmile Lake and it was a true gift. I still remember the awe and majesty that the area filled me with. Please, do not continue with a dam expansion that would threaten this area. As we move forward with new research and information, dams are being removed, not built. Please do not threaten this beautiful area with an arrogant plan that would alter its ecosystem and leave it the way it is. Thanks you.

Regards,  
 Inga Walker

## Comment Letter 308

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**From:** Jacob Gunn <Jacob.Gunn.124383603@p2a.co>  
**Sent:** Sunday, July 29, 2018 1:09 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

308-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

308-2 On a personal level, the Enchantments area of the Alpine Lakes Wilderness is one of the most unique and beautiful places to which I have had privilege to experience, and I feel strongly in the protection of this area so that future generations may be as fortunate as we are to experience such a special place.

Regards,  
 Jacob Gunn

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 309

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**From:** Jean Coy <Jean.Coy.13909044@p2a.co>  
**Sent:** Thursday, July 19, 2018 11:00 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

309-1 I don't understand why you want to ruin the enchantments Don't you understand that it can never be replaced? People  
309-2 come from all over to see the beauty of the area. Don't you want tourists? I thought that the Leavenworth area thrived  
on the tourist economy. I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The  
Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the  
detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular  
campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative  
impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that  
don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Jean Coy

Comment Letter 310

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**From:** Judy Knold <Judy.Knold.92310708@p2a.co>  
**Sent:** Monday, July 30, 2018 7:08 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

310-1 God is watching.....  
We must save the Alpine Lakes Wilderness for hikers, campers, wildlife and nature lovers.  
We must take care of God's planet...

310-2 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is  
an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from  
the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular  
campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative  
impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that  
don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Judy Knold

## Comment Letter 311

## Comment Letter 312

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**From:** Kevin Shipe <Kevin.Shive.117566860@p2a.co>  
**Sent:** Friday, July 20, 2018 8:48 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

311-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

311-2 Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley. Hikers come from all over the world to hike the enchantments and they contribute more to the economy than a dam would.

Regards,  
Kevin Shipe

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**From:** Manuela Giese <Manuela.Giese.124477050@p2a.co>  
**Sent:** Monday, July 30, 2018 4:32 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

312-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan and take a close read of the excellent book on water management called Cadillac Desert. This is a terrible idea.

312-2 The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Manuela Giese

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 313

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**From:** Mark Salser <Mark.Salser.90400313@p2a.co>  
**Sent:** Monday, July 23, 2018 6:32 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 313-1 | I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.
- 313-2 | As someone who has camped a number of times at both Eightmile Lake and Upper Snow Lake, I can honestly tell you that the proposed projects at Eightmile Lake and Upper and Lower Snow Lakes would drastically harm the experience of backpackers and hikers. Those outdoor recreation people contribute a huge amount to the economy in the local area. When friends visit from out of town and they ask me where they should go backpacking or hiking, the Enchantments is always top on my list of places to recommend in all of Washington - that's what an incredible natural resource it is.
- 313-1 | Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Mark Salser

Comment Letter 314

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**From:** MICHAELA MANSFIELD <MICHAELA.MANSFIELD.124398337@p2a.co>  
**Sent:** Sunday, July 29, 2018 11:31 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 314-1 | I am writing to you to express my concerns with the proposed Icicle Creek water strategy.
- 314-2 | The text below this paragraph is scripted from WTA, and while I stand behind every word, I would like to include my own story as well. I backpacked The Enchantments with 7 family members two years ago, in September 2016. While on this trip, we enjoyed views and the geography on the way up Aasgard Pass, and awoke the first morning to a [undesired] snow storm which continued the entire day during our time in the Core Zone - we opted to spend the second night at Snow Lake and fortunately, the weather had cleared when we got there. This trip is one my family deemed "Type 2 Fun," the type of activity that is not necessarily fun while you're doing it, but is fun to look back on. We often recall fondly (and sometimes not so fondly) many portions of the backpack, and look forward to another shot, sometime when we aren't in a near-white out, so can see the lakes-a big reason we went into The Enchantments. The proposed project could jeopardize this second shot for my family and countless other groups planning to do this thru-hike in the future. It would be heartbreaking to lose the opportunity to spend time in this beautiful area due to the needless creation of dams. I do not use the word "needless" lightly; I am a Professional Water Resources Engineer. Having been in industry for six years, I quickly learned the immense benefits of preserving natural systems to the greatest extent we can. We must be stewards of our environment and the future of species that depend on people to fight for them, when they obviously cannot do so for themselves. We should be removing hydraulic controls to restore natural hydrology, not building new ones. It may seem silly that I recommend the documentary "Damnation" as a resource, but in my opinion, and that of my Civil Engineer peers, and my father (also a Civil Engineer), is a good simplified explanation for why localized dams are an oftentimes non-functioning thing of the past. We should not be building these types of structures in the fragile area of The Enchantments, or elsewhere on freshwater bodies. I support the habitat enhancement measures listed in this proposal but PLEASE reconsider the proposed construction of hydraulic controls in the form of unnatural tunnels AND dams in this special area.
- 314-1 | The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.
- The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.
- Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
MICHAELA MANSFIELD

## Comment Letter 315

## Comment Letter 316

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**From:** Robert Pasko <Robert.Pasko.94441558@p2a.co>  
**Sent:** Monday, July 30, 2018 4:19 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 315-1 The WTA wrote the following comments but I would like to add mine. I recommend that you reconsider the proposed water project. It is a very high price to pay for the water in terms of dollars and in terms of irreplaceable natural resources. Undoubtly you realize the unmatched nature in the area of the proposed project. It is the most desired backpacking location in the whole state. So much so that i have never been able to get an overnight permit so that my visits have been single day trips to the enchantments. Very strenuous but very much worth the effort. A large project such as this is not compatable with the pristine and scenic location such as it is. It would make more sense to find a different source for the water. We will never recover if it proceeds- please replan for another location.
- 315-2 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.
- The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.
- Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.
- Regards,  
 Robert Pasko

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**From:** Robert Schutzner <Robert.Schutzner.123983437@p2a.co>  
**Sent:** Friday, July 20, 2018 2:05 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 316-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.
- The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.
- Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.
- 316-2 It is counter to everything the Alpine Lakes Wilderness stands for to allow this project to proceed. To allow it to happen to to destroy a part of this magnificent area forever. We CANNOT let this happen!!!!!!
- Regards,  
 Robert Schutzner

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 317

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**From:** Rachel Swerdlow (rswerdlow@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 8:36 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

317-1 | Do not touch the Alpine Lakes region for dams or anything to do with dams.

Sincerely,

Rachel Swerdlow  
2819 10th Pl W  
Seattle, WA 98119  
rswerdlow@gmail.com  
(206) 789-3568

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 318

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**From:** Roberta Daniels <Famleafair@aol.com>  
**Sent:** Friday, June 22, 2018 4:24 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Icicle Project

318-1 | As a local and a hiker/backpacker, if the lake levels have to rise to preserve our water source then certainly new campsites or trails can be developed. WTA on Gace Book indicates losing campsites might be a deal breaker but I respectfully disagree.

Sent from my iPhone,  
Roberta Daniels  
Wenatchee

## Comment Letter 319

## Comment Letter 320

**From:** ben murray <benjideniro@yahoo.ca>  
**Sent:** Tuesday, July 31, 2018 1:55 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 319-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- 319-2 The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- 319-3 The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- 319-4 Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.
- 319-5 Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- 319-6 IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- 319-7 For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- 319-8 The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

1

**From:** Baiss Eric Magnusson (baiss@comcast.net) Sent You a Personal Message  
 <automail@knowwho.com>  
**Sent:** Tuesday, July 31, 2018 2:02 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 320-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- 320-2 The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 320-3 Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Baiss Eric Magnusson  
 11540 Alton Ave NE  
 Seattle, WA 98125  
 baiss@comcast.net  
 (206) 361-0718

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1

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 321

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**From:** Aylin Llona (aylin.llona@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 10:16 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

321-1 | What in God's name are you thinking? Obviously you are not. This earth is not for ours to rape. We must learn to live in cooperation with our nature, not destroy it. We as humans have minds, to be used creatively to nourish our environment and ourselves. Get your heads out of your asses and use the gift of thought that is yours to create something that does not destroy our beautiful nature.

321-2 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Aylin Llona  
11605 488th Ave SE  
North Bend, WA 98045  
aylin.llona@gmail.com  
(206) 601-2688

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 322

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**From:** Barry Truman (brtruman@yahoo.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 8:41 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

322-1 | DUMB IDEA.  
BETTER IDEA - DAM THE POTOMAC, FLOOD D.C.

322-2 | The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Barry Truman  
PO Box 1558  
Monroe, WA 98272  
brtruman@yahoo.com  
(360) 568-5902

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



## Comment Letter 323

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**From:** Chris Gnehm (chris@starlightpath.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 6:33 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

323-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we  
323-2 | appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for  
our public lands in the process. DO NOT REMOVE -ANY- TREES LAWSUITS WILL RESULT

323-3 | The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious.  
The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact  
on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes  
the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one  
natural area to be exploited under the guise of enhancing another.

Sincerely,

Chris Gnehm  
506 Pitner Dr  
Lynnwood, WA 98087  
chris@starlightpath.com  
(206) 412-8170

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender  
information.

## Comment Letter 324

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**From:** Daniel Erickson (seattles2r800@gmail.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 3:10 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

324-1 | The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. Stop tampering with  
nature in this protected areas!

Sincerely,

Daniel Erickson  
1011 NW 122nd St  
Seattle, WA 98177  
seattles2r800@gmail.com  
(206) 555-6666

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender  
information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 325

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**From:** Denise Mahnke (dcmark@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 9:42 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 325-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 325-2 This region in the high alpine fosters native plant growth that cannot be lost by drowning. High mountain habitats are important to our native system here in the NW, from summit to sea. Please consider what this region needs to remain a viable habitat for this planet, as essential to the future.
- 325-1 Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Denise Mahnke  
PO Box 14  
Carnation, WA 98014  
dcmark@gmail.com  
(206) 551-6321

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 326

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**From:** Dorothy Hiestand (dorothyhiestand@gmail.com) Sent You a PersonalMessage  
<automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 11:23 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 326-1 Wilderness means wilderness! If an area has been designated wilderness, it needs to stay that way! That's WHY it was designated wilderness!
- 326-2 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Dorothy Hiestand  
1006 Bluff Ave Unit 1  
Snohomish, WA 98290  
dorothyhiestand@gmail.com  
(425) 408-1824

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 327

## Comment Letter 328

**From:** Ellen Lyons (ellenlyonsdesigns@hotmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Wednesday, June 27, 2018 6:32 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 327-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.
- 327-2 | All life on this planet is connected. Protecting natural habitats for birds, fish and other wildlife is as important for them as it is for all sentient life.

Sincerely,

Ellen Lyons  
 2144 5th Ave W  
 Seattle, WA 98119  
 ellenlyonsdesigns@hotmail.com  
 (206) 854-3155

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**From:** Gerry Smith (gsmith@fhcrc.org) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 1:34 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 328-1 | Wilderness should remain wilderness, meaning that the entire designated area is protected from motors, building (other than maintaining trails), or leaving evidence of humans' being there. I think this is the meaning of the Wilderness Act. It should be respected and maintained.
- The Alpine Lake Wilderness Area, from east to west, from north to south, is a source of rejuvenation for me and countless people I know. We are obliged to keep this for our children, their children, and on and on, just as others, consciously or unconsciously, kept it for us.
- 328-2 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Gerry Smith  
 606 17th Ave East  
 Seattle, WA 98112  
 gsmith@fhcrc.org  
 (206) 667-4438

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 329

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**From:** James Davis (davisje@nwi.net) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 7:02 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

329-1 | What the hell are you thinking? Was this one of Trump's hair-brained ideas?

329-2 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

James Davis  
1314 Welch Ave  
Wenatchee, WA 98801  
davisje@nwi.net  
(509) 662-0804

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 330

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**From:** Janet Way (janetway@yahoo.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Thursday, June 28, 2018 6:47 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

330-1 | It is crucial that you protect all areas related to Alpine Lakes to protect this precious ecosystem. Protect all streams leading to it and prevent any actions that will lead to damage to groundwater, habitat and water quality.

330-2 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Janet Way  
940 NE 147th St  
Shoreline, WA 98155  
janetway@yahoo.com  
(206) 734-5545

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 331

## Comment Letter 332

**From:** Kate Butt (kateabutt@hotmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 7:44 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

331-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

331-2 | For the love of God and Country, quit tinkering with Mother Nature. MAKE A BETTER PLAN FOR THE ALPINE LAKES!!!

Sincerely,

Kate Butt  
 8845 166th Ave NE Apt B206  
 Redmond, WA 98052  
 kateabutt@hotmail.com  
 (425) 881-3185

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**From:** Kevin Jones (kevinjonvash@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 9:37 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

332-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

332-2 | A tremendous amount of work and support was behind the wilderness designation in the Alpine Lakes area. That accomplishment must be respected and this area must be protected from water infrastructure projects that deface the landscape.

Sincerely,

Kevin Jones  
 PO Box 2607  
 Vashon, WA 98070  
 kevinjonvash@gmail.com  
 (206) 463-1766

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 333

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**From:** Kristeen Penrod (kristeen@scwildlands.org) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 5:53 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 333-1 | Keep it Wild! We should be removing dams, not repairing them. This is Washington State for goodness sakes!
- 333-2 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Kristeen Penrod  
3816 31st Ave W  
Seattle, WA 98199  
kristeen@scwildlands.org  
(206) 285-1916

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 334

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**From:** Kristen Long (kjl原因20@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 8:24 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 334-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 334-2 | I am devastated by this photo alone. Billions in tech money in Seattle, and we can't come up with a single way to do these repairs without destroying wildlife? There must be a better way.
- 334-1 | Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Kristen Long  
703 N I St #3  
Tacoma, WA 98177  
kjl原因20@gmail.com  
(206) 218-5022

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 335

## Comment Letter 336

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**From:** Kristina Fury (kfuryus@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 5:43 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

335-1 This cannot be undone. Your children, their children, and theirs-they will all suffer and pay in reduction in health and climate at minimum. Do you want to create those conditions?

335-2 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Kristina Fury  
2525 NE 195th St Apt 101  
Lake Forest Park, WA 98155  
kfuryus@gmail.com  
(925) 477-1257

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

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**From:** Mark Stewart (stewart.carrie@comcast.net) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Sunday, June 24, 2018 10:37 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

336-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

336-2 I have enjoyed multiple trips into the Alpine Lakes Wilderness and the Enchantments in the past, and plan to spend more time there in the future. I would hate to see this amazing wilderness area affected by this type of activity in the area. We need to save these precious places for our enjoyment, and the enjoyment of many generations to come. Don't sacrifice our wilderness!!

Sincerely,

Mark Stewart  
1537 NE 95th St  
Seattle, WA 98115  
stewart.carrie@comcast.net  
(206) 523-9108

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 337

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**From:** Matt Knox (mknox5764@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 5:00 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 337-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 337-2 Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another. Please look for other alternatives to enhance flows in the creek!

Sincerely,

Matt Knox  
12021 SE 209th St  
Kent, WA 98031  
mknox5764@gmail.com  
(253) 797-6487

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 338

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**From:** Mayellen Henry (mayellen@comcast.net) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 10:34 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 338-1 Please, please, do not damage our beautiful Alpine Lakes to help another place. Our family has hiked this area and cannot think that anyone who has ever seen it could in good conscience harm it in any way.
- 338-2 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Mayellen Henry  
16651 SE 17th St  
Bellevue, WA 98008  
mayellen@comcast.net  
(425) 746-5959

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



## Comment Letter 339

## Comment Letter 340

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**From:** Menno Sennesael (mennosennesael@gmail.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 9:54 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

339-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

339-2 | Please do the right thing, listen to the people, and think of future generations.

Thank you for your work

Sincerely,

Menno Sennesael  
7222 Linden Ave N Apt C  
Seattle, WA 98103  
mennosennesael@gmail.com  
(206) 356-7801

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

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**From:** Niels and Susan Andersen (andersen@chem.washington.edu) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 5:24 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

340-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. It has been one of our favorites for decades and always a highlight. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process. These lakes are jewels, not just reserves of water.

340-2 | The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Niels and Susan Andersen  
6529 Greenwood Ave N  
Seattle, WA 98103  
andersen@chem.washington.edu  
(206) 781-1964

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 341

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**From:** Oliver Dunn (dunn.oliver@outlook.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Sunday, July 01, 2018 1:07 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

341-1 I have lived in Washington my entire life and have found my career, calling and passion in life in Washingtons wilderness. Please don't mess it up. Alpinerness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

341-2

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Oliver Dunn  
10029 61st Ave S  
Seattle, WA 98178  
dunn.oliver@outlook.com  
(206) 612-7452

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 342

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**From:** Patrick Conn (nvr2l82conntactme@comcast.net) Sent You a PersonalMessage <automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 10:22 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

342-1 I ASK YOU SO-CALLED INTELLIGENT INDIVIDUALS: WHAT IS SO HARD ABOUT LEAVING "NATURE" ALONE AND "LETTING IT TAKE ITS OWN COURSE"? Why continue making the same human idiotic hubris-generated mistakes at trying to "manage" Nature that have failed miserably for centuries past? Think about it?

342-2 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Patrick Conn  
22018 126th Ct SE  
Kent, WA 98031  
nvr2l82conntactme@comcast.net  
(253) 631-9100

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 343

## Comment Letter 344

**From:** Paul Fior (dogsfoot@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 7:15 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

343-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

343-2 Anyone whose visited the stunning landscapes of the Alpine Lakes Enchantment Lakes Basin has seen for themselves what a wilderness gem it is. Offering us a uniquely accessible pristine wilderness area that can only compare to Seven Lakes Basin in the Olympics. It is incumbent upon us to retain this special place, undisturbed, unencumbered, in the public trust for us and future generations. Future water use is a concern for a growing population. It needs to be approached with the utmost care and consideration for all of the varied needs it may be used to support.

Thank You; Paul Fior  
 Newcastle, WA 98056  
 dogsfoot@gmail.com

Sincerely,

Paul Fior  
 9216 120th Ave SE  
 Newcastle, WA 98056  
 dogsfoot@gmail.com  
 (425) 941-1003

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**From:** Paul Granquist (paulgranq6439@comcast.net) Sent You a Personal Message  
 <automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 10:35 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

344-1 As a frequent hiker in the Alpine Lakes Wilderness area I am appalled that plans are being made for the use of heavy construction equipment in this wilderness area. This activity would destroy a pristine area. Construction scars would last for decades. Even repairing existing dams while a more acceptable alternative would result in some habitat and ecological degradation. The Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Paul Granquist  
 10109 21st Ave W  
 Everett, WA 98204  
 paulgranq6439@comcast.net  
 (425) 514-8006

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 345

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**From:** Rachel Thomas (inkedsiren@yahoo.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Friday, June 22, 2018 5:46 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

345-1 How could you really and truly be considering this? How can you justify this?!

345-2 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Rachel Thomas  
519 W Roy St Apt 312  
Seattle, WA 98119  
inkedsiren@yahoo.com  
(808) 651-6828

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 346

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**From:** Rose Lagerberg (russlag1@live.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Saturday, June 23, 2018 2:52 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

346-1 While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

346-2 Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Rose Lagerberg  
8513 Madrona Ln  
Edmonds, WA 98026  
russlag1@live.com  
(206) 708-9478

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 347

## Comment Letter 348

**From:** Shanna Sierra (sierramorgan4@msn.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Thursday, June 28, 2018 10:09 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

347-1 We must grow up NOT OUT! We the People want to preserve our amazing outdoors for GENERATIONS to come, not years! We must stop damming of these pristine areas and NOT ALLOW human influence to ruin this area for wildlife or human enjoyment. Short-sightedness is not worth it!

347-2 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Shanna Sierra  
 819 NE 151st St.  
 Shoreline, WA 98155  
 sierramorgan4@msn.com  
 (206) 856-3980

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

**From:** Sigrid Asmus (essay@nwlink.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Sunday, June 24, 2018 4:03 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

348-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot and must not allow the projects currently proposed by the Washington Department of Ecology and Chelan County. These destructive projects, in a precious and irreplaceable wilderness area, would undermine the well-deserved protections for our public lands. They must be stopped, both because -- in this case -- similar past efforts have wasted millions and never worked, and because if they are permitted that action would be a bright green light to still more invasive and destructive actions in Washington's wilderness areas.

348-1 The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS must be revised to make certain that it complies with all state and federal laws, properly ensures there is NO impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Sigrid Asmus  
 4009 24th Ave W  
 Seattle, WA 98199  
 essay@nwlink.com  
 (206) 283-1382

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 349

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**From:** Sue Tiffany (sunshine91070@yahoo.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Tuesday, June 26, 2018 4:52 PM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 349-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

- 349-2 I have taken my children hiking in these pristine wilderness areas. No reasonable person would want to see bulldozers trampling ecosystems in these areas. In the last 30 years Washington State has seen much of its open space put under concrete. These lands are lost to the people who visited them and the animals that once called them home.

Reconsider the work on the Alpine Lakes area and use creative and conservation thinking.

Sincerely,

Sue Tiffany  
25320 144th PI SE  
Kent, WA 98042  
sunshine91070@yahoo.com  
(253) 631-0312

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Comment Letter 350

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**From:** Suzanne Davis (gardens2a11@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Monday, June 25, 2018 10:42 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 350-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

- 350-2 I've spent time in this wilderness and fully appreciate what we might lose. I also used to spend time each summer hosebackpacking in the Pasayten Wilderness. Decades later, I remember that time as some of the most formative of my life. That is where I learned the interconnectedness of life and the importance of taking care of the earth. That is where I learned how many stars there are in the night sky.

Please do not destroy any part of the wilderness area we have left. We can't get it back once it's gone.

Sincerely,

Suzanne Davis  
1018 13th St Apt 65  
Snohomish, WA 98290  
gardens2a11@gmail.com  
(360) 563-2672

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

## Comment Letter 351

## Comment Letter 352

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**From:** Tanya Lawson (ovowlart@gmail.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Saturday, July 28, 2018 6:35 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 351-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- 351-2 | Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. Is it right for one natural area to be exploited under the guise of enhancing another? Please find a more suitable and cost effective way to resolve this issue!

Sincerely,

Tanya Lawson  
 424 Kittitas  
 Wenathcee, WA 98801  
 ovowlart@gmail.com  
 (509) 579-0479

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

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**From:** Venard Trevisanut (risanut@yahoo.com) Sent You a Personal Message <automail@knowwho.com>  
**Sent:** Wednesday, June 27, 2018 10:43 AM  
**To:** nr.iciclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

- 352-1 | Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.
- The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.
- Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

- 352-2 | save the highlands.

Sincerely,

Venard Trevisanut  
 24508 229th Ct SE  
 Maple Valley, WA 98038  
 risanut@yahoo.com  
 (425) 458-8165

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 353

Comment Letter 353

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**From:** Barbara Cunningham <bcunningster@gmail.com>  
**Sent:** Thursday, July 26, 2018 1:56 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

353-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

1

353-2 Since we own this land and it belongs to ALL of us, I forbid you to let a small number of people take it upon themselves to destroy what is a beautiful wilderness!

Sincerely,  
Barbara Cunningham

2



## Comment Letter 354

## Comment Letter 354

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**From:** Barbara Cunningham <bcunningster@gmail.com>  
**Sent:** Monday, July 23, 2018 3:09 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

354-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

1

354-2 I urge you to choose Alternate 5. Don't destroy land that you are not responsible for! Leave the wilderness area alone!

Sincerely,  
 Barbara Cunningham

2

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 355

**From:** Cassandra Bufano <Cassandra.Bufano.53459950@p2a.co>  
**Sent:** Tuesday, July 24, 2018 10:15 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

My name is Cassandra Bufano and I am writing to you to express my concerns with the proposed Icicle Creek water strategy.

355-1 I recently moved to Washington from Florida. I relocated to this areas primarily for the untouched and heavily respected Alpine Lakes Wilderness. When visiting in 2015 I felt a sense of wonder and awe as I went of my first hike ever at Snow Lake. Since then my life has completely changed and I then spent a year of my life living in Yellowstone National Park. I cannot explain how happy and at ease I am since I have started my life here. We have the chance to preserve this land and I know that I am not the only one that feels this way about Washington and the PNW in general. You are the voice we need to help this. Please do not let the rest of the country down.

355-2 The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.

The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.

Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Cassandra Bufano

1

Comment Letter 356

**From:** jennifer schultz <firls4eva@roadrunner.com>  
**Sent:** Thursday, July 26, 2018 6:41 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

356-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

1

## Comment Letter 356

## Comment Letter 357

356-2 BUILDING MAN MADE DAMS IS HORRIBLE FOR THIS AREA. SINCE THIS AREA IS FEDERAL LAND IT SHOULD BE PROTECTED FOR AMERICANS.

Sincerely,  
jennifer schultz

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**From:** Mark and Susan Vossler <vosslerm1@comcast.net>  
**Sent:** Sunday, July 29, 2018 11:33 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

357-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 357

357-2 We oppose new/enlarged dams.  
We support minimizing wilderness impact.  
Keep our wilderness "wild."  
Thank you!

Sincerely,  
Mark and Susan Vossler

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Comment Letter 358

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**From:** Mark and Susan Vossler <vosslerm1@comcast.net>  
**Sent:** Friday, July 27, 2018 11:45 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

358-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

## Comment Letter 358

## Comment Letter 359

358-2 We support keeping our wilderness in it's natural and wild state.....there's already too few of these for future generations to enjoy. No tunnel, no dam in Alpine Lakes Wilderness.

Sincerely,  
Mark and Susan Vossler

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**From:** Mary Johnson <mekj@earthlink.net>  
**Sent:** Monday, July 23, 2018 2:26 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

359-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 359

Comment Letter 360

359-2 | It's very important to protect our wild places and waterways. Please come up with a plan that will do so. Thank you.

Sincerely,  
Mary Johnson

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2

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**From:** Nancy Anderson <buhglady3@yahoo.com>  
**Sent:** Thursday, July 26, 2018 12:42 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

360-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

1

## Comment Letter 360

## Comment Letter 361

360-2 Please do not ruin our beautiful country. This would definitely do that. And also hurt our wildlife.

Sincerely,  
Nancy Anderson

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**From:** Robert Havrilla <rhjtest@aol.com>  
**Sent:** Sunday, July 29, 2018 5:29 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

361-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

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For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 361

361-2 | I don't know how to be any more straight forward and direct about this project other than to say it is an obvious and blatant violation and affront to the Wilderness Act of 1964 to be building man-made dams in wilderness areas.

Sincerely,  
Robert Havrilla

,

Comment Letter 362

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**From:** Robert Havrilla <rhjtest@aol.com>  
**Sent:** Thursday, July 26, 2018 9:13 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

362-1 | The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.



## Comment Letter 362

## Comment Letter 363

362-2 Please correct me if I'm wrong but when Lewis&Clark explored the Far West, the only dams they may have come across were natural beaver dams; thus, man-made dams are out of character for wilderness areas and not in keeping with the Wilderness Act.

Sincerely,  
Robert Havrilla

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**From:** edie.lie@everyactioncustom.com on behalf of Edith Lie <edie.lie@everyactioncustom.com>  
**Sent:** Sunday, July 22, 2018 9:05 PM  
**To:** nr.iclesepa@co.chelan.wa.us  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

363-1 These changes would have a negative effect on important trails and campsites in the Enchantments. Our children and their children should have the opportunity to hike to and camp at Eightmile and Snow Lakes. You would be taking away a precious place in Washington, a place where people can appreciate the wild beauty of the land. As it is now, hiking and camping in the Enchantments is already limited, and you were further deny us the experience of spectacular alpine scenery. Please reconsider the increase of the dams and boring the tunnel. These projects' negative effects outweigh the positive.

Sincerely,  
Mrs. Edith Lie  
18640 103rd Ave NE Bothell, WA 98011-3816 edie.lie@me.com

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 364

Comment Letter 364

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**From:** Linda Carroll <lindalouise701184951@yahoo.com>  
**Sent:** Monday, July 23, 2018 9:43 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

364-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:

The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.

The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.

Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klonauqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klonauqua Lake.

Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.

IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.

For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.

The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

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364-2 As a native of Seattle who knows how much wilderness has been lost in our state in the last 70 years, I urge that the wilderness character of this region be preserved according to the law that governs it for all Americans, to whom it belongs.

Sincerely,  
Linda Carroll

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## Comment Letter 365

## Comment Letter 366

**From:** Bruce Turcott <turcotts@comcast.net>  
**Sent:** Friday, June 22, 2018 8:20 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

365-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

365-2 I am a Washington native and first backpacked in the Enchantments in 1968. My son has made 3 trips there. We are well familiar with the area.

Bruce Turcott  
 4308 5th Ave NW  
 Olympia, WA 98502

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**From:** Tim McNulty <mcmorgan@olypen.com>  
**Sent:** Monday, June 25, 2018 10:02 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

366-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

366-2 My family and I are frequent visitors to Chelan County, the Alpine Lakes Wilderness, and the Leavenworth area where we have good friends. We are dismayed that the County DEIS has proposed irrigation water projects in the Alpine Lakes Wilderness.

Tim McNulty  
 168 Lost Mountain Ln  
 Sequim, WA 98382

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ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 367

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**From:** Thom Peters <voice4wild@aol.com>  
**Sent:** Monday, June 25, 2018 12:38 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

367-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

367-2 No designated orchard irrigation water for developments.

Thom Peters  
7725 Riverview Road  
Snohomish, WA 98290

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Comment Letter 368

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**From:** Susan Cuturilo <susancuturilo@msn.com>  
**Sent:** Friday, June 22, 2018 12:24 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

368-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

368-2 I don't understand the need for a dam. Can someone explain? It's pretty outrageous to even consider dams up there.

Susan Cuturilo  
1302 Seneca St.  
Seattle, WA 98101

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## Comment Letter 369

**From:** Shirley Sonnichsen <jssonn.dawgs@charter.net>  
**Sent:** Sunday, July 01, 2018 9:02 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

369-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

369-2 Please do not approve these projects of which many are illegal. This is a treasured wilderness area.

Shirley Sonnichsen  
 1150 Englewood Dr  
 Richland, WA 99352

## Comment Letter 370

**From:** Seth Rolland <melseth@olypen.com>  
**Sent:** Saturday, June 30, 2018 7:36 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

370-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

370-2 Please keep any new dams, tunnels or other development out of the Alpine Lakes wilderness. There are few places in the country that approach the beauty and wildness of this area, and it needs to be preserved for future generations.

Seth Rolland  
 1039 Jackson Street  
 Port Townsend, WA 98368

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 371

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**From:** Scott Elliott <scott@mountainlogic.com>  
**Sent:** Friday, June 22, 2018 11:09 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mike Kaputa,

371-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

371-2 The outdoor recreation industry is key to job growth and economic development in our region. Please support jobs by protecting Alpine Lakes Wilderness.

Scott Elliott  
PO Box 166  
North Bend, WA 98045

Comment Letter 372

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**From:** Peter Carskaddan <p.carskaddan@centurylink.net>  
**Sent:** Thursday, June 28, 2018 8:19 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

372-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

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The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

372-2 Director Kaputa, the Wilderness Act is the single best tool for the preservation of wilderness and should not be infringed upon. The Alpine Lakes is a treasure not just for Washington but the entire nation; it should not be chipped apart. Thank you

Peter Carskaddan  
331 N 82nd St  
Seattle, WA 98103

## Comment Letter 373

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**From:** Mr. Shelley Dahlgren, PhD <shelley@dahlgren.com>  
**Sent:** Friday, June 22, 2018 8:21 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

373-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

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The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

373-2 Mr. SDD. Once gone, gone forever. There must be other options that are as good this area. Mr. SDD

Mr. Shelley Dahlgren, PhD  
 4449 242nd Ave SE  
 Sammamish, WA 98029

## Comment Letter 374

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**From:** Michael Siptroth <flybill2@aol.com>  
**Sent:** Monday, June 25, 2018 6:36 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

374-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

374-2 We need more protections for wilderness, for humans and wildlife; protecting waters crucial for salmon recovery and orcas!

Michael Siptroth  
 2160 E Trails End Dr  
 Belfair, WA 98528

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 375

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**From:** Julie Stohlman <jubilation@h4consulting.com>  
**Sent:** Friday, June 22, 2018 2:25 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

375-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

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The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

375-2 This is an area where I love to hike. It is legally protected from development. Do not encroach on this area.

Julie Stohlman  
715 Summit Ave E Apt B  
Seattle, WA 98102

Comment Letter 376

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**From:** Emily Myette <emily.myette@gmail.com>  
**Sent:** Friday, June 22, 2018 2:01 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

376-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

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The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

376-2 Additionally, I was lucky enough to get a permit to camp at Eightmile Lake last month. Not only was it appalling to see construction there at all, but I can only imagine how detrimental a large dam would be to the lake's natural beauty.

Emily Myette  
1414 10th Ave  
Seattle, WA 98122



## Comment Letter 377

**From:** Denise Harnly <denise@harnly.net>  
**Sent:** Tuesday, June 26, 2018 1:07 PM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

377-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

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The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.

The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

377-2 Please- revise the draft EIS. There will be years of litigation if it stands as it is but more importantly this is one of the most pristine areas in the country.

Thank you!

Denise Harnly

Denise Harnly  
 3302 S Washington St  
 Seattle, WA 98144

## Comment Letter 378

**From:** Bob Aegerter <Bob\_Aegerter@comcast.net>  
**Sent:** Friday, June 22, 2018 8:28 AM  
**To:** Mike Kaputa  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Mike Kaputa,

378-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.

The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.

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The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

378-2 Please do the legal thing.

Bob Aegerter  
 78 North Point Dr  
 Bellingham, WA 98229

ICICLE CREEK SUBBASIN  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 379

Comment Letter 379 Signatures

**From:** ben murray <benjideniro@yahoo.ca>  
**Sent:** Tuesday, July 31, 2018 1:55 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] RE: "Icicle Creek Watershed Water Resources Management Strategy."

Dear Mike Kaputa,

- 379-1 The DPEIS should be revised to address the following deficiencies and a revised Draft PEIS should be released for public comment:
- 379-2 The Alpine Lakes Wilderness is federal public land that belongs equally to all Americans. As such, it's a shared natural resource that must be respected and protected. The national interest in preserving its wilderness character must be protected.
- 379-3 The DPEIS fails to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The DPEIS assumes Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The DPEIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals.
- 379-4 Alternative 4 is the worst. It includes drilling a tunnel between two lakes (Upper and Lower Klon aqua Lakes); building a higher dam at Upper Snow Lake (enlarging that lake); and a higher-than-ever dam at Eightmile Lake (making that lake bigger than it has ever been). All of these lakes are inside the Alpine Lakes Wilderness. The DPEIS analysis of these proposals is grossly inadequate. IPID has no right to enlarge Eightmile Lake, and has never had any water rights at Upper Klon aqua Lake.
- 379-5 Alternative 5 is best. It includes the "Full IPID Pump Station," which would move IPID's point of diversion downstream to the Wenatchee River, and greatly improve flows in Icicle Creek without building bigger dams in the Wilderness, especially in future decades when climate change will reduce flows in the Icicle watershed.
- 379-6 IPID's water rights were granted for the designated purpose of irrigation. The DPEIS proposes to use IPID water for other purposes, such as the fish hatchery and domestic use in Leavenworth, but IPID has no right to use water for these additional purposes.
- 379-7 For new storage, "restoration" storage and "optimization" projects, the timelines and estimated costs stated in the DPEIS are highly suspect, because the DPEIS fails to account for the fact that these lakes are on National Forest lands inside the Alpine Lakes Wilderness. The DPEIS repeatedly ignores protections of the Wilderness Act. It repeatedly ignores the land management role and authority of the U.S. Forest Service on these National Forest lands. It repeatedly ignores the fact that major federal actions require analysis under the National Environmental Policy Act (NEPA). The State Environmental Policy Act (SEPA) is not NEPA. The true costs of Alternatives 1, 2 and 4 are likely much higher than the DPEIS estimates, and closer to the cost of Alternative 5.
- 379-8 The DPEIS repeatedly ignores the negative impacts on the riparian ecosystems in the Alpine Lakes Wilderness from the proposed off-season releases of water from lakes, which alters stream hydrology.

Thank you.

* Zentura	Adriana Micciulla	Alberto Paquola
A A	Adrienne Doherty	Alec Campbell
A Haley	Adrienne Frey	Aleda Richardson
A Krevitz	Adrienne Strandberg	Aleks Kosowicz
A Michael Dianich	Aggie Parish	alena jorgensen
A Puza	Aida Marina	Alex Christensen
A. Norris	Aimee Whitman	Alex Harris
A. S. Evans	Aislinn Gagliardi	Alex Monny
A. Todd	Al DeRoy	Alex Vollmer
A.B. Kovats	Al Mendelsohn	Alexander Grant
A.L. Steiner	Al Trutter	Alexander Knopf
a+a+c = 3 voters jhangiani	Al Werner	Alexandra Gruskos
Aaron Sheiman	Alan Binnie	Alexandra Zarzycka
Aaron St. John	Alan Carlton	Alexey Zimenko
Aaron Ucko	Alan Carter	Alexia Jandourek
Abdullah Goldstein	Alan Cyr	Alfa Santos
Abigail Corbet	Alan Haggard	Alfred Mancini
Abigail Gindele	Alan Hart	Ali Van Zee
ACE HULL	Alan Jasper	Alice Felix
Adam D'Onofrio	Alan Lambert	alice jena
Adam Fogel	Alan Robert	Alice Kelly
Adam Giancarlo	Alan Schenck	Alice Mizsak
Adam Mead	Alan Stein	Alice Petersen
Adam Sargent	Alan Wojtalik	Alice Swan
Adele Sposato	Albert and Marcia Hertz	Alice Tseng
Adella Albiani	Albert Gamble	Alicia Deherrera
Aditi Sundarajan	Albert Honican	Alicia Power
Adina Parsley	Albert Marra	Alida Bockino
Adriana Faraldo	Albert Tahhan	Alisa Lewis

# DPEIS COMMENTS & RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Alisa Ocean	Amy Heyneman	Andrea Neal	Angie Rhinier	Ann Marie	anne hammond
Alisha BeGell	Amy Kubin	Andrea Smith	ANGRY VOTER	Ann Marie Ross	Anne Harbut
Alison Massa	Amy Liebman	Andrea Williamson	Angus MacDonald	Ann McCall	Anne Jackson
Alison Taylor	Amy Roberts	Andrea Zemel	Anita Brandariz	Ann Pilcher	Anne Jameson
Allen Altman	amy Schumacher	andres venegas	Anita Gwinn	Ann Pryich	Anne LaBouy
Allen Royer	Amy Veloz	Andrew Bukovitz	Anita Hoos	Ann Sherwood	Anne Mathot
Allen Salyer	Amy Wolfe	Andrew Burnham	Anita McNamara	Ann Sweeten	Anne Moeller
Allen Symonds	Amy Wolff	Andrew Fisher	Anita Ross	Ann Vileisis	Anne Montarou
Allie Tennant	Ana Herold	Andrew Hellinger	Anita Watkins	Ann Waller	Anne Noire
Allycia Godbee	Ana Jacques	Andrew Lenz	Ann Barnes	Ann White	Anne Phillips
Alyce Fritch	AnaLisa Crandall	Andrew Mumford	Ann Barnett	Ann Wiley	Anne Pinkerton
Alycia Staats	Ananya Boonyarattaphun	Andrew Wadsworth	Ann Bartell	Ann Wiseman	Anne Spesick
alysen shotz	Anastasia Devaris	Andy Hughes	Ann Bein	Anna Bengel	Anne Streeter
Alyssa Freeman	Anastasia Hanifan	Andy Johnson	Ann Berndt	Anna Brewer	anne veraldi
Amanda Hostetler	Anastasia Ogle	Andy Lynn	Ann Coz	Anna Engdahl	Anneke DeLuycker
Amanda Petel	Anders Hengsteler	Andy Zahn	Ann Craig	Anna Janakiraman	Anne-Marie Hewitt
Amanda Smock	Andi Lamoreaux	anet Gee	Ann DeBolt	Anna Jasiukiewicz	Annette Bork
Amanda Sousa	Andra Heide	Angela Bellacosa	Ann Downey	Anna Jones	Annette Frisbie
Amanda Zangara	Andre Gregoire	Angela Judy	Ann Eastabrooks	Anna Louise Fontaine	Annette McMullen
Amber Davidson	Andre Meaux	Angela Leventis	Ann Frutkin	Anna Mosqueda	Annette Raible
Amelia Linder	Andrea Alagammai	Angela Peters	Ann Hinshaw	Anna Narbutovskih	Annette Tchelka
Amie Corrado-Babe	Andrea and James Gutman	Angela Ridolfo	Ann Jacobs	Anna Stein	Annie Bien
Amit Shoham	Andrea Bonnett	Angela Russell	Ann James	Anna Szaszorowska	Annie McCombs
Amitav Dash	Andrea Chisari	Angela Shadwick	Ann K Brady	Anna Tangi	Annie McCuen
Amy Bright	Andrea Eisenberg	Angela Terranova	ann kam	Annabel P	Annie McMahon
Amy England	andrea Feig	Angela West-Piotrowski	Ann King	Anne Barker	Annie P
Amy F .	Andrea Ford	Angelina None	Ann Klinefelter	Anne Dal Vera	Annie Winstead
Amy Hansen	Andrea Kendall	Angi Tilley	Ann Kuter	Anne Easterling	Anthony Albert
Amy Harlib	Andrea Lewis	Angie Dixon	ann Malyon	Anne Ficke	Anthony Arcure

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Comment Letter 379 Signatures

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Anthony DeCarlo	Arthur Hagar	Barbara Amsler	Barbara Mathes	BARTON COX	Benton Elliott
Anthony Gilchriest	ARTHUR MEINCKE	Barbara Anderson	Barbara McDonald	Bassam Imam	Berinda Van Cleave
Anthony Kropovitch	Artie Schlette	Barbara Andrew	Barbara McMahan	Beatrice Attier	Bernadette Schein
Anthony Mehle	Arturo Beyeler	Barbara Blackwood	Barbara Mesa	Beatrix Schramm	Bernadine Turner
Anthony Miragliotta	Asano Fertig	Barbara Bonfield	Barbara Mintz	Beatriz Pallanes	bernardo alayza mujica
Anthony Presutto	Ashley Lewis	Barbara Brockway	Barbara Nardone	Beau Ryba	Bernice Van Steenberg
Antoinette Gonzales	Ashley Wapenski	Barbara Carr	Barbara Osada	bec marant	Beth Bowling
Antonia Chianis	Aubrey Johnson	Barbara Collins	barbara poland	Becca Forrest	Beth Call
Antonia Mattheu	Aubrey Lees	Barbara Conrad	Barbara Rizzo	Becky Anderson	Beth Chao
Antonio Ruiz	Aubrey Wilson	Barbara Consbruck	Barbara Rogers	Becky Andrews	Beth Drewelow
April shame on you Lo	Audrey Arnold	Barbara Dague	Barbara Root	Becky Breeding	Beth Flake
April West	Audrey Higbee	Barbara Damm	Barbara Rosenkotter	Becky Daiss	Beth Goodhue
Arden Down	August Abel	Barbara Diederichs	Barbara Rubinstein	Becky Johnson	Beth Hawes
Ariana Saraha	August Scheer	Barbara Dincau	Barbara Silverman	Becky Marek	Beth Levin
arianna volpi	Aurea Abrantes	Barbara Fleming	Barbara Simonds	Becky Monger	Beth Raynis
Ariel Leibowitz	Austin Turney	Barbara Gladfelter	Barbara Stone	Bee Wenzer	Beth Yelensky
Arlene Aughey	Avi Okin	Barbara Glassheim	BARBARA SWYDEN	Beedona Cracium	Bethany Bradshaw
Arlene Dobra	Avril Harville	Barbara Graper	Barbara Tacker	Belle McMaster	Beti Webb Trauth
Arlene Drete	Axel Vogt	Barbara Gross	Barbara Tonsberg	Bellinda Rolf-Jansen	Betsey Porter
Arlene Forward	B DEmilio	Barbara Grove	Barbara Tountas	Ben Bryant	Betsy Herbert, Ph.D.
Arlene Goodenough	B K	Barbara Hanson	Barbara Trypaluk	Ben Horner-Johnson	Betsy Maestro
Arlene Waller	B Nigrini	Barbara Hegedus	Barbara Wagner	Ben Johnson	Betti Jones
Arlene Zuckerman	B. ROSE	Barbara Jacobsen	Barry Adler	Ben Martin	Bettina Bickel
arline lohli	BA Mack	Barbara Jacoby	Barry Bennett	ben murray	Betty J. Van Wicklen
Armando Gomez	Baker Smith	barbara kruse	Barry Cutler	Ben Ruwe	Betty King
Art Hanson	Barb Borah	Barbara Lasley	Barry LeBeau	Benjamin Joannou Jr	Betty Lee Smith
Arthur Altree	Barb DeLeone	barbara maat	Barry Schwartz	Benjamin Martin	Betty Peterson-wheeler
Arthur Coates	Barb Hauser	Barbara MacAlpine	Bart Stegman	Bennie Scott	Betty Schuessler
Arthur Fellows	Barb McCarthy	Barbara Manildi	Bartley Deason	BENNIE WOODARD	Betty Stewart

# DPEIS COMMENTS & RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Beverly Ann Conroy	BO BREDA	Bonnie Faith	Brent Riggs	Brittni Mills	C. Kasey
Beverly Deering	Bo Svensson	Bonnie Farmer	Brent Rocks	Brooke Kane	C. Mendel
Beverly Garcia	Bob Bousquet	Bonnie Fletcher	Bret Smith	Brooke Miltner	Caephren McKenna
Beverly Harris	Bob Brister	Bonnie J. Smith	Brett Taylor	Bruce Allen	Caitlin Archambault
Beverly Herrington	Bob Conrich	Bonnie Orkow	Bria Wheat	Bruce Anderson	Caitlin Meyer
Beverly Janowitz-Price	Bob Douse	Bonnie Sadowskas	Brian Boortz	Bruce Barnbaum	Cal and Alice Elshoff
Beverly Linton	Bob e Burnham	Bonnie Walsh	Brian Field	Bruce Bernard	Cal Cole
Beverly Minn	Bob Flagg	Bonnie Wassmer	Brian Gibbons	Bruce Carley	Calley O'Neill
Beverly Railsback	Bob Gendron	Bonnie Worden	Brian Gottejman	Bruce Cohen	Callie Riley
beverly rice	Bob Hoffman	Brad Jacobsen	Brian Huntley	Bruce Higgins	Callie Stilwell
Beverly Stickley	Bob Justis	Brad Snyder	Brian Kessler	Bruce Jackson	Camelia Mitu
Beverly Williams	Bob M	Bradford Crain	Brian Larson	Bruce Jensen	Camilla Spicer
Bill and Fran Stenberg	Bob Miller	Bradley Houseworth	BRIAN MCSHANE	Bruce McNally	Camille Gilbert
Bill Boyd	Bob Saint	Brandi McCauley	Brian Moscatello	Bruce Olson	Cammy Colton
Bill Brabson	Bob Schildgen	BRANDI THOMAS	Brian Paradise	BRUCE OSHABEN	Candace Bassat
Bill Christie	bob senko	Brandie Deal	Brian Pierce	Bruce Ross	Candace Gabriel
Bill Engs	Bob Sipe	Brandon Juhl	Brian Pike	Bruce Sadowskas	Candace Galen
Bill Hughes	Bob Steininger	Brandon Steiner	Brian Schwartz	Bruce Turcott	Candace McCann
Bill Leikam	Bob Thomas	Brandt Mannchen	Brian Thorbjornsen	Bryan Bell	Candace Rocha
BILL MARCH	bob welch	brandy faber	Brian Weatherby	Bryan Bradley	Candy Frantz-Crafton
Bill Mikulak	bob Yancey	Brandy Parris	Brian Yanke	Bryan Hansel	Cara Busch
Bill Scott	BOBBI GOLDIN	Brandy Schumacher	Bridget LaNoir	Bryan Wyberg	CARA lou wicks
Billie Gordon	Bobbie Flowers	Brant Kotch	Bridget Nelson	Bryn Heist	Caren Hanson
BILLY WOODS	Bobbie Hensley	Braxton Worth	Bridgett Heinly	bryna fuchslocher	Carina Ramirez
Bjoern Mannsfeld	Bobby Belknap	Brenda Eckberg	Brig Larson	Burkhard Broecker	Carl Pribanic
blake wu	Bonita Staas	Brenda Hartman	brigitte hiller	Burt Torgan	Carl Stapler
Blanca Luz Ross	Bonna Mettie	Brenda Michaels	Brita Mjos	C Day	carl tyndall
Blanche Jones	Bonnie Dryer	Brenda Theus	BRITT CLEMM	c leonard	Carla Behrens
Bo Baggs	Bonnie Eden	BrendaLee Lennick	brittney bergstrom	C Pearson	Carla L

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Comment Letter 379 Signatures

Carla Womack	Carol Hinkelman	Carol Weaver
Carleen Terrano	Carol Howell	Carol Weber
Carlene Meeker	carol jagiello	Carol Wick
Carlene Moscott	Carol Jensen	Carol Wiley
Carlos Castro	Carol Joan Patterson	Carol Wyndham
Carlos Nunez	Carol King	Carole Campbell
Carlotta Harrell	Carol Knight Watson	Carole Ehrhardt
Carly Clements Owens	Carol Kommerstad-Reiche	carole klumb
Carly Wilcox	Carol Kreck	Carole Mathews
Carmel Parr	Carol Kuelper	Carole Pappas
carol bartelt	Carol Laurencell	carole pooler
Carol Book	Carol Lawrence	Carole Stodder
Carol Bostick	Carol Lillis	Carolie Booth
Carol Brazee	Carol Maghakian	Caroline Garland
Carol Chappell	Carol Metzger	Caroline Kane
Carol Collins	Carol Ohlendorf	Caroline Kipling
Carol Cunningham	Carol Rahbari	Caroline Mead
Carol Dearborn	Carol Ramo	Caroline Sévilla
Carol Doty	Carol Rue	Carolita McGee
Carol Else	Carol Ruth	Carolyn and Richard Rosenstein
carol flatmo	Carol Schaming	Carolyn Barker
Carol Fletcher	Carol Sears	Carolyn Boydston
Carol Fly	Carol Skowronnek	Carolyn Clark Pierson
Carol Freese	Carol Smith	Carolyn Dennison
Carol Goerke	Carol Stotmyer	Carolyn Dickson
Carol Gold	Carol Taggart	Carolyn Doty
Carol Goslant	Carol Thompson	Carolyn Eden
Carol Hendrie	CAROL VANDEVEIRE	Carolyn Gann
Carol Hewitt	Carol Waggener	

Carolyn Haupt	Catherine Hale	Cecilia Barea
Carolyn Knoll	Catherine Houtakker	Cecilia Burns
carolyn massey	Catherine Jones	Celeste Anacker
Carolyn Nieland	Catherine Keys	Celeste Hong
Carolyn Poinelli	Catherine Lambeau	Celeste Watt
Carolyn Raasch	Catherine Loudis	Celia Wulff
Carolyn Ricketts	Catherine McNamara	Chad Bowers
Carolyn Simon	Catherine Nelson	Chad Evans
Carolyn Smith	Catherine Nettesheim	Chad Fuqua
Carolyn Wood	Catherine Uchiyama	Chad Held
Carrie Darling	Catherine Vernon	Chadwick Wright
Carrie Thompson	Catherine Williams	Chandra Hershey-Lear
Carrie Walker	cathie ernst	Charity Moschopoulos
carrie west	Cathie Kwasneski	Charleen Steeves
Carrie Windhorst	Cathy Adams	Charleen Strelke
Carroll Darte	Cathy Bledsoe	Charlene Boydston
Cary Appenzeller	cathy crum	Charlene Ferguson
Caryl Speck	cathy elizabeth levin	Charlene Knop
Caryn Cowin	cathy Ellis	Charlene Rush
casey coates danson	Cathy Felix	charles anderson
Casey Cochran	Cathy Grovenburg	Charles Barnard Jr
Cashin Hunt	Cathy Hope	Charles Bittorf
Cassandra Browning	Cathy Lambeth	Charles Casper
Cassie Alford	Cathy Marczyk	Charles Clusen
Cassie Valent	Cathy Nieman	Charles Davis
Catherina Pressman	Cathy Ream	Charles Fitze
Catherine Anders	cathy russo	Charles Hammerstad
Catherine Beauchamp	cb michaels	Charles Hessler
Catherine Corwin	Cecelia Samp	Charles Hottle

Comment Letter 379 Signatures

# DPEIS COMMENTS & RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Charles McRae	Chessa Rae Johnson	Christie Hammond	Christopher Lepine	Clark Shores	colonel meyer
Charles Phillips	Chiimey Lee	Christina Dickson	Christopher Seymour	Claudia Cannaday	Connie Burris
Charles Tribbey	Chilton Gregory	Christina Little	Christopher Still	Claudia Greco	Connie Curnow
Charles Wirth	Chrid George	Christina Maris	Christopher Toye	Claudia Halsell	Connie Devine
Charles Wolfe	Chris Bihler	Christina Marx	Christopher Ware	Claudia Kaplan	Connie Hupperts
Charles Younger	chris burns	Christina McKeon	Christopher Weisel	Claudia Miranda	Connie Kaye
CHARLOTTE COOK	Chris Casper	Christina Nillo	Christy Bolognani	Claudia Vernon-Sabine	Connie Murphy
Charlotte Pirch	chris frost	christina penrose	chrystyne braaten	Claudia Wornum	Connie ROUX
Charlotte Read	chris gardner	Christine Becker	Chuck Gehling	Clay Wright	Connie Whitson-Forbes
Charlotte Zitis	Chris Gulick	Christine Brazzell	Chuck Graver	Clayton Cunha Filho	Connie Williams
Charmaine Pulgados	Chris Horton	Christine Cummer	Chuck Wieland	Clayton Daughenbaugh	Connor Harrison
Chas Martin	Chris Komiensky	Christine Gasco	Cigy Cyriac	Cleo Hagen	Constance Baughan
Chelsea Smart	Chris Lavin	Christine Goetz	cindy allison	Clifford Provost	constance lorig
Chelsey Stuart	Chris Law	Christine Jones	Cindy Bassham	Clifton Ware	Consuelo Larrabee
Cheri Haram	Chris Lima	Christine King	Cindy Girvani Leerer	Clint Lenard	Consuelo Olivarez
Cheri Moore	Chris Loo	Christine Klunder	Cindy Koch	Clinton Nagel	Copley Smoak
Cheriel Jensen	Chris LOPEZ	Christine M.C. Money	Cindy Lance	Clive O'Donoghue	Corey Benjamin
Cherri Gilbert	chris marquette	Christine McDowell	Cindy Marshall	cm daudier	Corey Carlson
Cheryl Arthur	Chris Moore	Christine Mueller	Cindy Parrone	Cody Dolnick	Corey Schade
Cheryl Biale	Chris Saia	Christine Newport	Cinzia Paganuzzi	Colene flaherty	Cori Bishop
Cheryl Carney	Chris Stay	Christine Radau	Ciry Null	Colette Sherrington	corine cathala
Cheryl Dzubak	Chris Tiedemann	christine Schnebly	Claire Chambers	Colette Taglieri	Corinne Greenberg
Cheryl Fischer	Chris Washington	Christine V Fink	Claire Cohen	Colin Goldie	Corinne Hollings
Cheryl Michalak	Chris Young	Christopher Barnes	Claire Jackson	Colin Kay	Corinne Musy
Cheryl Nunn	Christa Hegland	christopher carbone	Claire Lawrence	Colleen Harrison	Correne George
Cheryl Reid	Christain Paul Schneider	Christopher Chatard	Claire Perricelli	Colleen K	Corrina Parker
Cheryl Wait	Christeen Anderson	Christopher Ecker	Claire Thibault	Colleen Lobel	Cortney Zaret
cheryl watters	Christi Dillon	Christopher Heuman	Clara Blank	Colleen McMullen	COURTLAND HUBER
Cheryl Weiden	christiane citron	Christopher Keefe	Clare Halloran	Colleen Wysser - Martin	Courtney Thunstrom

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

Comment Letter 379 Signatures

Courtney Hough	Cynthia Shahan	Dan Sherwood	Darcy Macconnell	David Drecktrah	David Larsen
Courtney Little	Cynthia Smith	Dan Struble	darece Swindler	David Dzikowski	David LaVerne
craig conn	D Bello	Dan VanderVere	Darius Fattahipour	David Evans	David LeRoy
craig drew	d hipworth	Dana Bleckinger	darius mitchell	David Fiedler	David Linn
Craig Markson	d ng	Dana Pierson	Darlene Jakusz	David Fisher	David Luboff
Craig Murray	d robinson	Dana Sklar	Darrel Lepiane	David Foulger	David McNiff
Craig Peariso	D Rosengrant	Daniel and Judith Dickinson	Darren Mitton	David G. Laramie	David Miller
craig robinson	D. Fairburn	Daniel Aunkst	Darren Strain	David Giantomasi	David Mitchell
Craig Warren	D. Rex Miller	Daniel Bauer	Darvin Schild	david gladstone	David Neal
Craig Zimmerman	Dacia Dyer	Daniel Bennett	darynne jessler	David Grant	David Neumann
Cristen C.J. Osborne	Daimhin Graves	Daniel Chandler	Dave Frank	David Griffith	David Nichols
Cristina Gatti	Dale LaCognata	Daniel Dowdle	Dave Goodlin	David Guleke	David Nielsen
Cristina Novelo	Dale Peterson	Daniel Jordan	Dave Karrmann	David Gurarie	David Olson
Cristine Saunders	dale riehart	Daniel L. Harris	Dave Potter	David Hall	David Osterhoudt
Crystal Rector	Dale Shero	Daniel Mink	Dave Searles	David Harralson	David Parker
Crystal Wolf	Dallas Dill	Daniel O'Keefe	Dave Taylor	David Harrison	David Porter
curt johnson	Dameon Hansen	Daniel Salmen	Dave/Rita Cross	David Henning	david prystal
Curtis Bohlen	Dameta Robinson	Daniel Schmidt	Daviann McClurg	David Hermanns	David Pyle
Curtis Coffey	Dan Esposito	Daniel Vallero	David E. White	david j. lafond	David Rice
Cyndi Clough	Dan Heffernan	Daniel W	David A Lawrence	David Judd	David Rieckmann
Cyndi Hunt	Dan McCurdy	Daniel Wilkinson	David Addison	David K Oberlin Jr	David Rockwell
Cynthia Arnold	Dan Melius	Daniela Rossi	David and Sally Mikkelsen	David Kagan	David Rose
CYNTHIA DICARLO	Dan Morgan	Daniele Vitalini	David Balan	David Katz	David Sandage
cynthia edwards	dan murray	Danielle Stanley	David Bauer	David Kehl	David Sanders
Cynthia Hellmuth	Dan Nelson	Danielle White	David Boyer	david king	David Saperia
Cynthia Lopreto	Dan O'Hara	Danna Williams	David Brewer	David Klass	David Schommer
Cynthia Marrs	Dan Pepin	Danny King	DAVID BURNS	David Koeller	David Seaborg
Cynthia McNamara	Dan Robinhold	D'Arcy Goodrich	David Christman	David Kornreich	David Sickles
Cynthia Obyrne	Dan Satchell	Darcy Leach	David Collins	David Laing	David Smith



## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

David Stallings	Deanne O'Donnell	Deborah Coviello	debra poscharscky	Dennis Hartenstine	Diana Ward
David Stetler	Deb Kilgore	Deborah Dahlgren	Debra Teplin	Dennis Heinzig	Diane Bartkovich
David Taylor	Deb Michaels	Deborah Dobski	Debra Thompson	Dennis Kreiner	Diane Brandstetter
David Thometz	Deb Staudt	Deborah Doolittle	Debra Ashton	Dennis Ledden	Diane Brown
David Todnem	Deb Williamson	Deborah Efron	Dee Gee	Dennis Manning	Diane Clark
david Trask	Debbi Weiler	Deborah Finn	Dee Gee	Dennis Marceron	Diane Davis
David Tvedt	Debbie Bonnet	DEBORAH FREELAND	Deesa Balasingam	Dennis McGee	Diane Dobreuenaski
David Whalen	Debbie Bremner	Deborah Golembiewski	Deirdre Morris	dennis nagel	Diane Ethridge
David Ashton	Debbie Burroughs	Deborah Harris	Deja Lizer	Dennis Ruffer	Diane Fascione
Davinia Bleijenberg	Debbie Friesen	Deborah Hoffmann	Delyth Owen	Dennis Trembly	Diane Gentile
Dawn Albanese	Debbie Jackson	Deborah Kassis	Demelza Costa	Dennis Wingle	Diane Hendricks
Dawn Cumings	Debbie Kearns	Deborah Kenyon	Dena Maguire young	Derald Myers	Diane Kadamoto
Dawn DiBlasi	Debbie McCarthy	Deborah King	Denie English	Derinda Nilsson	DIANE KASTEL
Dawn Florio	Debbie Pinkham-Salt	Deborah Labb	DENIS HAWKINS	Desiree Mendes	Diane Kent
Dawn Foster	Debbie Sanders	Deborah Lipman	Denise Brennan	Devin McCormick	Diane Kokowski
dawn kenyon	Debbie Sequichie-Kerchee	Deborah Mangan	Denise Brown	Devyn Arbogast	Diane Kraynik
dawn king	Debbie Sierchio	Deborah Reeves	Denise Carmosino	Diana Anderson	Diane Krell-Bates
Dawn Kosec	Debbie Spear	Deborah Rollings	Denise Clarke	Diana Bain	Diane Lamb
Dawn Mason	Debbie Stephenson	Deborah Santone	Denise Keeton	Diana Baker	Diane Loughbom
Dawn Pesicka	Debbie Sturt	Deborah Spencer	Denise Lenardson	Diana Bohn	Diane McLunkin
Dawn Turner	debbie thorn	deborah straker	Denise Lytle	Diana Cristina	Diane Neale
Dayle Carter	Debbie Woods	Deborah Wiley	Denise Ress	Diana Dee	Diane Nowak
DC Katten	Debi Griepsma	Deborah Williams	Denise Romesburg	Diana Duffy	Diane Nunez
Dean Mieras	Debi Holt	Debra Ashton	Denise Szymanski	Diana Franco	DIANE POOLE
Dean Pryer	Debi Wong	Debra Csenge	Denise Ward	diana kekule	Diane Redner
Dean Sherwood	Deborah and Johnny Alderson	Debra Evon	Dennis and Susan Kepner	diana Keyser	Diane Sadowski
Dean Sigler	Deborah Boomhower	Debra Guel	Dennis Bahr	Diana Merson	Diane Schwarz
deann alex	Deborah Brown	Debra Miller	Dennis Edgar	Diana Saxon	Diane Stroz
Deanna W. Bundren		Debra Murphy	Dennis Feichtinger	diana schmidt	Diane Sullivan

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

Diane Thomas	Donald Goppert	Donna Pemberton
Dianna McNair	Donald Shaw	Donna Robin Lippman
Dianne Blane	Donald Tayloe	Donna Rose Sherman
Dianne Douglas	Donald Turken	Donna Selquist
Dianne Ensign	Donald Walsh	Donna Sharee
Dina Duffy	Donald Wilson	Donna Shroyer
Dirk Beving	Donette Erdmann	Donna Slowik
DJ Wagner	Donna Alleyne-Chin	Donna Smith
Dobi Dobroslawa	Donna Austin	Donna Snow
Dolly Marshall	Donna Barham	Donna Thelander
Dolores Graham	Donna Bing	Donna Watson
Domenico Mastrotoaro	Donna Blue	Dorcas Daly
Dominique LANG	Donna Bonetti	Dorene Randall
Don B. Meriwether	Donna Bookheimer	Dori Cole
Don Bergey	Donna Buscemi	Dorien Zaricor
Don Bolanos	Donna Crossman	dorinda kelley
Don Cianelli	Donna Curry	Doris June
DON COTE	Donna D Varcoe	Doris Luther
Don Johnson	Donna Fabiano	Doris Potter
Don McKelvey	Donna Feirtag	dorit grunberger
Don Pew	Donna Friedman	Dorothea Leicher
Don Schapker	Donna Harris	Dorothea Stephan
Don Thompson	Donna Jones	Dorothy Anderson
Dona LaSchiava	Donna Kleinert	Dorothy Brooks
Dona Pereira	Donna Leavitt	Dorothy Brown
Donald Di Russo	Donna Lenhart	Dorothy Cardlin
Donald Dybel	Donna Lewis	Dorothy Daraio
Donald Erway	Donna Mandel	Dorothy Davis
Donald Garlit	Donna Parente	Dorothy Hamilton

Dorothy Lee  
Dorothy Parshall  
Dorothy Shelton  
Dorothy Wheeler  
Dorothy Wyatt  
DOTTIE ANKLAM  
Dottie Butler  
Doug Alderson  
Doug and Jan Parker  
doug franklin  
Doug Gledhill  
doug krause  
Doug Landau  
Doug Schwartz  
Doug Thompson  
Doug Wittren  
Doug Young  
Douglas Cooke  
Douglas Fater  
Douglas Kinney  
Douglas McCormick  
Douglas Rives  
Douglas Rohn  
Douglas Sedon  
DOUGLASS SWANSON  
Dr Lori Ugolik  
Dr. Susan Caswell  
Dr. Ronald E. and Mrs.  
Paulette Tatum

Dr. Tammy King  
Dr. William 'Skip' Dykoski  
Drew Keller  
Drew Martin  
Drew Reese  
Drs. Sher and Randall Todd  
Duncan Van Arsdale  
Dwight Sanders  
Dyan Muse  
Dylan Flather  
Dylan McCoy  
E M Knight  
e p  
E Scantlebury  
E. James Nedeau  
Earl Frounfelter  
Earl Stevens  
Ed Abdool  
Ed Bennett  
Ed Dobson  
Ed Fiedler  
Ed Lee  
Ed Loosli  
Ed Maxedon  
Ed Perry  
Ed Rowell  
Edele Heath  
Eden Kennan  
Edh Stanley

Comment Letter 379 Signatures

Edie Bruce  
Edith Crowe  
Edith Ogella  
Edith Yelland  
Edmund Attanasio  
Edmund Gutierrez  
Edna Mullen  
Edward Bennett  
Edward Butler  
Edward Cavasian  
Edward Day  
Edward DeFrancia  
EDWARD G. MRKVICKA  
Edward Kush  
Edward LeBlanc  
Edward McDowell  
EDWARD MORALES  
Edward Rengers  
Edward Savage  
Edward Schneider  
Edward Souza  
Edward Stewart  
Edward Thornton  
Edwin Quigley  
Eileen Easton  
Eileen Gerrity  
Eileen Gersuk-Byrd  
Eileen Massey  
Eileen Sonnenberg

# DPEIS COMMENTS & RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Eileen Stark	Elisabeth Olsson	Elizabeth Mostov	Eloise Robbins	Eric Pickering	Esther Garvett
Elaine Alfaro	Elisabeth Spaeth	Elizabeth ODear	Elsie Wattson Lamb	Eric Potter	Eugene Cahill
Elaine Blair	Elise Adibi	Elizabeth Seltzer	Elsy Shallman	Eric Reyes	Eugene Gourley
Elaine Donovan	Elise Phillips Margulis	Elizabeth Sheppard	elyette weinstein	Eric Robson	Eugene Howard
Elaine Genasci	Elissa Mericle-Gray	elizabeth spragins	Elzbieta Lis	Eric Schmidt	Eugene LeCouteur
Elaine Hughes	Elissa Wagner	Elizabeth Stucki	em Levitt	Eric Schweitzer	Eugene Majerowicz
Elaine Koffman	Elizabeth Agren	Elizabeth Veillette	Emilia Bland	Eric Towle	eugenie jenkins
Elaine Pinckard	Elizabeth and Gerritt Baker-Smith	Elizabeth Vitale	Emilia Wolfova	Eric Voorhies	Eva Coffee
Elaine Sloan	Elizabeth Ashby	Elizabeth Watts	Emilie Jones	Eric Zdilla	Eva Hiwan Abraha
Elan Carlson	Elizabeth Berggren	Elizabeth Wroblewski	Emily Boliver	Erica Gasparini	Eva Hofberg
Eleanor BACHMANN	Elizabeth Bradshaw	Elke Hoppenbrouwers	Emily D Adams	Erica Himes	Eva Z
Eleanor Dowson	Elizabeth Brandt	Elke Romer	Emily Haggerty	Erica Johanson	Evan Jane Kriss
Eleanor Gomez	Elizabeth Brannon	Ellen Ander	Emily McDonald	Erica St . John	Evan Oakley
Eleanor Harding	Elizabeth Brannon	Ellen Atkinson	Emily Rothman	Erica Tyron	Eve Shapiro
Eleanor Horneman	Elizabeth Brown	Ellen Barth	Emily van Alyne	Erik LaRue	Evelyn Ball
Eleanor Liggio	Elizabeth Burin	ellen boyle	Emma Jean Musto	Erik Peterson	Evelyn Coltman
Eleanor Navarro	Elizabeth Butler	Ellen Brouillet	Ena Sroat	Erika Boka	Evelyn Foster
Eleanor Smithwick	Elizabeth Dahmus	Ellen Domke	Enid Cardinal	Erika Howards	Evelyn Griffin
Elena Busani	Elizabeth Darovic	Ellen Dryer	enzo mulas	Erika Miller	Evelyn Lilienfeld
Elena De Fanis	Elizabeth De Guise	Ellen Jahos	eqw qweqwe	Erika Seibel	Evelyn McMullen
Elena Knox	Elizabeth Garibaldi	Ellen McCann	Eric Bon	Erika-Jayne Sison	Evelyn Och
Elena Myers	Elizabeth Hemzacek	Ellen McNeirney	Eric Brooker	Erin Howard	Evelyn Pietrowski-Ciullo
Elena Rumiantseva	Elizabeth Hickman	Ellen Middleditch	Eric Dougherty	Erin Karp	evie hager
Eleonora di Liscia	Elizabeth Knowlton	Ellen Segal	Eric Edwards	Erin Kilpatrick	EVINNA ENGLEZOU
Eliette Bozzola	Elizabeth Larrison	Ellen Sweeney	Eric Fosburgh	Erin Maas	F Corr
Elinor Burnside	Elizabeth Lengel	ellen walsh	Eric Meyer	Erin McCarty	f Fitz
elisa francesca Lorenzetti	Elizabeth MacKelvie	ellie carin	eric naji	Erin Znidar	F Hammer
Elisa Pagan	Elizabeth Milliken	Elliot Daniels	eric nylan	Erma Lewis	F. Carlene Reuscher
Elisabeth Bechmann	Elizabeth Mooney	Ellis Woodward	eric pash	Ernest Stromberg	F. Robert Wesley

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

Fabio Capelli	Francis Schilling	G Allen Daily
Faith Franck	Francisco Gadea	G Claycomb
Faith Kirk	francois verly	G Griego
Faith Strailley	Frank Baele	G Van Slyke
fallon hume	Frank DiGregorio	G. Austin Smith
Fann Harding	Frank Fenimore	G. D.
fay forman	Frank Fredenburg	G. G. Johnson
Faye Gregory	Frank Gonzales Jr .	G. Paxton
Felicity Devlin	Frank Hartig	G. Trubow
Fiona Nolan	Frank K. Thorp	Gabriel Lautaro
flavia pellizzari	Frank Klug	Gabriel Neilson
Florence Morris	Frank Marwood	Gaia Cole
Florence Sandok	Frank Matalone	Gaia Schubert
Florie Rothenberg	Frank Phillips	Gail and Richard Konopacki
Forrest Netzel	Frank Sabatini	Gail Caswell
Fran Delaney	Frank Wilsey	GAIL GACHARNA
Fran Hormel	Franklin Kapustka	Gail Goldsmith
Fran Teders	Franziska Eber	Gail Harris
Frances Bell	Fred Coppotelli	Gail Laurson
Frances Crocco	Fred Granlund	Gail Padalino
Frances Crouter	Fred Karlson	Gail Veiby
Frances Emanuel	Fred Luke	Gail Walter
Frances Harriman	Fred Martin	Gale Espinosa
frances Mostov	Freda karpf	Gale Rullmann
Frances O'Neal	freddie sykes	Galen Hansen
Frances Rogovin	freddie williams	Galloway Allbright
Francine Traniello	freddy sall	GARRY DASHNER
Francine Ungaro	Frédéric Jaubert	Garry Jones
francis mastri	Frederick Weinstein	Garry LOUGH

Comment Letter 379 Signatures

GARY BECK	Gene Cochran	Georgina Wright
Gary Bowers	Gene Tabish	Gerald Alexander
Gary Brooker	Gene Wheeler	Gerald and Nancy Wright
Gary Christensen	Genevieve Esson	Gerald Brookman
Gary Cobb	Geoff Regalado	gerald gouge
Gary Cox	Geoffrey Conrad	Gerald Hassett
Gary Davis	Geoffrey Lizotte	Gerald KOLBE
Gary Gilbert	George Bourlotos	Gerald Walsh
Gary Goetz	George Casner	GERALYN LLOYD
Gary Herwig	George Craciun	Gerard Billmeier
Gary Ivey	George Dillmann	Gerhard Eckardt
Gary Kolb	George Erceg	Gerhild Paris
gary kuhn	George Grace	Geri Miller
Gary McCuen	George Hartman	Geri Ott
Gary Meredith	George Lamb	gerrit woudstra
Gary Overby	George Latta, M.D., MBA	Gerry Milliken
Gary Rejsek	George Mackison	Gerry Williams
gary schenkel	George Neste	Gertrude Battaly
Gary Wolf Ardito	George Ripplinger	Gila Wdowinski
Gavin Bornholtz	George Schaefer	Gilbert & Sonya Leyva
Gay Mikelson	George Schneider	Gilda Fusilier
Gaye Georges	Georgian Goldenberg	Gilda Levinson
Gayle Janzen	Georgianne Samuelson	Gillian Miller
Gayle Smith	Georgia Braithwaite	gina anson
Geert Vancompernelle	Georgia Goldfarb	Gina Gatto
Gena DiLabio	Georgia Mattingly	gina mondazze
Gene and Dori Peters	Georgia Shankel	Gina Obrien
GENE AND LIZBETH CASEY	Georgie Song	Gina Paige
gene chorostecki	Georgina Kazan	Gina Read

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

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Gina Scarnati	Grant Barnard	Gwen Hadland	Harvey Brown	Helen Strader	Holly Mooney
Gina Writz	Grayson Henry	Gwen Stone	Harvey Metzger	Helena Doerr	holly smallwood
Ginger Anderson	Greg Dudley	Gwen Straub	Harvey Rubenstein	HELENA HEFINGER HERNANDEZ	Hope Schnee
Ginger Hipszky	Greg Gentry	Gwen Trube	Heath Post	helene ly	Howard Higson
Gisela Zech	Greg Ratkovsky	H. Guh	Heather Cross	Helga S .	Howard Stein
Gisele Sampson	Greg Rosas	H. Rosenberg	Heather Halvorson	Helmut Kothbauer	Howard Whitaker
giustina damiano	Greg Singleton	Hal Enerson	Heather Murawski	Henry Berkowitz	Howard Young
Glen Venezio	Greg Sweel	Hal Forsen	Heather Parker	Henry Coleman	Hugh Curtler III
Glenda Lilling	Greg Wilson	Hal Glidden	Heather Payne	Henry Ewert	Hugh Havlik
Glenn Davis	Greg Zahradnik	Hali Holmes	Heather Tachna	Henry Gaudsmith	Hugh Sutherland
Glenn Gray	Gregg Kolessar	Hans-Jürgen Sass-Conradt	Heide Coppotelli	Henry Kimbell	I. ATKINS
Glenn Hopkins	Gregory Crockett	Hans-Peter Heinrich	Heidi Ahlstrand	Henry M .	I.J. DuBois
Glenn Hufnagel	Gregory Esteve	Hariana Dias	Heidi Baruch	Henry Martini	Ian Shelley
Glenn Schlippert	Gregory Fite	Harley Pierce	Heidi Bresilge	Herb Lowrance	Ian Wade
Gloria Clements	Gregory Flower	Harold Johnsen	Heidi Handsaker	Herbert Jeschke	Ida Carideo
gloria czapnik	Gregory Griffin	Harold Watson	Heidi Hartman	Herman Fletcher	Ilene Budin
Gloria Diggle	Gregory Jones	Harriet Cohen	Heidi Hurd	Herman Waetjen	Ilene Cento
Gloria Linda Maldonado	Gregory Morton	Harriet Greene	Heidi Lynn	Hermine Willey	Ilona Braune
Gloria Resa	Gregory Pais	Harriet Grose	Heidi Mugrauer	HEYWARD NASH	Ina Kessler
Gloria Uribe	Gregory Robert	harriet hutchinson	Heidi Pringle	Hilary Capstick	Ingrid Broecker
Gordon Corkrum	Gregory Skutches	Harriet Jernquist	Heidi Wacker	Hilary Lubin Rausher	Ira cOHEN
Gordon Hait	Gretchen Bratvold	harriet levine	helen bacon	Hilda Neustadter	Ira Weissman
Gordon Kelly	Gretchen Wolf	Harriett Cody	Helen Curtis	Hiroshi Suzuki	Iraida Capaccio
Gordon Seyfarth	Gretchen Zeiger-May	Harriett Fazio	helen freedman	HK Khalsa	Irena Franchi
Grace Morsberger	Grey Larsen	Harriette Frank	Helen Greer	Holly Crawford	Irene Osten
Grace Neff	Gudy Terenzio	Harry Cunningham III	Helen Kite	Holly Graves	irene Radke
Grace Padelford	Guillemette Epailly	Harry Gerecke	Helen Manning-Brown	Holly Hall	Irene Saikewych
Grace Willard	gunnar sievert	harry knapp	Helen Moissant	Holly Hook	Irene Schmidt
Graeme Magruder	Guy Merckx	Harry Tucci	Helen Rutherford		Irene Willey

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

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Irini Dieringer	Jackie Lunz	James Hinson	James Thrailkill	Jane Butler	Janet Moser
Iris & Patty Yermak	Jackie Smith	James Hoffmann	James Wolcott	Jane Byars	Janet Parkins
Iris Rochkind	Jackie Tryggeseth	JAMES HUSE	Jami Ojala	jane deocurseay	janet perlman
Iris Sinai	Jacob Anderson	James Jachimiak	Jamie Caya	Jane Edwards	Janet Roberts
Irv and Janet Berlin	Jacob Nolan	James Kerr	Jamie Fillmore	Jane Ellison	Janet Robinson
Irving Shapiro	Jacqueline Bobnick	James Klein	Jamie Green	Jane Gulley	Janet Smith
Irwin Hoenig	Jacqueline Sgroi	James Little	Jamie Greer	Jane Herschlag	Janet Tice
Isabel and Carl Cohen	Jacqueline Sweeney	James Littlefield	Jamie Harris	Jane Hoagfelt	Janet Walls
Ivanka Cresko	Jacqui Lipschitz	James Loacker	jamie masterson	Jane Johnson	Janeth and Gary Mallory
Iwona Krzeminska	jai parekh	James McAndrew	Jamie Rosenblood	Jane Neave	JANEY MCMILLEN
J Beverly	Jaice Cooperrider	James McClure	Jamie Shultz	Jane Oldfield	Janice Banks
J Gabriel	Jaime Grimwood	James Miles	Jamila Garrecht	jane reilly	Janice Bergeron
j h	Jak Gray	James Moran	jamila hadjsalem	Jane Sawina	Janice Durbin
J Reed	Jake Hodie	James Mulcare	Jan Ackerman	Jane Wilken	Janice Gams
J. Barry Gurdin	Jamaka Petzak	James Neely	Jan Ankerson	Janell Cooper	Janice Hallman
J. Holley Taylor	James & Kay Burde	James Patton	Jan Barshis	Janell Smith	Janice Otis
J. Justice	James & Marsha Turner	James Pierson	Jan Clark	Janet Carter	Janice Pringle
J.I. Farlow	James and Virginia Wagner	James Pruitte	Jan Cowan	Janet Draper	janice shannon
Jacci McKenna	James Apland	James R Monroe	Jan Emerson	Janet Duran	JANINE COMRACK
Jack Dinkmeyer	james balder	James Rankin	Jan Hadley	Janet Falcone	Janine Vinton
Jack Gegner	James Bradley	James Roberts	Jan Hansen	Janet Fotos	Janis Kinslow
jack hogan	James Bragg	James ropicki	Jan Hoey	Janet Hirschhorn	Janis Todd
Jack Keyes	James Corrigan	James Rosamilia	Jan Jackson	Janet Hitz	Jared Kloth
Jack Miller	james doubt	James Rutkowski	Jan Jones	Janet Hoover	Jared Lai
Jack Raby	James Flanagan	James Schinnerer	Jan McMichael	Janet Kennington	jarka okreskova
Jacki Hileman	james gerstley	James Sorrells	jan nelson	Janet Lee Beatty	Jason Bowman
jackie boucher	James Glucroft	James Stuhlmacher	Jana Perinchief	Janet Marineau	Jason Ellis
Jackie Cole	James Henriksen	James Terrano	jane biggins esq	Janet McDonough	jason evans
Jackie Demarais	James Herther	James Thomas	jane branyan	Janet Monfredini	Jason Fish

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Jason Gibson	Jeanine Wilder	Jeff Steenberg	Jennifer Bocchino	Jerily Rushworth	Jessie Vosti
Jason Steadmon	Jeanne Bergen	Jeff Stromgren	Jennifer Brandon	Jerry Castor	Jill Alibrandi
Jason Waldo	Jeanne Chisholm	Jeff Wells	Jennifer Brown-Hall	Jerry Eskew	Jill B .
Javier Reza	Jeanne Doherty	Jeffery Biss	Jennifer Eskridge-Hart	Jerry Hillman	Jill Berkowitz-Berliner
Javier Rivera	Jeanne Faust	Jeffery Morgenthaler	Jennifer Falk	Jerry Hudgins	Jill Coffey
Jay Humphrey	Jeanne Friedman	Jeffrey Ambrose	Jennifer Forrest	Jerry Hughes	Jill Denton
Jay Morren	jeanne hayes	Jeffrey Bains	Jennifer Gitschier	jerry persky	Jill Giencke
Jay Russo	Jeanne Held-Warmkessel	Jeffrey Block	Jennifer Grasso	jerry rosen	Jill McManus
Jayne Cerny	Jeanne Saint-Amour	Jeffrey Campbell	Jennifer Hayes	Jes Ro	Jill Mossor
Jayne McPherson	Jeanne Schlatter	Jeffrey Collins	Jennifer Hill	Jess Graffell	Jill Nicholas
JC Corcoran	Jeanne Sozio	Jeffrey Hemenez	Jennifer Lewis	Jesse Holth	Jill Wettersten
Jean Ehrman	Jeanneadele Pallen	Jeffrey Hurwitz	Jennifer McKeel	Jesse Kessler	Jillian Fiedor
Jean Genasci	Jeannette Allan	Jeffrey Jones	Jennifer Miller	Jesse Taylor	jillian shannon
Jean Hall	Jeannette Welling	Jeffrey Juel	Jennifer Nelson	jesse williams	Jim and Sophie Swirczynski
Jean King	Jeannie Pollak	Jeffrey Kreidler	Jennifer Nitz	Jessica Black	Jim Bearden
jean le marquand	Jeannine Lowenkron	jeffrey lapic	Jennifer Oppenheim	Jessica Brown	Jim Brunton
Jean Mack	Jeff Duncan	Jeffrey Meyers, MSc	Jennifer Overton	Jessica Burlew	Jim Buonocore
Jean Naples	jeff frantz	Jeffrey Smith	Jennifer Rogers	Jessica Card	JIM CORRIERE
Jean Oakes	Jeff Fromberg	Jeffrey Stone	Jennifer Romans	Jessica Cresseveur	Jim Drevescraft
Jean Phillips-Calapai	Jeff Harvey	Jeffrey White	Jennifer Scott	Jessica File	Jim Freeberg
JEAN PUBLIEE	Jeff Herman	Jelica Roland	Jennifer Sellers	Jessica Gawlik	Jim Gear
jean publieee	jeff krupnick	Jen Danner	Jennifer Staiger	Jessica Jean Posner	jim Gergat
Jean Roberts	Jeff McElveen	Jen Hunter	Jennifer Stedman	Jessica Koran	JIM HAJEK
Jean Saja	JEFF MCHENRY	Jen Manders	jennifer valentine	Jessica Miracola	Jim Halbert
Jean Skiles	Jeff Peters	Jena Hallmark	Jennifer Waters	Jessica Ramirez	Jim Leske
Jean SmilingCoyote	Jeff Pokorny	Jenna Bergeron	Jennifer Westra	Jessica Rice	Jim Melton
Jeanette Brito	Jeff Reynolds	Jennie sabato	Jenny Wilder	Jessica Rocheleau	Jim Notestine
jeanette zawacki	Jeff Sluiter	Jennifer Alden	Jerald Vinikoff	Jessie Casteel	Jim Scarborough
jeanie harvey	Jeff Smith	Jennifer Bissell	Jeremy Ehrlich	Jessie Root	Jim Summers

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 379 Signatures

Jim Wingate	JoAnn Alberts	Jody Nunez
Jim Yarbrough	Joann Koch	jody Wier
Jimmie Lunsford	Jo-Ann Murphy	Joe Brazie
Jimmy Carrell	JoAnn Pedersen	JOE DONOHOE
Jitka Mencik	JoAnn Riley	joe galdo
JL Angell	JoAnn Schropp	Joe Ginsburg
JL Charrier	Joanna Chen	Joe Glaston
Jo Anna Hebbberger	Joanna Kling	Joe Quirk
joan armstrong	Joanna Rindt	Joe Roy
Joan Bailey	Joanna Vintilla	Joe Salazar
Joan Ellen Mccoy	Joanne Brierly	joe shaw
Joan Farber	Joanne Britton	joe sirgo
Joan Faszczewski	JoAnne Cohen	Joe Stoner
Joan Glasser	Joanne Doherty	Joe Toigo
Joan Hasselgren	JoAnne Edsall	Joe Torres
Joan Hebert	Joanne Habrecht	Joe Tutt
Joan Kozlowski	Joanne Hesselink	Joel Blumert
Joan Kyler	Joanne Kellar	Joel Clasemann
Joan Milford	JoAnne Klein	Joel Leitner
Joan Peter	Joanne Lowery	Joel Maguire
Joan Scott	Joanne Nelson	Joel Meier
joan silaco	Joanne Peppiatt-Combes	Joel Perkins
Joan Smith	Joanne Rist	Joel Schmidt
Joan Squires	Joanne Stephens	Joey Westhead
Joan Stelter	Joanne Sulkoske	Johanna Lang
Joan Strickland	Jocelyn Blake	John A Beavers
Joan Svenson	Jody Conrad	John Abbott
Joan Walker	Jody Dehart	John Adams
Joanie Vigh	Jody Gibson	John Altshuler

John and Ellen Woodruff	John Heyneman	John Roig
John Baggenstos	John Hinnant	John Ryan
John Barger	John Howden	John Scahill
John Barrett	John Jumonville	John Schaechter
John Bernard	John K Erskine	John Schmittauer
John Burridge	John Keiser	John Schreiber
John Butler	John Kerschbaum	john seward
John Cannon	John Kirchner	John Sparks
John Carpenter	John LaMantia	JOHN STEENSON
John Chapman	John Lampson	John Sutherland
John Cole	John Laughlin	John Teevan
John Cornely	John Leonard	john thomas
John Coyier	John Lippiello	John Uscian
John Crotty	John Lorand	John Varga
john daniello	John Lundquist	John Viacrucis
John Day	John Madrid	John Weston
JOHN DEDDY	John McLaurin	John Wienert
John Dervin	John Merriman	John Wiesner
John Doucette	John Miskelly	john Zamos
John Dulik	John Moss	John Zimmermann
John Dunkum	John Musgrave	John+M Long
John Dunn	John Mutzberg	joie winnick
john Ebenal	John P Davis	Jolie Misek
John Eckler	John Peeters	Joline Barth
John Essman	John Pepple	Jon Bazinet
John Geiger	John Petroni	Jon Eden
John Gieser	John R Donaldson	Jon Hager
john Haller	John R. Bartels	Jon Hayenga
John Helland	John Roche	Jon Krueger



## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Jon Lee	Joseph Otto	Jude Todd	Judith Smith	Julia French	Julie Svendsen
Jon Macy	Joseph Schultz	Judi Poulson	judith tuck	Julia Johnson	Julie Takatsch
JON NOGGLE	Joseph Shulman	judith ackerman	Judith Whitcomb	Julia N Allen PhD DVM	Julie Watt
Jon Piersol	Joseph Slaven	Judith Anderson	Judith Wright	Julia Stevenson	Julie Wreford
Jon Read	Joseph Vincent	Judith Elliott	Judy Allen	Julian Huffer	Juliet Pearson
Jon Rosenblatt	Josh Kaye-Carr	Judith Embry	Judy Baker	Juliana Baaten	Julija Merljak
Jon Singleton	Josh Swink	Judith Fletcher	Judy Bradford	Juliann Pinto	Julio Aviles
Jon Van de Grift	Joshua Angelus	Judith Fraser	judy brown	Juliann Rule	june bullied
Jonathan Boyne	Joshua Krasnoff	Judith Gordon	Judy Clarke	Julianne Savage-Boeding	June Cattell
Jonathan Clapp	Joslyn Baxter	Judith Hazelton	Judy Cohen	Julie Barger	June Curley
Jonathan Lee	Joslyn Pine	JUDITH HOAGLUND	Judy Dufficy	julie bohnet	June Egan
Jonathan Peter	jovita prinz	judith hoppe	Judy Fairless	Julie Bresciani	Jurissah Naive
Jonathan Stillman	Jovita Tieso	judith hutchison	Judy Hawn	Julie Clayman	jussi gamache
Jonathan Wilsnack	Joy Fedele	judith keeley	Judy Klafra	Julie Eppler	Justin Powell
jonelle Reynolds	Joy Massa	Judith Maron-Friend	Judy Knueven	Julie Gengo	Justin Small
Joni Mulder	Joyce Burk	Judith Marvin	Judy Krach	Julie Griffith	Justin Stricker
Jonn Gordon	Joyce Conklin	judith morgan	Judy Miller-Lyons	Julie Harris	Justin Weisenauer
Jordan Glass	joyce cotter	Judith Mueller	JUDY PIZARRO	Julie Hoerner	Justine King
Jörg Gaiser	Joyce Dixon	Judith Owens-Yamane	Judy Rhee	Julie Holtzman	k b schaetzel-hill
Jose de Arteaga	Joyce Frohn	Judith Pedersen	Judy Shively	julie javrotsky	k danowski
Jose Leroux	Joyce Grajczyk	Judith Pelletier	Judy Sutton	Julie Martin	K G
Joseph Acosta	Joyce Lan-eddy	Judith Peter	Judy Tyler	Julie Moore	K H
Joseph Boone	Joyce Overton	Judith Poxon	Judy Wyeth	Julie O'Donnell	K Nichols
Joseph DeMarco	Joyce Pusel	judith ramos	juli cooper	Julie Ostoich	K. Chung
Joseph DiMaggio	Joyce Schwartz	Judith Rinesmith	Julia Amsler	Julie Ozias	K. Laurence
Joseph Hayes	Joyce Stoffers	Judith S Anderson	Julia Bellefontaine	Julie Parcels	Kaatje Adams
Joseph Jordan	Joyce Winslow	Judith Sandeen	Julia Bohnen	Julie Riffle	Kacey Donston
Joseph Lahm	Juanita Gonzalez	Judith Schneider	Julia Broad	Julie Singh	Karen A Katrak
Joseph O'Sullivan	jud woodard	Judith Shematek	Julia Cranmer	Julie Skelton	Karen Ahn

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 379 Signatures

Comment Letter 379 Signatures

Karen and Edward Osgood	Karen Profet	Karlene Gunter	Katherine Tildes	Kathleen Turnbull	Kathy Oppenhuizen
Karen Berger	Karen Ratzlaff	Karol Rice	Katherine Werner	kathleen v Adamski	Kathy Rapp
Karen Bond	Karen Rubino	Karuna Eberl	Katherine Wright	Kathleen Williams	Kathy Silvey
Karen Breny	karen Sanders	Karyn Loveless	Kathi Kibbel	Kathleen Wright	Kathy Stobbe
Karen Collins	Karen Schnitzer	kat burgess	Kathi Ridgway	kathryn alexandra	kathy sugarman
Karen Cowen	Karen Simon	Kat Ross	Kathi Woods	Kathryn Andre	Kathy Watkins
Karen D. Felts	Karen Slote	Kate Ague	Kathie Baumoe	Kathryn Choudhury	Kathy Watson
Karen Davidse	Karen Steele	Kate Anderson	Kathleen Arnold	Kathryn Johanness	Kathy Watt
Karen Deora	Karen Suit	Kate Darrigo	Kathleen Cafiero	Kathryn Lemoine	kathy weber
Karen Espanol	Karen Swistak	Kate Harder	Kathleen Eaton	Kathryn Melton	Kathy Wright
Karen Estel	Karen Tlusty	Kate Kenner	Kathleen Galligan	Kathryn Rose	Katie Brady
Karen Fedorov	Karen Vayda	Kate Ravenstein	KATHLEEN Grantham	Kathryn Ryan	Katie Connelly
Karen Gaylin	Karen Watkins	Kate Sims	Kathleen Hill	Kathryn Sugg	Katie Coonfield
Karen Geahlen	Karen White	Kate Skolnick	Kathleen Kelcey	Kathy Alter	Katie Yu
Karen Hodges	Karen Wilson	katharine kehr	Kathleen Keske	Kathy Bradley	Katira Tejeda
Karen Husocki	karen winnubst	Katharine Rosser	Kathleen Kiselewich	Kathy Britt	Katrin Seelbach
Karen Ireland, M.D.	Karen Woollams	Katharine Tussing	Kathleen Kuczynski	Kathy Bussiere	Kay Hardy
Karen Kawszan	Karena Wells	Katharine Warner	Kathleen Leister	Kathy Chakoutis	Kay Koelker
karen kelleher	Kari Gunderson	Kathe Garbrick	Kathleen McConnell	Kathy Day	Kay Lipman
Karen Kirschling	Kari King	Katherine Babiak	Kathleen McLane	kathy dowds	Kay Lockridge
karen krause	Kari Miller	Katherine DeAngelis	Kathleen Mireault	Kathy Durrum	Kay Lowe
Karen Laakaniemi	Kari Sanderson	Katherine Fitch	Kathleen Mohning	Kathy Fullerton	Kay Reinfried
Karen Lamitie-King	Kari Wouk	Katherine Flickinger	Kathleen Moraski	Kathy Gynane	Kay Von Tress
Karen Lampke	Karin Boixo	Katherine Hinson	Kathleen OConnell	Kathy Hanson	kaye foltz
Karen Larsen	Karin Peck	Katherine Leahy	Kathleen O'Sullivan	Kathy Harvey	Kaye Porter
Karen Lund	Karina Black	Katherine Mouzourakis	Kathleen Peters	kathy haverkamp	Kaylah Sterling
karen meadow	Karla Devine	Katherine Nelson	Kathleen Querner	kathy jensen	Keefe Nghe
Karen Neubauer	Karla Horst	Katherine Porter	Kathleen Reifke	Kathy Kowalchick	keelin brett
Karen Paul	karleen hoggarth	Katherine sampson	Kathleen Sorce	Kathy Newman	Keith Adams

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Keith Albritton	Ken Maurice	Kerry Kovarik	Kim Duncan	Kris Steinke	L David Waterbury
Keith Boyd	ken Mincin	KEVIN BOLEMBACH	Kim Gentes	Kris Strate	I hurd
Keith Cowan	Ken Morrison	Kevin Bond	Kim George	Kristen Conner	I ship
Keith D'Alessandro	Ken Novak	Kevin Branstetter	Kim Keller	Kristen Murray	L Wayn
Keith Emery	Ken Reynolds	Kevin Chapman	Kim McReavy	Kristi Collins	L Wilson
Keith Fisher	Ken Schulman	Kevin Costigliolo	Kim Perez	Kristi Hendrickson	L. Helaudais
keith heaton	Ken Ward	Kevin Curtis	Kim Powell	Kristi Kelley	L. Z.
Keith Milligan	Ken Wenzer	Kevin Macdonald	Kim Sellon	Kristi Meier	Lacey Hicks
Keith Portka	Kendall Sanford	Kevin McKelvie	Kim Tran	Kristie Lindgren	Lacey Levitt
Keith Runion	Kendra Hunter	Kevin Mcnamara	Kim Wells	Kristin Green	Lael Bradshaw
Kelley Anderson	Kendra Knight	Kevin Moore	Kim Wemer	Kristin King	Laetitia Petit
Kelley Dempsey	Kenneth Able	Kevin O'Brien	Kimberly Crane	Kristin Klass	Laird Lorenz
Kellie Smith	Kenneth Bickel	Kevin O'Rourke	Kimberly Foster	Kristin Konstanty	Lana Schmitt
Kelly Arellanes	Kenneth Clucas	Kevin Patterson	Kimberly Frey	Kristin Lewis	Lara Beard
Kelly Brannigan	KENNETH COLEY	Kevin Proescholdt	Kimberly Gronemeyer	Kristina Heiks	Lara Post
kelly byrnes	Kenneth Fisher	Kevin Rolfes	Kimberly Hurtt	Kristina Mitchell	Laraine Bowen
Kelly Clark	kenneth hill	Kevin Schmidt	Kimberly McConkey	Kristy Rotermund	Larisa Long
Kelly Garner	Kenneth Nahigian	Kevin Schuster	Kimberly Morse	Krystal Weilage	Larkin Sinnott
Kelly Haferkamp	Kenneth Reeves	Kevin Watkins	Kimberly Wiley	Krystina Stark	Larry Bathgate
Kelly Huynh	Kenneth Robertson	Kevin West	Kirsten Lear	KURT CRUGER	Larry Bogolub
Kelly Larkin	Kenneth Ryan	ki paul	Kirstina Whitford	kurt emmanuele	Larry Carter
Kelly Lyon	Kenneth Wright	Kian Daniel	Kit Dugan	Kurt Fratzke	Larry Casey
Kelly McFadden	Kent Davies	Kicab Castaneda-Mendez	Kitrina Lisiewski	Kurt Jenisio	larry french
Kelly OBrien	Kent Minault	Kiele Goins	Kitty Dantonio	Kurt Simer	Larry Huber
Ken (and Louise) Vinciquerra (and Acheson)	Kent Wilson	Kiley Newton	Konstantina Balaska	Kyle Crocker	Larry LaPointe
Ken Box	Kent Wright	Kim Altana	Kraig and Valerie Schweiss	Kyle Haines	Larry Lewin
Ken Epstein	Kerby Miller	Kim Beeler	Krin Asselta	Kyri Freeman	Larry Lewis
Ken Greenwald	Kerry Burkhardt	Kim Block	Kris Gata	L A	Larry Orzechowski
	Kerry Dietz	Kim Camuso	Kris Nill-Snow	I d	LARRY RAZZANO

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

Comment Letter 379 Signatures

LARRY ROD	laureen picciani	Lawrence Gilbert	Len Carella	Leslie Hardyman	Linda Cramer
Iarua koulish	Laurel Colton	Lawrence Gioielli	lena maristo	Leslie Homan	Linda Dubnick
Lascinda Goetschius	Laurel Marshfield	Lawrence Hilf	Lenny Cavallaro	Leslie Simon	Linda Elbow
Lasha Wells	Laurel Starr	Lawrence Lintner	Leno Sislin	Leslie Smith	Linda Fair
Laura Bruess	Lauren Devine	Lawrence Magliola	Lenore Bussing	leslie spoon	Linda Ferland
Laura Chariton	Lauren Fenenbock	Lawrence Nagel	Lenore Reeves	LESLIE SUTLIFF	Linda Freeman
Laura De la Garza	Lauren Linda	Lawrence Padilla	Lenore Rodah	Leslie Sweeney	Linda Frese
Laura Fake	Lauren Moss-Racusin	Lawrence Thompson	lenore sorensen	Leslie Valentine	Linda Gazzola
Laura Grove	Lauren Murdock	Lea Boyle	Leo Dyksman	Leslie Winston	Linda Goetz
Laura Hanks	Laurence Buckingham	Leah Browning	Leo Tobin	Letitia Noel	Linda Graham
Laura Herndon	Laurence Margolis	Leanne Yerby	Leon Clingman	Leuise Crumble	Linda H
Laura Horton	Lauren-Michelle Kraft	Leda Zimmerman	Leon Paley	Leyah Fredericks	Linda Harrell
laura lee	laurent SEUGNET	Lee Basnar	Leona Klerer	Liana Moran	Linda Hendrix
Laura M. Ohanian	lauri DesMarais	Lee Bhattacharji	Leonard Farr	LIDA SKRZYPCZAK	Linda Holasek
Laura Manning	Laurie Carr	Lee Gibson	Leonard Thornton	Lilia Wood	Linda Howard
Laura Muñoz	Laurie Conroy	Lee K	Leonora Xhrouet	Liliana fiorinl	Linda Huffman
Laura Napoleon	Laurie Duncan	Lee Lambert	les roberts	Lilli Ross	Linda Ivany
Laura Nowack	Laurie Hein	Lee Margulies	Lesia Mills	Lillian Hutchison	Linda jarvis
Laura Pitt Taylor	Laurie Lindemulder Harris	Lee Musgrave	Leslee Eldard	Lilly Knuth	Linda Jones
Laura Prestridge	Laurie Neill	Lee Winslow	Lesley Jorgensen	Lin Just	Linda Just
Laura Rich	Laurie Puca	LeeAnn Bennett	lesley Pillsbury	Linda Allen	Linda Kehew
Laura Riley	Laurie Rittenberg	LeeAnne Gfroerer	Lesley Schultz	Linda Baker	Linda Leckliter
Laura Rose-Fortmueller	Laurie Storm	Lehman Holder	Leslie Bradford	Linda Bdescript	Linda Lemmel
Laura Schwartz	Laurie Tweedell	Leigh Fabbri	Leslie Burpo	Linda Buckingham	Linda Leonard
Laura Sholtz	Laury Benson	Leigh Norcott	Leslie Cassidy	Linda Byrne	linda long
Laura St Clair	Lavaune Guenther	Leilah Yanez	Leslie Consuegra	Linda Cabanban	Linda MacLeman
Laura Staples	Lawrence Bojarski	Lela Perkins	leslie danielle brown	Linda Carroll	Linda Macpherson
Laura Stice	Lawrence Crowley	Leland Block	Leslie Fellows	Linda Covington	Linda Marble
Laura Wetzel	Lawrence East	Leland Brun	Leslie Gold	Linda Cowgill	LINDA MC CAUGHEY

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Linda McKillip	Linda Vaughan	Lisa Hart	Litsa Katsarou	Lori Miranda	Lowell Young
Linda Morgan	Linda Vopicka	Lisa Hoch	Liz Dyer	Lori Mulvey	Luan Pinson
Linda Mori-Roberts	Linda Walters	Lisa Hughes	Liz Field	Lori Rosas	Lucia Dahlstrand
Linda Murray	linda williams	Lisa Hunkler	Liz Reed	Lori Rosenthal	Lucille Sadowski
Linda Myers	Linda Wright	Lisa Kincannon	Liz Szabo	Loritta Braden	Lucinda Upton
Linda Oeth	Linda Youngblood	Lisa Knight	LJ Harris	Lorne Beatty	Lucretia Jevne
linda paleias	Lindsay Johnson	Lisa Krieger	lloyd reynolds	Lorraine Brabham	Lucy Schneider
Linda Patzke	Lindsay Muggleston	Lisa Kunsch	Lois Dunn	Lorraine D. Johnson	Luisa Cox
Linda Peterson	Lindsey Caudill	Lisa Lashaway	Lois Fenstemaker	Lorraine Dumas	Luisa P
Linda Petrulias	Lindy A Von Dohlen	Lisa Lester	Lois Johnson-Hammerman	Lorraine Foster	Lumarian Conklin
Linda Phillips	Line Ringgaard	Lisa Long	Lois Jordan	Lorraine Kittner	Lyle Collins
Linda Prostko	Linnell Krikorian	Lisa MacMillan	lois lommel	Lorraine Laprade	Lyn Burns
Linda Ricks	Lisa Annecone	Lisa Mazzola	Lois Shadix	Lorraine Martinez	lyn du mont
linda satter	Lisa Barrett	Lisa McLain	Lois Shubert	Lorraine Small	Lynda Giuliani
Linda Schimpf	Lisa Blanck	Lisa Modola	Lois White	lou paller	Lynda Pauling
Linda Schrader	Lisa Brehm	Lisa Montanus	Lonnelle Prather	Lou Rowan	Lynell Withers
Linda Schulz	Lisa Buehler	lisa moore	Lonnie Ward	Louis Anipen	Lynette Ridder
Linda Sear	Lisa Clifton	Lisa Neste	Lora Leland	Louis Bubala	Lynette Rynders
Linda Skorheim	Lisa Conner	Lisa Pedersen	Loretta Aja	Louis Chorba	Lynn Alley
Linda Spanski	Lisa Cossettini	Lisa Perrotta	Loretta Cummings	Louis Fischer	Lynn Bengston
Linda Sperber	Lisa Crum-Freund	Lisa Quartararo	Loretta Lehman	Louise B ANGELIS	Lynn C. Lang
Linda Stead	Lisa Daloia	Lisa Stimpson	Loretta Tiefen	Louise Eiler	Lynn Colson
Linda Sullivan	lisa dunphy	Lisa Stone	Lori Barrie	Louise Friedenson	Lynn Costa
Linda Tabb	Lisa Fernandes	lisa vasta	Lori Beth Kidd	Louise Gross	Lynn Kamm
Linda Tabor	Lisa FitzGerald	Lisa Whalen	Lori Braden	Louise LaFrancis	Lynn Killam
Linda Tarantino	Lisa Gee	Lisabeth Faller	lori conley	louise lewis	Lynn Longan
Linda Thompson	Lisa Gold	Lise susi	Lori Erbs	Louise Mann	Lynn Nease
Linda Thompson	Lisa Gordon	Lisha Doucet	Lori Girshick	Louise Rangel	Lynn Sayers
Linda Townill	Lisa Halpern	Lissa Wiley	Lori Kegler	Louise Zimmer	Lynn Shoemaker

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

Comment Letter 379 Signatures

Lynn Slonaker	Maeve Callaghan	Marcia Sherman	margarita clayton	Marianne Frusteri	Marilyn Levine
lynn snyder	MAGALI FEUGIER	Marcia Weare	Margarita Ruiz	Marianne Lazarus	Marilyn Martin
Lynne Glaeske	Magdalena Szaszorowska	Marco Aguilera	Marge Dakouzlian	Marianne McDermott	Marilyn Mueller
Lynne Gordon-Watson	Maggie Alk	Marcus Kronau	Marge Schwartz	Marianne Nelson	Marilyn Olson
Lynne Hargett	Maggie Davidson	Marcus Lanskey	margo surovik	Marianne Williams	Marilyn Scott
Lynne Jeffries	Maggie Hawk	Marcy Moyer	Margretta Miller	Marie Beckham	Marilyn Shepherd
Lynne Teplin	Maggie Reid	mardy weinstein	Marguerite Shuster	Marie Bernache	Marilyn Stachenfeld
Lynne Van Ness	Maia Van Pelt	Marga Gili	Marguerite Smukler	Marie Dickenson	Marilyn Waltasti
Lynne Weiske	Maija Schaefer	Margaret Cathey	Marguerite Winkel	Marie Michl	Marilyn Webb
m c kubiak	Malcolm Fordham	margaret CHILDERS	Mari Carmen Cortina	Marie Perkins	Marilyn Weber
m komisar	Malcolm Groome	margaret cooney	Mari Dominguez	marie rago	Marilynn Herman
M Langelan	malcolm simpson	Margaret Dodge	Maria Borges	Marie Snavelly	Marina Barry
m palowoda	Malgo Schmidt	Margaret Eells	Maria Botello	marie spaulding	Marina Cappas
M Spadafora	Manfred Zanger	Margaret Fularczyk	Maria Cybyk	Marie Wakefield	MARINA OMAÑA
M. L. Parrino	Maralyn James	Margaret Haas	Maria Gonzalez	Marie Weis	marina sagardua
M. Moran	Marc Conrad	Margaret Jensen	maria kavvoura	Marie Young	mario giannone
M. S.	Marc Draper	Margaret Lohr	Maria Kjaerulff	Marie-Ange Berchem	Marion Bennett
M. Veazey	Marc Maloney	Margaret MONAHAN	Maria Magana	Marie-Anne Phillips	Marion Menna
M.C. Corvalan	Marc Melinkoff	margaret muirhead	Maria Nowicki	Marietta Bala	Marisa Landsberg
M.E. Scullard	marc meshekow	MARGARET MURRAY	Maria Sousa	Marietta Scaltrito	Marisa Strange
Ma. Elena Guillermo	Marc van de Waarsenburg	Margaret Polino	Maria Sturchler	Mariko Wheeler	marjorie angelo
Mac Donofrio	Marcela Resa	Margaret Rangnow	Maria White	MARILEE HENRY	Marjorie Browning
Mac Miller	MARCELLA CRANE	Margaret Schulenberg	Mariam Noorai	Marilyn Costamagna	Marjorie Clisson
Mace Clarridge	marcello franciamore	margaret scripp	Marian Hoblitt	Marilyn Evenson	marjorie curci
Madalyn Benoit	Marcia Flannery	Margaret spak	Marian Huq	marilyn gockowski	Marjorie McNae
Madeleine Drake	Marcia Henning	Margaret Vernon	Marian Kauffman	Marilyn Hill	Marjorie Monteleon
Madeline Amalphy	Marcia Hoodwin	Margaret Weimer	MarianKitty Dennis	Marilyn Jasper	Marjorie Streeter
Madonna Giamberdino	Marcia Krull	Margaret Woll	Marianna Sokol	Marilyn King	marjorie Xavier
mae basye	Marcia Migdal	Margaret Wood	Marianne Bentley	Marilyn Lee	Mark Ahlstrom

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Mark Alderman	mark Rist	Marsha Whitty	Marty Crowley	Mary Guard	Mary Walls
Mark Anthony Wood	Mark Rynearson	Marsha Wiseltier	Martyn Roberts	Mary Haan	Mary Wellington
Mark Bales	Mark Strauss	MARTA HAWKINS	Marvin J Ward	Mary Harte	Mary Wiener
Mark Bartleman	Mark Weeks	Martha Arreguin	Mary Almendarez	Mary Hayes	mary williams
Mark Bastian	Mark Wheeler	Martha Barnes	Mary Ann and Frank Graffagnino	MARY JO LOPEZ	Mary Wolney
Mark Beckwith	Mark White	Martha Boltares	Mary Ann Barrett	Mary Jo Masters	Mary Workman
Mark Betti	Mark Wirth	martha burton	Mary Ann Cernak	Mary Keithler	Marya Zanders
Mark Blitzer	Mark Zuefeldt	Martha Carrington	Mary Ann Leitch	Mary Klein	Maryann Haller
MARK BRADLEY	Markus Opel	Martha Durham	Mary Ann Smith	Mary Kraeszig	Maryann Piccione
Mark Canright	marla maleski	Martha Fitzpatrick	Mary Ann Axle	Mary Levan	MaryAnna Foskett
Mark Davis	Marla Meehl	Martha Gorak	Mary Barbezat	Mary Louise Wooldridge	MaryAnne Muller
Mark Elman	Marla West	Martha Horter	Mary Beckman	Mary Madeco	MaryAnne Romito
Mark Feldman	Marlena Lange	martha jones	mary beth first	Mary Mansfield	Maryjo & Edward Osowski
Mark Fraser	Marlena Lovewell	Martha Krikava	Mary Beth OConnor	Mary Masters	MaryJo Andrews
Mark Gillono	Marlene Barrett	Martha Lyons	Mary Bissell	Mary McCoy	Marylyn Stroup
Mark Glasser	Marlene Borton	Martha Mullens	Mary Bowen	Mary Metcalf	Maryrose Cimino
Mark Gotvald	Marlene Miller	Martha Munger	Mary Brayton	Mary Miller	Matea Leon
Mark Haggerty	marlene powers	Martha Sharkin	mary camardo	Mary Mutch	Mathew Vipond
Mark Hallett	Marlene Schwarz	Martha Spencer	Mary Cato	Mary Neumann	Matt Meier
Mark Hargraves	Marlene Stalter	Martha Vennes	Mary Davis	Mary Owens	Matt Otto
Mark Hollinrake	Marlene Tandler	Martha Williamson	Mary Degon	mary p williams	Matt Reola
Mark Jordan	Marliese Bonk	Martin Albert	Mary Derengowski	Mary Pivarnik	Matt Stedman
Mark Kantor	Marsha Adams	Martin Diedrich	Mary Dosch	Mary Randolph-Frye	Matt Woolery
Mark Kidd	Marsha Heinrich	Martin Fox	Mary Eldredge	Mary Reed	Matthew Ashmore
Mark Mansfield	MARSHA HUNTER	Martin Judd	Mary Ellingwood	Mary Reilly	Matthew Boruta
Mark Meeks	Marsha Jarvis	Martin Lupowitz	Mary Fahey	Mary Shabbott	Matthew Franck
Mark Peltan	Marsha Lyon	Martin Reifinger	Mary Gregory	Mary Shea	Matthew Genaze
Mark Porter	Marsha Seeley	Martina Clark	Mary Gronholt	Mary Sue Baker	Matthew Janusauskas
Mark Reback	Marsha Warren	Martina Martens		Mary tanoury	Matthew Koehler

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 379 Signatures

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Matthew Lipschik	Maylin Fisher	Melissa S	Michael Essex	Michael Price	Michele Johnson
Matthew O'Brien	Mayumi Knox	Melissa Suarez	Michael Frank	Michael Rees	Michele Kowalski
Matthew Schaut	MC Hagerty	Melodie Huffman	Michael Garitty	Michael Renfrow	Michele Labrie
Matthew Tarpley	Meagan Fastuca	Mercedes Benet	Michael Gary	Michael Rosa	Michele LaPorte
Matthieu Brillet	Meg Doyle	Mercy Drake	Michael Gillett	Michael Rynes	Michele Morris
mattie goodwin	Meg Gilman	Meredith Buck	Michael Gordon	Michael short	Michele Nihipali
Matty Giuliano	Meg Seltzer	Meredith Needham	Michael Gorr	Michael Sklar	Michele Reynolds
Maura Leus	Megan Gnekow	Merikay Garrett	Michael Gotmer	michael sordill	Michelle Benes
Maureen Collins	Megan Martinez	Merlin and Diana Emrys- Lightmoon	Michael Gumpert	Michael Stewart	Michelle Carter
Maureen Finlon	Megan Warren	Merlin Hay	Michael Herzog	michael stocker	Michelle Dail
Maureen Gibson	Meghan's Quillen	Mernbish Bish	Michael Hogan	Michael Stuart	MICHELLE DAVIS
Maureen McGee	Melanie Ann Ersson	Merrie Thornburg	Michael Iltis	michael sullivan	Michelle Diss
Maureen O'Neal	Melanie B Goldman	Meryl Pinque	Michael K. Hampu	Michael T Williams	Michelle Dudeck
Maureen Ouellette	Melanie Hlavacka	Mha Atma S Khalsa	Michael Kavanaugh	Michael Terry	Michelle Freedman
Maureen Parriott	Melanie Waleski	mia wyatt	Michael Kendall	michael toto	Michelle Fuller
Maureen Pisani	Melba Dlugonski	Michael Bennett	Michael Klausung	Michael W Evans	michelle grabowski
Maureen Powers	Melinda Michael	Michael Braude	Michael Lawrence	michael waters	Michelle Hayward
Maureen Vanderbosch	Melinda Moros	Michael Cecil	Michael Lee	Michael Weaver	MICHELLE HOFF
Mauria McClay	Melinda Parke	Michael Chutich	Michael Letendre	Michael Wichman	Michelle Kehm
Maurice robinson	Melissa Bauer	Michael Cloud	Michael Lombardi	Michael Yowell	Michelle Kopteros
Maurice Rosenstraus	Melissa Elbrecht	Michael Coe	Michael MacPherson	Michael Zeller	Michelle MacKenzie
Max Burg	Melissa Elder	Michael Collier	michael maggied	Michaela Rohr	Michelle Macy
Max Salt	Melissa Grondin	Michael Comstock	Michael Marr	Michaela Treffil	Michelle Mondragon
Max Sampson	Melissa Grush	Michael Desi	MICHAEL MCCARTHY	Michel and Sonja	Michelle Oroz
Maxine Cannon	Melissa Hanmer	Michael Dutton	Michael McLaughlin	Michel Collin	Michelle Rivers
Maxine Clark	Melissa Heithaus	Michael Ehmke	Michael McMahan	Michele Bacher	Michelle Sewald
Maxine Goodyear	Melissa K	Michael Eisenberg	Michael Norden	Michele Balfour	Mick Alderman
Maxine Zylberberg	Melissa McCool	Michael Ellison	Michael Ott	Michele Biggane	Midori Furutate
Maya Robinson	Melissa Pappas		michael phipps	Michele Busler	Miguel Ramos



# DPEIS COMMENTS & RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Mihail Bancu	Miriam Sexton	Mrs. P. D. Waterworth	NANCY CAREY	Nancy Roberts-Moneir	Nathan Vogel
Miia Suuronen	Miriam van Santen	MRS. WILLIAM A. ROSS	Nancy Cencula	nancy sadowsky	Nathaniel Hansen
Mija Gentes	Miro Krajnc	Murlin Goeken	nancy coffey	Nancy Sagatelian	Navarre Bartz
Mike Bridschge	Misha Askren	Murray Head	Nancy Cormia	Nancy Schweiger	Neal Feuerman
Mike Brinkley	Missy Kendrick	Myra Aronow	Nancy Crider	Nancy Stamm	Neil Illiano
Mike Conlan	Misti Schneider	myra berario	nancy ellestad	Nancy Taylor	Neil Resico
Mike Couch	Mo Kafka	MYRIAM BOIS	Nancy Fifer	Nancy Telese	Nelson Baker
Mike Decook	Modell McEntire	Myrna Cohen	Nancy Fox	Nancy Ward	Nelson Pena
Mike Ferguson	Mollie Vreeland	Myron Klos	Nancy Gates	Nancy White	Nena Cook
Mike Hudak	Molly Brent	N Burrows	Nancy Hanson	Nancy Woolley	Nicholas Cartabona
Mike LeHew	Molly Campbell	N Houghton	Nancy Hartman	Nancy Young	Nicholas Coleman
MIKE LYMAN	Molly Hauck	n jackson	Nancy Hauer	nanette cronk	Nicholas Falletta
Mike Mahler	Molly Mendez	N Murray	Nancy Heck	Nanette Mosiman	Nicholas Feda
Mike Mattox	Molly Walker	N. Coyle	Nancy Hiestand	Nannette Taylor	Nicholas Frederick
Mike McCormick	Mona Sangesland	Nadine Kouba	Nancy Huntington	Naomi Avissar	Nicholas Mouzourakis
Mike Mutchler	Monica Firely	Nadine LaVonne	Nancy James	Naomi Klass	Nicholas Prychodko
Mike O'Connell	Monica Gilman	Nadine Wolff	nancy king	Naomi Zurcher	Nick Barcott
Mike Peale	monica jelonnek	nady corvers	Nancy Kmonk	Nasrin Mazuji	Nick Hood
mike schuster	Monica McKeown Gallicho	namita dalal	Nancy L Reynolds	Natalie Clay	Nicola Nicolai
Mike Van dyne	Monica Raymond	Nan Wollman	Nancy L. Roll	Natalie Hall	Nicolaas Strik
Mike Winget	Monica Russo	Nancy L. Anderson	Nancy McLean	Natalie Mannering	Nicolás Altamirano
Mikki Chalker	monika bronhen	Nancy Anderson	Nancy Meute	Natalie Stephens	Nicolas Humphrey
Mildred Gittinger	Monique Musialowski	Nancy Arbuckle	Nancy Miller	Natalie Van Leekwijck	Nicole Cerra
Miles Patterson	monjit guram	Nancy Archibald	Nancy Moore	Natasha Saravanja	Nicole Hafemeyer
Miles Roscher	Morgan Cormia	Nancy Beavers	Nancy Newbury	nathalie camus	Nicole Mikals
millie bush	Morris Givner	nancyY bird	NANCY OR	Nathan Allen	NICOLE REICHER
Millie Wagner	Mr. and Mrs. E. R. Adams	Nancy Bowsher	nancy Pearson	nathan pate	Nicole Rosa
Minivere Wenzer	Mr. Claire Egtvedt	Nancy Byers	Nancy Richard	Nathan Tompkins	Nicole Shaffer
Miriam Angress	Mr. Shelley Dahlgren, PhD	Nancy Byrum	Nancy Riggleman	Nathan Van Velson	Nicole Terry

**ICICLE CREEK SUBBASIN**  
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Comment Letter 379 Signatures

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nika kollar	Oksana Brodie	Pamela cote	Patricia Benjamin	Patricia Puterbaugh	Patty Viers
Nikhil Bahl	Olive Ayhens	Pamela Hamilton	Patricia Blochowiak	Patricia R. Wendell	Paul & Tiina Oker
Nikki Martin	Oly Bravo	Pamela Hamulak	Patricia Borri	Patricia Rowell, PhD, RN	Paul Allen
Nikki Nafziger	Omar Siddique	Pamela Harper-Smith	Patricia Cardoso	Patricia Sloan	Paul Bettelheim
Nikki Wojtalik	Onur Agirseven	Pamela Hendricks	patricia carlton	Patricia Smith	Paul Borcherding
Nina Aronoff	Oscar Gutierrez	Pamela Jiraneck	Patricia Chamberlain	Patricia Traub	Paul Daly
Nina Garfinkel	Owen Gustafson	Pamela Joan Olsen	Patricia Chelmecki	Patricia Vineski	Paul Daniello
Nina Mcnitzky	P A Paye	Pamela Miller	Patricia Clucas	Patricia Williamson	Paul Eisenberg
Nina Miller	P NUNEZ	Pamela Rhodes	Patricia Copenhaver	Patricia Young	Paul Emerson
Nina Perino	p perron	Pamela Scott	Patricia Davenport	Patrick Aitchison	Paul Grove
nm hoover	P Sticha	Pamela Sullivan	Patricia DeLuca	Patrick Annabel	Paul Haskins
Noel Crim	Pablo Bobe	Pamela Vasquez	Patricia Dion	Patrick Bak	Paul Hefferon
Noel Smith	Paige Ziehlermartin	Pamylle Greinke	Patricia Dishman	Patrick Beaudry	Paul Hunrichs
Nora Lewis	Pam Clark	Paola Maino	Patricia Fiedler	Patrick D'Annunzio	Paul Jarzembski
Norda Gromoll	Pam Evans	Pat Albertson	Patricia Forrest	Patrick McGuffin	Paul Johnson
Noreen Weedon	Pam Fletcher	Pat and Gary Gover	Patricia Frederick	Patrick Uhtoff	Paul Kalka
Norm Stanley	Pam Millett	Pat Blackwell-Marchant	Patricia Giles	PATRICK WATSON	PAUL KINSLOW
Norm Wilmes	pam neely	Pat Bryan	Patricia Gregory	Patsy Di Leo	Paul Komishock Jr .
NORMA CAMPBELL	Pam Rensch	Pat Foster	Patricia Harlow	Patsy Shafchuk	Paul Kripli
Norma Kafer	Pam Roth	Pat Johnson	Patricia Heiden	Patti Fink	paul Lamberg
Norma McCulloch	Pam Scoville	pat matz	Patricia Kay Youngson	Patti Johnson	Paul Lau
Norma McNeill	Pam Tezza	Pat Rose	Patricia Lauer	Patti Martin	Paul M. Deauville, DVM
Norma WASHBURN	pam ward	pat turney	Patricia Law	Patti Packer	Paul Moss
Norman Baker	Pam Wetzels	Patrice Aiello	Patricia McCain	Patti Schultze	Paul Moyer
Norman Bishop	Pam Wilbourn	Patrice Capan	patricia misner	Patti Wright	Paul Novak
Norman Howell	Pamela Brocious	Patrice Lamariana	Patricia Nadreau	Pattie Meade	Paul Palla
Norman Ives	Pamela Check	Patrice Roberts	PATRICA NARDONE	Patty Bonney	Paul Ramos
Norman Thornton	Pamela Chipman	Patricia Auer	Patricia Nazzaro	Patty Ridenour	Paul Rasmussen
O. Youmans	Pamela Clark	Patricia Baley	Patricia Platt	Patty Traube	Paul Riley

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Paul Rinear	Peggy Fugate	Peter Lee	phyllis attanasio	R Peirce	Randy Hammer
Paul Rosen	Peggy Furminger-Haist	Peter Lockwood	Phyllis Erwin	R Rogers	Randy Harrison
paul runion	Peggy Kocoras	Peter Mathews	Phyllis Gregory	R Wells	Randy Heidenfelder
Paul Russell	Peggy La Point	Peter Rawlings	Phyllis Holzworth	R. Dene Larson, Jr.	Randy Herman
Paul Schmalzer	Peggy Mahle	Peter Roche	Phyllis Schmidt	R. Thorne	Randy Nichols
Paul Torrence	PEGGY MORRIS	Peter Ware	Phyllis Stanbury	R. Zierikzee	randy s
Paul Verzosa	Peggy Tribble	Peter Wilsnack	Phyllis Turner	Rachael Glogovsky	Ranko Balog
Paul Vesper	Peggy Yeargain	Peter Wood	Pia Loeper	Rachael Varney	Raso Hultgren
Paul West	Penelope Prochazka	Peter/ R4 CH	Pierre Del Prato	Rachel Berg	Ray C. Telfair II, Ph.D.
Paula Carrier	Penny and Bob Greenboam	Petra Jones	Pierre Schlemel	Rachel Chaput	Ray Derrickson
Paula Eppler	Penny Morrow	Phil Hanson	Pieter Kark	RACHEL CLARKEROBERTS	Ray Goodwin
Paula Grande	Penny Platt	Phil Pennock	Pilar Barranco	Rachel Collins	Ray Lorensen
Paula keisler	Pepper Trail	Phil Rocky	Pilar Quintana	Rachel Gullett	Ray Nuesch
Paula Minklei	Percy Hicks-Severn	Philip Dennany	Polly Harris	Rachel Jett	Ray Szumal
Paula Myles	Perolina Fernandes	Philip Hult	Polly O'Malley	Rachel Krucoff	Rayline Dean
Paula Neville	Perry Chapdelaine	Philip Kritzman	pPia Mustonen	Rachel Scott	Raymond Crannell
Paula Shafransky	Pete DeLorenzo	Philip Maloney	Prem Mulberry	Rachel Syverson	Raymond Gill
Paula Zerzan	Pete Ferraro	philip RANDALL	PRISCILLA DELANEY	Rachel Wolf	Raymond Johnson
Paulette Kaplan	Peter Altman	Philip Ratcliff	Priscilla Mattison	Rae Cecil	Raymond Keeling
Paulette Schindele	Peter Ayres	Philip Rohr	Priscilla Mezrahi	Ragen Serra	Raymond Litzsinger
Pauline Berkeley	Peter Beves	Philip Schuster	Priscilla Tine'	Ramona Kopnick	Raymond Peters
Pauline Burak	Peter Clemo	Philip Shook	Priscilla tRUDEAU	Ramona Krause	Raymond Savarda
Pauline Faye	Peter Coleman	Philip Simon	PROTECT ALL THINGS WILD & WONDERFUL	Ramsay Kieffer	reba worden
peg bradley	Peter Cox	Philip Young	Pui Hang Miles	Randall Collins	Rebecca Baker
PEG HENDERSON MILLS	Peter D'Luhosch	phillip gagliardi	Querido Galdo	Randall Nord	Rebecca Beardsley
Peggy Acosta	Peter Dramer	Phillip McMurray	QUIDA JACOBS	Randall Webb	Rebecca Bierbaum
Peggy Bergen	Peter Evans	Phillippa Hilsden	r dean james	Randle Sink	Rebecca Burmester
Peggy Detmers	Peter Haroutian	Phyl Newbeck	r f	Randolph Hogan	Rebecca Canright
Peggy England	Peter Harris	Phyllis Acadia		randy bewer	Rebecca Casstevens

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Rebecca Clark	Rhett Lawrence	Richard Knablin	Rick Kemenesi	Robert and Dolores Scheelen	Robert Jenks
Rebecca Frey	Rhonda Bradley	Richard L Ashbacker	Rick Pearson	Robert Arneach	Robert Kaiser
Rebecca Gould	Rhonda Clements	Richard La Londe	Rick Posten	Robert B. Kaplan	Robert Keim
Rebecca Kimsey	Rhonda Hertenstein	Richard Langstaff	Rick Provencio	Robert Bamford	Robert Kennedy
Rebecca LaGessee	Rhonda Johnson	Richard Longley	Rick Roberson	Robert Belknap	Robert knauber jr
Rebecca McDonough	rhonda lawford	Richard Mackin	Rick Shreve	Robert Beverly	Robert Leggett
Rebecca Muzychka	Rhonda Oxley	Richard Marchick	Rick Whitman	Robert Blumenthal	Robert Liedike
Rebecca Schroeder	Rich Surdyk	Richard McConaughy	Rickey Westbrook	Robert Brown	Robert Lindberg
Rebecca Shovan	Richard Abel	Richard Medlock	Ricki Newman	Robert Burnett	Robert Lombardi
Rebecca Skalsky	Richard Agee	Richard Olson	Ricky Taylor	Robert Carroll	Robert M/Carol G Reed
Rebecca Swanson	Richard Alloway	Richard Partlow	rio valencia	Robert Chirpin	Robert Megraw
Rebekah Obrien	RICHARD AMERLING	Richard Patenaude	Rita Carlson	robert cobb	Robert Mitchell
Reed Heff	Richard and Kim Rendigs	Richard Phillips	Rita Falsetto	Robert Coppola	Robert More
Reeta Roo	Richard Barker	Richard Plancich	Rita Lewis	Robert Courson	Robert Mutascio
Regina Carpenter	Richard Booth	richard ranieri	Rita Melton	Robert Crum	Robert Nix
Regina Charles	Richard Bowen	Richard Ress	rita meuer	robert curtin	Robert O'Brien
Renae McKeon	Richard Boyce	Richard Sappelli	rita racioppo	Robert Fanniff	Robert Racine
Rene Gelsomino	richard collins	Richard Schuh	Rita Zielinski	robert ferrara	Robert Rippetoe
Renee Grant	Richard Coveny	Richard Schulte	RJ Browne	Robert Fingerman	Robert Roberto
Renee Gregory	Richard Creswell	Richard Shepard	rob bril	Robert Furst	Robert Russo
Renee Landuyt	Richard Fish	Richard Spotts	Rob Carter	Robert Gibb	Robert Samaniego
Renee Reinero	Richard Friesenhengst	Richard Stanley	rob fursich	Robert H. Feuchter	Robert Sanders
Renee Woodman	Richard Griggs	Richard Takagi	Rob Lee	Robert Hammond	Robert Sargent
Reto Pieth	Richard Hassinger	Richard Tidd	Rob Lowe	Robert Handelsman	Robert Schuessler
Rev. Elizabeth Zenker	Richard Heinlein	Richard Wightman	Rob Lozon	Robert Harris	Robert Seltzer
Rev. L. Cline	Richard Henderson	Rick Blanchett	Rob Put	Robert Haslag	Robert Shippee
rex franklyn	Richard Hieber	Rick Brigham	Rob Rondanini	Robert Hicks	Robert Slomer
Reynold Tharp	richard jackson	Rick Hancock	Rob You	robert hughes	robert spaccarotelli
rhea moss	Richard Klene	Rick Hatten	Robbie White	Robert J. Herman	Robert Stewart

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Robert Sullivan	Rochelle Phillips	Ronald Clayton	Rosemary Graham-Gardner	Ruth Griffiths	Sally Hodson
robert swift	Rochelle Willis	Ronald Garner	rosemary Green	rUTH Karl	Sally Jacques
Robert Szeligo	Rocky reuter	Ronald Harden	Rosemary Hewett	Ruth Katz	Sally Neary
Robert Taggart	Roert knauber jr	Ronald Howard	Rosemary Ward	Ruth Koblenz	Sally Vogel
Robert Veralli	Roger Dober	Ronald Hubert	Rosiris Paniagua	Ruth Mendes	Sally Webb
Robert W. Rhodes, III	Roger Lewis	Ronald Partridge	Roslynn Budoff	Ruth Vacin	SallyMarie Jones
Robert Wagner	Roger Stanley	Ronald Ratner	Roth Woods	Ruth Vickers	sam bleecker
Robert Wallace	Roger Williams	Ronald Silver	RoxAnn Capps	RY MORAN	Sam Catron
Robert Wist	rohana wolf	Ronald Taliano	roxie harrington	Ryan Davis	sam chapman
Robert Wohlberg	Roidina Salisbury	Ronald Warren	roy adsit	Ryan Draper	Sam Dratch
roberta e. newman	Rolf Mense	Ronit Corry	Roy Berces	Ryan Fabich	Sam Mead
Roberta Richardson	Rolf Vaardal	Ronlyn Schwartz	Roy Conner	S B	Sam Stearns
Roberta Shields	Rollin Odell	Ronnie Bolling	Roy Ferguson	s cook	Sam Todd
Robin Banks	Romy Goltz	Rosa Rodriguez	ROY OSHITA	S Hall	Samantha Hanks
Robin Connolly	Ron Barnett	Rosalind Bresnahan	Roz Goldstein	S J Polk	Samantha Rosa-Re
Robin Covino	Ron Beard	Rosanna Power	Ruby Weeks	S Logan	Samantha Solomon
Robin Gotfrid	Ron Bohr	Rosario Cosimo	Rudolph Ripp	S Thompson	Samantha Steigerwaldt
Robin Lorentzen	Ron Carlson	Rose Ann Reynolds	Rus Postel	S. Andregg	Samantha Turetsky
robin mater	Ron Cuoio	Rose Fraser	Russ Beebe	S. Barnhart	Sammia Panciocco
Robin Mayerat	Ron Faich	Rose Leather	Russ Ludwick	S. Chapek	Sammy Low
Robin Patten	Ron Hansel	Rose Marie Stef	Russell Congdon	S. Nam	Samuel Eaton
Robin Ranchau	Ron Kucynski	Rose R Aranita	Russell Fowler	S. Repp	Samuel Rametta Jr
robin reinhart	Ron Melin	Rose Schlecker	Russell Huffman	Sabina Taneja	Sanand Dillip
Robin Rysavy	Ron Melsha	Rose Smith	Russell James	sabine greger	Sandi Aden
Robin Spiegelman	ron morrisette	Roseann Foley	Russell Weisz	Sabine Prather	Sandi Cornez
Robyn Reichert	Ron Ruth	Roseanne Pacheco	Rut T	SABRE METCALF	Sandi Covell
Robyn Sliney	Ron S .	Rosemarie Paolinelli	Ruth Burman	Sabrina Thompson	Sandi Crist
rocco frangione	Ron Santi	Rosemary Caolo	Ruth Cooper	Sabrina Wojnaroski	Sandi Redman
Rochelle Didier, M.D.	Ron Torretta	Rosemary Futrovsky	Ruth Goldstein	sally abrams	Sandra Angelini

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Sandra Ashmore	Sandra Stock	Sarah Rowe	Scott Ploger	Shari Sutherland	Shawn Jackson
Sandra Beemer	Sandra Ust	Sarah Schaefer	Scott Romanowski	Sharman Petri	Shawn Johnson
Sandra Christopher	Sandra Varvel	Sarah Sercombe	Scott Rubel	Sharmayne Busher	Shawn Liddick
Sandra Cobb	Sandra Wearne	Sarah Stewart	Scott Schweizer	Sharon Anton	Shea Craver
Sandra Cope	Sandra Woodall	Sarah Townsend	Scott Sobel	Sharon Bailey	Shearle Furnish
Sandra Costa	Sandy Dalcais	Sarah Valentine	Scott Swanson	Sharon Barry	Sheila Cowden
Sandra Couch	Sandy J .	Sarah Volpe	Scott Teel	Sharon Bramblett	Sheila Desmond
Sandra Dybel	Sandy Rasich	Sarah Wiebenson	Scott Troup	Sharon Burge	Sheila Draughon
Sandra Franz	Sandy Schout	Saran K .	Scott Wagner	Sharon Cook	sheila ganz
Sandra Guman	Sandy Thompson	saraphine metis	Scott Zellner	Sharon Crocker	Sheila Goldner
sandra hazzard	Sandy Zelasko	Sargon Donabed	Sean Corrigan	Sharon Davis	Sheila Haas
Sandra Joos	Sara Avery	satya vayu	Sean McFeeley	Sharon Divis	Sheila Powers
Sandra Kawa	Sara Brandon	Savannah Green	Sean O'Dell	Sharon Downs	Sheila Silan
Sandra Kerr	sara carroll	Savannah Scarborough	Seana Graham	Sharon Fetter	Shelby Homer
Sandra Laase	Sara Green	SAVERIA GARCIA-MACRI	Serena Klempin	Sharon Fisher	shelley frazier
Sandra Lane	Sara Lazarus	SAWATDEE SANLAVUN	serenella Castri	Sharon Kaylor	Shelley Volk
Sandra Lawrence	Sara McGuire	Scott Britton-Mehlisch	Sergey Galushko	SHARON KOESTER	Shelly Wallace
Sandra Lowy	Sara Miller	Scott Deering	Setsuko Maruki-Fox	Sharon Koogler	Sher Surratt
Sandra Materi	Sara Shutkin	Scott Duncan, M.D.	Seven Dunsmore	Sharon LeVine	Sheree Bala
Sandra Mooney	Saraah Hamilton	scott finamore	SG Hurlburt	Sharon Longyear	Sheri Greenspan
Sandra Pearson	Sarah Epstein	Scott Greenblatt	Shandra Bell	Sharon Lovell	Sheri Kuticka
Sandra Perkins	Sarah Funk	Scott Harrison	Shanin Terrell	Sharon Mylott	Sherlene Evans
Sandra Quirnbach	Sarah Gallagher	scott jung	SHANNON BUDDDES	Sharon Teagardin	Sherri Fryer
Sandra Resner	Sarah Garn	Scott Kunkler	Shannon Griffin	sharon walsh	Sherri Jones
Sandra Rubin-Wright	Sarah Hunnewell	Scott Messick	Shannon Healey	Sharon Wojno	sherri kalman
Sandra Simons	Sarah Jordan	Scott Myers	Shannon Milhaupt	Shary B	Sherrill Futrell
Sandra Smith	Sarah Kowalske	Scott Nelson	Shanta Gabriel	Shauna Sparlin	Sherry Blackshear
Sandra Sobanski	Sarah Love	Scott Pace	Shari Krueger	Shawn Blaesing-thompson	Sherry Knoppers
Sandra steinle	Sarah Rose	Scott Pingel	Shari Sharp	shawn clotworthy	Sherry Leinbach

## DPEIS COMMENTS &amp; RESPONSES

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Sherry Leonardo	Simone Butler	Stephanie DeArmeY	Stephen Rosenblum	Steve Uyenishi	Sue Halligan
Sherry Lewis	Sister James Marie Gross	Stephanie E .	Stephen Sleeper	Steve V .	Sue Hanlin
Sherry Marsh	Skot McDaniel	Stephanie Fairchild	Stephen Smith	Steven Aderhold	Sue Jarrard
Sherry Salomon	Sofie Forsberg	Stephanie Hildreth	Stephen Taylor	Steven Berman	sue lee mossman
Sherry Vatter	Solo Greene	Stephanie Hines	Sterling Proffitt	steven carpenter	Sue Loesch-Fries
Sherry Weiland	Sondra Huber	Stephanie Kob	Steve Aydelott	Steven Cypher	Sue McHenry
sheryl lee	Sondra Katz	Stephanie Linam	Steve Clifford	Steven Deutsch	Sue Stoeckel
Sheryl Pierson	Sonia Goldstein	Stephanie Lovell	Steve Cosgrove	Steven Federman	Sue Wilkin
Sheryl Porter	Sonia Romero Villanueva	Stephanie Marco	Steve Downing	Steven Fenster	Sugar Bouche
Sheryl Williams	sonja franz	stephanie maxwell	Steve Garrett	Steven Gary	Summer Spinks-Marasco
Sheryll Punneo	Sonya Chan	Stephanie Mory	Steve Green	Steven Handwerker	Susan Allen
Shirley gilbreath	Sonya Hodge	Stephanie Reynolds	Steve Griffith	Steven Hernandez	Susan Alter
Shirley LaRue	Sophie Ralston	Stephanie Seymour	Steve Gross	Steven Kline	Susan Armistead, M.D.
Shirley Reider	Soretta Rodack	Stephanie Trudeau	Steve Henry	Steven McCann	Susan Beard
Shonna Davis	Spencer Bedwell	Stephanie Welch	Steve Hopkins	Steven Schlam	Susan Bechtholt
Shreeraj Sutaria	Spring Ligi	Stephen Appell	Steve Hylton	Steven Tempelman	Susan Berzac
sid shapiro	Stacey Bradley	Stephen Burns	Steve Iverson	Steven Velasco	susan betourne
Sidney Ash	Stacey McRae	Stephen Diamond	Steve Kaub	Stevie Sugarman	Susan Brandes
Sidney Hirsh	Stacey Rohrbaugh	Stephen Dutschke	steve kent	Stewart Rosenkrantz	Susan Campanelli
Sidney Schultz	STACIE CHARLEBOIS	Stephen Farkash	Steve Kokol	Strong Supporter	Susan Coen
Sidney Thiessen	Stacy Butrim	Stephen Gliva	Steve Mattan	Stuart Mork	Susan Crampton
Sigal Tzoore	Stacy Cornelius	Stephen Hackney	Steve Netti	Su Horty	Susan Decious
Signe Stuart	Stacy Grossman	Stephen Hoeprich	Steve Overton	Sudeshna Ghosh	susan delles
Signe Wetteland	Stacy Nisperos	Stephen Howard	Steve Prince	Sue Balk	Susan Elvira Floran-Bernier
Silvana Borrelli	Stacy Owens	Stephen La Serra	Steve S	Sue Batchelor	Susan Finley
Silvia Bertano	Stanley Charles	Stephen Mahoney	Steve Schildwachter	sue davies	Susan Fontanes
Silvia De Los Santos	Stanley Hayes	Stephen Mead	Steve Schueth	Sue DiCara	Susan Galante
Silvia Hall	Stefan Taylor	Stephen Mudrick	Steve Sheehy	Sue E. Dean	Susan Gill
Sima Cooperman	STEPHANI BORDA	Stephen Nichols	Steve Tyler	Sue Hall	Susan Goldberg

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Susan Goldhor	Susan Peters	Susie Irwin	T J Thompson	Ted Clausen	Terri Rimmer
Susan Goldman	Susan Ponchot	Susie O'Keeffe	T Mo	Ted Fishman	Terry Fiske
Susan Gottfried	Susan Porter	Susie Shapira	T Roland	Ted LaPage	terry king
susan gunther	Susan Preston	Suzanne Alexander	T TODARO	Ted Neumann	Terry S . C .
SUSAN HAEBIG	Susan Proffitt	Suzanne Barns	Tabitha Rodriguez	Tedd Ward Jr .	Terry Sessford
Susan Hamann	Susan Reichter	Suzanne Claggett	Takako Ishii-Kiefer	tena garlick	Terry Tedesco-Kerrick
Susan Hampton	Susan Rodriguez	suzanne cogen	Tamara Abashian	Teo Teo	Terry Vaccaro
Susan Harmon	Susan Rubin	Suzanne Fejes	Tamara Matz	Teresa Bessett	teseo staffilani
Susan Harrie	Susan Schlessinger	Suzanne Jones	Tami Linder	Teresa Bratton	Tess Husbands
Susan Hathaway	Susan Schmidt	Suzanne Kirby	Tami Mccready	Teresa Edens	Tessa Pou
Susan Head	Susan Schneeberger	Suzanne kruger	Tami T .	Teresa Fleener	Theo Giesy
Susan Himes-Powers	Susan Schuchard	Suzanne Marienau	Tammie Rayburn	teresa gingras	Theo Ostler
Susan Hood	Susan Severino	Suzanne Murphy-Larronde	Tammy Fisher	Teresa Hommel	Theodora Moriarty
Susan jacobson	Susan Siens	Suzette Hoyt	Tammy McCullough	Teresa Iovino	Theodore Burger
Susan Jobe	Susan Slapnick	Suzy Lawrence	Tammy Weatherly	Teresa Ligorelli	Theodore King
Susan Jonas	Susan Stavros	Sybil Schlesinger	Tammy Weaver	Teresa Lyman	THEODORE Mertig
Susan Lantow	Susan Swan	Sydney Hilt	TANIA CARDOSO	Teresa Martin	Theodore Stone
Susan LaRue	susan thompson	Sylvia Baldwin	Tanya Alstott	Teresa McMahon	THEODORE WUERSLIN
susan leber	Susan Wechsler	SYLVIA BURGESS	Tanya Baldwin	Teresa Nordquist	Theresa Badus
Susan Linden	Susan Westervelt	Sylvia Cardella	Tanya Gerard	Teresa Rex	Theresa Deery
Susan Madden	Susan Whipple	sylvia chai	Tanya Glasser	Teresa Thomas	Theresa Knapp
Susan Messerschmitt	Susan Wilkie	Sylvia De Baca	Tanya Piker	Teri Koslen	Theresa Peckham
susan michetti	Susan Woods	Sylvia Duncan	Tanya Taylor	Teri Sigler	Theresa Shiels
Susan Mitchell	Susan Workman	Sylvia Nachlinger	Tara Kamath	Teri Teed	theresa Sullivan
Susan Mulcahy	Susan Yost	Sylvia Ruiz	Tara Souther	Terri Armao	Theresa Yandell
Susan P. Vessicchio	Susan Zimmer	Sylvie Rochat	Tara Verbridge	Terri Coppersmith	Therese Ryan
Susan P. Walp	Susang-Talamo Family	T Bell	Tayyaba Khokhar	Terri Hughes	Thom Goodrich
susan peirce	Susannah Gelbart	T C	Ted Bahn	Terri knauber	Thomas Bejgrowicz
Susan Perez	susanne madden	T Garmon	Ted Cheeseman	Terri Pigford	Thomas Brenner



## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 379 Signatures

## Comment Letter 379 Signatures

Thomas Brustman	Tim Glover	Todd Guthrie	toni siegrist	Troy Cunlisk	Verona Murray
Thomas Giblin	Tim Hayes	Todd Jaeger	Toni Stark	troy grant	Veronica Ambler
Thomas Gillespie	Tim Hissam	Todd LeClaire	Toni Vale	trudy dittmar	Veronica Bourassa
Thomas Herzog	Tim Maurer	Todd Snyder	Tonia Liss	Tsilla SLAKMON	Veronica Michael
Thomas Higgins	Tim Mckimmie	Todd Steglinski	Tony Girolami	Twyla Meyer	Vic Bostock
Thomas Humphrey	Timothy Beitel	Toddy Perryman	Tony Jones	Tyler Harrington	Vic DeAngelo
Thomas L Wettengel	Timothy Coleman	Tom Bailey	Tony Menechella	Ursula Dicks	Vic Miiller
Thomas Lewis	Timothy Dow	Tom Beatini	Tony Piselli	Uta Cortimilia	Vic Simmons
Thomas Miller	Timothy Dunn	Tom Canning	Tonya Stiffler	Ute Baker	Vicki & Rod Kastlie
Thomas Peel	Timothy Dunnbier	Tom Cate	Torah Wolf	v currey	Vicki Johnson
Thomas Pintagro	Timothy Ludington	Tom Cuevas	Tori Herbst	V Kent	Vicki Kerr
Thomas Poole	Timothy Miller	Tom Emmott	Torunn Sivesind	V. Euripides	Vicki Kruschwitz
Thomas Ray	Timothy Schacht	Tom Fray	Tova Cohen	Val Schroeder	Vicki Spanogle
Thomas Reynolds	Timothy Troendle	tom harris	Tracey Aquino	Valarie Snell	Vickie Stimac
Thomas Sebrell	Tina Bailey	Tom Hougham	Tracy Eve	Valentina Khoury	Vickie Wagner
Thomas Struhsaker	Tina Beedle	Tom Johnson	Tracy Foster	Valerie Adell	Vicky Brandt
Thomas Swoffer	Tina Behla	Tom Kovalicky	Tracy Gilbert	valerie brown	vicky keays
Thomas Tizard	Tina Cook	Tom Nieland	Tracy Griswold	Valerie Friedman	Vicky Matsui
Thomas Trescone	Tina Johnston	Tom Peace	Tracy Leinbaugh	Valerie Lyon-Parker	Vicky Moraiti
Thomas Turner	Tina Tine'	Tom Pitman	Tracy M	Valerie Ralston	Victor Carmichael
Thomas Viceconte	Tina Vaz	Tom Quinn	Trav Bolin	Valerie Robbin	Victor Escobar
thomas warner	Tina Wener	Tom Rust	Travis Miller	Valerie Stiff	Victor Vuyas
Thomasin Kellermann	Tina Wilson	Tom Warhol	Tricia Rizzi	Van Knox	victoria Hall
Tia Pearson	Tobey Thatcher	Tom Williams	Trigg Wright III	Vanessa Pizarro	Victoria Holzendorf
Tibor Gacs	Toby Ann Reese	Tomasz Nakonieczny	Trina Manthei	Vanna Pichel	Victoria Jensen
Tiffany Clark	todd atkins	Toni Freeman	Trish Gardiner	Veda White	Victoria Miller
Tiffany H	Todd Cisna	Toni Garmon	Trish Stevens	Verla D. Walker	Victoria Powers
tika bordelon	Todd Fisk	Toni Mayer	Trisha Winn	Vernon Batty	victoria wade
Tim Barrington	Todd Gross	Toni Rautus	Tristan Sophia	Vernon DeWitt	Vikki Jones

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 379 Signatures

Comment Letter 379 Signatures

Vikram Singh Sikand	W. Robinson	Wendy Andresen	William Burgess	William S.T. Holcomb
Vinc Simon	Wallace Elton	Wendy Bauer	William Butler	William Schultz
Vince L	wally sykes	Wendy Beyda	William Clarke	William Sneiderwine
Vince Marshall	Walt Anderson	wendy cornell	William Conger	William Steele
Vince Mendieta	walter blanc	Wendy Eckert	William Cope	William Tracy
Vincent Elliott	Walter Bock	Wendy Goetz	William Dane	William White
Vincent Fonseca	walter bolcon	Wendy Gosker	William Dudley	William Wilson
Vincent Geiger	Walter Bost	Wendy Lanchester	William Dustin	William Young
Vinnedge Lawrence	Walter Connelly	Wendy Lukowitz	William Edgar	Wingate Steitz
Violet Houtzagers	Walter Hixson	Wendy McGowan	William Estay	Winifred Riester
Vira Confectioner	Walter Klockenbrink	Wendy Palmquist	WILLIAM ESTEP	Wolfgang Loera
Virginia Baksa	Walter Kuciej	Wendy Raymond	William Forbes	Wyman Whipple
Virginia Broadbeck	Walter Loquet	Wendy Stevens	William Gray	Xavier O'Mack
Virginia Cook	Walter Pinkus	Wendy Talkington	william haegele	Ya Hui Shih
Virginia Davis	Walter Schmitt	Wendy Walters	William Hallman	Yazmin Gonzalez
Virginia Garesche	Wanda Ballentine	Wendy Wittl	William Harker	Yee Yean Lim
Virginia Jastromb	Wanda Koory	Wendy Worth	William Henzel	Yelerna Katsen
VIRGINIA JONES	Wanda Sturrock	Wesley Hamilton	William J. Etges	YING COOPER
virginia wilson	Ward Peterson	Wesley Tyler	William Klitzke	Yma Corrales
Vittorio Ricci	Warren Fries	Wesley Wolf	William McCullough	Yolani Moratz
Vivian Newman	warwick Hansell	Whitney watters	William McDowell	Yvonne Irvin
Vivien Steele	Wayne & Kelly Hagenbuch	Whitney-Bear Bradsher	William McGunagle	Yvonne Marley
Vivienne Benton	Wayne Hornak	Wilfred Mejia	William McNaughton	Yvonne White
Vonnie Iams	Wayne Kelly	Will Roush	William Mitchell	Zandra Talbert
W H Wolverton	Wayne Mortimer	will salmon	William Montgomery	Zara Ivanova
W Jansen	Wayne Teel	Will Silva	William Nusbaum	zee Fisher
W Johnson	Wayne Wathen	Willem Wachtmeester	William Obrien	zelma taylor
W Lynch	Wayne Wilkinson	William Anderson	William Persky	zod schultz
W. Andrew Stover	Wendi Cohen	William Arndt	William Ryerson	

## DPEIS COMMENTS & RESPONSES

### Comment Letter 380

### Comment Letter 380 Signatures

**From:** Baiss Eric Magnusson (baiss@comcast.net) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Tuesday, July 31, 2018 2:02 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Do not undermine Alpine Lakes Wilderness protections

Dear WA Department of Ecology and Chelan County Officials,

380-1 Alpine Lakes Wilderness is one of the state's most iconic landscapes, and draws untold visitors every year. While we appreciate the goal to improve instream flows in Icicle Creek, we cannot undermine the well-deserved protections for our public lands in the process.

380-2 The DPEIS lays out five alternatives to address instream flows in the Icicle Creek, ranging from workable to egregious. The DPEIS should be revised to make sure it complies with all state and federal laws, properly ensures there is no impact on watershed function, offers water conservation options, does not enlarge any wilderness lakes, and fully recognizes the limits on water rights at each lake.

380-3 Alpine Lakes Wilderness is a shared natural resource that must be respected and protected. We cannot allow one natural area to be exploited under the guise of enhancing another.

Sincerely,

Baiss Eric Magnusson  
11540 Alton Ave NE  
Seattle, WA 98125  
baiss@comcast.net  
(206) 361-0718

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

A Ehrlich	Alissa A	Andrew Daday
A Feher	Allan Hendrix	Andrew Griego
A L	Allen Olson	Andrew Martin
A R	Allison Cox	Andrew Rosenthal
Adam Eshleman	Allison McCoy	Anett Young
Adam Levine	Allison Ostrer	Angela Amdur
Adam Wong	Allison Phares	Angela Atkins
Addison Klinke	Ally Jones	Angela Bellacosa
Al and Anne Bridges	Alycia Staats	Angela Merges
Alaina Miller	Amanda Battles	Angela Modelski
Alan and Joann Riley	Amanda Huppert	Angela Romano
Alan Nechols	Amanda Reynolds	Angeleah Dolfay
Alana Rogers	Amanda Sorell	Animae Chi
Alanna Taylor	Ambre Olsen	Anita Das
Aldora Perez	Amelia Apfel	Anita Keiter Jahns
Aleece Mann	Amelia Brower	Ann Becherer
Alex and Pauline Nakamura	Amelia Roberts	Ann Crosby
Alex Berger	Amorah Ross	Ann Daigle
Alex Lim	Amy Cihak	Ann Darlington
Alex Pinkerton	Amy Dyanne Phillips	Ann Horwitt
Alexander Brenner	Amy Graham	Ann Staley
Alexander Craven	Amy Hixon	Anna Hauksdottir
Alexandra Tufnell	Anand Naik	Anna Liljegren
Alfred Higgins	Anand Parikh	Anna Schier
Alice Burr	Andrea Fisher	Annabel Kirschner
Alice Pfister	Andrea Hanses	Anne Durbin
Alisha Leviten	Andrea Loewen	Anne Hepfer
Alison Archer	Andres Rivera	Anne Huckins
Alison Eckels	Andrew Brinkhaus	Anne Ihnen

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 380 Signatures

Anne Lapora	Barbara Bouche	Beverly Brandt
Anne Mann	Barbara Boyle	Bianca Reich
Anne O'Leary	Barbara Cardarelli	Bibi Powell
Anne Quirk Chafee	Barbara Delgiudice	Bill Arthur
Anne Sherwood	Barbara Goldoftas	Bill Phillips
Annetta Ezelle	Barbara Gross	Billie Rain-Shadid
Annie Alvord	Barbara Hirsch	Bitu Baker
Annie Duggan	Barbara Kirkevold	Blair Kangley
Annie Dwyer	Barbara Lau	Blythe Horman
Annie May	Barbara Luniuck-Rakita	Bob Boyce
Annie Spear	Barbara O'Steen	Bob Breeden
Annie Szeliski	Barbara Tomlinson	Bob Farrell
Annika Horlings	Barbara Vigars	Bobette Plendl
Annika Horlings	Barbara Whitson	Bonnie Ashleman
Anthony Buch	Barbara Wight	Bonnie Dewitt
Anthony Jongejan	Barbara Woo	Bonnie Faith-Smith
Antoinette Bonsignore	Barry Bermet	Bonnie Lawlor
April Sims	Barry Chernick	Bonnie Lynn MacKinnon
Ari Schwartz	Barry Hollander	Bonnie Mandell-Rice
Arieh Stolar	Bartholda Manderville	Bonnie Storm
Arlene Roth	Beate Funke	Bonny Jean Austin
Arthur Kaufman	Benjamin Fisher	Brad Hudson
Arti Chandra	Benjamin H.	Brandie Deal
Ashley Howisey-Turiya	Benjamin Spurgeon	Brandon Juhl
Asphodel Denning	Benjamin Tromly	Brandon Juhl
Audrey Meade	Bernadette Gero	Brandy Parris
August Easton-Calabria	Beth Daynes	Brenda Lewis
Barbara and Charles Staab	Beth Lanie	Brent Howell
Barbara and John Goldthwait	Betsy Gudz	Brett Perry

Brett Tanis-Likkel
Brian Graham
Brian Larson
Brian O'Dell
Brie Gyncild
Brita Horlings
Brittany Dibenedetti
Brock Smith
Bruce and Jill Sanchez
Bruce Barnbaum
Bruce Micklewright
Bruce Sillers
Bruce Tipton
C. David Cook
Cailin Trimble
Caleb Wrege
Callie LeVina
Callise Janikula
Camille Blanchette
Camille Roberts
Candace Ammons
Cara Alderson
Carl Malmfeldt
Carl Woestwin
Carla Carroll
Carlene Cole-Embree
Carol Ann
Carol Ellis
Carol Erickson

Carol Hawthorne	Cassie Koomjian
Carol Long	Cate Menting
Carol Mariano	Catherine Chaney
Carol Olivier	Catherine Keys
Carol Root	Cathy Bangerter
Carol Sibley	Cathy Cleghorn
Carol Stanley	Cathy Lindsay
Carol Thompson	Cathy Sherwood
Carol Verga	Cece Paltep
Carol White	Chad Evans
Caroline Ackerlund	Charleen Dalmeida
Caroline Goulding	Charlene Finn
Caroline Poulas	Charles and Barbara Staab
Carolyn and David Kummerlowe	Charles and Carol Ogden
Carolyn And Robert Fletcher	Charles Caswell
Carolyn Finch	Charles Collier
Carolyn Marquardt	Charles Ellenberger
Carolyn Treadway	Charles Karr
Carolyn Vaughan	Charles Mac Laren
Carrie and Marc Flexer	Charles Riddle
Carrie Foster Campbell	Charles Soncrant
Carrie Heron	Charlie Comnick-Dammand
Carrie Schonwald	Charlie Wallblom
Carrie Shriver	Charlotte Vandyke
Cary Given	Cheri Smith
Caryn Smith	Cheryl Galt
Casey Wagner	Chip Burrows
Cass Newell	Chris Christensen
	Chris Meder

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 380 Signatures

## Comment Letter 380 Signatures

Chris Moore	Colette Lilly	Daniela Leon	David Kipnis	Deja Linet	Diane Weyer
Chris Olafson	Colin Waller	Danielle Baehm	David Peha	Del E. Domke	Dixie Lee Hawkins
Chris Turvey	Colleen Johnson	Danielle Cataline	David Penhallegon	Delfino Cornali	Don Barnett
Christa Carpentiere	Colleen Mohn	Danielle Mottley	David Ramsay	Delia Gerhard	Don Kahler
Christian Giuffre	Constance Anderton	Danielle Rogers	David Scheer	Delores Sanford	Don Silverman
Christie Bradley	Constance Corrick	Danielle Wilburn	David Sielaff	Delorse Lovelady	Don Stutheit
Christina Dysonfarrell	Courtney Canavera	Danny A	David Stetler	Denee Scribner	Dona Costello
Christina Mccluskey	Courtney Stoker	Danny Kim	David Vonmoos	Denise Eicher	Donal Murphy
Christine Hoggatt	Craig Anderson	Danny O'Keefe	David Wilbur	Dennis Bahr	Donald Barrie
Christine Kindle	Craig Mccord	Darcia Hurst	David Yao	Dennis Heller	Donald Beard
Christine Landon	Craig Michaelis	Darin Jones	Dawn Chapel	Dennis Marceron	Donald Kunkle
Christine Martin	Craig Swanson	Dariusz Kowalczyk	Dawn Marie Pares	Denny Onslow	Donald Stobbe
Christine Merrill	Cynthia Calhoun	Darlene Johnston	Deanna Armstrong	Derek Benedict	Donna Gelder
Christine Morgan	Cynthia Calkins	Darlene Maurer	Debbi Pratt	Derek Gendvil	Donna Hamilton
Christine Zomorodian	Cynthia Lachance	Dave Eddy	Debbie Bremner	Derek Newkirk	Donna Hartwell
Christopher Bain	Cynthia Otto	Dave Russell	Debbie Rowe	Diana Frawley	Donna Larson
Christopher Burke	D Kocher	Dave Shaver	Debby Jackson	Diana Johnson	Donna Lipsky
Chuck Lennox	Dale Russ	David Baine	Deborah Anderson	Diana Klug	Donna Musgrove
Cigdem Capan	Dan McGuire	David Chambers	Deborah Efron	Diane Adam	Donna Stonecipher
Cindy Cole	Dan Ritzman	David Dunneback	Deborah Ellman	Diane Deno	Donni Mccray
Cindy Leadenham	Dan Schneider	David Fall	Deborah Gandolfo	Diane Dixon	Dora Weyer
Cj Livingston	Dan Shoe	David Gordon	Deborah Hunt	Diane Horn	DorÃ's Richman
Claire Giordano	Dan Thanh Nguyen	David Grimmer	Deborah Merrill	Diane Kent	Dore Richman
Claire Meisel	Daniel Burnstein	David Gross	Deborah Voves	Diane Langgin	dorinda kelley
Claire Newman	Daniel Henling	David Habib	Deborah Walker	Diane Nixon	Doris
Clayton Vollan	Daniel Herman	David Hall	Deborah Wolf	Diane O'brien	Doris Carey
Cleo Faraone	Daniel Neish	David Halsell	Debra Fixman	Diane Rose	Dorothy Michaelson
Cody Bay	Daniel Rosenfeld	David Harte	Debra Rogers	Diane Rudnick	Doug Guillot
Coleen George	Daniel Sandvig	David Joel Thornton	Deena Sadek	Diane Weinstein	Dru Druzianich

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 380 Signatures

Comment Letter 380 Signatures

Dushani Taleyratne	Ellen Zarter	Fiona Pakiam	Gerald Kessinger	Guy Chan	Howard Mizuta DDS
E. Mcsorley	Ellesa Hunter	Florie Rothenberg	Giana paz	Gwen Hadland	Howard Nebeck
E. Mcsorley	Elmer Berger	Frances Lawren	Gianina Graham	Gwen Straley	Ian Breaser
Earl Emerson	Elyssa Dixon	Frances Paley	Giles Sydnor	Hafidha Acuay	Ilse Kluge
Ed Gallo	Emelia Nevers	Frances Parson	Ginny Haver	Hal Enerson	Ines Decastro
Ed Hare	Emily Bandy	Francis Schwinger	Ginny Mitchell	Hal Trufan	Ingrid Eisenman
Ed Kiniry	Emily Bjork	Frank Valenti	Giselle Wyers	Haley Mateen	Iris Sin
Ed Sobey	Emily Willoughby	Fred Zapf	Gj Price	Hallie Sloan	ISABEL CERVERA
Edie Lackland	Emma Sullivan	Gabriel Webster	Glen Peterson	Hanifah Murfin	Ivy Sacks
Edith Kusnic	Eric and Elisabeth Krauss	Gail Chism	Glenda Carper	Harout Meguerditchian	J B West
Edward Andrews	Eric Drozdov	Gail McDonough	Glenda Jenkins	Harrie Kessler	J D
Edward Elvy	Eric Holst	Gail McMullen	Gloria Mann	Harrison Davignon	J Ochsner
Elaine Packard	Eric Weidaw	Gail Stevens	Grace Padelford	Heather Herrera	J Williamson
Elaine Woo	Eric Zimdars	Gajus Miknaitis	Grace Padelford	Heinke Clark	Jack Lofton
Elana Kupor	Erich Rau	Garth Hockersmith	Greg Armstrong	Helen Barler	Jack Putnam
Eleanor Dowson	Erik Myklestad	Gary Andolina	Greg Carriere	Helen Gutierrez	Jack Stansfield
Elena Conforti	Erika Anderson	Gary Andolina	Greg Gausewitz	Helena Fantin	Jacob Masen-Smith
Elena Rumiantseva	Erin Kilpatrick	Gary Beckham	Greg Glassman	Helene Steinhardt	Jacqueline Williamson
Eli Tayrien	Erin Neubauer	Gary Brill	Greg Leege	Hillary Sanders	Jaime Pardo
Elise Baldwin	Ethan Miedema	Gary Schaefer	Greg Meyer	Hing Wong	James A and Joanne Carpenter
Elizabeth Berggren	Ethel Renner	Gavin Tierney	Greg Stamolis	Hoa Bullock	James Anderson
Elizabeth Beuthel	Eva Cosgrove	Gaye Detzer	Greg Steuck	Hoa Pantastico	James Arrigoni
Elizabeth Boutin	Eva Dusek	Gayle Robey	Greg Wingard	Holden Holdings LLC Investments	James Bates
Elizabeth Derooy	Eva Tyler	Gayle St. Luise	Gregory Armstrong	Holger Mathews	James French
Elizabeth Nedeff	Eve McClure	Gena Shapiro	Gregory Espe	Holli Smith	James Haas
Elizabeth Weber	Eve-Marie Lucerne	Gene And Betty Strickland	Gregory Penchoen	Holly Anderson	James Haywood
Elizabeth Weyer	Felicia Benthams	Geoff Lowery	Gregory Severson	Holly Taylor	James Julien
Elizabeth Wise	Felicia Dale	George Fuller	Gretchen Miller-Carpenter	Howard Mizuta	James Kotarski
Ellen Leary	Finley Tevlin	Gerald Eller	Gudrun Murti		

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 380 Signatures

## Comment Letter 380 Signatures

James M. Tandoo	Jason De Bruler	Jennifer Pittman	Jill Wollman	John Lambert	Judith Laik
James Mulcare	Javier Rivera	Jennifer Pletcher	Jill Yetter	John Larson	Judith Mayotte
James Tandoo	Jayna Cole	Jennifer Pope	Jim Ploger	john mackay	judith milner
James Woodruff	Jb Brooks	Jennifer Riker	Jingwei He	John Mixon	Judy Beach
Jamie Hascall	Jd Li	Jennifer Robbins	Jo Burnstein	John Mudd	Judy Brennan
Jan Robbins	Jean Darsie	Jennifer Rudinsky	Jo Harvey	John O'Halloran	Judy Chapman
Jane Bellousov	Jean Gorecki	Jennifer Straniti Schmolz	Jo Napier	JOHN PASQUA	Judy Hedstrom
Jane Dejarnatt	Jean Marie Lehtinen	Jennifer Sturm	Joan Hunt	John Paul Kemmick	Judy Honican
Jane Millard	Jean Pauley	Jennifer Vining	Joan Kurtz	John Ringler	Judy Jensen
Janet Bird	Jeanene Lorey	Jennifer Wheeler	Joan Shelby	John Vogt	Judy Prudhon
JANET CALLIS	Jeanne Brown	Jennifer Wyatt	JoAnn Riley	John Walenta	Judy Swanson
Janet Feifel	Jeanne Deller	Jenny Adams	Joann Zugel	Jon Chouinard	Julia Buck
Janet Hada	Jeanne Erdahl	Jeremiah Alexander	Joanna Redman-Smith	Jonas Carson	Julia Camp
Janet Hedgepath	Jeanne Poirier	Jeremiah Allen	Joanna Vintilla	Jonathan Loeffler	Julia Heggen
Janet Kempf	Jeannette Halverson	Jeremy Luscher	Joanne Watchie	Jordan Robbins	Julia Larsen
Janet Riordan	Jeannine Sielinski	Jerry Brees	Jodi Taylor	Jose Garcia	Julia Rankin
Janet Sutton	Jeannine Wilmes	Jerry D'Addio	Joe Ginsburg	Joseph Diate	Julie Biggs
Janet Triplet	Jeff Lane	Jerry Kessinger	Joe Terrenzio	Joseph Yencich	Julie Buck
Janice Brookshier	Jeff Perzynski	Jerry Legas	Joel Flank	Josh Huisenga	Julie Carmen
Janice Erdman	Jeff Welsh	Jerry Stansfield	Johan Luchsinger	Josh Kato	Julie Holtzman
Janice Holkup	Jen Smoose	Jerry Thompson	John Backes	Joshua Brown-White	Julie Lawell
Janice Lonergan	Jenefer Mcsharry	Jessalyn Pinneo	John Bliss	Joshua Lieberman	Julie Pierce
Janice Pollard	Jennifer Davison	Jesse Gore	John Edison	Josie Hazen	Julie Slocum Bennani
Janine Cleland	Jennifer Durrie	Jessica Hopkins	John Fiddler	Joy Gardner	Julie Starkel
Janis Keller	Jennifer Hydrick	Jessica Levin	John Flynn	Joy Huffine	Julie Urvater
Janna Treisman	Jennifer Kardiah	Jessica Ostfeld	John Goodman	Joyce Ramee	June M
Jared Howe	Jennifer McClure	Jill Blaisdell	John Guros	Joyce Schulte	Justas Vilgalys
Jared Macrobb	Jennifer Nelson	Jill Kinkade	John Iki	Juanita J. Cozart	Justin Richey
Jason Brown	Jennifer Pflum	Jill Seipel	John Kenyon	Judith Adams	K Keiser

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 380 Signatures

K Kikawa	Kate Hourihan	Kathy Albert
k m keiser	Kate Ionina	Kathy Corella
K Otto	Kate Lenthall	Kathy Sparks
K White	Katelyn Kenderish	Katie Hopper
K. Youmans	Katerine Chesick	Katie Klahn
Kadri Linask Goode	Katharine Harkins	Katie Kuhl
Kara Harms	Katherine Alice Tylczak	Katie Poinier
Karen Barnes	KATHERINE JOHNSON	Katie Scherrer
Karen Bukis	Katherine Nelson	Kay Kite
Karen Fortier	Kathleen Costinett	Kay Lakey
Karen Gielgens	Kathleen Gylland	Kayla Thompson
Karen Grabo	Kathleen Kemper	Kc Young
Karen Jones	Kathleen Lange	Keith Cowan
Karen Joy	Kathleen Matson	Keith Ervin
Karen Loeser	Kathleen Mcbeth	Keith Horton
Karen Meadows-Hills	Kathleen McMurray	Kelley Guiney
Karen Richards	Kathleen Melin	Kelly Soderberg
Karen Sauve	Kathleen Schmidt	Kelsey Almendariz
Karen Smith	Kathleen Steyaert	Kelsey Colliander
Karen Thomas	Kathleen Thomas	Ken Gersten
karen Wang	Kathlene Croasdale	Ken Realmuto
Kari Fiore	Kathryn Bromley	Kendall Mclean
Kari Westphal	Kathryn Davis	Kendra Williams
Karl Forsgaard	Kathryn Haupt	Kenneth Apostol
Karl Scholze	Kathryn Lambros	Kenneth Carlson
Karrie Sanderson	Kathryn Lee	Kent Daniels
Karris Grumm	Kathryn Matti-Spickard	Kergan Street
Kat Thomas	Kathryn Potter	Kerry Knight
Kate Blessing	Kathryn Umbarger	Kerstin Rogers

Kevin Chiu
Kevin Ducoing
Kevin Filocamo
Kevin Gallagher
Kevin Kane
Kim Altenburg
Kim Gowrie
Kim Hanke
Kim Josund
Kim Mitchell
Kim Seater
Kimberly Crane
Kimberly Grass
Kimberly Vacchiery
Kimberly Wiley
Kirk Warburton
Kirsten Taeuber
Klouse Cook
Kristen Parton
Kristin Michael
Kristina Rohder
Kristine Kriner
Kristine Trumbo
Kurt Krusinski
Kyle Tunstall
Kylee Kuest
L A Heberlein
Lacy Linney
Lance Powell

Lao Kemper
Lara Backman
Larisa Moore
Larry La Caille
Larry Mahlis
Larry Werner
Laura Arrigoni
Laura Boss
Laura Corcoran
Laura Crow
Laura Delmas
Laura Huddleston
Laura Livingston
Laura Ray
Laura Sagen-Hughes
Laura Weiden
Laura Zerr
Laurel Hughes
Lauren Biddle
Lauren Fountain
Lauren Holzer
Lauren Mendez
Lauren Rutherford
Lauren Sewell
Lauren Wilson
Laurie Chinn
Laurie Ketron
Laurie Nichols
Laurie Tucker

Comment Letter 380 Signatures

Leah Klein
Lenore Meyer
Leo Butzel
Leon Kos
Leon Robert
Leonard Elliott
Leonard Obert
Leroy Farmer
Leslie Bedell
Leslie Bernhardt
Leslie Bontecou
Leslie Elison
Leslie Fleming
Leslie Keenan
Leslie Milstein
Libby Erie
Lily Ulmer
Lin Provost
Linda A Carroll
Linda and Alan Murray
Linda Andersson
Linda Chung
Linda Givler
Linda Jenkins
Linda Kroeger
Linda Maki
Linda Massey
Linda Murray
Linda Newman



## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 380 Signatures

## Comment Letter 380 Signatures

Linda Story	lorey donaldson	Mara Price	Mark Cramer	Mary Kudo	Melissa Roberts
Linda Studley	Lori Woodbury	Marcia Mckinzie	Mark Daniels	Mary Lambert	Melissa Young
Linda White	Lorraine Johnson	Marcia Rutan	Mark Ferraz	Mary Lou Sumioka	Melodi Crowley
Linda Wright	Lorraine Read	Marcia Smith	Mark Lewandowski	Mary Moloney	Melodie Martin
Lindsay Ward	Lou Orr	Marco de la Rosa	Mark Lucianna	Mary Onufer	melodie martin
Lindsey Zuercher	Louann Ballew	Marcy Golde	Mark Pawlosky	Mary Part DiLeva	Melvin Belding
Lisa Goldstein	Lozz Starseed	Maren Culter	Mark Scott	Mary Scherer	Meredith Armstrong
Lisa Karas	Lozz Starseed	Margaret Bradford	Mark Staub	Mary Schreifels	Meredith Berlin
Lisa Love	Lucille Holmes-Anderson	Margaret Fostee	Mark Stocker	Mary Sebring	Meta Chessin
Lisa Messinger	Lucinda Gilbrough	Margaret Graham	Marta Janer	Mary Shackelford	Michael Adams
Lisa Messinger	Lyla Medeiros	Margaret Johnson	Marta Janer Villanueva	Mary Shanley	Michael Bianco
Lisa Symonds	Lynda Beets	Margaret Rinaldi	Marta Kosaly	Mary Sprute	Michael Blizniak
Lisa Winters	Lynette Ching	Margot Haggard	Martha Jacobs	Mary Stevens	Michael Cosgrove
Lisa Wright	Lynette Currier	Margot Mott-Smith	Martha K Koester	Mary Wickwire	Michael Czuczak
Liz Cunningham	Lynette Petrie	Mari Declements	Martha Norwalk	Mary-Jane Brown	Michael Dabrowski
Liz Fallin	Lynn Emerson	Mariah Mitchell	Martin and Teresa Strelecky	Maryjane Gasdick	Michael Dillon
Liz Field	Lynn Erckmann	Marian Hackl	Martin Kaplan	MaryLynn Michaelis	Michael Erickson
Liz Wallace	Lynn Ireland	Marian Hayes	Marty Westerman	Matt Lennon	Michael Faoro
Liza Comtois	Lynn Johnston	Marian Wineman	Mary Anderson	Matthew Boguske	Michael Hoffman
Liza Martin	Lynn Lichtenberg	Marianne Carlin	Mary Ann Gonzales	Matthew Hart	Michael J. Dabrowski
Liza Sheehan	Lynn Patterson	Marie Steffens	Mary Childs	Matthew Smitherman	Michael Lampi
Lloyd Johnston	Lynne and Arthur Olson	Marilyn Leblond	Mary Cutrera	Maureen Kill	Michael Longpockets
Lloyd Weller	Lynne Bannerman	Marilyn Webb	Mary Dinino	Maureen Traxler	Michael Mcconaghy
Lois Fenstemaker	Lyssa Mercier	Marin Anderson	Mary Emmons	Mccree Williams	Michael Rosen
Lon Levalley	M Charles	Marina Ruiz	Mary Forrester	Mechthild Rast	Michael Weatherby
Lona Sepessy	Madalyn Chevallier	Marion Moat	Mary Gallagher	Meegan Mckiernan	Michele Kneram
Lorelei Seifert	Madelaine Ramey	Marjorie Cogan	Mary Holland	Melanie Coerver	Michelle Baker
Lorelette Knowles	Madeleine Shachat	Marjorie Fields	Mary Jeffrey	Melanie Henry	Michelle Huelmann
Loretta and Gerard Jancoski	Madora Lawson	Marjorie Thoman	Mary Knight	Melissa Eriksen	Michelle Levey

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 380 Signatures

Comment Letter 380 Signatures

Michelle Mcrae	Nadine He	Nigel Rudra	Patricia Henderson	Polly Parson	Rebecca Harris
Michelle Pavcovich	Nadine LaVonne	Nina Bohn	Patricia Parsley	Priscilla Krueger	Rebecca Hunter
Michelle Reed	Nancy Alice	Noel Barnes	Patricia Pickering	Priscilla Nunez	Rebecca Mehringer
Michelle Taylor	Nancy Blackadder	Noel Orr	Patricia Turnberg	R Digiacom0	Rebecca Moore
Michelle Terrii	Nancy Brajtbord	Ola Edwards	Patti Dilg	R. DUFFY	REBECCA TIPPENS
Mike And Kathy Sherman	Nancy Easterberg	Oleg Varanitsa	Patti Hoyopatubbi	Rachael LeValley	Ref Lindmark
Mike Conlan	Nancy Hines	Oleksii Bilous	Patti Rader	Rachel Ben-Shmuel	Reidar Dittmann
Mike Eddy	Nancy Hutto	Ovina Feldman	Patty Bowen	Rachel Freund	Renee Duprel
Mike King	Nancy Johnson	P.M. Benjamin	Patty Teubner	Rachel G	Renee Lashua
Mike Macguire	Nancy Little	Paige Garberding	Paul Allen	Rachel Minnery	Rev. Lauren Cannon
Mike Schuhow	Nancy Peacock	Pam Adams	Paul Nehring	Rachel Sadri	Revital Ever
Mike Sciarra	Nancy Peters	Pam Williamson	Paul Pierot	Rachel Stewart	Rhonda Maloney
Mike Sherman	Nancy Shah	Pamela Barber	Paul Roberts	Rae Ann Engdahl	Rich Lague
Millie Magner	Nancy Shimeall	Pamela Dhanapal	Paul Sampson	Rafe Dimmitt	Richard Allen
Milton Bullion	Nancy Vandenberg	Pamela Johnson	Paul Talbert	RALEIGH KORITZ	Richard Atkinson
Mimi Perrin	Nancy Vollmar	Pamela Morgan	paul vanzwalenburg	Ralph Jenkins	Richard Black
Miranda Fischer	Nancy Wagner	Pamela Pogemiller	Paula Rose	Rand Guthrie	Richard Flynn
Miranda Joeegen	Nanna Taralesca	Pamela Pule	Peggy Mckasy	Randal Jeter	Richard Kennedy
Miriam Stone	Natasha Lozano	Pamela Rains	Peggy Rita	Randi Bernhardt	Richard Nelson
Mitch Mellors	Nathan Bledsoe	Pamela Telkamp	Peter and Alix Van Zant	Randi Freeman	Richard Plancich
Mitchell Dover	Nathaniel Feyma	Pamela Weeks	Peter Dahl	Raven Alder	Richard Rafoth
Mollie Twidale	Neil Gest	Pati An	Peter Graham	Raymond Ensign	Richard Reuther
Mona Steinach	Nellie Diaz	Patrice Collet	Peter Mikkelsen	Raymond Huey	Richard Rosen
Monica Mcdowell	Neva Donalds	Patricia and Randall Jackson	Peter Rimbos	Rebecca Caulfield	Richard Tupper
Monika Holm	Nick Barcott	Patricia Burton	Peter Tracy	Rebecca Dare	Richard Voget
Monique Morgan	Nicole Hopkins	Patricia Carroll	Peter van Der Ven	Rebecca Davis	Richard Yust
Morris Mutal	Nicole Jekich	Patricia Dawson	Phil Myers	Rebecca Deardorff	Rick Taylor
Morris Williams	Nicole Moreland	Patricia Garrison	Philip And Terra Duggan	Rebecca Degeorge	Rik Deskin
Mr. Shelley Dahlgren, PhD	Niele Gillooly	Patricia Grenfell	Phillip Wood	Rebecca Glass	Rob Hughes

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 380 Signatures

## Comment Letter 380 Signatures

Rob Seltzer	Ronald Snell	Sandra Ciske	Sean M Huff Huff	Sravan Gondipalli	Sue Pfeiffer-Johnson
Robert Allan	Ronna Scott	Sandra Perkins	Sean O'Dell	Srijan Chakraborty	Summer Spinks-Marasco
Robert Boyce	Rosa Gimson	Sandra Ryder	Selim Uzuner	Stacey Lissit	Susan And Mark Vossler
Robert Camar	Rosa Visser	Sandra Smith	Shakira Todd	Stacey Mckinley	Susan Arnold
Robert Canamar	Rose Obrien Ochs	Sandra Thatcher	Shane Mitchell	Stacia Haley	Susan Ball
Robert Corpus	Rosemary Bertucci	Sandra Tomlinson	Shannon Markley	Stacy Parr	Susan Beckham
Robert Grimm	Roxanne Dubarry	Sandra Wiggins-Woolf	Sharon Abreu	Stacy Winnick	Susan Davis
Robert Kaminski	Rozenn Lemaitre	Sandra Wiggins-Woolf	Sharon Leishman	Stefanie Durbin	Susan Doederlein
Robert Kniestedt	Rusty West	Sandra Woods	Sharon Parshall	Stella Day	Susan Hovey
Robert Lowe	Ruth Ann Lorentzen	Sandy Nichols	Sharon Wilson	Stephanie Breiding	Susan Irwin
Robert McBride	Ruth Darden	Sanja Futterman	Shary Bozied	Stephanie Cook	Susan Johnston
Robert Meyer	Ruth Maule	Sara Strickland	Sharyn Pennington	Stephanie Dunnewind	Susan Latter
Robert Osrowske	Ruth Rogers	Sara Zeglin	Shawn O'Grady	Stephanie Marshall	Susan Macgregor
Robert Sanders	Ruth Sarvis	Sarah Cassidy	Shawn Tuthill	Stephanie Peron	Susan Nelson
Robert Stier	Ruth Thorpe	Sarah Kavage	Sheila Desmond	Stephen Garratt	Susan Osborne-Garrison
Robert Walling Walling	ryan Grant	Sarah Lynch	Sheila Sutton	Stephen Rosenman	Susan Rohder
Robert Wildman	Ryan Sleight	Sarah Mcdonald	Shelley Brodersen	Stephen Schafer	Susan Rolfe
Robert Yates	RYDER LANIER	Sarah Salter	Sherrie Chatzkel	Stephen Williamson	Susan Scanlon
Robert Young	S Jitreun	Sarah Sears	Sherril Gerell	Steve Foss	Susan Seniuk
Roberta Nestaas	Sabina Astete	Sarah Shields	Sherry Daniel	Steve Jacobs	Susan Vennerholm
Roberta R Czarnecki	Sabine Bestier	Saralee Kane	Sherry Eiswald	Steve Prince	Susan Wilson
Robin Booth	Sabrina Rasmussen	Saundra White	Sherry Henshaw	Steve Schneider	Susann Leroy
Robyn Scola	Sally Bartow	Scott Carroll	Sherry Walters	Steven Thompson	Susanne Berlin
Robyn Smith	Sally Eastey	Scott Duncan	Shirley Konizeski	Steven Uyenishi	Suzan Bobette
Roger Nelson	Sally King	Scott Dungan	Shirley Nelsen	Steven Woods	Suzann Daley
Roger Nystrom	Sally Stroud	Scott Hilsen	Shreeraj Sutaria	Stuart Blum	Suzanne Phillips
Romi Mahajan	Samantha Blake	Scott Mallard	Skye Stoury	Stuart Mork	Suzanne Rettenmier
Ron Slosky	Sammy Low	Scott Minner	Sonia Cobo	Sue Harris	Suzanne Stockton
Ronald Ratner	Sandi Bond	Scott Patterson	Sonja Weaver	Sue Little	Sybil Davis

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 380 Signatures

Comment Letter 380 Signatures

Sylas Wright	Thomas Mcwhinnie	Valerie Mehring	William Palmeri
T Johnston	Thomas Padrick	Vanassa Lundheim	William Phillips
Taen Scherer	Thomas Quinn	Vanessa Jamison	William Winship
Tamara Lange	Thomas Wettengel	Vanessa Ruelas	Wolfram Krieger
Tamara Morillas	Tiffany Dinh	Vanessa Skantze	Yohanna Briscoe
Tami Palacky	Tiffany Welton	Vickey Baker	Yvonne Leach
Tammi Turner	Tika Bordelon	Victoira Hall	Zachary Johnson
Tammi Turner-Franklin	tim nelsen	Victor Dimascio	Zaira Huskinson
Tara Iacolucci	Tina Huang	Victoria Grayland	Zak Nelson
Tara Leigh	Tina Urso	Victoria Peyser	
Tatyana Galushko	Todd Milazzo	Vince Stenton	
Terence Mcgee	Tom Lang	Vincent Duffy	
Teresa Bzdek	Toni Jacks	Virginia DeForest	
Teresa Neff	Toni Penton	Virginia James	
Teresa O'Connor	Toniann Reading	Wally Bubelis	
Teri Fox	Tony Buch	Walter Kuciej	
Teri Scheuer	Tony Girolami	walter stawicki	
Terie-Lee Taylor-Smith	Tonya Stiffler	Wendy And Dan Peterson	
Terri Jones	Tracy Nishimoto	Wendy Heiman	
Terry Arnhold	Tracy Wang	Wendy Livesley	
Terry Sullivan	Travis Vandervort	Wendy Lucio	
Tess Morgan	Trish Fernstrom	Werner Bergman	
Theresa Dougherty	Trish Reed	Wesley Rogers	
Theresa Horstman	Tristin Gower	Wilder Kingsley	
Theresa Neylon	Tyler Hall	William Davison	
Theresa Nix	Udayan Shukla	William Enochs	
Thom Peters	Valentina Warner	William Hanson	
Thomas Cox	Valeria Aizen	William Jarcho	
Thomas Hammond	Valerie Allen	William O'Gorman	

## DPEIS COMMENTS & RESPONSES

### Comment Letter 381

### Comment Letter 381 Signatures

**From:** Theresa Dougherty <treeka80@gmail.com>  
**Sent:** Monday, July 30, 2018 10:58 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Oppose New Dam Reconstruction, Illegal Projects in the Alpine Lakes Wilderness

Dear Mike Kaputa,

- 381-1 I am writing in concern to the Draft Environmental Impact Statement (EIS) for the Icicle Strategy. Many of the projects proposed take place inside the Alpine Lakes Wilderness, one of the most popular National Forest wilderness areas in the country. Furthermore, the Enchantment Lakes Basin and surrounding area is one of the most treasured areas in the Alpine Lakes, renowned for its rugged beauty, enchanting lakes, and breadth of recreational opportunities. This is an area where management decisions require the utmost scrutiny and adherence to sustaining wilderness values. All alternatives include projects that are illegal within wilderness, including raising the Snow Lake Dam and building tunnel between two lakes. The Alpine Lakes Wilderness is a shared natural resource that must be respected and protected.
- 381-2 The Draft EIS is not compliant with federal or state laws, failing to meaningfully consider fundamental legal issues that will determine which proposals can and cannot be built, including federal wilderness law and state water law. The draft EIS assumes that Icicle Peshastin Irrigation District's (IPID) easements supersede federal wilderness law, which is wrong. The draft EIS also fails to fully analyze limitations on the scope and validity of IPID's water rights, which would limit several proposals. In addition, The DPEIS fails to account for IPID's relinquishment of part of its water rights at Eightmile Lake. Water that IPID has not used now belongs to the federal government under the federal reserved water right doctrine. If the dam is rebuilt it should remain at its current elevation, where it has been since at least 1990. Any dam rebuilding must be approved by the USFS and comply with the National Environmental Policy Act and the Wilderness Act of 1964.
- 381-3 The draft EIS also does not provide an adequate range of alternatives. The Eightmile "Restoration" project assumes a new dam will be higher than the current one, and fails to analyze the alternative scenario where IPID is not allowed to build a new dam any higher than the current one. That alternative is missing, and thus the draft EIS fails to present an adequate range of alternatives. The wilderness protection community has repeatedly told the draft EIS authors that there will be litigation to enjoin any effort to make the dam higher. Litigation takes time and money on both sides.
- 381-4 The draft EIS should be revised to address the above deficiencies. A revised Draft EIS should be released for public comment.

Sincerely,  
Theresa Dougherty

,

Adam Deer	Bre Kiser	david gladstone
adam Magnuson	Brenna Bolinger	David Gould
Aidan Schmitt	Brian Ervin	David Hanig
Alicia Klein	Brian Slick	David Neevel
Alyssa Street	Bryan Carroll	David Town
Amanda Albright	Callie Wontor	David Wilson
Amanda Mosiniak	Caroline Brown	Dennis Fisher
Amy Anderson	Cheryl Schuelke	Dennis Pearce
Amy Dearborn	Cheryl Woodruff	Diane Weinstein
Amy Mower	Chris Prowell	Donald Stobbe
Andrew Salter	Christian Rodriguez	Donna Snow
Angella Mickowski	Christopher Young	Dorothy Jordan
Ann Bradshaw	Clare Cloutier	Duncan Stevenson
Anna Santo	Cody Brooke	Ed Draper
Annie Cubberly	Constance Eichenlaub	Edward Whitesell
Anthony Anderson	Cristina Hawkes	Edward Wolfe
Anthony Colosimo	Crystal Olden	Elizabeth Smith
Ariel West	Curtis Kukal	eric knesz
Ashley Ernst	Curtis von Trapp	Erick Flores
Avio Brooklyn	Cynthia Cannon	Erin Kinneen
Barbara Sna	Dameon Hansen	Erinn Zavaglia
Barbara Wilhite	Dan Bitterman	Freida Fenn
Beatrice Greenwald	Dan Finn	Fritz Wollett
Becky Shaddox	Dan Huntington	Gail Bohnhoff-Hlavacek
Ben Curran	Daniel Schuetz	Gail McDonough
Beth Easton	Dara Fredericksen	Garrett Waiss
Bethany Fowler	Darcey Hughes	Gay Fawcett
Bethany Moss	David & Elinor Vandegrift	Geoff Cole
Blaine Snow	David Dunneback	Gerald Wheeler

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 381 Signatures

Gina Hart	Jill Roseen-Czaplicki	Lou Ann Lomax
Greg Giboney	Joanna Muench	lucy flanagan
Gregry Loomis	Joe Arenales	Luisa Lopez
Gwen Straley	Joe Rutter	Lyle Collins
Hailey Solvey	Joel Aiken	Lynnette Eldredge
Harrison Davignon	John Lovie	Madison Ellington
Harry Oesterreicher	Jonathan Loeffler	Marcus Hendrickson
Heath Lawson	Joseph Rettenmaier	Margaret Sandvig
Heather Kirwan	Joshua Sienkiewich	Maria Vishnyakova
Hilary Groh	judith cohen	Marian Hennings
Isaiah Scheel	Judy Chapman	Mark Blitzter
Jake Ross	Julie O'Donald	Mark Swanson
James Anest	Katelynn Manz	Marlee Fiacher
James Donaldson	Katherine Erickson	Mary Beinrer
James Durett	Kayleigh Faulhaber	Mary Ratermann
James Norman	Kerry Field	Mary Teesdale
Jane Beaven	Kestrel Rundle	matthew Penny
Janet Millard	Kim Goddu	Maxime Nouet
Jared Carvitto	Kim Saunders	McCree Williams
Jasmine Goodnow	Kirsten Randall	Melissa Thirloway
Jason Stariwat	Kristine De Guzman	Menno Sennesael
Jean Lanz	Kyle Collins	Mikayla Melton
Jeffrey Williams	Laura Keegan	Millie Magner
Jenelle Findley	Laura Lehtola	Mitchell McCommons
Jennie Scheerer	Laverne Will	Molly Graham
Jennifer Fairchild	Leslie Sandage	Molly Ware
Jennifer Goodwin	Linda Broun	Monica Dunn
Jennifer Kardiak	Liz Wurster	Monica Reinoso
Jill Oldham	Lori Erbs	Mont Livermore

Nancy Matlock	Seraphina Gordon	Zach Wilcox
Nancy White	Shannon Polson	zachary mclellan
Nanette Boileau	Sherry Antoniak	
Nelson Bell	Stanley Holmes	
Nic Plemel	Stephanie Blakey	
Nicholas Ueland	Stephen Semansky	
Nicole Marble	Steven Dailey	
Noah Brenowitz	Steven Erwood	
Noelle Sun	Susan Fitch	
Pam Spier	Susan Heywood	
Patrick Tschetter	Susan Juhre	
Paul Crane	Susan Vennerholm	
Paul Fitzgerald	Suzanne Bess Wollborg	
Paula Waltner	Tanner Jones	
Peter Guerrero	Teresa Castner	
Peter Holman	teresa dix	
Peter Rimbos	Theresa Dougherty	
Peter Wilsnack	Thomas Cokeley	
Polly Taylor	Thomas Deardorff	
Ricky Taylor	Todd Penke	
Robert Garlow	Tony Russo	
Robin Day	Travis Hammond	
Roger Lippman	Trina Rohrer	
Ryan Beachy	Vafa Ghazi-Moghadam	
Ryan Davis	vanna haniff	
Samantha Burse	Vicki McMullin	
Samantha Garlow	Virginia White	
Sarah Therrien-Power	Vivian Korneliussen	
scott raudebaugh	Wendy Cooper	

Comment Letter 381 Signatures

## DPEIS COMMENTS &amp; RESPONSES

## Comment Letter 382

## Comment Letter 382 Signatures

**From:** Brian Baltin <Brian.Baltin.26321646@p2a.co>  
**Sent:** Monday, July 30, 2018 10:09 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Don't sacrifice wilderness for flawed Icicle Strategy

Dear Director, Chelan County Natural Resource Dept. Mike Kaputa,

- 382-1 The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands each year. The wilderness lakes and surrounding public lands in the Icicle basin support a diversity of wildlife species, recreation tourism and nature enjoyment that require careful stewardship and management into the future. The Icicle Strategy proposes drastic and unprecedented actions such as new dams, a tunnel between two wilderness lakes and other major infrastructure in a federally designated wilderness area—all of which will require unprecedented industrial activity in this truly wild place. As proposed, the Icicle Strategy threatens to exploit one resource (i.e., the wilderness and the water it provides) under the guise of protecting another (i.e., water in Icicle Creek). This is simply wrong.
- 382-2 Chelan County and Ecology can and should do better to meet instream flow targets, ensure agricultural reliability, enhance hydrologic function of the basin, and protect wilderness values. The Icicle Strategy fails to do so. Furthermore, the current proposal is based on the flawed assumption that the Icicle-Peshastin Irrigation District has a right to more water than it has ever used before, and that its rights supersede federal law. This is also wrong.
- 382-3 Chelan County and Ecology should withdraw, revise and re-release the Draft Plan with an adequate range of alternatives that doesn't sacrifice wilderness values for new dams and unprecedented infrastructure in this treasured alpine valley.

Regards,  
 Brian Baltin  
 500 13th Ave E  
 Seattle, WA 98102

Adam Kaufman	Brenda Bachman	Dennnis Lengel
Addison Barrett	Bruce Dobson	Diane Dishion
AILISH DALY-WALKER	Bruce York	Diane Puckett
Alexandra Forin	Camille von Eberstein	Diane Rose
Alexandra Griffith	Candace LaPorte	Diane Sullivan
Alice Pfister	Carol Papworth	Diane Weinstein
Alicia Watras	Carole H	Diann Sheldon
Allycia Godbee	Cecilia Alvarez	Dianna MacLeod
Alycia Staats	Charlene Lauzon	Don Ely
Amber Hall	Charles Ballard	Don Huling
Amy Gulick	Charles Wilfing	Don Watt
Amy Heyneman	Cheri Thompson	donald munn
Amy Tappen	CHRIS BATTIS	Doris Acosta
Andrea Riley	Chris Stay	Dorothy Knudson
Angela Bellacosa	CHRISTOPHER BURKE	EJ Norgard
Anita Woodruff	Cindy Ambrosius	Eldon Leuning
Ann Pryich	Clay Cook-Mowery	Eleanor Dowson
ANN WALES	Clayton Jones	Eliot Kaplan
Ann White	Coleman Larson	elyette weinstein
Anne Hepfer	Courtney Straight	Emily van Alyne
B Whitson	Cyndi Cross	Erica Harzewski
Barbara Cornwall	Cynthia Rose	Erik LaRue
Barbara Rosenkotter	Daniel Newell	Ethel Adams
Barbara Tountas	Dave Baine	f h
Barbara Wight	David Pearson	Forest Payne
Berinda Van Cleave	David Stetler	Garry Nakayama
Beverly Gilyeart	david vican	Gary Beckham
Boni Biery	debbie thorn	Gene Wheeler
Brandie Deal	Dennis Marceron	Gilbert Ward

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 382 Signatures

Heather Blakely	Kathryn Tomas	Mary Wilkins
Irina Doronin	Kathryn Tominey	Matthew Boguske
J. Justice	KATHY SCHAEFFER	Maxine Clark
James Andersson	Kay Abraamson	McCree Williams
James Giles	Ken Weeks	Melissa McDonough
James Mulcare	Kenton Wilcox	Michael Bowler
Jan DeGrandchamp	Lanie Cox	Michael Deak
Janne Abullarade	Laura Ackerman	Michael Faoro
Jay Russo	Laurette Culbert	Michael Lampi
JENNIFER TITILAH	Laverne Will	Michael Mendiola
Jeremy Luscher	Leanne Welch	Michelle Pavcovich
Jessica Adams	Leo Egashira	Mike Schuster
Jill Gustafson	Linda Bassett	Miranda scalzo
Jill Hawtrey	Liza Martin	Monika Holm
Jim Gutterman	Lloyd Hedger	Moriah Barton
JoAnn Hill	Luan Pinson	Mr. Dahlgren
JoAnn Riley	Lynn Offutt	Nancy Miller
John Boblett	Lynne Bannerman	Nate Brown
John Gimbel	M h	nate marino
Joni Dennison	Marc Daniel	Nolan Foss
Joyce Grajczyk	Marcia McKinzie	Ovina Feldman
judith cohen	Marcy Lynn	Owen Curtsinger
Judith Schwab	Margo Robinson	Pamela Adams
Judy McDonald	Maria Magana	Patricia Miller
Judy Palmer	Mark Downey	Patrick Annabel
Julia McLaughlin	Mark Wolf-Armstrong	Paula Shafransky
Julie Holtzman	Marlyn Mosley	Peggy Willis
Katherine Elliott	Mary Gibson	Percy Hilo
Kathleen Wheeler	Mary Robinson	Peter Holcomb

Comment Letter 382 Signatures

Peter Miller	Susanne Murray
Priscilla Martinez	Suzanne Hamer
R. Larson	Ted Atjubs
Raeann Scott	Terry Karro
Ralph Miner	Theresa Carey
Ray Couture	Thomas Dolese
Rebecca Dierst	Thomas Gilmore
Ref Lindmark	Tika Bordelon
Rene Fuentes	Tim Adams
Renee Gagnon	Tim Durnell
Richard Plancich	Tom Rarey
Richard Ress	Travis Miller
Rick Hatten	Trevor Malakowsky
Robert Adamson	Trina Leaf
Robert Bamford	Vanessa Jamison
Robert Farrell	Vicki Martz
Robert Kaplan	Victoria Grayland
Robin Harper	Virgene Link-New
Sandra Smith	Washington Resident
Scott Duncan	Wehner Ronald
Selim Uzuner	Wesley Banks
Shary B	William McGunagle
Steven Sanders	YVETTE GOULD
Stuart Vazquez	Zachary Nelson
Sue Stoeckel	
Susan Bradford	
Susan Durnell	
Susan Hampel	
Susan McDowell	



## DPEIS COMMENTS & RESPONSES

### Comment Letter 383

### Comment Letter 383 Signatures

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**From:** Victoria Baier <Victoria.Baier.124408416@p2a.co>  
**Sent:** Monday, July 30, 2018 7:50 AM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Please Protect the Enchantments and Alpine Lakes Wilderness

Dear Director Mike Kaputa,

- 383-1 I am writing to you to express my concerns with the proposed Icicle Creek water strategy. The Alpine Lakes Wilderness is an iconic and treasured natural resource enjoyed by thousands annually. Please remove the detrimental projects from the draft plan.
- 383-2 The proposed projects at Eightmile Lake and Upper and Lower Snow Lakes threaten to flood the trail and popular campsites around the lake. Other projects at the Upper and Lower Klonauqua Lakes could cause permanent negative impacts due to the proposed tunnel being bored between them.
- 383-3 Chelan County and Ecology should revise and re-release the PEIS to remove these projects and provide alternatives that don't sacrifice the experience of hikers for more water and new dams in this treasured alpine valley.

Regards,  
Victoria Baier

Aaron Rinn	Anastasia Christman	Anthony Elarth
Aaron Stock	Andrea Baines	Anthony Ferrara
Aaron Terrazas	Andrea Imler	Anthony Marquez
Abigail Caldwell	Andrea Russell	Anthony Munden
Adam Elkington	andrea gagiu	Antoinette Angulo
Adam Faherty	Andrew Bowman	Ardith Ferglia
Adam Rynd	ANDREW DALTON	Arjaye Evangelista
Adam Wilson	Andrew Dunford	Arlene DENNISTOUN
Al Anderson	Andrew Henningsen	Arlene Oglove
Alex Blackmur	Andrew Knox	Ashlee Davis
Alexander Carrell	Andrew Wurdeman	Ashleigh Flowers
Alexander Lim	Andy Walford	Ashley Derum
Alexandra Dodge	Angela Rumsey	Ashley Gardner
Allison King	Angelette Gunderson	Ashley Gossens
Alyson Indrunas	Angelika Hagen-Breaux	Ashley McBee
AMANDA AYLING	Angelina Shell	Ashley Olson
Amanda kraft	Anhar Mohamed	Austin Eddington
Amanda Nguyen	ann carlile	Ava LARSEN
Amanda Pille	Ann Milhorn	Bailey Rahn
Amanda Sorensen	Anna Batie	Barbara Espejo
Amanda Spiegel	Annalise Wille	Barbara Saulie
Amanda Summers	Anne Bergsma	Barbara Willey
Amanda Tose	Anne Kelly	Ben Jones
Amelia Petersen	Anne McDermott	Ben Rall
Amit Gupta	Anne Theibert	Ben Warren
Amy Bader	Annie Chih	Benjamin Smith
Amy Borgmeyer	Annie Han	Bertha Hanson
Amy Diehl	Annika Seaver	Beth Macinko
Amy Sutton	Anthony Consiglio	Betty Lucas

**ICICLE CREEK SUBBASIN**  
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Comment Letter 383 Signatures

Bhavna Chauhan	Carl Stieglitz	Chris Spurlock
Billy Tipke	Carl Swedberg	Chris Tabor
BIRGITTA HUGHES	Carly Reed	Chris Turner
Bob Blair	Carol Charles	Christa Gerard
Bob Hoyle	Carol Hering-Phillips	Christian Frink
Bob Wicks	Carole Biasotti	Christian Jacobsen
Brais Alonso	Caroline Ptaszynski	Christina Bjarvin
Brandi Hansen	Carrie Kahler	Christina Cuenca
Brandon Budd	Casey McDonnell	christina hickman
Brandon Wiese	Cassandra Burgess	Christina Nichols
Brandon Workman	Cassandra Swank	Christine Sanders
Brett Aniballi	Cassidy Walker	Christopher Cornwell
Brian Besand	Cassie Taylor	christopher hill
Brian Peterman	Catalina Bazaldua	Christopher Popek
Brian Smith	Catherine Pottinger	Christopher Rossi
Brian Vrsalovich	Catie Plourde	Christopher Stover
Britt McCracken	Cavan hender	CJ Bowles
Britta Bowman	Celina Carros	claire bunney
Britta Mueller	Chancellor Cramer	Clara Hall
Brittney Neidhardt-Gruhl	Charles Bpwers	Clare Cloutier
Britton Green	Charles Fredricks	Claudia Elliott
Bruce Burger	Charles Gustafson	Cliff Grant
Bryan Lee	Charles Hurt	Colleen Chupik
Caileigh Robertson	Chas DeLong	Connie Olinde
Caitlin Moore	Chelsea Peterson	Corinne Shubin
Carl Baker (cbaker@uw.edu)	Chelsea Shearer	Corinne Spero
Sent You a Personal Message	Cheryl Tsuhako	Cormac Diggins
Carl Barner	Chris Bailey	Cory Curtis
Carl Petterson	Chris Marks	Cory Zanker

Courtney Holleman	Dawid Pol	Elisabeth Dekker
Craig Schoenberg	Dawn Bustanoby	Elise Murphy
Crissondra doxey	Debbie Kirstein	Elizabeth Nucci
Crystal Gartner	Debbie Thorne	Ellie Long
Crystal kaya	Deborah Hanes	Ellie M
crystal lester	Deborah Wolf	Emie Lamping
Cynthia Holt	Deena Penhale	Emily Gunn
Dan Miller	Delita due	Emily Haney
Dan Nevill	Denise Templeman	Emily Hill
Dan Ryen	Diane Dakin	Emily larson
Dane Brooks	Diane Davis	Emily Thomas
Dani Repp	Diane Falk	Emily Watkins
Daniel Doran	Diane Lewis	Emma Wilson
Daniel Newell	Diann Sheldon	Eric Adler
Daniel Singleton	Doane Rising	Eric Gehner
Danielle Bock	Dominick Reale	Eric Heinitz
Danny Arguetty	Donald MacLaren	Erica Diede
Darren Cohen	Donald Maynard	Erich Rau
David Eastwood	Donald McIntyre	Erik Antonelli
David Hall	Dorothy McBride	Erin Amicucci
David Huneryager	Douglas Park	Erin OConnell
David Laws	Drew McDermott	Eva Cosgrove
David Lee	DYLAN BAILEY	Evan Malina
David Puhrmann	DYLAN RHYS	Evan Manderbach
David Roche	Dyllan Freeburg	Fawzi Mhemedi
David Smith	Eamonn Kress	FIONA BENNITT
David Swedin	Ed Draper	Fiona Hatfield
David Toop	Edie Lie	Frank Stieber
David Weinfeld	Edward Reinsel	Frank Strobel

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Fransing Daisy	Harry Bell	James Cronin	Jeffrey Stevenson	Jodi Robin	Joshua Watson
Fred DeHaven	Harry Gerecke	James DiNatale	Jeffrey Vazquez	Joe Crandall	Judith Akins
Frederick Moulton	Heather Cabal	James Epes	Jena Winger	John Alley	Judy Talarico
Gary Wiles	Heather Grehan	James Harsh	Jenessa Osteen	John Bock	Judy West
Gayle Austin	Heather Ivarsen	James McClung	Jennifer Divine	John Borgmeyer	Julia Hobbs
Gayle Grything	Heather Lisagor	James Schmidt	Jennifer Froscher	John Kerwin	Julia Hodges
Gemina Garland-Lewis	Heidi Barnes	James Sterling	JENNIFER GARDNER	John Kilpatrick	Julia Marks
Gene Church	Heidi Greenwood	Jamie Clayton	Jennifer Grant	John Peterson	Julia Yang
Gene McConnachie	Heidi Morales	Jamie Osborn	Jennifer Grasso	John Quattrocchi	Julie Cloninger
GENE WISEMILLER	Heidi Perry	Jamie Power	Jennifer Lyne	John Ringler	Julie Lutovsky
Geneva Sullivan	Heidi Venturine	Janee Romesberg	Jennifer Mahaffey	John Trousdale	Juryann Vallejo
Genevieve Levin	Helen Worthington	Janette Cunningham	Jennifer Oriordan	John Van Eenwyk	Justas Vilgalys
George Jensen	Holly Berneking	Janiene Licciardi	Jennifer Rozler	Johnathan Texidor	Justin Brown
Gillia Angell	Holly Johnson	Janine Griggs	Jennifer Siembor	Jon Peterman	Justin Jones
Gizela Berreth	Holly McBride	Jasmin Avendano	Jenny Pascal	Jonathan Allred	Justin Yale
Glen Acord	Holly McDonough	Jason Bubolz	Jennylynn Vidas	Jonathan Balsley	Justine Bormann
Glenn Eriksen	Howard Haemmerle	Jason Gardner	Jera Vincelli	Jonathan Lee	Kaci Darsow
Glenn Robinson	Howard Mason	Jay Schober	Jerry D'Addio	Jonathan Olver	Kaelie Coleman
Grace Huang	Ian Lindell	Jay Schram	Jesse Miller	Jonathan Rily	Kahrin Cadwell
Grace Padelford	Ian Sullivan	Jay Weden	Jessica Brown	Jordan Hinton	Kaitlin Bailey
Grant Sutherland	Ina Ross	Jayne Misko	Jessica DeBoer	Jordan Sell	Kara Ziegler
Gratianne Daum	Ivy Jin	Jazlyn Dukatz	Jessica Howard	Joseph Beback	Kari Hoover
Greg Grimes	Jack Bochsler	JB Brooks	Jessica Logan	Joseph Knapik	Kate Tokareva
Greg Wentzell	Jack DVM	Jeff Fennell	Jessica Rosebaugh	Joseph Smith	Katharine Clements
Gregory Miller	Jack Gillette	Jeff Girtz	Jessica Simpson	Joseph Yencich	Katherine Morrison
Gregory Schrupp	Jackson Lindeke	Jeff Goble	Jill Cano	Joshua Farris	Katherine Traczyk
Gretchen Morgan	Jacky Sabin	Jeff Rodriguez	Joann Moe	Joshua Flynn	Katherine Wade-Easley
GUILHERME DE CASTRO	Jake Miller	Jeffrey DeWitt	Joanna Dittemore	Joshua Hubbard	Kathi Pickett
Hannah Tennent	James Blumer	Jeffrey Jacka	Jodi Brill	Joshua Plotkin	Kathleen Holloway

**ICICLE CREEK SUBBASIN**  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Comment Letter 383 Signatures

Kathryn Parks	Krishna Tummeti	Leilani Sommers
Kathy Forgrave	Kristin Austin	Lennon Aldort
Kathy Schneider	Kristina Caselman	Leslie Strickland
Katie Giuliano	Kristine wigley	Leya Barr
Katie Sutterman	Kristopher Pomeroy	Lin Provost
Katy Shaw	Kyle Griggs	Linda Niedbalski
Keith Schackmuth	Kyle Peckham	Lindsey Falkenburg
Keith Stobie	L Grayum	Liz McGehee
Kelley Keegan	Lacey Johnson	Liz Wurster
Kelly Burchardt	Lacie DeBoer	Lori Welby
Kelly Dona	Lara Gwaltney	Louise McNerney
Kelly Robbins	Larisa Maxwell	Luan Pinson
Kelty Allen	Laura Barnoski	Luann Berman
Ken Benoit	Laura Baron	LuAnne Swainson
Kenny Chou	Laura Gibbons	Lucas Fernandez
Keri Young	Laura Murahashi	Lucille Uhlig
Kerry Martin	Laura Nash	Luke Daining
Kerry Ragain	Laura Norsen	Lyucy Chase
Kerry Schlund	Laura Snoddy	Madison Dyckman
Kevin Clark	Laura Webster	Malorie Yerbey
Kevin Killeen	Laureen France	Mamie Bolender
Kevin Povey	Lauren Heine	Marc Lower
Kevin Yangas	Lauren phillip	Marc Manzo
Kim Jones	Lauren sattely	Margaret Bomber
Kim Kalina	Lawrence Highton	Margaret Mann
Kimberly Kuhne	Lawrence Magliola	Margaret Rosner
Kirk Stallman	Leah Harari	Maria Drowing
Kirsten Rue	Leah Hughes	Maria Jouravleva
Kjersten Gmeiner	Lee Gekas	Marian Wineman

Marina Smith	Matthew Gebert	Mike Sancrant
Marion Ellis	Matthew Griffin	Mike Sandefur
Marit Jensen	Matthew Koosmann	Miki Boisjolie
Marius Constantinescu	Matthew Logalbo	Milo Heiret
Marjorie Sullivan	Maureen Kostyack	Mitchell Pohlkamp
Mark Gerber	Meagan Ledbetter	Molly Wilmoth
mark lucianna	Melanie Dunn	Morgan Battrell
Mark Noll	Melissa Ferrell	Mr. Cook
Mark Uhart	Melissa Frye	Nadine Snyder
Marta McCreary	Melissa Washko	Nancy Zwicker
Martha McCaffrey	MELODY OVARD	Naomi Hansen
Martin Alfaro	Merilyn Moss	Natalie Franz
Marty Eckrem	Michael Abu	Natalie Koncz
Marty Pompermayer	Michael Ailion	Natalie Shirley
Mary Carlson	Michael Davis	Nathan Starr
Mary Christensen	Michael Harvey	Nicholas Evans
Mary Gibson	Michael Kovacs	Nicholas Iverson
Mary Jeffrey	Michael Malencia	Nick Clute-Reinig
Mary McCray	Michael Miller	Nick Seidler
MARY ONUFER	Michael Scholl	Nicole Calvert
Mary Ratermann	Michael Schultz	NICOLE CISNEROS
Mary Rozance	Michael Sousa	Nicole Schoen
Mary Smith	Michael Weekly	Nina Mesihovic
MaryAnn Mabbott	Michael Wiseman	Noah Overby
Maryanna Brown	Michele Boderck	Noelle Marchesini
Matt Woodward	Michele Manning	Nora Brannon
Matt Yancheck	Michelle Forrest	Oana Nica
Matt Yukubousky	Michelle Mizuki	Olga Nevtrinos
Matthew Crawford	Michelle Whitney	p balduff

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## DPEIS COMMENTS &amp; RESPONSES

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Pacheena Shuen-Mitchell	Rachel Spence	Roy McMurtrey	Shea Harris	Terry Wood	Vladimir Gole
Paige Robidoux	Raina Ratcheson	Ruby Geballe	Shelby Griffith	Tesa Brewer	Walter Allen
Pam Whatmore	Ramaswamy Narayana	Ruthanne Leishman	Sherrie Crow	Thao Hoang	Walter Croshaw
pamela bouchard	Randall Hoover	Ryan Beachy	Sibylle Kamdar	Theodore Day	Warren Kagarise
Pamela Winter	Randall Oglesby	Ryan Howard	Siobhan Costello	Theresa Burlingame	Webster Chang
Patricia Friedman	Raymond Anderson	Ryan Perrault	SM Duntz	Thomas Brigham	Wenda Millee
Patrick Klein	Rayna Weth	Sally McCray	Sondra Yancey	Thomas Dancs	Wendy Chamberlin
Paul Balcerak	Rebecca Collins	Sam Cutler	Stacey Silver	Thomas Doggett	William Betz
Paul Fior	Rebecca Mazahreh	Sam Nofziger	Stella Kiehn	Thomas Robinson	William carson
Paul Stroud	Reed Braden	Sam Rucks	Stephanie Luck	Tim Russell	William Crowley
Paul Tuck	Renae Porter	Samanta Pugh	Steve Garcia	Timothy Carr	William Dudley
Paul Woolsey	Renee Buell	Samantha Wellington	Steve Hindman	Todd Dunfield	William Marks
Pauline Bruce	Riah Buchanan	Sandra Carlson	Steve logan	Todd Gerson	William Westbrook
Peter Christensen	Richard Lipsky	Sandro Squadrito	Steve Roguski	Todd Vlastnik	Xanthe Denning
Peter Gonda	Rita Reitz	Sandy Robinson	Steven Bell	Topher Ostendorf	Xavier Martinez
Petr Horak	Rob Salvino	Sara Blackmur	Steven Cragar	Tory Burns	Yu-chin Chen
Petr Sokolo	Rob schnelle	Sara shook	Steven Schenk	Tova Alexandra	Yvonne Poole
Phil Bebbington	Robert Bryan	Sarah Elliott	Stuart Jones	Tracy Petragallo	Zane Madinger
Phil Lewis	Robert Ferguson	Sarah Kepa	Susanna Smith	Travis Abram	Zdenek Dohnalek
Phill Ramey	Robert Girvin	Sarah Lee	Suzanne Arellano	Travis Miller	Zeke Barger
Polina Sharabarina	Robert Lamb	Sarah Michel	Suzanne Gagnet	Trinell Carpenter	
Priscilla Shaw	Roberta Laue	Sarah Patterson	Suzanne Kraus	Troy Keene	
Rachel Churchward	Rodney Spitz	Sarah Tesar	Sydney Miyahara	Tyanne Faulkes	
Rachel Covault	Ron Graham	Scott Fortman	Taianna Jesus	Tyler Cleveland	
Rachel Holland	Ronald Chase	Scott Klein	Tammie Jorgensen	Tyler Herman	
Rachel Lyell	RONALD SORRELL	Sean Kennedy	Tara Fulton	Valerie Doerrfeld	
Rachel McNulty	Rory Brennan	Shaun Vinyard	Taylor Greene	Vanessa Woo	
Rachel Ogrodowski	Rose Hesse	Shauna Clark	Teresa Nemeth	Victoria Clarke	
Rachel Silverman	Roxanne Lewis	Shawna dhaenens	Teresa Tam	Virginia Bell	

**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

**Comment Letter 384**

**Comment Letter 384 Signatures**

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**From:** questionz@everyactioncustom.com on behalf of Katherine Scheulen  
<questionz@everyactioncustom.com>  
**Sent:** Monday, July 30, 2018 9:19 PM  
**To:** NR Icicle SEPA  
**Subject:** [Icicle SEPA] Proposed Water Plans in the Icicle Basin

Dear Director Mike Kaputa,

Thank you for considering the following comments on the Draft Programmatic Environmental Statement for the Icicle Strategy:

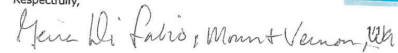
Sincerely,  
Ms Katherine Scheulen  
5803 43rd Ave NE Seattle, WA 98105-2226 questionz@gmail.com

Anna Santo  
Arland Swanson  
Austin Johnson  
Brian Falkner  
Cheryk Perazzoli  
Dennis Bahr  
Doug Adams  
Doug Cole  
Doug Day  
Emily Wing  
Judy Dougherty  
Katherine Scheulen  
Maribeth Spencer  
Meghan Falkner  
Michelle Garcia  
Noelle Dwarzski  
PETER SEIDMAN  
Phoebe Smith  
Rosanna Cartwright  
Surya Jakhotia  
Susan Heath  
Thom Peters  
Thomas Fred Boyd

## Comment Letter 385

- I have read the PEIS for the Icicle Strategy/ Alpine Lakes Wilderness proposal for damming seven lakes and would like first and foremost a complete review of the following.
- 385-1 1. Please consider the Impacts of Climate Change.
- 385-2 2. Analyze the impacts of water diversion on the beauty of this most beloved place and the impacts on plant and animal species.
- 385-3 3. Consider the decades long history of the thousands of people and the mainly 40 conservation groups who worked for the Wilderness designation of this place. These people and their work must be respected and considered.
- 385-4 4. Make sure all laws, The Wilderness Act of 1964, The Alpine Lakes Management Act of 1967, The Wenatchee Forest Plan of 1990 and any further protection acts thereafter be considered.
- 385-5 5. Consider the uses of modern technology (pumping and piping) so that water will not have to be diverted from the lakes and cause negative impacts to this pristine environment.
- 385-6 6. Water Conservation should be considered at the top of the list! Many Westside cities like Seattle have initiated Water Conservation Rules and they proven to be effective.
- 385-7 I have a great investment in The Alpine Lakes Wilderness Area. I worked for years with thousands of other people to make sure this jewel of the state and nation would be protected for future generations to enjoy. I care about wildlife and about the habitat they need to survive, this area is not just a recreation area for people but a home for other species.
- I also eat apples and other fruits that are grown in the beautiful Wenatchee Valley. I know these orchards and farms put food on my table and provide jobs for many people. I am grateful for the work these people do. It is a difficult challenge to provide instream flow and water supply for the agri-businesses, but I believe that all parties working together in the best interests of the Wilderness and Agri-business must find a non-destructive alternative to the damming and any negative environmental footprint in The Alpine Lakes Wilderness. Please make Water Conservation a priority.

Respectfully,




## Comment Responses

<b>Comment Letter No. 001 - United States Bureau of Reclamation</b>	
1-1	The co-leads recognize that SEPA does not supersede NEPA. If a project does not receive federal authorization or funding due to NEPA analysis, that project will be replaced by another project to meet the Guiding Principles. Should this occur, additional SEPA review would be conducted as required under Chapter 197-11 WAC. This information is included in the FPEIS in Section 1.9.
1-2	The co-leads recognize USFWS and USBOR will serve as co-lead agencies on any NEPA actions related to LNFH operations and maintenance. This information is included in the FPEIS in Section 1.9.
<b>Comment Letter No. 002 - United States Fish and Wildlife Service, Washington Fish and Wildlife Office</b>	
2-1	The co-leads have coordinated with USFWS, WDFW, the Yakama Nation, and the Confederated Tribes of the Colville Reservation throughout the development of the Icicle Strategy, meeting the requirements of the FWCA. The co-leads will work with the Instream Flow Subcommittee (IFS), which all these entities are members of, to determine if the preparation of a CAR would be beneficial as part of project level environmental review. The co-leads look forward to continued coordination with USFWS.
2-2	The co-leads look forward to continued coordination and collaboration with federal stakeholders.
<b>Comment Letter No. 003 - United States Fish and Wildlife Service, Leavenworth Fisheries Complex</b>	
3-1	Your comment indicating general support for the process is noted.
3-2	Your comment that it would be inappropriate for USFWS to advocate for any alternative until the conclusion of NEPA review is noted.
<b>Comment Letter No. 004 - United States Forest Service</b>	
4-1	The co-leads appreciate the USFS input as part of the IWG for the past 5 years. Your comment regarding coordination is noted. Prior to project level implementation the co-leads will coordinate with USFS on proposed actions on NFS lands.
<b>Comment Letter No. 005 - Washington Department of Fish and Wildlife, North Central Region</b>	
5-1	OCR manages the two-third/one-third statutory responsibility at the program level, not project level, and only applies to new storage allocations. At the program level, the Icicle Strategy instream flow allocation is over 90-percent instream flow benefit. Water supply generated from the Icicle Strategy that accrues downstream of the Icicle Creek/Wenatchee River confluence will either be managed for instream flow only, or for uses with no increase in consumptive use.
5-2	The FPEIS evaluates climate change impacts and efficacy in Section 4.13. OCR and Chelan County evaluated climate change impacts associated with each alternative to address adaptation issues raised by WDFW. The co-leads included storage projects that are better able to adapt to climate change in the Preferred Alternative. The co-leads envision long-term monitoring and adaptation to evaluate performance of the Preferred Alternative.



**ICICLE CREEK SUBBASIN**  
**PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

5-3	Our programmatic analysis found construction windows that could impact fish and wildlife are likely to be short and of limited extent for the Preferred Alternative. The co-leads welcome WDFW input as further BMPs and mitigation measures are developed during project level review.
5-4	See response to comment 5-3.
5-5	See response to comment 5-3.
5-6	Long term growth in the Icicle Subbasin and Wenatchee Basin, and the environmental impacts thereof are addressed through Chelan County and City of Leavenworth comprehensive plans and zoning. The Preferred Alternative provides additional mitigated water supply for City of Leavenworth and Chelan County domestic uses through at least 2050. Development impacts are expected to occur irrespective of implementation of the Icicle Strategy. However, the Icicle Strategy includes BMPs and terrestrial mitigation in addition to robust instream flow improvements to help offset impacts that may result from planned growth.
5-7	The co-leads adopted a FPEIS with programmatic level analysis. Opportunities for project level analysis would occur during project level review in the future.
5-8	The IFS has met at least annually each year at the direction of the IWG and includes state, tribal, federal, and NGO representatives, including WDFW. The operation of the IFS is based on the IWG operating procedures, which WDFW helped develop. The co-leads envision additional IFS support during project level environmental review and project implementation. The IFS will also be tasked with evaluating whether a Fish and Wildlife Coordinated Act Report (CAR) would be helpful during project level environmental review and Icicle Strategy implementation. WDFW's continued involvement in the IFS would be valued by the IWG.
5-9	IPID and COIC conservation projects are intended to meet agricultural reliability and instream flow Guiding Principles. The Preferred Alternative includes the COIC Irrigation Efficiencies and Pump Exchange, which is currently being designed with a pump station on Icicle Creek near the Icicle Creek/Wenatchee River confluence. The IPID Dryden Pump Exchange project is included in the Preferred Alternative if long-term operation and maintenance funding can be identified. Both projects provide substantial instream flow benefit in Icicle Creek.
5-10	The Preferred Alternative does not include removal of the IPID diversion from Icicle Creek. Long-term enhancement of the IPID diversion can be considered in future Icicle Strategy stages.
5-11	City and County's domestic water use is already low relative to other eastern Washington communities. City of Leavenworth metering and leak detection is expected to conserve water supply further. Water conservation is considered in all action alternatives. The FPEIS includes more expansive water conservation opportunities around lawn reduction that is also intended to extend domestic supplies.
5-12	These lakes and stream experience drawdown and increased flows at least once every five years, if not more often under current baseline conditions. The total volume of release would not change under the Alpine Lakes Optimization, Modernization, and Automation project. Discussion of baseline conditions in the tributaries are located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases is not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
5-13	The co-leads envision the IFC playing a continuing role in maximizing fisheries benefit associated with the Icicle Strategy.

## DPEIS COMMENTS &amp; RESPONSES

5-14	See response to comment 5-1. OCR manages the two-third/one-third statutory responsibility at the program level, not project level. If WDFW's suggestion were taken, the Guiding Principle for domestic water supply would not be met.
5-15	The Guiding Principles for domestic supply requires mitigation for consumptive use impacts when instream flows are not met. There is natural flow availability in Icicle Creek and the Wenatchee River above weekly instream flows that does not require mitigation. Use of the 900 ac-ft for consumptive use mitigation only, means that more than 900 ac-ft of water right authorizations are possible.
5-16	The 900 ac-ft have historically been released for irrigation purposes, which is more consumptive than domestic use.
5-17	The figure on page 2-64 has been updated to reflect 900 acre-feet, which is the correct quantity.
5-18	Your comment is noted. This requirement is referenced in the final PEIS.
5-19	Your concern regarding storage enhancement projects is noted. Discussion of impacts to shoreline of these projects is described at a programmatic level in Section 4.18.5. These projects are not included in the Preferred Alternative.
5-20	We envision WDFW helping the IWG select appropriate mitigation projects as part of the Preferred Alternative habitat project list. The co-leads are envisioning WDFW will help select conservation acquisitions, with priority being given to in basin habitat projects, as part of implementation of the Preferred Alternative.
5-21	See response to comment 5-20
5-22	Your comment is noted.
5-23	Section 1.9 provides information regarding the SEPA and NEPA process and integration. Project level environmental review for both SEPA and NEPA will be determined by appropriate lead agencies in determining whether project level impacts, mitigation, and permitting requirements are fully met.
5-24	Your comment will be incorporated into the FPEIS.
5-25	Your comment will be incorporated into the FPEIS.
5-26	Water markets are proposed to meet the agricultural reliability Guiding Principle, not instream flow benefit, which is provided by other projects in the Preferred Alternative. However, there may be opportunistic instream flow benefit that can be identified as this element of the Preferred Alternative is further developed.
5-27	The 0.5 cfs from the Icicle Reserve is envisioned for a combination of City of Leavenworth and Chelan County domestic water uses, which will be determined at project level review and permitting. Additionally, the City and the County have an interlocal agreement regarding reserve quantities provided for in the Wenatchee Instream Flow Rule (Chapter 173-545 WAC), which is designated for domestic use.
5-28	The Preferred Alternative includes the City of Leavenworth utilizing their well field for new growth as part of the Icicle Strategy. Any water provided for from the Icicle Strategy for use at the City wellfield will be debited based on total use rather than consumptive use.
5-29	Ecology and Chelan County are co-managing responsibility for reserve accounting. The reserve frame work described in RCW 173-545-090 and your comment is referenced in the FPEIS.
5-30	A legislative OCPI change is not included as part of the preferred alternative.

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5-31	The Preferred Alternative aligns well with the project list referenced in this comment. The Preferred Alternative also includes that rule amendment adopted as part of the 2006 Wenatchee Watershed Plan, which is necessary to meet the domestic supply guiding principle. The Preferred Alternative also includes a voluntary or incentivized lawn buyback program that will reduce terrestrial impacts and increase conservation as part of the Icicle Strategy.
<b>Comment Letter No. 006 - Icicle Creek Watershed Council and Trout Unlimited-Washington Water Project</b>	
6-1	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. In this instance, the proposal has not changed in a way nor has new information been found indicating that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, additional project level environmental review will be required.
6-2	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning, not at the programmatic environmental review stage. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.
6-3	Your comment regarding concern over the implementation timeline of activities at LFNH is noted.
6-4	The goal of the co-leads has been to provide as much detail and information as possible for each of the alternatives under consideration. SEPA threshold determinations will be made on each project. Permitting agencies will determine what level of additional project level analysis is required, if any, on a project by project basis.
6-5	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action, which comes after environmental review. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
6-6	The co-leads view the short-term goal to be achievable in approximately 10 years and the long-term goal to be achievable in approximately 50 years. Revisions have been made to Chapter 1 of the FPEIS to clarify these time-steps.
6-7	The method used for determining average year and drought year hydrographs align with the protocols provided in the Department of Ecology document "Historical Stream Flow Data by Water, Protocols for Creating Streamflow Graphs". These graphs were created using the most recent 20-years of stream flow data as recorded at the USGS gage. Additionally, using averaged historical data is a common practice for modeling future conditions. However, to address concerns with "washing out" low flow conditions, these graphs include the lowest recorded flow as a point of comparison (purple line), which appropriately shows "worst case scenario".

## DPEIS COMMENTS &amp; RESPONSES

6-8	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. These lakes and tributaries are already dammed and already experience increased flow and draw down at least once out of every five years if not more frequently, so natural conditions do not currently exist. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis.
6-9	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. Alternative 3 represents a conservation focused alternative. However, an OCPI legislative fix would be required for a conservation focused alternative because without storage, it will not be possible to meet domestic supply goals year-round without impacts to the instream flow rule. Converting agricultural lands to residential lands is not an objective of the Icicle Strategy, and conflicts with the agricultural reliability guiding principle.
6-10	See response to comment 6-5.
6-11	See response to comment 6-7.
6-12	See response to comment 6-7.
6-13	See response to comment 6-7.
6-14	OCR and Chelan County evaluated climate change impacts associated with each alternative. Given the programmatic nature of the analysis in the PEIS, individually calibrated catchment scale climate models are beyond the scope of this analysis. The co-leads included storage projects that are better able to adapt to climate change in the Preferred Alternative. The co-leads envision long-term monitoring and adaptation to evaluate performance of the Preferred Alternative.
6-15	See response to comment 6-7. Table 4-3 and Appendix F has been updated to include 2030 and 2050 modeling data.
6-16	The co-leads view the short-term goal to be achievable in approximately 10 years and the long-term goal to be achievable in approximately 50 years. Revisions have been made to Chapter 1 of the document to clarify these time-steps.
6-17	City and County's domestic water use is already low relative to other eastern Washington communities. City of Leavenworth metering and leak detection is expected to conserve water supply further. Section 2.5.4 of the FPEIS includes more detailed description of water conservation opportunities around lawn reduction that is also intended to extend domestic supplies. IPID conservation goals have been developed and are described in the newly released CWCP. More detailed description of conservation projects will occur after project design, when specific conservation work will be selected for additional review and implementation. Land use and the land use regulatory framework is described in Section 3.16.
6-18	See response to comment 6-5.
6-19	Your comments in support of the IPID Full Piping and Pump Exchange Project are noted. Your comment in opposition to projects proposed in the ALWA is noted.
6-20	City and County's domestic water use is already low relative to other eastern Washington communities. City of Leavenworth metering and leak detection is expected to conserve water supply further. The Preferred Alternative includes more expansive water conservation opportunities around lawn reduction that is also intended to extend domestic supplies. IPID conservation goals have been developed and are described in the newly released CPCW. Converting agricultural lands to residential lands is not an objective of the Icicle Strategy and conflicts with the agricultural Guiding Principle.
6-21	See response to comment 6-8.
6-22	See response to comment 6-8.

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6-23	See response to comment 6-8.
6-24	See response to comment 6-8.
<b>Comment Letter No. 007 - Washington Water Trust</b>	
7-1	Your comment in support of the goals of the Icicle Strategy is noted.
7-2	Per your comment, discussion of the system laterals has been added to the COIC Irrigation Efficiencies and Pump Exchange project description.
7-3	Your comment affirming the environmental benefit of the COIC project is noted.
7-4	This level of detail was not added to the PEIS. It is the co-leads understanding that while the COIC advisory board supports pump station site 3, some factors have emerged that may make this site less feasible than the location on lower Icicle Creek near the confluence with the Wenatchee. Currently, project design is focused on this Icicle Creek site.
7-5	See response to comment 7-4.
7-6	Per your comment, the cost estimate for the COIC Irrigation Efficiencies and Pump Exchange will be updated.
7-7	Your comment is noted.
7-8	Your comment is noted.
7-9	Your comment is noted. A note has been added to the table pointing out that the parcels served are subject to change.
7-10	The text on page 4-20 has been updated to reflect your comment regarding COIC's season of use.
7-11	Your comment is noted. The co-leads recognize the likely quantities and trust water reach that would result from the COIC pump exchange portion of this project.
7-12	This language has been updated per your comment.
7-13	Comment noted. The text on page 4-50 has been updated with the correct river mile.
7-14	Per your comment, additional text about the benefit reach for the Icicle Creek Pump Station site has been added.
7-15	Per your comment, outmigration benefits have been added to this section.
7-16	Per your comment, changes to the text on page 4-153 have been made.
7-17	Per your comment, changes to the text on page 4-270 have been made.
7-18	Per your comment, change to the text on page 4-283 have been made.
7-19	The text on page 4-320 have been updated to reflect the use of PUD power at the proposed COIC pump station.
7-20	Per your comment, the text on page 4-327 have been updated to reflect possible lane closures during the construction phase of the COIC Irrigation Efficiencies and Pump Exchange project.
<b>Comment Letter No. 008 - Daryl Harnden, IWG Agricultural Representative &amp; Local Farmer</b>	
8-1	Your comment in support of Alternative 1 is noted.
<b>Comment Letter No. 009 - Yakama Nation</b>	
9-1	Your comment is noted. The co-leads recognize the importance of LNFH in mitigating fish losses associated with Grand Coulee Dam.

9-2	The Yakama Nation's support for Alternative 1 is noted.
<b>Comment Letter No. 010 - Washington State Department of Agriculture</b>	
10-1	Your support for Alternative 1 is noted.
<b>Comment Letter No. 011 - Department of Health, Office of Drinking Water</b>	
11-1	Your general support of the process is noted.
11-2	Growth projections were used to estimate long-term growth in Section 1.5.1.4 for programmatic review. A more detailed analysis may occur during project level review. If projections under-predict growth, then the municipal guidance principle will not extend to 2050 as planned. Alternatively, if projections over-predict growth, then water supply past 2050 will be available.
11-3	The 2018 Water System Plan (WSP) was reviewed. While the projections in the updated WSP suggested improved efficiency since the release of the 2011 plan, projects and goals developed for the Icicle Strategy have not been changed. If projections over-predict growth or demand, then water supply past 2050 will be available.
11-4	Per your comment, changes to the text in Section 1.10.23 have been made.
11-5	Per your comment, changes to the text in Section 1.10.25 have been made.
11-6	Per your comment, changes to the text have been made to more clearly define group systems.
11-7	Per your comment, changes to the text have been made to more clearly describe when WSP must be updated.
11-8	Per your comment, reference to Municipal Water Law has been updated to RCW 70.119A.180
11-9	Per your comment, text has been revised so that Dryden, Monitor, Peshastin and Sunnyslope are not referred to as cities or towns, but as unincorporated areas.
11-10	Per your comment, "State" has been added to "The Forest Practices Act" for clarity and consistency.
11-11	Per your comment, a list of Group A water systems has been added to section 3.19.1.
11-12	While Chelan County is not a water purveyor, they are the responsible party for domestic exempt well use through their management of the Wenatchee Reserve established in WAC 173-545. Additionally, because they are responsible for issuing building permits and regulating building codes, they have a role in managing rural domestic water conservation.
<b>Comment Letter No. 012 - Alpine Lakes Protection Society et al.</b>	
12-1	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
12-2	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
12-3	Your support for specific elements of the Icicle Strategy are noted.

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12-4	The Icicle Work Group has invited additional members that represent the conservation or recreation communities, who have chosen not to become members. The co-leads welcome additional input on organizations who wish to become members. More detailed information about adding members to the Icicle Work Group is available in the Operating Procedures, which are incorporated into the FPEIS by reference.
12-5	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads included information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. Such a project would be for irrigation reliability, not for instream flow and domestic uses. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.
12-6	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
12-7	See response to comment 12-6.
12-8	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter (Letter 4), coordination will occur at the project level for any projects that may have permitting actions required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.
12-9	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
12-10	See response to comment 12-6.
12-11	See response to comment 12-5 and 12-6.
12-12	See response to comment 12-1.
12-13	See response to comment 12-5. The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative to ensure compliance with all applicable rule and regulations.
12-14	See response to comment 12-13.
12-15	See response to comment 12-6.
12-16	See response to comment 12-13.
12-17	Your comment is noted. Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review. A PEIS is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level construction details that is required in subsequent project level review. See response to comment 12-13.

## DPEIS COMMENTS &amp; RESPONSES

12-18	The FPEIS provides general language from the IPID easements and applicable wilderness regulations to provide a comprehensive understanding of the proposal and issues. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative to ensure compliance with all applicable rule and regulations.
12-19	Impacts to Wilderness, Recreation, and Aesthetics are described in Sections 4.17, 4.15, and 4.11 respectively. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts to these resources will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
12-20	See response to comment 12-17.
12-21	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
12-22	See response to comment 12-13. Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
12-23	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
12-24	In the notes for Table 5-2, it states that should special use permits be required by the USFS, USFS would likely serve as the federal lead agency responsible under NEPA. To clarify this point, additional discussion will be added to the text and this note will be added to all projects proposed in the ALWA.
12-25	See response to comment 12-1.
12-26	Per the Guiding Principles, all projects must comply with federal laws. Under SEPA environmental impacts of the proposals are considered. While several of the projects proposed under Alternatives 1, 2, 4, and 5 include action in the ALWA, the IWG and co-leads have found these projects to be feasible at the programmatic level. Additionally, the DPEIS does consider an alternative that does not include action in the ALWA, Alternative 3. However, the DPEIS does recognize that IPID has expressed intent to restore historical storage levels at Eightmile Lake outside of the IWG process should an alternative be selected that does not include the Eightmile Lake Storage Restoration Project. This discussion is provided in Section 2.3.1. Consideration of these impacts does not preclude the dam at Eightmile Lake being repaired rather than restored, so long as that action does not have any additional significant adverse environmental impacts.
12-27	See Response to comment 12-26.
12-28	See Response to comment 12-26.



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12-29	Per WAC 197-11-406, an EIS should occur as early as possible to meaningfully contribute to the decision-making process. Additionally, this is a programmatic level review that is intended to provide a comprehensive overview to help decision makers select one of several programmatic alternatives (WAC 197-11-704(2)(b)). Some elements of the project are not known at this time, such as number of helicopter flights. However, the DPEIS does provide as much information as possible regarding impacts, such as inundated and disturbed land (Section 4.29). However, to be responsive to concerns about impacts of the number of helicopter flights, the FPEIS includes a rough magnitude of helicopter flights to compare between alternatives. A more specific number of helicopter flights will be reviewed at the project level, as required depending on the Preferred Alternative.
12-30	Per your comment, text has been revised in Section 1.9.3 to better describe the environmental review process.
12-31	Per your comment, text has been revised in Section 1.9.3 to better describe the environmental review process.
12-32	The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address potential increased costs of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS. This will be revisited during project level review.
12-33	Each project assumes between 10 and 20 percent of the budget will go to environmental review and design. The DPEIS provides a two-year timeline for completing additional environmental review. The co-leads believe it is reasonable for NEPA review to be completed during a two-year window, but ultimately the federal lead conducting NEPA will determine the appropriate schedule.
12-34	See response to comment 12-32.
12-35	See response to comment 12-32.
12-36	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. These lakes and tributaries are already dammed and already experience increased flow and draw down at least once out of every five years if not more frequently, so natural conditions do not currently exist. Discussion of baseline conditions in the tributaries are located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases is not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species based on input from the IWG Instream Flow Subcommittee. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
12-37	See response to comment 12-36
12-38	See response to comment 12-36.
12-39	See response to comment 12-36.
12-40	See response to comment 12-36.
12-41	See response to comment 12-36.
12-42	See response to comment 12-36.
12-43	See response to comment 12-36.
12-44	See response to comment 12-36.
12-45	See response to comment 12-36.
12-46	See response to comment 12-36.
12-47	See response to comment 12-36.

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12-48	See response to comment 12-36.
12-49	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
12-50	Your support for conservation is noted. City and County's domestic water use is already low relative to other eastern Washington communities. City of Leavenworth metering and leak detection is expected to conserve water supply further. The Preferred Alternative includes water conservation opportunities around lawn reduction that is also intended to extend domestic supplies. IPID conservation goals have been developed and are described in the newly released CWCP.
12-51	Conservation has been included in all Alternatives. However, increased focus and discussion of conservation has been included in the PEIS.
12-52	See response to comment 12-51.
12-53	The domestic supply goal is to meet demand to 2050 at a minimum. If the City of Leavenworth continues to increase efficiency, which is a goal of the IWG, additional water for the City of Leavenworth will provide for sustained supply for a further planning horizon.
12-54	See response to comment 12-53.
12-55	The major diverters on Icicle Creek have already achieved reasonable efficiency as is required by State Law. The standard for efficiency is based on local custom per Ecology v. Grimes. Detailed information regarding IPID's water use is available in the recently completed CWCP, which is incorporated by reference. COIC water use information is available in their Alternatives Evaluation Study, which is also incorporated by reference. The City and County's domestic water use is already low relative to other eastern Washington communities. This information has been added to Section 3.6 of the FPEIS.
12-56	Per your comment, more detail about Washington State water law is included in Section 3.6 of the FPEIS.
12-57	See response to comment 12-6.
12-58	Your comment is noted. Please see response to comment 12-55.
12-59	IPID recently completed a CWCP, which details their water use and measures to improve efficiency. IPID uses their rights in a way that is consistent with local custom and maintains an efficiency that is not considered waste under RCW. 90.09.005 per Ecology v. Grimes.
12-60	IPID recently completed a CWCP that details water use. This report will be incorporated by reference.
12-61	See response to comment 12-59.
12-62	Your comment is noted. The additional water provided to the City of Leavenworth in the Icicle Strategy is intended to resolve the water right dispute in Leavenworth v. Ecology and provide for additional growth. Increased domestic conservation is a goal of the Icicle Strategy, as discussed in more detail in Section 2.5.4 of the FPEIS.
12-63	The domestic supply goal is to meet demand to 2050 at a minimum. If the City of Leavenworth continues to increase efficiency, which is a goal of the IWG, additional water for the City of Leavenworth will provide for sustained supply for a further planning horizon.
12-64	See response to comment 12-63.
12-65	The additional water provided to the City of Leavenworth in the Icicle Strategy is intended to resolve the water right dispute in Leavenworth v. Ecology and provide for additional growth. The domestic supply goal is to meet demand to 2050 at a minimum. If the City of Leavenworth continues to increase efficiency, which is a goal of the IWG, additional water for the City of Leavenworth will provide for sustained supply for a further planning horizon.

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12-66	The conservation measures outlined in the WSP are a minimum commitment to conservation required by RCW 70.119A.180. The Icicle Strategy includes conservation measures that exceed this minimum requirement.
12-67	See response to comment 12-66. The Icicle Strategy is proposing to spend \$1 million on funding conservation efforts. To be responsive to concerns over lawn watering, a lawn buyback program along with other conservation measures have been added to the Domestic Conservation Project.
12-68	Domestic supply is envisioned for a combination of City of Leavenworth and Chelan County domestic water uses, which will be determined at project level review and permitting. Additionally, the City and the County have an interlocal agreement regarding reserve quantities provided for in the Wenatchee Instream Flow Rule.
12-69	Your comment in support of closing the Wenatchee Basin to new water rights is noted. Closing the Wenatchee Basin is outside the scope of the Icicle Work Group.
12-70	Growth will be compliant with City of Leavenworth or Chelan County's Comprehensive Plan and planning efforts.
12-71	Supporting LNFH in improving its water supply and efficiency is one of the goals of the IWG. While this goal is in line with current planning goals of LNFH, these goals were developed independent of one another. The Icicle Strategy is an integrated water resource management plan, that includes efforts to support LNFH in meeting the BiOp. A plan to improve streamflow, habitat, and tribal fish harvest in the Icicle Creek Subbasin without setting sustainability goals at LNFH would be incomplete. The requirements at LNFH and the BiOp are described throughout Chapter 1.
12-72	Your support for water markets are noted. To be responsive to concerns over lawn watering, a lawn buyback program along with other conservation measures have been added to the Domestic Conservation Project.
12-73	Maximum habitat benefit (100 percent WUA) for steelhead rearing in Reach 4 would be achieved with a flow of 250 cubic feet per second (cfs) and the IWG adopted this as their long-term goal. However, the IWG recognized a diminishing return on investment above 100 cfs (80 percent WUA) when considering additional habitat achieved for each 1 cfs of flow improvement. The IWG also recognized that funding may be a constraint, at least initially, to achieve the highest level of flow improvement. Therefore, the IWG endorsed an initial flow restoration target of 100 cfs, which increases WUA to 80 percent, while maintaining the long-term restoration goal of 250 cfs.
12-74	Figure 2-6 through Figure 2-17 indicate all action alternatives would meet the short-term instream flow goal of 100 cfs during non-drought years and 60 cfs during drought years. Additional information on how to read these figures have been added to the FPEIS.
12-75	The Icicle Strategy proposes using water markets or market-based reallocation of senior water rights to improve agricultural reliability of water user's junior to the instream flow rule. Your comment in support of closing the Wenatchee Basin to new water rights is noted. Closing the Wenatchee Basin is outside the scope of the Icicle Work Group.
12-76	Legal descriptions of the easements are in Appendix F. Maps provided by the USFS and/or IPID are also available in this Appendix, but new maps were not created because of the availability of survey data. These maps do not include Eightmile Lake easements.
12-77	The IWG believes that expanding habitat conservation and connectivity with areas outside the Subbasin provides benefits for wildlife within the Subbasin, as wildlife often move beyond Subbasin boundaries. The co-leads envision WDFW helping the IWG select appropriate mitigation projects as part of the Preferred Alternative habitat project list. The co-leads are envisioning WDFW will help select conservation acquisitions, with priority being given to in basin habitat projects. Land acquisition is not a requirement of the reserve amendment as described in WAC 173-545-090(1)(d)(iv).

12-78	The additional water provided to the City of Leavenworth in the Icicle Strategy is intended to resolve the water right dispute in Leavenworth v. Ecology and provide for additional growth. The domestic supply goal is to meet demand to 2050 at a minimum. If the City of Leavenworth continues to increase efficiency, which is a goal of the IWG, additional water for the City of Leavenworth will provide for sustained supply for a further planning horizon. Currently, the City of Leavenworth is meeting water conservation standards set in WAC 246-290-496(1) and has use that is low when compared to other Eastern Washington communities.
12-79	The impacts of groundwater augmentation at LNFH on groundwater and flows in Icicle Creek are discussed in Section 4.3. It is anticipated that increases in flows to Icicle Creek will more than offset impacts of groundwater augmentation. A more detailed analysis of impacts to groundwater and groundwater/surface water interaction will be reviewed during project level review as appropriate.
12-80	OCR's methodology for developing estimates on water development costs is available in the 2017 Columbia River Basin Annual Water Supply Inventory Report located on Ecology's website: <a href="https://fortress.wa.gov/ecy/publications/documents/1812001.pdf">https://fortress.wa.gov/ecy/publications/documents/1812001.pdf</a> .
<b>Comment Letter No. 013 - Washington Trails Association, The Mountaineers, and Access Fund</b>	
13-1	Your support for specific elements of the Icicle Strategy are noted.
13-2	Your opposition to Alternative 4 is noted. This was not selected as the Preferred Alternative.
13-3	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.
13-4	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
13-5	Seasonal inundation of trail and surrounding campsites would result from this project. Impacts to recreation and visual impacts are discussed in Sections 4.11.5.2 and 4.15.5.2. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. This project was not included in the Preferred Alternative selected for the Icicle Strategy.
13-6	Construction impacts to recreation are expected to be short in duration and may be managed through timing of construction. The PEIS reviews the impacts of the various alternatives in as much detail as is appropriate for a programmatic evaluation. A more specific look at impacts and mitigation will occur at project-level environmental review.
13-7	Based on the GIS data provided by the USFS, it appears that the trail along the northside of Eightmile Lake and many documented backcountry campsites are above the proposed highwater level of the Eightmile Lake Storage Restoration project. A more specific look at impacts and mitigation will occur at project-level environmental review.
13-8	Your opposition to the Eightmile Lake Storage Enhancement project and concerns regarding recreation impacts are noted. This project was not included in the Preferred Alternative for the Icicle Strategy.
13-9	Your opposition to this project and concern regarding relocating the trail are noted. Seasonal inundation of the trail would occur if the Upper and Lower Snow Lakes Storage Enhancement Project were implemented. This project was not included in the Preferred Alternative for the Icicle Strategy.

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13-10	Your opposition to the Upper Klonaka Lake Storage Enhancement project and concerns regarding visual and physical impacts are noted. Projects under the alternatives considered in the PEIS are at varying stages of development, and as much detail as possible at a programmatic level. This project was not included in the Preferred Alternative for the Icicle Strategy.
13-11	The USFS is an active member of the IWG and regularly attends meetings. Per the USFS comment letter (Letter 4), coordination will occur at the project level for any projects that may have a permitting action required by USFS.
13-12	See response to comment 13-11. The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.
13-13	USBR and USFWS are working as co-lead agencies for NEPA actions related to their infrastructure at Snow Lake and LNFH. USFS will likely be NEPA lead agency for work that would require a special use permit within the National Forest. NEPA review, along with project level SEPA environmental review, would likely occur following feasibility and design, when project level permitting is started. Information regarding project level SEPA review and NEPA review will occur via Chelan County's Icicle Workgroup webpage, public notices and press releases, and at IWG meetings.
13-14	See response to comment 13-4.
13-15	Your email address will be added to the IWG email distribution list.
<b>Comment Letter No. 014 - Alpine Lakes Foundation</b>	
14-1	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
14-2	See response to comment 14-1.
14-3	See response to comment 14-1. USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations.
14-4	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative.
14-5	The Preferred Alternative selected for the Icicle Strategy does not include any project at Upper Klonaka Lake.
14-6	See response to comment 14-1.
14-7	Your support for the IPID Full Piping and Pump Exchange project is noted. Your concern for other projects proposed under Alternative 5 is noted.
14-8	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
14-9	USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations.

<b>Comment Letter No. 015 - Chelan-Douglas Land Trust</b>	
15-1	Your comment in support of conservation protection and acquisition is noted. \$2.5 million is the amount of conservation funds that the IWG has currently committed to. Selection of this level of conservation funding will not preclude additional conservation work in the future. Although, additional environmental review would be required if any adverse impacts were likely.
<b>Comment Letter No. 016 - Great Old Broads for Wilderness</b>	
16	This letter does not contain comments relevant to the Icicle Creek Strategy DPEIS.
<b>Comment Letter No. 017 - North Central Washington Audubon Society</b>	
17-1	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
17-2	Per your comment, the text has been modified in Section 1.1 to clarify the environmental review process.
17-3	Certified water use was used as a surrogate for demand, along with data from the City of Leavenworth's WSP and the Wenatchee Watershed Plan, which is appropriate for a programmatic level review. The water rights listed in Table 3-10 have historically been used and use has been certified by Ecology or its predecessor agency. To address concern with lack of annual quantities in Table 3-10, annually quantities were estimated based on available data or authorized instantaneous quantities. All major diverters on Icicle Creek measure their water use. To help improve water conservation, IPID has completed a CWCP which examines water use and conservation savings potentials. Additionally, expanded conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
17-4	Any water quantity greater than what is authorized in water rights would require additional water right authority. Section 4.6 discusses the need to obtain additional water rights for storage enhancement projects. However, storage enhancement projects are not included in the Preferred Alternative.
17-5	The rights listed in Tables 3-9 and 3-10 have been permitted or certified. Information regarding new water rights required for various projects is provided in Table 5-2.
17-6	Your comment is noted. Text will be updated to indicate the City will exercise new water made available through the Icicle Strategy from their Wenatchee River well field, with any exceptions, such as emergency situations or peaking that cannot be met with wellfield capacity, provided.
17-7	Long term growth in the Icicle Subbasin and Wenatchee Basin, and the environmental impacts thereof are addressed through Chelan County and City of Leavenworth comprehensive plans and zoning. The Preferred Alternative provides additional mitigated water supply for City of Leavenworth and Chelan County domestic uses through at least 2050. Development impacts are expected to occur irrespective of implementation of the Icicle Strategy. However, the Icicle Strategy includes BMPs and terrestrial mitigation in addition to robust instream flow improvements to help offset impacts that may result from planned growth.

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17-8	<p>For the projects within the ALWA, the operational changes proposed are not anticipated to cause significant adverse impacts. Many of these projects are modification of existing storage that are within the historical operational range. The DPEIS found that storage enhancement would likely have moderate impacts on several resources. However, Alternative 4 was not selected as the Preferred Alternative.</p> <p>More detail has been provided in Section 4.28 to provide decisionmakers with additional information. The level of detail provided in this section is appropriate for a programmatic EIS and provides a comprehensive understanding of the impacts of implementing the Icicle Strategy. Additional environmental review will be conducted on individual products as they are carried forward for additional planning and review.</p>
<b>Comment Letter No. 018 - Olympic Park Associates</b>	
18-1	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.
18-2	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. These lakes and tributaries are already dammed and already experience increased flow and draw down at least once out of every five years if not more frequently, so natural conditions do not currently exist. Discussion of baseline conditions in the tributaries are located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
18-3	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation of the Preferred Alternative.
18-4	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
<b>Comment Letter No. 019 - Pacific Crest Trail Association</b>	
19-1	Your opposition to the Icicle Strategy is noted.
19-2	USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations.
19-3	None of the proposed actions are within the viewshed of the Pacific Crest Trail (PCT), nor is the PCT accessible by trail from any of the proposed project sites. We do not anticipate adverse impacts to PCT recreational users.
19-4	See response to comment 19-2.

Comment Letter No. 020 - Pacifica Law Group	
20-1	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
20-2	Per WAC 197-11-055, a programmatic SEPA review was launched at the earliest possible point in programmatic development to allow decision making to be guiding by the environmental review process.
20-3	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120. The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative to ensure compliance with all applicable rules and regulations.
20-4	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. An overview of this process is provided in Water Resources POL-1120.
20-5	The level of detail provided in the PEIS is intended to provide a programmatic level comprehensive understanding of the impacts of implementing the Icicle Strategy. As discussed in the response to comment 20-3, limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative to ensure compliance with all applicable rules and regulations.
20-6	The section of the Wilderness Act involving presidential approval for water resources projects, 33 U.S.C. 1133(d)(4), relates to prospecting for new water resources and establishment of and maintenance of new reservoirs. Other provisions of the Wilderness Act, 33 U.S.C. Sections 1133-1136, indicate that wilderness protections are in certain circumstances subject to preexisting private property rights and that access to private or state-owned inholdings shall be provided. The Act also contains provisions relating to the federal government's acquisition of private property within designated wilderness, as has occurred here.
20-7	At this point in project development, number of helicopter flights is not known. Details regarding number of helicopter flights will be known prior to project level environmental review. The PEIS provides this information in the level of detail appropriate for a programmatic of review. As discussed in Section 4.17, it is anticipated that the long-term number of helicopter flights initiated by LNFH and IPID will decrease with remote management and modernized infrastructure.



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20-8	The PEIS provides this information in the level of detail appropriate for a programmatic of review. A more detailed analysis is appropriate for a project level review and project permitting. A SEPA programmatic review is not intended to predetermine permitting decisions, especially those that are the jurisdiction of other programs or agencies.
20-9	The alternatives reviewed in the DPEIS were developed in response to comments received during scoping. The description and analysis of these alternatives was programmatic in nature based on data and information available at the time of writing.
20-10	The No-action Alternative contemplates what would happen should the Icicle Strategy not be implemented, per WAC 197-11-440(5)(b)(ii). Based on discussion with Icicle Work Group members, the co-leads characterized which projects would likely proceed without an integrated water management strategy, and which project would likely not proceed. Those that would proceed regardless of the IWG's adoption of the integrated strategy were included in as the No-action Alternative. It should be noted, that although some projects may proceed if no-action is taken on the Icicle Strategy, the beneficiaries of those projects may not be the same as it would be under the Icicle Strategy.
20-11	Per WAC 197-11-786, a reasonable alternative is one that could feasibly attain or approximate the proposal's objective. Dam removal in the Uinta Wilderness was possible because of a large BOR project lower in the basin. There are no analogous reservoirs to the Big Sandy Reservoir (Uinta) near the Icicle Creek Subbasin to make dam removal a reasonable alternative to meeting program objectives. Without the water storage offered by the existing dams, there was not a reasonable alternative project suite available that could achieve the IWG guiding principles, which include increased stream flow, domestic supply, and agricultural reliability. This is discussed in more detail in Section 2.11.
20-12	See response to comment 20-10.
20-13	These notes and inclusions were provided to be as transparent as possible about the fact that some projects may be undertaken outside of the IWG process if not selected as part of the preferred alternative. This was based on statements made by work group members and discussed at Icicle Work Group meetings.
20-14	Analysis of emergency work at Eightmile Lake is outside the scope of the PEIS. This analysis was not included in the DPEIS or the FPEIS and proceeded under a separate SEPA review. Department of Ecology Dam Safety Program and Chelan County Emergency Response are leading emergency work effort at Eightmile Lake. Since Eightmile Lake emergency work is not analyzed in this environmental review, the DPEIS does not provide any ex post facto justification.
20-15	The lack of specificity about environmental impacts is due to the programmatic level of detail for the alternatives given the level of planning of specific projects under the proposal at this point in time (WAC 197-11-442). As noted in the FPEIS, project environmental review will be conducted on individual projects as they are carried forward.
20-16	The level of detail on mitigation measures is appropriate for the programmatic review. More detailed mitigation measures will be reviewed in project level analysis once specific design and construction elements are identified.
20-17	The co-leads adopted a FPEIS with programmatic level analysis. Opportunities for project level analysis would occur during project level review in the future.
<b>Comment Letter No. 021 - Washington Native Plant Society</b>	
21-1	This DPEIS was developed under SEPA. Future NEPA review will be required for any projects with a federal nexus, such as permitting or funding. Impacts to vegetation was reviewed at a programmatic level in Section 4.8.
<b>Comment Letter No. 022 - Wise Use Movement</b>	
22-1	Your opposition to the Office of the Columbia River is noted. Per your request, the report attached to your comments is included in the record.

22-2	City and County's domestic water use is already low relative to other eastern Washington communities. City of Leavenworth metering and leak detection is expected to conserve water supply further. The Preferred Alternative includes more expansive water conservation opportunities around lawn reduction that is also intended to extend domestic supplies. IPID conservation goals have been developed and are described in the newly released CWCP. LNFH is required for mitigation of Grand Coulee Dam and considering fish passage over Grand Coulee Dam is beyond the scope of the Icicle Work Group. The USFWS recently conducted an alternatives analysis that included the potential of removing LNFH. This report found that improving efficiency at LNFH was the best alternative.
22-3	IWG meetings are open to the public. Members of the public are encouraged to attend and provided opportunity to comment during the meetings. The Guiding Principles (Improve Instream Flow, Improve Sustainability of LNFH, Protect Tribal and Non-Tribal harvest, Improve Domestic Supply, Improve Agricultural Reliability, Enhance Icicle Creek Habitat, Comply with State and Federal Law, and Wilderness Acts) have received broad support. However, you are welcome to attend meetings and provide input on the Icicle Strategy objectives during a public comment period.
22-4	Average per capita domestic water use in King County is 82 gallons per day per person (USGS, 2018). City of Leavenworth and Chelan County's domestic water use is already low relative to other eastern Washington communities. City of Leavenworth metering and leak detection is expected to conserve water supply further. The Preferred Alternative includes more expansive water conservation opportunities around lawn reduction that is also intended to extend domestic supplies.
22-5	Considering passage over Grand Coulee Dam is beyond the scope of the Icicle Work Group. While SEPA requires reasonable alternatives be considered, it does not require alternatives that do not align with program objects to be considered.
22-6	See response to comment 22-5.
22-7	See response to comment 22-5.
22-8	See response to comment 22-5.
22-9	See response to comment 22-5.
22-10	See response to comment 22-5.
<b>Comment Letter No. 023 - Anne Bridges</b>	
23-1	Your comment is noted.
<b>Comment Letter No. 024 - Kathleen Ward (Fromm)</b>	
24-1	Your support of the process is noted. Several representatives from the conservation, Wilderness, and recreation community were invited to participate at the inception of the Icicle Work Group. However, these groups have chosen not to participate. The Icicle Work Group would welcome additional members that represent these communities. More detailed information about adding members to the Icicle Work Group is available in the Operating Procedures, which are incorporated into the FPEIS by reference.
24-2	The PEIS reviewed impacts of the project on recreational access in Section 4.15. Recreational impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
24-3	Based on the programmatic level of analysis, we do not anticipate that any of the action alternatives would significantly increase bank erosion because flows increase would be within the range of already occurring flows. Additional, some habitat improvement projects that would be pursued under the Icicle Strategy could reduce bank erosion in Lower Icicle Creek. Project level analysis will analyze impacts to earth resources, including bank erosion, which will include more detailed analysis where appropriate.
24-4	Your comment is noted.

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24-5	Your support for specific elements of the Icicle Strategy is noted.
<b>Comment Letter No. 025 - Natalie Williams</b>	
25-1	Your support for pump exchange projects and concern regarding projects within ALWA is noted. The IWG and co-leads will work with the USFS at the project level review and project permitting for projects in the Preferred Alternative that are located in the ALWA to ensure compliance with all applicable rules and regulations.
25-2	Your comment is noted. The USFWS and BOR are working together on funding and environmental review relating to upgrades at LNFH and to meet BiOp requirements. More discussion of BiOp requirements for upgrades at LNFH are discussed throughout Chapter 1.
<b>Comment Letter No. 026 - Chad Spies</b>	
26-1	Your support of the Icicle Strategy and comments about recreational impacts are noted. Section 4.15 of the PEIS discussed the impacts of the Alternatives on recreation.
26-2	Your support for Alternative 4 is noted.
<b>Comment Letter No. 027 - Jan Petrie</b>	
27-1	Your support of the Icicle Strategy is noted.
27-2	Your support for Alternative 4 is noted.
<b>Comment Letter No. 028 - Jerome "Jerry" Schneider</b>	
28-1	Your support for the COIC Pump Exchange and Irrigation Efficiencies Project is noted.
<b>Comment Letter No. 029 - Will Henson</b>	
29-1	Your concerns are noted. Project level environmental review will provide more detailed analysis on the impacts of the projects in the Preferred Alternative on streamflow where appropriate.
29-2	Your concerns about recreation is noted. Project level environmental review will provide more detailed analysis on the impacts of the projects in the Preferred Alternative on recreation where appropriate.
29-3	Your concerns about LNFH is noted. LNFH is in compliance with Clean Water Act requirements. More discussion about LNFH is provided throughout Chapter 1.
29-4	Your concern regarding water storage elements in the Icicle Strategy is noted. The Preferred Alternative includes restoration of the dam at Eightmile Lake to the original dam height.
29-5	You support for expanded conservation, groundwater right use, and reallocating shares in the irrigation district are noted. An expanded description of water conservation measures is described in Section 2.5.4 of the FPEIS, which includes a program for irrigation water reallocation under the Preferred Alternative.
29-6	See response to comment 29-2.
29-7	Your comment regarding dam safety is noted. IPID is working with Ecology's Dam Safety office and Chelan County's Office of Emergency Response to make sure all the dams in the area are safe and up to code. Your comment in opposition to instream flow improvements and recreational use is noted. Project level environmental review will provide more detailed analysis on the impacts of the projects in the Preferred Alternative on recreation and streamflow where appropriate.

<b>Comment Letter No. 030 - Gro Buer</b>	
30-1	Your comment about concern over the cost is noted. Part of the purpose of the FPEIS is to focus work on a specific set of projects, so design work and more specific cost estimates can be developed. This will help inform decision making further. If a project is determined to be fatally flawed for cost, or any other reason, that project will be replaced as required by the IWG Operating Procedures. The FPIES does not authorize any spending, and estimated costs are included to aid in the decision-making process.
30-2	<p>Your support for expanded conservation measures is noted. Conservation is an important element of the Preferred Alternative. Additional detail regarding conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.5.4. IPID recently completed its CWCP, which details efficiency upgrades that can be made to improve streamflow by reducing IPID's diversion on Icicle and Peshastin Creeks. The CWCP is incorporated in the FPEIS by reference. Similarly, the City of Leavenworth has an up-to-date conservation section in its water system plan. More detail on the Domestic Conservation portion of the Icicle Strategy is expected during project development, review, and permitting. The Programmatic EIS is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan in Icicle Creek Subbasin.</p> <p>Your comment about having an outside panel of experts looking at additional conservation measures is noted.</p>
<b>Comment Letter No. 031 - Norm Stoddard</b>	
31-1	Your support for the No-action Alternative and support for storage elements discussed in the PEIS is noted.
<b>Comment Letter No. 032 - Greg Shannon</b>	
32-1	Your comment is noted. A 60-day comment period was selected to balance the need for public and agency review and input and moving the process forward with limited delay.
<b>Comment Letter No. 033 - Alan F. Hunt</b>	
33-1	Your support for the No-action Alternative is noted.
33-2	Your comments about population, tourism, and ERU growth in the City of Leavenworth is noted. Growth occurs in compliance with County and City comprehensive planning and limiting tourism is outside the scope of the Icicle Work Group or the Icicle Strategy. The Preferred Alternative makes a fixed quantity of water available for domestic use which is intended to supply growth through at least 2050, but actual growth will determine the longevity of that supply.
33-3	See response to comment 33-2.
33-4	The Icicle Strategy seeks to improve domestic supply for both the City of Leavenworth and areas outside the City's urban growth boundary. These projections are based on Watershed Planning documents, OFM population growth statistics, City of Leavenworth planning documents, and information about litigation between City of Leavenworth and Ecology over water rights.
33-5	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur at project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative.

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33-6	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
33-7	Your support for the IPID Full Piping and Pump Exchange project is noted. Your concern regarding other projects in Alternative 5 is noted.
33-8	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
33-9	See response to comment 33-5.
<b>Comment Letter No. 034 - Bill Burwell</b>	
34-1	See response to comment 33-6.
34-2	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter, coordination will occur at the project level for any projects that may have permitting actions required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review as needed.
34-3	Your comment supporting wilderness protections is noted.
34-4	Fisheries impacts are discussed in section 4.7 of the document. Impacts were found to be less than significant and, in most cases, beneficial. Fish impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
34-5	The USFS is an active member of the IWG and regularly attends meetings. See response to 34-2.
34-6	Federal reserved water rights can be established with the Congressional reservation of federal lands. These rights are limited to the purpose and intent of the reservation. Federal reserved rights priority dates are the date of federal reservation and do not supersede senior water rights. No federal reserve water rights have been determined in these areas.
34-7	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process or irrigation drought resiliency, if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored.
34-8	LNFH and City of Leavenworth each hold rights to divert water from Icicle Creek. Some of the elements in the action Alternatives considered in the PEIS would require a change in purpose of use or other water right permitting actions. This is described in Section 4.6 of the PEIS.
34-9	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
34-10	The scoping process is intended to identify additional alternatives to be considered, potential impacts, and potential mitigation measures as described in WAC 197-11-792. Alternative 4 was developed in response to comments received regarding the development of additional water supplies.

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34-11	Your support for the IPID Full Piping and Pump Exchange project is noted.
34-12	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. Your concern over greenhouse gas emissions is noted. Reducing greenhouse gas emissions is outside the scope of the Icicle Work Group, but energy consumption was considered in the PEIS.
34-13	Several informational meetings have been held throughout the Puget Sound area and information had been distributed throughout the state that detailed how to comment on the DPEIS. Your comment for more outreach on the westside is noted.
34-14	See response to comment 34-3.
34-15	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.
<b>Comment Letter No. 035 - Dick Rieman</b>	
35-1	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Water is currently released from these lakes to supply water for irrigation uses. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
<b>Comment Letter No. 036 - Dick Rieman (2)</b>	
36-1	See response to comment 35-1.
<b>Comment Letter No. 037 - Drew Meyers</b>	
37-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
37-2	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Square, Lower Klonaqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2.  The PEIS found that increased frequency of releases for instream flow benefit not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
37-3	See response to comment 37-1.

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<b>Comment Letter No. 038 - Edward Henderson</b>	
38-1	<p>Table 5-2 details anticipated permits for each alternative considered in the PEIS.</p> <p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p> <p>Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.</p>
38-2	<p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations.</p> <p>Per the USFS comment letter, coordination will occur at the project level for any projects that may have a permitting action required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.</p>
38-4	See response to comment 38-1.
38-5	<p>One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW.</p> <p>The Icicle Strategy is not seeking to increase water supplies at LNFH with water from IPID's storage rights.</p>
38-6	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
38-7	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
38-8	<p>The construction approach for many of the projects that might occur in the ALWA are detailed in Appendix B and C.</p> <p>The PEIS reviews the impacts of the various alternatives in as much detail as is appropriate for a programmatic evaluation and at the current level of project planning. A more specific look at construction impacts, such as number of helicopter flights, and mitigation will occur at project-level environmental review.</p>
38-9	Impacts of the proposal on noise is detailed in Section 4.14 and impacts on wilderness values is detailed in Section 4.17.
38-10	Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
38-11	Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.
38-12	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.

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38-13	Your comment supporting wilderness protections is noted. Wilderness Protection is a Guiding Principle of the Icicle Strategy and the Preferred Alternative must be in compliance with it.
38-14	This is a programmatic level EIS, which looks to examine non-project actions, such as developing an integrated water resource management plan. Project level environmental review will occur on any project implemented under the plan. If permitting agencies deem it appropriate, project level EIS's would be prepared prior to implementation of specific project.
38-15	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.
38-16	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.
<b>Comment Letter No. 039 - James Woods</b>	
39-1	USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.  The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2.
39-2	Your comment supporting wilderness protections is noted. Icicle Creek and tributary flows within and outside the Alpine Lakes have not been natural for nearly 100 years, but are instead regulated for irrigation purposes. Instead, the Preferred Alternative would regulate them for both irrigation and instream flow purpose.
39-3	The natural flow pattern of the watershed has been modified by authorized dams that have existed for nearly 100 years. Under the action alternatives, flow would be within the range of flows currently experiences within the subbasin. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
39-4	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.
39-5	The efficacy of the various alternatives under climate change scenarios are discussed in section 4.13 and Appendix F of the DPEIS.
<b>Comment Letter No. 040 - Janet Thompson</b>	
40-1	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.



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40-2	Your comment supporting wilderness protections is noted.
40-3	Your concerns regarding storage enhancement and restoration are noted.
40-4	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads included information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.</p> <p>The No-action Alternative contemplates what would happen should the Icicle Strategy not be implemented, per WAC 197-11-440(5)(b)(ii). Based on discussion with Icicle Work Group members, the co-leads characterized which projects would likely proceed without an integrated water management strategy, and which project would likely not proceed. Those that would proceed regardless of the IWG's adoption of the integrated strategy were included in as the No-action Alternative. It should be noted, that although some projects may proceed if no-action is taken on the Icicle Strategy, the beneficiaries of those projects may not be the same as it would be under the Icicle Strategy.</p>
40-5	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
40-6	Federal reserved water rights can be established with a Congressional reservation of federal lands. These rights are limited to the purpose and intent of the land reservation. Federal reserved rights priority dates are the date of federal reservation and do not supersede senior water rights. No federal reserve water rights have been determined in these areas.
40-7	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project under the Preferred Alternative, as described in Chapter 2.
40-8	<p>Your comment supporting ecosystem function is noted.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
40-9	<p>Current members that represent environmental interests include Trout Unlimited, Washington Water Trust, and Icicle Creek Watershed Council.</p> <p>Originally, the Center for Environmental Law and Policy and Wild Fish Conservancy represented environmental interests on the work group as well. However, these entities choose to leave the Icicle Work Group to pursue a lawsuit against the LNFH, which is another member of the work group. This action violated membership expectations, as members cannot participate in good-faith with an honest intent to find collaborative solutions to address the needs, issues, and concerns of all Work Group Members while actively engaged in litigation with other work group members.</p> <p>The Icicle Work Group has invited and would welcome additional members that represent the conservation, Wilderness, or recreation communities. More detailed information about adding members to the Icicle Work Group is available in the Operating Procedures, which are incorporated into the FPEIS by reference.</p>

<b>Comment Letter No. 041 - Janiese Loekn</b>	
41-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 042 - Jeffrey Currier</b>	
42-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
42-2	<p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.</p>
<b>Comment Letter No. 043 - Julia Beebs</b>	
43-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 044 - Julianne Lamsek</b>	
44-1	Your comment supporting wilderness protections is noted.
44-2	Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer, but this was not selected as the Preferred Alternative. No other projects considered under the action alternatives are expected to result in trail or campsite inundation.
44-3	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
44-4	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p> <p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.</p>
<b>Comment Letter No. 045 - Laurie Colacurcio</b>	
45-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.

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<b>Comment Letter No. 046 - Ryan Jones</b>	
46-1	<p>Your comment supporting wilderness protections is noted.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>The action alternatives considered in the PEIS do not include energy development. However, several alternatives considered include modification or reoperations to existing dam structures in the ALWA.</p>
<b>Comment Letter No. 047 - William B. and Margaret L. Beyers</b>	
47-1	<p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
47-2	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. In this instance, the proposal does not meet these criteria and a supplemental draft EIS is not required at this time. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p>
<b>Comment Letter No. 048 - Allison Oster</b>	
48-1	<p>Your comment opposing new dams is noted. No new dams are proposed under the action alternatives considered in the PEIS.</p> <p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
<b>Comment Letter No. 049 - Ansel Wald</b>	
49-1	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p>
49-2	<p>Your comment to seek supplies from the Columbia River as an alternative water supply is noted.</p>
<b>Comment Letter No. 050 - Brynne Koscianski</b>	
50-1	<p>Your comment supporting wilderness protections is noted.</p> <p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.</p>
<b>Comment Letter No. 051 - Chris Murray</b>	
51-1	<p>Your comment supporting wilderness protections is noted.</p>

51-2	<p>Your support for expanded conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p> <p>All action alternatives analyzed in the PEIS include water markets to improve agricultural reliability.</p>
<b>Comment Letter No. 052 - Darrel Martin</b>	
52-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 053 - Deanna Pumplin</b>	
53-1	Your comment opposing the Icicle Strategy is noted. The referenced letter was considered during scoping.
53-2	Your comment supporting wilderness protections is noted.
53-3	<p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p> <p>Most of the proposed water supply under the Icicle Strategy would go to improve instream flow for fish. The goals of the Icicle Strategy, known as the Guiding Principles, are described in section 1.5.</p>
<b>Comment Letter No. 054 - Fichard Fiddler</b>	
54-1	<p>Impacts to wilderness character are described in Sections 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.</p> <p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation. Currently, coordination with USFS on Wilderness issues occurs at IWG meetings. USFS is an active member of the IWG, and regularly attends meetings.</p> <p>IWG meeting are open to the public and published on Chelan County's website. Members of the public are encouraged to attend and provided opportunity to comment during the meetings.</p> <p>Your comment supporting wilderness protections is noted.</p>
54-2	<p>The Center for Environmental Law and Policy and Wild Fish Conservancy chose to leave the Icicle Work Group to pursue a lawsuit against the LNFH, which is another member of the work group. This action violated membership expectations, as members cannot participate in good-faith with an honest intent to find collaborative solutions to address the needs, issues, and concerns of all Work Group Members while actively engaged in litigation with other work group members.</p> <p>Current members that represent environmental interests include Trout Unlimited, Washington Water Trust, and Icicle Creek Watershed Council.</p> <p>The Icicle Work Group would welcome additional members that represent the conservation, Wilderness, or recreation communities. More detailed information about adding members to the Icicle Work Group is available in the Operating Procedures, which are incorporated into the FPEIS by reference.</p>

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54-3	Your support for expanded conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 055 - Jeff Lambert</b>	
55-1	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
55-2	Impacts to ecosystem resources and recreation are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
55-3	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 056 - John Russell</b>	
56-1	Your support for dam removal is noted. Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.
<b>Comment Letter No. 057 - M. Johnson</b>	
57-1	Your general support of the Icicle Strategy is noted.
<b>Comment Letter No. 058 - Mark Shipman</b>	
058-1	Your support for storage enhancement is noted.
<b>Comment Letter No. 059 - Matt Parker</b>	
59-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.  Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes. Several of the alternatives considered include modifications and/or reoperation of dams to meet the Guiding principles described in section 1.5.
<b>Comment Letter No. 060 - Michelle Bright</b>	
60-1	Your comment supporting wilderness protections is noted.
60-2	The goals of the Icicle Strategy are described in section 1.5 of the PEIS. The primary objective is to provide increased instream flows, better water quality, and more habitat for salmonid species. The Guiding Principles, which are the objectives of the Icicle Strategy, are not seeking to increase water supply for irrigation uses. One of the goals is to increase agricultural reliability. To this accomplish a water markets approach was proposed by the IWG and included in all of the action alternatives considered in the PEIS. Climate change impacts on each alternative are discussed in the PEIS.

## DPEIS COMMENTS &amp; RESPONSES

60-3	Impacts of the alternatives on climate change are discussed at the programmatic level in section 4.13 of the DPEIS. The action alternatives are not anticipated to have a significant increase in greenhouse gas emissions.
60-4	Your support for seeking alternative water supplies is noted.
60-5	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 061 - Natalie Williams</b>	
61-1	Your concern with the alternative presented in the PEIS is noted. Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.
61-2	Your support of the IPID Full Piping and Pump Exchange is noted.
61-3	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
61-4	Your comment suggesting the IPID Full Piping and Pump Exchange to Alternative 3 is noted. The co-leads have decided not to consider additional alternatives at this time.
<b>Comment Letter No. 062 - Peter Fiddler</b>	
62-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 063 - Sam Smith</b>	
63-1	The labeling on Figure 3-1 appears accurate.
63-2	<p>Illustrations of proposed changes are located in project descriptions in Chapter 2 and Aesthetics in Chapter 4.</p> <p>Figures 2-19 through 2-25 show the current conditions of equipment at the Eightmile, Colchuck, Square Klonaka, Nada, and Snow Lakes. Figure 2-26 show what the proposed equipment upgrades would likely look like under the Alpine Lakes Optimization, Modernization, and Automation project. Figure 4-26 through 4-28 shows photos of representative equipment installed elsewhere. Figures 4-29 through 4-42 show comparative photos of these lakes at their high water and low water stages. Under the Alpine Lakes Optimization, Modernization, and Automation project, lake levels would not change, but the lakes would be drawn down more frequently. Currently, drawdown occurs one to two times every five years. Under this project, drawdown would occur in response to instream flow needs in lower Icicle Creek and would likely occur annually.</p> <p>Figure 2-30 is a map that shows current and proposed shoreline changes for the Eightmile Lake Storage Restoration project. Figures 4-52 through 4-54 provide current and simulated photos based on shoreline changes proposed under the project.</p> <p>Figures 2-46, 2-47, and 2-48 are maps showing current and proposed shoreline changes for the Eightmile Storage Enhancement project, the Upper Klonaka Storage Enhancement project, and the Snow Lake Storage Enhancement project. These projects are included in Alternative 4. Figures 4-57 through 4-65 provide current and simulated photos based on shoreline changes proposed under these projects.</p>
<b>Comment Letter No. 064 - Thor Thompson</b>	
64-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 065 - Timothy Gartland</b>	
65-1	Your comment supporting wilderness protections is noted.

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65-2	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
65-3	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
65-4	Your support for the IPID Full Piping and Pump Exchange projects is noted. Your concern regarding the Eightmile Lake Storage Restoration project is noted.
65-5	<p>See response to 65-2.</p> <p>Federal reserved water rights can be established with a Congressional reservation of federal lands. These rights are limited to the purpose and intent of the land reservation. Federal reserved rights priority dates are the date of federal reservation and do not supersede senior water rights. No federal reserve water rights have been determined in these areas.</p>
65-6	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.
65-7	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter, coordination will occur at the project level for any projects that may have a permitting action required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.
65-8	See response to comment 65-6.
65-9	<p>One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW.</p> <p>The Icicle Strategy is not seeking to increase water supplies at LNFH with water from IPID's storage rights.</p>
65-10	See response to comment 65-7.
65-11	The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.
65-12	Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.

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65-13	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
65-14	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
65-15	Your comment is noted.
65-16	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 066 - Will Henson</b>	
66-1	Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.
66-2	LNFB is required for mitigation of Grand Coulee Dam and considering fish passage over Grand Coulee Dam is beyond the scope of the Icicle Work Group. The USFWS recently conducted an alternatives analysis that included the potential of removing LNFB. This report found that improving efficiency at LNFB was the best alternative. More discussion about why this was not considered in the PEIS is provided in Section 2.11.2.
66-3	Your comment is noted.
66-4	Your concerns regarding commercial tubing is noted.
<b>Comment Letter No. 067 - Will Henson (2)</b>	
67-1	Your concerns regarding commercial tubing is noted.
<b>Comment Letter No. 068 - Andrea Fisher</b>	
68-1	Your comment opposing the Icicle Strategy is noted.
<b>Comment Letter No. 069 - Charles Bagley</b>	
69-1	Your support of Alternative 2 is noted.
69-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 070 - Christopher Barchet</b>	
70-1	Your comment supporting wilderness protections is noted.
70-2	This letter was considered during the PEIS scoping phase.
<b>Comment Letter No. 071 - James Donaldson</b>	
71-1	Your comment supporting wilderness protections is noted.



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<b>Comment Letter No. 072 - Mark Curtis</b>	
72-1	Your comment in support of beaver re-introduction is noted.
<b>Comment Letter No. 073 - Melinda Mueller</b>	
73-1	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
73-2	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation. Currently, coordination with USFS on Wilderness issues occurs at IWG meetings. USFS is an active member of the IWG, and regularly attends meetings.
73-3	Each project assumes between 10 and 20 percent of the budget will go to environmental review and design. The DPEIS provides a two-year timeline for completing additional environmental review. The co-leads believe it is reasonable for NEPA review to be completed during a two-year window.  The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.
73-4	Your support for expanded conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.
73-5	The IWG does not hold any water rights, although several work group members do. Your comment is noted.
73-6	The No-action Alternative contemplates what would happen should the Icicle Strategy not be implemented, per WAC 197-11-440(5)(b)(ii). Based on discussion with Icicle Work Group members, the co-leads characterized which projects would likely proceed without an integrated water management strategy, and which project would likely not proceed. Those that would proceed regardless of the IWG's adoption of the integrated strategy were included in as the No-action Alternative. It should be noted, that although some projects may proceed if no-action is taken on the Icicle Strategy, the beneficiaries of those projects may not be the same as it would be under the Icicle Strategy.
73-7	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels and releases are currently managed for agricultural water supply. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
73-8	Your comment supporting wilderness protections is noted.

<b>Comment Letter No. 074 - Peter Fry</b>	
74-1	<p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Your preference for the No-action Alternative is noted.</p>
74-2	Your comment supporting wilderness protections is noted.
74-3	The goals of the Icicle Strategy, which are called the Guiding Principles, are described in section 1.5 of the PEIS. The primary objective is to provide increased instream flows, better water quality, and more habitat for salmonid species. Goals also include improving sustainability of LNFH, protecting fish harvest rights, improving domestic supply, improving passage, improving agricultural reliability, and complying with state federal laws.
<b>Comment Letter No. 075 - Rebecca Caulfield</b>	
75-1	Your comment supporting wilderness protections is noted.
75-2	The Icicle Strategy is proposing to spend significant funding for domestic conservation efforts. This irrigation and domestic conservation elements are included in all five action alternatives. To be responsive to concerns over lawn watering, a lawn buyback program along with other conservation measures have been added to the Domestic Conservation Project.
75-3	<p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p> <p>Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.</p>
75-4	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
75-5	One of the goals of the Icicle Strategy is improved domestic supply, along with increased instream flow, and improved conservation and habitat. Long term growth in the Icicle Subbasin and Wenatchee Basin are addressed through Chelan County and City of Leavenworth comprehensive plans and zoning.
75-6	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.

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<b>Comment Letter No. 076 - Allison Kutz</b>	
76-1	Your comment supporting wilderness protections is noted.
76-2	Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. No other projects considered under the action alternatives are expected to result in trail or campsite inundation. Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 077 - Anastasia Christman</b>	
77-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
77-2	Your comment supporting wilderness protections is noted.
77-3	Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer, but Alternative 4 was not selected as the Preferred Alternative. No other projects considered under the action alternatives are expected to result in trail or campsite inundation. Section 4.24 analyzes the socioeconomics of the five action alternatives considered in the PEIS.
<b>Comment Letter No. 078 - Barbara Gamrath</b>	
78-1	You support for the No-action Alternative is noted.
<b>Comment Letter No. 079 - Brian Telfner</b>	
79-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 080 - Brianne Vanderlinden</b>	
80-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS
80-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 081 - Brittany Granger</b>	
81-1	Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate. None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 082 - William All</b>	
82-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS
<b>Comment Letter No. 083 - Carol Sund</b>	
83-1	Your support for the No-action Alternative is noted.

<b>Comment Letter No. 084 - Carolyn Graham</b>	
84-1	Your comment supporting wilderness protections is noted.
84-2	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 085 - Cedar Hyde</b>	
85-1	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p> <p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes. Alternatives 1, 2, 4, and 5 propose projects that would modify and/or re-operate the dams at these sites.</p>
85-2	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.
<b>Comment Letter No. 086 - Christian Chabot</b>	
86-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
86-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 087 - CJ Beegle</b>	
87-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
87-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 088 - Constance Anderton</b>	
88-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
88-2	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.
<b>Comment Letter No. 089 - Craig Mabie</b>	
89-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 090 - Danielle Graham</b>	
90-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
90-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 091 - David Panozzo</b>	
91-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.

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91-2	Your opposition is noted.
<b>Comment Letter No. 092 - David Van Cleve</b>	
92-1	The City has determined in necessary to maintain their Icicle Creek diversion for redundancy purposes. Any additional water made available through the Icicle Strategy to the City of Leavenworth would be taken from the City's wellfield.
92-2	The conservation measures outlined in the WSP are a minimum commitment to conservation required by RCW 70.119A.180. The Icicle Strategy includes conservation measures that seek to exceed this minimum requirement. While the Icicle Strategy is not proposing reclaimed water at this time, it may be explored under the Domestic Conservation element. More detail regarding specific conservation projects will be developed as project level planning is initiated.
92-3	The additional water provided to the City of Leavenworth in the Icicle Strategy is intended to resolve the water right dispute in Leavenworth v. Ecology and provide for additional growth. The domestic supply goal is to meet demand to 2050 at a minimum. If the City of Leavenworth continues to increase efficiency, which is a goal of the IWG, additional water for the City of Leavenworth will provide for sustained supply for a further planning horizon.
92-4	See response to comment 92-2 and 92-3.
92-5	Domestic supply is envisioned for a combination of City of Leavenworth and Chelan County domestic water uses, which will be determined at project level review and permitting. Additionally, the City and the County have an interlocal agreement regarding reserve quantities provided for in the Wenatchee Instream Flow Rule.  Your support for developing additional water markets is noted and water marketing is a part of the Preferred Alternative.  Development is regulated by the Chelan County and City of Leavenworth's through zoning and comprehensive plans.
<b>Comment Letter No. 093 - Deanna Gill</b>	
93-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 094 - Deloa Dalby</b>	
94-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 095 - Elizbeth Vu</b>	
95-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
95-2	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.  Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.
<b>Comment Letter No. 096 - Gabriel Houle</b>	
96-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 097 - Greg Wellman</b>	
97-1	Your comment supporting wilderness protections is noted.

97-2	<p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p>
<b>Comment Letter No. 098 - Harvey Halpern</b>	
98-1	<p>Your comment supporting wilderness protections is noted.</p> <p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
<b>Comment Letter No. 099 - Jane Erickson</b>	
99-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 100 - Jeanne Poirier</b>	
100-1	<p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p> <p>The goals of the Icicle Strategy are described in section 1.5 of the PEIS. The primary objective is to provide increased instream flows, better water quality, and more habitat for salmonid species. The Guiding Principles, which are the objectives of the Icicle Strategy, are not seeking to increase water supply for irrigation uses. One of the goals is to increase agricultural reliability. To this accomplish a water markets approach was proposed by the IWG and included in all of the action alternatives considered in the PEIS.</p>
<b>Comment Letter No. 101 - Jeffrey Whittall</b>	
101-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 102 - Juliet Maurer</b>	
102-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
102-2	<p>Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer, but Alternative 4 was not selected as the Preferred Alternative. No other projects considered under the action alternatives are expected to result in trail or campsite inundation.</p> <p>Section 4.9 describes impacts to wildlife. At the programmatic level, wildlife impacts were found to be less than significant. Wildlife impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
102-3	See response to comment 102-1
<b>Comment Letter No. 103 - Karen Thomas</b>	
103-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
103-2	Your support for specific elements of the Icicle Strategy are noted.

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<b>Comment Letter No. 104 - Kathleen and Robert Nerenberg</b>	
104-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 105 - Katrina Kok</b>	
105-1	Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. No other projects considered under the action alternatives are expected to result in trail or campsite inundation.
<b>Comment Letter No. 106 - Kendra Stegner</b>	
106-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
106-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 107 - Kimberly Stachowski</b>	
107-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 108 - Lane Aasen</b>	
108-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS. Your support for wilderness protections is noted.
<b>Comment Letter No. 109 - Laura Shauger</b>	
109-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS. Your support for wilderness protections is noted.
<b>Comment Letter No. 110 - Lawrence Lewin</b>	
110-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
110-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 111 - Leann Arend</b>	
111-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
111-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 112 - Louise Suhr</b>	
112-1	Your comment supporting wilderness protections is noted.

<b>Comment Letter No. 113 - Mary Eve</b>	
113-1	<p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p> <p>The co-leads are not aware of any scientific literature that demonstrates water management or storage increases wildfires or impacts the climate of mountain environments.</p> <p>Section 4.2.4.3 analyzes erosion impacts of the alternatives and found them to be less than significant. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>Climate change, including alternative efficacy and refill reliability for the Alpine Lake reservoirs is included in Section 4.13 and Appendix F. Refill reliability is not expected to significantly change.</p>
<b>Comment Letter No. 114 - Matt Busch</b>	
114-1	<p>Impacts to ecosystem resources and recreation are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. No other projects considered under the action alternatives are expected to result in trail or campsite inundation. This is described in Section 4.15.</p> <p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
<b>Comment Letter No. 115 - Mattias Huhta</b>	
115-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 116 - Michael Schemmel</b>	
116-1	<p>Your comment supporting wilderness protections is noted.</p> <p>Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. No other projects considered under the action alternatives are expected to result in trail or campsite inundation.</p>
116-2	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p>
<b>Comment Letter No. 117 - Michael Wyant</b>	
117-1	Your support for Alternative 1 is noted.
117-2	Your secondary support for Alternative 2 is noted.
117-3	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.



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117-4	Your support of IPID pump exchange projects is noted.
117-5	Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.
<b>Comment Letter No. 118 - Michelle Privat Obermeyer</b>	
118-1	Your support of the WTA and Mountaineers comment letter is noted.
<b>Comment Letter No. 119 - Mike Gundlach</b>	
119-1	Your concerns regarding storage enhancement projects in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
119-2	Impacts to ecosystem resources and recreation are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.  Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.
119-3	See response to comment 119-2
119-4	Your support of collecting rainwater is noted.
119-5	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 120 - Misa Heater</b>	
120-1	Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. No other projects considered under the action alternatives are expected to result in trail or campsite inundation. There are no anticipated impacts to climbing sites in the Lower Snow Creek area. Recreational impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 121 - Pat Siggs</b>	
121-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
121-2	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative.
<b>Comment Letter No. 122 - Patrick Podenski</b>	
122-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.

<b>Comment Letter No. 123 - Peter Dunau</b>	
123-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
123-2	Impacts to Recreation are described in Sections 4.15. Recreational Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate. USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.
<b>Comment Letter No. 124 - Peter Polson</b>	
124-1	Your concerns regarding storage enhancement projects in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
124-2	Your comment supporting wilderness protections is noted.
124-3	Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference. However, based on the goals established in the Guiding Principles (section 1.5), conservation alone cannot meet the objectives of the IWG.
<b>Comment Letter No. 125 - Philip Evans</b>	
125-1	Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. This seasonal inundation would occur prior to peak backpacking season in the area. No other projects considered under the action alternatives are expected to result in trail or campsite inundation. There are no anticipated impacts to climbing sites in the Lower Snow Creek area. Recreational impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate. Your concerns regarding storage enhancement projects in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 126 - Prithvi Shylendra</b>	
126-1	Your concerns regarding storage enhancement projects in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
126-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 127 - Rebecca Walton</b>	
127-1	Impacts to ecosystem resources and recreation are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate. Your concerns regarding specific projects in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
127-2	See response to comment 127-1.
127-3	Your support for specific elements of the Icicle Strategy are noted.

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<b>Comment Letter No. 128 - Rebecca Leiter</b>	
128-1	Your comment supporting wilderness protections is noted.
128-2	Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.
128-3	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 129 - Robert Werth</b>	
129-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 130 - Robert Yates</b>	
130-1	Your comment supporting wilderness protections is noted. Impacts to wilderness character and recreation are described in Sections 4.17 and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Resource impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 131 - Roberta de Regt</b>	
131-1	Your comment supporting wilderness protections is noted.
131-2	Your opposition to the Icicle Strategy is noted.
<b>Comment Letter No. 132 - Robin Buxton</b>	
132-1	Your comment supporting wilderness protections is noted. A discussion of baseline conditions of the water bodies analyzed in the PEIS is provided in Section 3.3.
132-2	Your support for expanded conservation measures is noted. All five action alternatives considered in the PEIS include domestic and agricultural water conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.
132-3	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 133 - Ronald Harden</b>	
133-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted. Your support for specific elements of the Icicle Strategy are noted. Your support of additional alternatives or adoption of the No-action Alternative is noted.
<b>Comment Letter No. 134 - Sandra Ciske</b>	
134-1	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
134-2	Your support for specific elements of the Icicle Strategy are noted.

<b>Comment Letter No. 135 - Sara Papanikolaou</b>	
135-1	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
135-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 136 - Sarah Leyrer</b>	
136-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 137 - Stefanie Dirks</b>	
137-1	<p>Your opposition to the storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>The PEIS reviews four other action alternatives that were developed to meet various goals. These alternatives are described in detail throughout Chapter 2.</p> <p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake from being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p>
137-2	Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
137-3	Your comment supporting wilderness protections is noted.
137-4	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p> <p>See response to comment 137-1.</p>
137-5	<p>Square, Lower Klonaquia, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.</p>
<b>Comment Letter No. 138 - Steve Swenson</b>	
138-1	Your comment supporting wilderness protections is noted.

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138-2	Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 139 - Steven Cox</b>	
139-1	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 140 - Steven Jones</b>	
140-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 141 - Timothy Hall</b>	
141-1	As described in section 1.5, one of the goals of the Icicle Strategy is improved domestic supply, along with increased instream flow, and improved conservation and habitat. Long term growth in the Icicle Subbasin and Wenatchee Basin, and the environmental impacts thereof are addressed through Chelan County and City of Leavenworth comprehensive plans and zoning.
<b>Comment Letter No. 142 - Tina Thompson</b>	
142-1	Your support of the No-action Alternative is noted.
142-2	Your comment supporting wilderness protections is noted.
142-3	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p> <p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p>
<b>Comment Letter No. 143 - Alan Moen</b>	
143-1	<p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Alternative elements that focus on storage reoperation and dam modification are intended to increase streamflow for salmonids in lower Icicle Creek and improve reliability of the domestic water supply.</p>
143-2	Your support for expanded conservation measures is noted. Agricultural conservation is included as an element in the five action alternatives proposed under the Icicle Strategy. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.

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143-3	Your comment supporting wilderness protections is noted.
143-4	One of the goals of the Icicle Strategy is improved domestic supply, along with increased instream flow, and improved conservation and habitat. Long term growth in the Icicle Subbasin and Wenatchee Basin, and the environmental impacts thereof are addressed through Chelan County and City of Leavenworth comprehensive plans and zoning.
143-5	Your support for expanded conservation measures is noted. All five action alternatives considered in the PEIS include domestic and agricultural conservation. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2 of the FPEIS.
143-6	See response to comment 143-3.
143-7	Metering is required for all major diverters on Icicle Creek.
143-8	See response to comment 143-1 and 143-3.
<b>Comment Letter No. 144 - Alex Bond</b>	
144-1	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p> <p>Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 145 - Alexander Phillips</b>	
145-1	Your comment has been included as part of the public record.
<b>Comment Letter No. 146 - Allison Shaw</b>	
146-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 147 - Andrea Riley</b>	
147-1	<p>Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Alternatives 1, 2, 4, and 5 include elements of dam modification to either restore or increase storage and/or modifying the current management on these lakes to increase stream flow and increase domestic water reliability.</p> <p>Your comment opposed to dams is noted.</p>
<b>Comment Letter No. 148 - Ann Crosby</b>	
148-1	Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.
148-2	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.

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148-3	<p>Your comment supporting wilderness protections is noted.</p> <p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p>
148-4	<p>Your support for expanded conservation measures is noted. All five action alternatives include conservation projects. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.</p>
148-5	<p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p> <p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.</p> <p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.</p> <p>Impacts to Threatened and Endangered Species are described in Sections 4.10. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts to Threatened and Endangered Species will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate. ESA compliance requirements are discussed in Table 5-2.</p> <p>Per WAC 197-11-406, an EIS should occur as early as possible to meaningfully contribute to the decision-making process. Additionally, this is a programmatic level review that is intended to provide a comprehensive overview to help decision makers select one of several programmatic alternatives (WAC 197-11-704(2)(b)). Some elements of the project are not known at this time. However, the DPEIS does provide as much information as possible regarding impacts at the programmatic level. Project-level environmental review will occur for all projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>Your comment supporting wilderness protections is noted.</p>
148-6	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p>

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148-7	Your comment supporting wilderness protections is noted. See response to comment 148-4.
<b>Comment Letter No. 149 - Bruce Williams</b>	
149-1	Your support of the No-action alternative is noted.
149-2	Your concern about the Icicle Strategy cost is noted. Alternative costs and general costs of water supply projects is provided for each alternative in Chapter 2.
149-3	Conservation elements for domestic, agricultural, and LNFH use are included in all action alternatives. Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. However, it should be noted that conservation is generally more expensive per unit of water than other methods of water supply development and that conservation only will not meet the Guiding Principles described in section 1.5 of the PEIS.
149-4	See response to comment 149-3.
149-5	IPID has worked with an independent consultant to release a CWCP. This plan was recently released and is incorporated into the PEIS by reference.
149-6	See response to comment 149-5.
149-7	The City has a current conservation program in its waters system plan. The domestic conservation element of the Icicle Strategy is intended to allow for the design and implementation of conservation measures. More detail regarding aspects of this element have been added to the FPEIS in Chapter 2. Additional detail will be developed during project planning.
149-8	Conservation elements for domestic, agricultural, and LNFH use are included in all action alternatives.
149-9	See response to comment 149-7. The IPID CWCP includes more detailed information about how much water can be saved from IPID with conservation improvements. Based on this document, it appears IPID could save 18.1 cfs with an investment of up to \$27 million. The unit price of this would be up to \$1.5 million/cfs. If IPID initiated all of these conservation upgrade and all other major diverters on Icicle Creek reduced water use by 50-percent, the instream flow goals described in the 1.5 of the PEIS would still not be achievable.
149-10	Your comment supporting wilderness protections is noted.
149-11	See response to comment 149-1.
<b>Comment Letter No. 150 - Carina Wedel</b>	
150-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 151 - Carolyn Waldow</b>	
151-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5.
151-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 152 - Cathy Craver</b>	
152-1	Your concern regarding storage enhancement elements included in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
152-2	Your support for specific elements of the Icicle Strategy are noted.



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<b>Comment Letter No. 153 - Charles Raymond</b>	
153-1	Your comment supporting wilderness protections is noted.
153-2	<p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.</p> <p>If a project is determined to be impermissible under federal or state law, that project will be replaced by another project to meet the Guiding Principles, as described in the Operating Procedures for the Icicle Work Group.</p>
153-3	Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review. The co-leads will continue to engage with the USFS to ensure compliance with all applicable regulations in the ALWA.
153-4	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
153-5	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>Your concerns regarding the Eightmile Lake Storage Restoration project are noted. See responses to comment 153-3 and 153-4.</p>
153-6	Your concerns regarding the Alpine Lakes Optimization, Modernization, and Automation project are noted. See response to comment 153-3.
153-7	Your support for pump exchange projects is noted.
153-8	These conservation projects are included in all action alternatives considered in the PEIS. Your support for conservation projects is noted.
153-9	The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations.
153-10	Your comments in support of the Alpine Lakes Optimization, Modernization, and Automation Project are noted.
153-11	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
153-12	See response to comment 153-5.
153-13	Your support for Alternative 5 is noted.

153-14	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p> <p>See response to comments 153-2 and 153-4.</p>
153-15	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p>
<b>Comment Letter No. 154 - Chris Lish</b>	
154-1	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.</p>
154-2	Your comment supporting wilderness protections is noted.
154-3	<p>Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
154-4	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
154-5	<p>Your support for Alternative 5 and the Full IPID Piping and Pump Exchange are noted. The efficacy of the various alternatives under climate change scenarios are discussed at the programmatic level in section 4.13 and Appendix F of the DPEIS. All action alternatives are expected to reach instream flow goals under low, medium, and high climate change scenarios in 2080, except Alternative 3.</p>

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154-6	<p>One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW.</p> <p>The Icicle Strategy is not seeking to increase water supplies at LNFH with water from IPID's storage rights.</p>
154-7	<p>The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.</p> <p>Each project assumes between 10 and 20 percent of the budget will go to environmental review and design. The DPEIS provides a two-year timeline for completing additional environmental review. The co-leads believe it is reasonable for NEPA review to be completed during a two-year window.</p> <p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.</p>
154-8	<p>See response to comment 154-7.</p> <p>The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Project level of detail regarding permitting and NEPA integration will be provided during project level review.</p>
154-9	<p>The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.</p>
154-10	See response to comment 154-1.
<b>Comment Letter No. 155 - Claire Giordano</b>	
155-1	<p>Impacts to ecosystem resources and wilderness character are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.</p> <p>If a project is determined to be impermissible under federal or state law, that project will be replaced by another project to meet the Guiding Principles, as described in the Operating Procedures for the Icicle Work Group.</p>
155-2	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>

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155-3	Based on the GIS data provided by the USFS, it appears that the trail along the northside of Eightmile Lake and documented backcountry campsites are above the proposed highwater level of the Eightmile Lake Storage Restoration project. A more specific look at impacts and mitigation will occur at project-level environmental review.
155-4	Your support of Alternative 3 is noted. Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.
155-5	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 156 - Cliff Leight</b>	
156-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 157 - David Foster</b>	
157-1	Your support for specific elements of the Icicle Strategy are noted.
157-2	Your concern regarding storage enhancement elements described in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 158 - Diana Rosenberg</b>	
158-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 159 - Diana Timpson</b>	
159-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 160 - Donald Mazzola</b>	
160-1	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.
160-2	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
160-3	Your comment supporting wilderness protections is noted.
160-4	Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.
160-5	Your support of the No-action Alternative is noted.
<b>Comment Letter No. 161 - Donald Potter</b>	
161-1	Your comment is noted.

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161-2	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation. Currently, coordination with USFS on Wilderness issues occurs at IWG meetings. USFS is an active member of the IWG, and regularly attends meetings.
161-3	Impacts to Wilderness Character are described in Sections 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.
161-4	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. Agricultural conservation is included as an element in the five action alternatives proposed under the Icicle Strategy. IPID conservation goals have been developed and are described in the newly released CWCP, which is incorporated into the FPIES by reference.
<b>Comment Letter No. 162 - Edward Henderson</b>	
	This is a duplicate submission. See comment and responses to comment letter 36.
<b>Comment Letter No. 163 - Elaine Badejo</b>	
163-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 164 - Erik Hagstrom</b>	
164-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.  Impacts to ecosystem resources and recreation are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate
<b>Comment Letter No. 165 - Evan Schelter</b>	
165-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.  Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
165-2	Your comment is noted.
<b>Comment Letter No. 166 - Fabian Frank</b>	
166-1	Your comment supporting wilderness protections is noted.
166-2	Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.

166-3	See response to comment 166-1.
<b>Comment Letter No. 167 - Francis and Gerald Conley</b>	
167-1	Your comment supporting wilderness protections is noted. Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.
167-2	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5.</p> <p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes. Many of the alternatives in the PEIS propose modification and reoperation of these dams/lakes to increase streamflow for salmonid benefit. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.</p> <p>Section 4.13 and appendix F provide analysis and discussion of climate change in the Icicle Creek Subbasin, specifically in the lower reaches of Icicle Creek. These sections also evaluate the efficacy of the alternatives under modeled climate change condition.</p>
<b>Comment Letter No. 168 - Greg Shannon</b>	
168-1	Per WAC 197-11-406, an EIS should occur as early as possible to meaningfully contribute to the decision-making process. Additionally, this is a programmatic level review that is intended to provide a comprehensive overview to help decision makers select one of several programmatic alternatives (WAC 197-11-704(2)(b)). Some elements of the project are not known at this time. However, the DPEIS does provide as much information as possible regarding impacts at the programmatic level. Project-level environmental review will occur for all projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
168-2	USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.
168-3	Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.
168-4	<p>Any water quantity greater than what is authorized in water rights would require additional water right authority. Text will be modified in Section 4.6.5 to provide clarity to this issue. However, storage enhancement projects are not included in the Preferred Alternative.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
168-5	The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.
168-6	Your support for the IPID Full Piping and Pump Exchange project is noted.

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168-7	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
168-8	Section 4.13 and appendix F provide analysis and discussion of climate change in the Icicle Creek Subbasin, specifically in the lower reaches of Icicle Creek. These sections also evaluate the efficacy of the alternatives under modeled climate change condition. The level of detail regarding climate change is appropriate for this programmatic review.
168-9	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
168-10	Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 169 - Gregory Sheehan</b>	
169-1	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 170 - Heather Heffner</b>	
170-1	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
170-2	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 171 - Howard Nebeck</b>	
171-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 172 - Isaac Gundersen</b>	
172-1	Your comment supporting wilderness protections is noted. Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
172-2	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS. See response to comment 172-1.
172-3	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.

<b>Comment Letter No. 173 - Jacqueline Shin</b>	
173-1	<p>Your concerns regarding the Icicle Strategy are noted.</p> <p>Impacts to wildlife are described in Sections 4.9. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Resource impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>The PEIS reviewed five different action alternatives and a No-action Alternative.</p>
<b>Comment Letter No. 174 - Jana Hobbs</b>	
174-1	<p>Your comment supporting wilderness protections is noted and your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>The Icicle Strategy seeks to increase water reliability for junior irrigators through a water market element that is included in all action alternatives. Water made available through reoperation and modification to storage would be manage for instream flow benefit and to meet projected domestic water supply needs.</p>
174-2	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>Impacts to shorelines and vegetation are described in Sections 4.18 and 4.8. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Resource impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
174-3	Your support for the modernizing existing facilities is noted.
174-4	<p>The priority species list was prepared with information provided by WDFW. To identify and assess vegetation, wetlands, wildlife, and threatened and endangered species within the Study Area, information was gathered from a variety of sources including agency information, existing literature, resource maps, and aerial photographs. Reconnaissance-level site visits to five of the Alpine Lakes were also performed on July 11 through July 15, 2016.</p> <p>Impacts these resources will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
174-5	See response to comment 174-4.
174-6	Your comment supporting wilderness protections is noted.
174-7	Your comment is noted. The City of Leavenworth is an active member of the IWG, and regularly attends meetings.
174-8	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
174-9	Your support for the IPID Full Piping and Pump Exchange project is noted.
174-10	See response to comment 174-6.
174-11	The goals of the Icicle Strategy are described in section 1.5 of the PEIS. The primary objective is to provide increased instream flows, better water quality, and more habitat for salmonid species. The Guiding Principles, which are the objectives of the Icicle Strategy, are not seeking to increase water supply for irrigation uses. One of the goals is to increase agricultural reliability. To this accomplish a water markets approach was proposed by the IWG and included in all of the action alternatives considered in the PEIS.



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<b>Comment Letter No. 175 - Janna Treisman</b>	
175-1	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
175-2	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
175-3	Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.
175-4	The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issues as they move to project level review and implementation.
175-5	See response to comment 175-1. One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW. The Icicle Strategy is not seeking to increase water supplies at LNFH with water from IPID's storage rights.
175-6	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
175-7	Your comment in support of the Alpine Lakes Optimization, Modernization, and Automation Project is noted.
175-8	Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review. Your support of using hikers to change head gate settings at the dams is noted.
175-9	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
175-10	Your support for the IPID Full Piping and Pump Exchange project are noted.

175-11	The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.
175-12	Your support for conservation upgrades and LNFH are noted.
<b>Comment Letter No. 176 - Jena Gilman</b>	
176-1	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
176-2	At this point, it has not been determined if all equipment will be flown in or if any equipment will be walked in for the Eightmile Lake Storage Restoration project. It is possible that a combination of these methods is used. If equipment is walked in, these impacts will be assessed at the project level environmental review.
176-3	The thought behind this statement is that stakeholders in the IWG would hold fellow project proponents to additional standards during project design because of the diverse interests of the group. Where the irrigation district itself may not be concerned with the aesthetics of a project, the IWG as a whole would be. The project permitting process may not require a project to be designed to blend in naturally with the surrounds, as was the case with the Nada Dam reconstruction that occurred in 2009. The quoted language in the EIS does not mean to suggest that individual project permitting standards would be any different depending on whether a project is part of the IWG or not.
176-4	The bathtub rings at the lakes are visible now. Alternative 4 was not selected, which includes alterations at Snow Lake. Restoration of Eightmile Lake is included in the Preferred Alternative, but will be subject to project level environmental review, NEPA review, and project level permitting as appropriate.
176-5	The Recreation section (section 4.15) focuses on impacts that could permanently alter the ability to use the recreation resource. While the Aesthetics section focuses more on user experience. However, there are several cross references in the Recreation section to the Aesthetic section. We will revise the Recreation introduction paragraph to make clear the focus of the Recreation section and where visual impacts are described.
176-6	Mitigation can take many forms per WAC 197-11-768, including actions to minimize impacts, or monitor impacts and take appropriate corrective measures if necessary. Often, these are actions required through permit conditions and regulatory requirements. As such, compliance with the terms and conditions of local, state, and federal regulations minimizes potential impacts of a proposal.  The intent of the PEIS is to provide as much detail regarding impacts and mitigation as is appropriate at this stage in planning and at the programmatic level. A more specific look at impacts and mitigation will occur at project-level environmental review.
176-7	Your comment regarding chapter organization is noted.
176-8	It is incorrect that the primary focus of the Icicle Strategy is on future domestic supply for the City. The primary focus of the Icicle Strategy is on instream flow and fish habitat based on dollars spent and water allocated, although other elements of the Guiding Principles are equally important. Information regarding the purpose and need for the Icicle Strategy, and background about the Icicle Creek Subbasin are including in Chapter 1. Section 1.6 describes past activities in the subbasin including watershed planning and instream flow and passage studies. Section 1.8 describes litigation that the Icicle Strategy is attempting to resolve. Chelan County and the City of Leavenworth manage growth and development through comprehensive planning, which is discussed in section 3.16.

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176-9	Your comment in support of the No-action Alternative is noted.
<b>Comment Letter No. 177 - Jeremy Jostad</b>	
177-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 178 - Jessica O'Sell</b>	
178-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 179 - Jim Perkins</b>	
179-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
179-2	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.
<b>Comment Letter No. 180 - Joan Frazee</b>	
180-1	Your concern regarding natural resource impacts is noted. Discussion of natural resource impacts are included throughout Chapter 4. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
180-2	It is anticipated that IPID trips to the ALWA for operation and maintenance of their facilities would be reduced by the updated proposed in the Alpine Lakes Optimization, Modernization, and Automation project. However, the co-leads recognize that on-site operation and maintenance would not be completely eliminated.
180-3	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
180-4	Your comments regarding noxious weeds are noted. During a reconnaissance survey, no noxious weed species were observed. No data specific to the Alpine Lakes Area as defined in Chapter 3 was found in the Aquatic Plants database or the weed list. Vegetation Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 181 - John Pollock</b>	
181-1	The PEIS includes five action alternatives and one No-action Alternative. Your comment supporting wilderness protections is noted.

<b>Comment Letter No. 182 - Kathleen Hurley</b>	
182-1	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.</p> <p>Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.</p>
182-2	<p>Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational Impacts will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
182-3	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
182-4	<p>Your support for specific elements of the Icicle Strategy are noted.</p>
<b>Comment Letter No. 183 - Kathleen Shannon</b>	
183-1	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p> <p>Your comment about adding wilderness protection to the Guiding Principles is noted. While a EIS under SEPA does not specifically need to assess impacts to wilderness, the PEIS does a programmatic level analysis of wilderness character impacts in section 4.17.</p>
183-2	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
183-3	<p>Your comment is noted.</p>
<b>Comment Letter No. 184 - Kathleen Ward</b>	
184-1	<p>The Icicle Work Group would welcome additional members that represent the conservation or recreation communities, including ALPS. More detailed information about adding members to the Icicle Work Group is available in the Operating Procedures, which are incorporated into the FPEIS by reference.</p> <p>The PEIS provides an overview of impacts at the Alpine Lakes and streams that they feed at the programmatic level. More detailed analysis of project level impacts will occur for projects in the Preferred Alternative where appropriate.</p>
184-2	<p>Growth management, zoning, and planning is guided by Chelan County and the City of Leavenworth. The Icicle workgroup seeks to meet domestic supply projections that have been developed through watershed planning, the City's water System Plan, and the State of Washington's Office of Financial Management. This is discussed in more detail in section 3.16 and 3.6 of the PEIS.</p>
<b>Comment Letter No. 185 - Kathy Haviland</b>	
185-1	<p>Your comment supporting wilderness protections is noted.</p>

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185-2	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p> <p>Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational impacts will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 186 - Kelsie Maney</b>	
186-1	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 187 - Kevin Farrell</b>	
187-1	<p>Instream flows and habitat are a top priority of the Icicle Strategy. The goals of the Icicle Strategy, known as the Guiding Principles, is detailed in section 1.5.</p>
187-2	<p>Your comment regarding tradition is noted.</p>
187-3	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
187-4	<p>Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.</p>
187-5	<p>Your comment supporting wilderness protections is noted.</p>
187-6	<p>See response to comment 187-3.</p> <p>Your support for pump exchange projects is noted.</p>
187-7	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy. More specific project details will be developed as projects move to design and project level environmental review.</p>
187-8	<p>Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.</p>
187-9	<p>Your comment on timeline is noted.</p>
187-10	<p>Your support for continued monitoring, data collection, and public outreach is noted.</p>
<b>Comment Letter No. 188 - Kyle Kohlwes</b>	
188-1	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 189 - Lael White</b>	
189-1	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p>

<b>Comment Letter No. 190 - Laurence Leveen</b>	
190-1	Your comment supporting wilderness protections is noted.
190-2	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
190-3	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which is incorporated in the FPEIS by reference.
190-4	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 191 - Lisa Bellefond</b>	
191-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 192 - Marjorie Fields</b>	
192-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 193 - Mathias Ricken</b>	
193-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
193-2	Your support for specific elements of the Icicle Strategy are noted.
193-3	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
193-4	Impacts to Recreation are described in Sections 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Recreational impacts will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate. Your concern regarding impacts of increased storage to trails and campsites is noted. Enhancement projects considered in Alternative 4 would likely result in seasonal inundation of trails and campsites. Alternative 4 was not selected as the Preferred Alternative. At this point, no inundation is expected to result from the Eightmile Lake Storage Restoration project.
<b>Comment Letter No. 194 - Megan Johnson</b>	
194-1	Your comment supporting wilderness protections is noted.

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<b>Comment Letter No. 195 - Meghan Young</b>	
195-1	Your comment supporting wilderness protections is noted. Impacts to Wildlife are described in Sections 4.9. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Wildlife impacts will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 196 - Michael Weinberg</b>	
196-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 197 - Mitchell McCommons</b>	
197-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 198 - Monica Charpentier</b>	
198-1	Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 199 - Nancy Zahn</b>	
199-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
199-2	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
199-3	<p>Your concern regarding Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p> <p>Per WAC 197-11-793, the purpose of SEPA scoping is to identify potential impacts and alternatives to consider in the EIS. During the scoping process for the Icicle Strategy, some comments reflected a desire for more storage and/or increased streamflow. Inclusion of Alternative 4 in the DPEIS was in response to those comments.</p>
199-4	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p> <p>Your support of the IPID Full Piping and Pump Exchange project is noted.</p>
199-5	See response to comment 199-2.

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199-6	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter, coordination will occur at the project level for any projects that may have a permitting action required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.
199-7	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.
199-8	One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW.
199-9	<p>The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. The USFS is an active member of the IWG and regularly attends meetings. Per the USFS comment letter, coordination will occur at the project level for any projects that may have a permitting action required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.</p> <p>The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.</p> <p>Each project assumes between 10 and 20 percent of the budget will go to environmental review and design. The PEIS provides a two-year timeline for completing additional environmental review. The co-leads believe it is reasonable for NEPA review to be completed during a two-year window.</p>
199-10	Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.
199-11	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases will not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
199-12	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.
199-13	Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.



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199-14	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 200 - Nete Olson</b>	
200-1	Per WAC 197-11-793, the purpose of SEPA scoping is to identify potential impacts and alternatives to consider in the EIS. During the scoping process for the Icicle Strategy, some comments reflected a desire for more storage and/or increased streamflow. Inclusion of Alternative 4 in the DPEIS was in response to those comments.
200-2	Your comment supporting wilderness protections is noted. A programmatic EIS is not a plan, rather it is a high-level analysis of the probable environmental impacts of implementing a plan. The PEIS provided as detailed analysis as possible based on the information available. Some of this information was limited because of where the various alternatives and elements are in the planning process.
200-3	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
200-4	The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter, coordination will occur at the project level for any projects that may have a permitting action required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.
200-5	One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW.
200-6	See response to comment 200-1. Your concerns regarding to Alternative 4 are noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
200-7	The co-leads provided for alternatives that were responsive to comments received during scoping that ranged from not wanting projects in the ALWA to be included to increased storage options. Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.

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200-8	See responses to comment 200-6. See response to comment 200-3. See response to comment 200-5.
200-9	See response to comment 200-7.
200-10	The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.  Project level analysis of Wilderness Act requirements, including minimum tools analysis, will be conducted during project level environmental review.
200-11	Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which is incorporated in the FPEIS by reference.
200-12	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 201 - Patrick Conn</b>	
201-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 202 - Rachel Nunez</b>	
202-1	Your comment supporting wilderness protections is noted.
202-2	Your concerns regarding to Alternative 4 are noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
202-3	Your support for specific elements of the Icicle Strategy are noted.
<b>Comment Letter No. 203 - Rachel Youngberg</b>	
203-1	Your concerns regarding to Alternative 4 are noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
203-2	Impacts to vegetation, wildlife, and water quality are described at the programmatic level in Sections 4.8, 4.9, and 4.5 respectively. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts on these resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
203-3	Impacts to recreation and wilderness are described in 4.15 and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts on these resources will undergo project level analysis for projects in the Preferred Alternative, which will include more detailed analysis where appropriate.  See response to comment 203-1.

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<b>Comment Letter No. 204 - Richard Curtis</b>	
204-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
204-2	<p>The PEIS reviews the impacts of the alternatives on recreation in section 4.15 at the programmatic level. Recreational impacts will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>The lakes involved in Icicle Strategy have already been developed as reservoirs and are used for agricultural purposes. The action alternatives considered in the PEIS seek to change operation or management to increase stream flow and meet the Guiding Principles described in section 1.5 of the document. Alternatives 1, 4 and 5 propose modernizing the outlet structures on these lakes, so that they can be remotely managed for instream flow and fish benefit. Alternatives 1, 2, and 5 proposing restoring Eightmile Lake Dam to its original height to provide increase stream flow and domestic supply. Alternative 4 proposes increasing storage for instream flow and fish benefit. All alternatives include a water market to increase agricultural reliability. A complete discussion of the alternatives is provided in Chapter 2.</p>
204-3	<p>The efficacy of the alternatives under climate change is analyzed in Section 4.13 of the PEIS.</p> <p>Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.</p> <p>See response to comment 204-1.</p>
204-4	Your support for specific elements of the Icicle Strategy are noted.
204-5	Your concerns regarding to Alternative 4 are noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
204-6	See response to comment 204-2.
<b>Comment Letter No. 205 - Richard Forbs</b>	
205-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
205-2	Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.
205-3	Conservation at LNFH is included as an element in the five action alternatives proposed under the Icicle Strategy. LNFH is required for mitigation of Grand Coulee Dam and considering fish passage over Grand Coulee Dam is beyond the scope of the Icicle Work Group. The USFWS recently conducted an alternatives analysis that included the potential of removing LNFH. This report found that improving efficiency at LNFH was the best alternative. More discussion about why this was not considered in the PEIS is provided in Section 2.11.2.
205-4	Your comment supporting wilderness protections is noted.

<b>Comment Letter No. 206 - Richard Forbs (2)</b>	
	Duplicate Letter. See Comment Letter No. 205
<b>Comment Letter No. 207 - Richard Haydon</b>	
207-1	This PEIS was prepared under SEPA regulations detailed in Chapter 197-11 WAC. The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. A more detailed analysis of the specific projects will occur during project level analysis where appropriate. NEPA integration is discussed in Section 1.9. NEPA will be performed on projects with a federal permitting or funding nexus.
207-2	While the PEIS provided as much detail as possible given the programmatic nature of the review and the current level of detail known about the various alternatives, it is not intended to be a site-specific, project level analysis. A more detailed analysis of the specific projects will occur during project level analysis where appropriate.
207-3	This is a programmatic environmental review prepared in accordance with WAC 197-11-442. Section 1.9 details the type of environmental review that was conducted under the PEIS, as well as the time-line for design, feasibility, and project level review.
207-4	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws. The PEIS reviewed wilderness regulations and impacts in sections 3.17 and 4.17 respectively, and other land use regulations and impacts in sections 3.16 and 4.16 respectively, at the programmatic level. A more detailed analysis of the specific projects will occur during project level analysis where appropriate.
207-5	The DPEIS discusses water right authority and state water law in Sections 3.6 and 4.6 at the programmatic level. Additional review of water rights will occur at project level review or permitting.  Indian Trust Assets and Fishing Harvest are described in Section 3.23 and 4.23. The Yakama Nation and the Confederated Tribes of the Colville Reservation, with the Wentachi band is a member of, are active members of the Icicle Work Group, and have provided feedback and guidance of the development of the Icicle Strategy.
207-6	This PEIS was developed under SEPA, not NEPA. Your concern regarding the analysis related to water rights and federal wilderness laws relative to Eightmile Lake is noted.
207-7	As discussed in responses above, this is a programmatic EIS that has been developed under the SEPA rules and regulations. The DPEIS complies with the requirements of Chapter 197-11 WAC. A more detailed analysis of the specific projects will occur during project level analysis where appropriate.
<b>Comment Letter No. 208 - Richard Korry</b>	
208-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
208-2	Your concerns regarding Alternative 4 are noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.

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208-3	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 209 - Richard Noll</b>	
209-1	This letter does not contain comments relevant to the Icicle Creek Strategy DPEIS.
<b>Comment Letter No. 210 - Richard Rutz</b>	
210-1	Your comment supporting wilderness protections is noted.
210-2	The purpose of the PEIS is to assess the probable environmental impacts to existing conditions of initiating an integrated water resource management plan for the Icicle Creek subbasin that focuses on the development of a suite of projects to solve instream flow and water supply issues in Icicle Creek. As described in section 2.2, alternatives for the Icicle Strategy focused on the objectives of the Icicle Work Group, known as the Guiding Principles (Section 1.5) and feedback provided during SEPA Scoping. The objectives of the Icicle Work Group are not specifically dam removal or wilderness restoration, so these actions were not included in the suite of alternatives considered.
210-3	Your comment in support of dam removal is noted. The PEIS' responsibility under Chapter 197-11 WAC is to analyze the probable environmental impacts to baseline conditions (i.e. existing environmental conditions) of implementing a plan or policy. SEPA does not require proposal proponents to improve existing environmental conditions. Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.
210-4	The PEIS reviews the impacts of the various alternatives on wilderness (section 4.17), fish (section 4.7), wildlife (section 4.9), recreation (section 4.15), and aesthetics (section 4.11) in as much detail as is appropriate for a programmatic evaluation. Impacts will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
210-5	The No-action Alternative contemplates the likely outcomes if the Icicle Strategy is not adopted. The co-leads discussed stakeholder intent with IWG members to determine what would likely occur if the Icicle Strategy were not adopted. The No-action Alternative describes in section 2.3 is the result of these discussions.
210-6	Alternative 1, 2, and 5 do not propose increasing storage water rights. They propose using the rights granted to IPID between 1920 and 1940 and restoring Eightmile dam to its original height before overtopping eroded part of the dam at some point in the 1990s or 2000s. Alternative 4 would require additional storage water rights be issued. That process would be regulated by state and federal permitting and wilderness laws. However, Alternative 4 has not been selected as the Preferred Alternative.
210-7	Per WAC 197-11-442, a PEIS is a document that analyzes probable environmental impacts of implementing a plan or policy. The Icicle Strategy PEIS analyzes the probable impacts of implementing a comprehensive water management strategy in Icicle Creek Subbasin. The document itself does not have or cause environmental impacts.

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210-8	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
210-9	Your concerns regarding Alternative 4 are noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
210-10	Your support for specific elements of the Icicle Strategy are noted.
210-11	A Programmatic SEPA review was launched at the earliest possible point in programmatic development to allow decision making to be guiding by the environmental review process. The level of analysis and detail in the PEIS is appropriate given the programmatic nature of the document and the amount of detail known at this time. Opportunities for project level analysis would occur during project level review in the future. Table 5-2 provides probable permitting and regulatory requirements for the various alternatives.
210-12	<p>The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions of the watershed, including water resources, water quality, shoreline, vegetation, and fish and wildlife are located in Chapter 3. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts to watershed function of increased frequency of releases will occur during project level analysis where appropriate.</p> <p>Your support for expanded conservation measures is noted. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
210-13	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p> <p>Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.</p>
210-14	See response to comment 210-3.
210-15	Your comment supporting wilderness protections is noted.

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210-16	The PEIS meets the requirements of a non-project environmental review, as described in WAC 197-11-442. An overview of applicable wilderness regulations is described in Section 3.17 and wilderness impacts are discussed section 4.17. However, the intent of this document is to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. The co-leads will coordinate with the USFS on specific wilderness area requirements. Per the USFS comment letter, this coordination will occur at the project level for any projects that may have a permitting action required by USFS.
<b>Comment Letter No. 211 - Robert Metzger</b>	
211-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 212 - Scott Presho</b>	
212-1	Alternative 1, 2, and 5 do not propose increasing storage water rights. They propose using the rights granted to IPID between 1920 and 1940. Alternative 4 would require additional storage water rights be issued. That process would be regulated by state and federal permitting laws. However, Alternative 4 has not been selected as the Preferred Alternative.
212-2	Your support for expanded conservation measures is noted. Additional conservation detail has been added to the Domestic Conservation Project, as described in Chapter 2. This expanded description includes a lawn buyback program to address concerns raised about lawn watering in the area. More details regarding conservation measures and savings will emerge during project level planning. The current program focuses on the programmatic impacts of increasing funding on conservation measures by \$1 million.
212-3	See response to comment 212-3.
<b>Comment Letter No. 213 - Steve Uyenishi</b>	
213-1	This letter does not contain comments relevant to the Icicle Creek Strategy DPEIS.
<b>Comment Letter No. 214 - Tami Rust</b>	
214-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 215 - Teresa Catford</b>	
215-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 216 - Terri and Ronald Jones</b>	
216-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 217 - Tessa Rue</b>	
217-1	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 218 - Bill Burwell</b>	
	Duplicate Letter. See Comment Letter No. 032
<b>Comment Letter No. 219 - Antje Fray</b>	
219-1	See response to Wilderness Watch letter (comment number 379).

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219-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>The dams at Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes are upstream of natural passage barriers.</p>
219-3	Your support for wilderness protections is noted.
<b>Comment Letter No. 220 – Christine Clum</b>	
220-1	See response to Wilderness Watch letter (comment number 379).
220-2	<p>Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes. Many of the alternatives considered in the PEIS examine modifying or re-operating these existing structures.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>None of the alternatives considered in the PEIS would result in people's homes being inundated.</p>
<b>Comment Letter No. 221 – Dawn Serra</b>	
221-1	See response to Wilderness Watch letter (comment number 379).
221-2	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS.</p> <p>Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.</p>
<b>Comment Letter No. 222 – Jennifer Schultz</b>	
222-1	See response to Wilderness Watch letter (comment number 379).
222-2	Your support for protecting waterways and community water supplies is noted.
<b>Comment Letter No. 223 – Joe McPhee</b>	
223-1	See response to Wilderness Watch letter (comment number 379).
223-2	<p>Your support for wilderness protections is noted.</p> <p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p>
<b>Comment Letter No. 224 – LD Anderson</b>	
224-1	See response to Wilderness Watch letter (comment number 379).
224-2	Your support for waste water recycling and wetland recharge is noted.



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<b>Comment Letter No. 225 – Linda Berd</b>	
225-1	See response to Wilderness Watch letter (comment number 379).
225-2	Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.
225-3	The IWG commissioned a report from UW's climate impacts group that reviewed likely impacts of climate change on hydrology in the Icicle Creek Subbasin. This report is included in Appendix F.
225-4	<p>The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter, coordination will occur at the project level for any projects that may have a permitting action required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review.</p> <p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations.</p>
<b>Comment Letter No. 226 – Linda Yow</b>	
226-1	See response to Wilderness Watch letter (comment number 379).
226-2	Your comment around septic systems is noted.
226-3	Your support for storage modification and reoperation projects and instream flow improvements is noted.
<b>Comment Letter No. 227 – M. Lou Orr</b>	
227-1	See response to Wilderness Watch letter (comment number 379).
227-2	One of the Guiding Principles, which are the goals of the Icicle Strategy and described in section 1.5, is to protect tribal harvest rights. The Confederated Tribes of the Colville are IWG members that actively participate at meetings and on the Instream Flow Subcommittee.
<b>Comment Letter No. 228 – N Refes</b>	
228-1	See response to Wilderness Watch letter (comment number 379).
228-2	This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 229 – Noel Orr</b>	
229-1	See response to Wilderness Watch letter (comment number 379).
229-2	One of the Guiding Principles, which are the goals of the Icicle Strategy and described in section 1.5, is to protect tribal harvest rights. The Confederated Tribes of the Colville and the Yakama Nation are IWG members that actively participate at meetings and on the Instream Flow Subcommittee.
<b>Comment Letter No. 230 – Sherry L. Olson, Ph.D.</b>	
230-1	See response to Wilderness Watch letter (comment number 379).

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230-2	An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.
<b>Comment Letter No. 231 – Singgih Tan</b>	
231-1	See response to Wilderness Watch letter (comment number 379).
231-2	The IWG commissioned a report from UW's climate impacts group that reviewed likely impacts of climate change on hydrology in the Icicle Creek Subbasin. This report is included in Appendix F.
<b>Comment Letter No. 232 – Aimee Polekoff</b>	
232-1	See response to Wilderness Watch letter (comment number 379).
232-2	<p>The Wenatchee Valley does not receive enough rain to grow crops such as pears without irrigation.</p> <p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes. Many of the alternatives considered in the PEIS examine modifying or re-operating these existing structures. Water from such projects would go to instream flow benefit and domestic supply.</p> <p>All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p>
<b>Comment Letter No. 233 – Al Kisner</b>	
233-1	See response to Wilderness Watch letter (comment number 379).
233-2	Your support of beaver dams is noted.
<b>Comment Letter No. 234 – Alice Nguyen</b>	
234-1	See response to Wilderness Watch letter (comment number 379).
234-2	<p>Impacts to wilderness character are described in Sections 4.17.</p> <p>USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.</p> <p>One of the primary goals of the Icicle Strategy is to increase streamflow. The goals are described in section 1.5.</p>
<b>Comment Letter No. 235 – Amy Davis</b>	
235-1	See response to Wilderness Watch letter (comment number 379).
235-2	<p>Your concern regarding all dams is noted.</p> <p>Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 236 – Andrew Fisher</b>	
236-1	See response to Wilderness Watch letter (comment number 379).
236-2	The referenced video does not appear to contain comments or information regarding the Icicle Strategy DPEIS.

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<b>Comment Letter No. 237 – Ann Rogers</b>	
237-1	See response to Wilderness Watch letter (comment number 379).
237-2	Your concern regarding all dams is noted.
<b>Comment Letter No. 238 – Antje Fray (2)</b>	
238-1	See response to Wilderness Watch letter (comment number 379).
238-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>The dams at Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes are upstream of natural passage barriers.</p>
<b>Comment Letter No. 239 – Arrie Hammel</b>	
239-1	See response to Wilderness Watch letter (comment number 379).
239-2	Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 240 – Barbara Trudell</b>	
240-1	See response to Wilderness Watch letter (comment number 379).
240-2	Your concern regarding all dams is noted.
<b>Comment Letter No. 241 – Beth Stanberry</b>	
241-1	See response to Wilderness Watch letter (comment number 379).
241-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 242 – Bill Parker</b>	
240-2	See response to Wilderness Watch letter (comment number 379).
	Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.
<b>Comment Letter No. 243 – Billy Angus</b>	
243-1	See response to Wilderness Watch letter (comment number 379).
243-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 244 – Bonnie Macraith</b>	
244-1	See response to Wilderness Watch letter (comment number 379).

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244-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>The dams at Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes are upstream of natural passage barriers.</p> <p>Impacts to vegetation and shoreline are described in Sections 4.8 and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Resource impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 245 – Carol Ann Brady, R.N.</b>	
245-1	See response to Wilderness Watch letter (comment number 379).
245-2	Your support for water way protection is noted.
<b>Comment Letter No. 246 – Carol Hatfield (2)</b>	
246-1	See response to Wilderness Watch letter (comment number 379).
246-2	<p>Your support for water way protection is noted.</p> <p>Impacts to ecosystem resources and wilderness character are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 247 – Carol Hatfield</b>	
247-1	See response to Wilderness Watch letter (comment number 379).
247-2	See response to comment 246-2.
<b>Comment Letter No. 248 – Carol Jackson</b>	
248-1	See response to Wilderness Watch letter (comment number 379).
248-2	<p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>IPID and LNFH coordinates with USFS and Ecology's Office of Dam Safety to ensure all dams under their ownership and operation are safe.</p>
<b>Comment Letter No. 249 – Carolyn Wacaser</b>	
249-1	See response to Wilderness Watch letter (comment number 379).
249-2	<p>Impacts to ecosystem resources and wilderness character are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 250 – Cheryl Lechtanski</b>	
250-1	See response to Wilderness Watch letter (comment number 379).

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250-2	Impacts to ecosystem resources and wilderness character are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 251 – Cris Smith</b>	
251-1	See response to Wilderness Watch letter (comment number 379).
251-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed. and section 3.3 provides descriptions of the baseline conditions.
<b>Comment Letter No. 252 – Darlene Marley</b>	
252-1	See response to Wilderness Watch letter (comment number 379).
252-2	Your support of sustainable water management is noted. This is one of the goals, or Guiding Principles, of the Icicle Work Group, as described in section 1.5.
<b>Comment Letter No. 253 – Donna Greathouse-Neel</b>	
253-1	See response to Wilderness Watch letter (comment number 379).
253-2	Your support for Wilderness Watch is noted.
253-3	Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.
<b>Comment Letter No. 254 – Echo Mitchell</b>	
254-1	See response to Wilderness Watch letter (comment number 379).
254-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.  The Icicle Strategy does not include any energy development elements.
<b>Comment Letter No. 255 – Edson Rood</b>	
255-1	See response to Wilderness Watch letter (comment number 379).
255-2	Your comment is noted. The purpose of the PEIS is to fine an alternative with the lowest level of environmental cost to achieve an objective. The PEIS describes the Icicle Strategy objectives in section 1.5.
<b>Comment Letter No. 256 – Elizabeth Lynch</b>	
256-1	See response to Wilderness Watch letter (comment number 379).
256-2	The PEIS describes the Icicle Strategy objectives, called the Guiding Principles, in section 1.5.
<b>Comment Letter No. 257 – Gayle Areheart</b>	
257-1	See response to Wilderness Watch letter (comment number 379).

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257-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>The Icicle Strategy does not include any energy development elements.</p>
<b>Comment Letter No. 258 – George Wuerthner</b>	
258-1	See response to Wilderness Watch letter (comment number 379).
258-2	IPID holds storage water rights at Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes. Any new water right authorization must not be detrimental to the public interest test, as required by Chapter 90.03 RCW.
<b>Comment Letter No. 259 – Gita Barbezat</b>	
259-1	See response to Wilderness Watch letter (comment number 379).
259-2	Your comment is noted. The purpose of the of a PEIS is to assess probable environmental impacts prior to implementing a plan or policy as a means of reducing and mitigating impacts of a project.
<b>Comment Letter No. 260 – Helga Oestreich</b>	
260-1	See response to Wilderness Watch letter (comment number 379).
260-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p>
<b>Comment Letter No. 261 – Jeffrey Christo</b>	
261-1	See response to Wilderness Watch letter (comment number 379).
261-2	<p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Alternative elements that focus on storage reoperation and dam modification are intended to increase streamflow for salmonids in lower Icicle Creek and improve reliability of the domestic water supply.</p> <p>The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. A more detailed analysis on the impacts of implementing projects in the Preferred Alternative will occur during project level analysis where appropriate.</p>
<b>Comment Letter No. 262 – Jessica McGeary</b>	
262-1	See response to Wilderness Watch letter (comment number 379).
162-2	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 263 – Joseph Breazeale</b>	
263-1	See response to Wilderness Watch letter (comment number 379).

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263-2	Your support for dam removal is noted.
<b>Comment Letter No. 264 – Joy Keithline</b>	
264-1	See response to Wilderness Watch letter (comment number 379).
264-2	Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 265 – Kathy, Mark, Chris &amp; Jessie Groth</b>	
265-1	See response to Wilderness Watch letter (comment number 379).
265-2	Your concern regarding all dams is noted.
<b>Comment Letter No. 266 – Kevin Spelts</b>	
266-1	See response to Wilderness Watch letter (comment number 379).
266-2	Your support of natural watersheds is noted.
<b>Comment Letter No. 267 – Lisa Dahill</b>	
267-1	See response to Wilderness Watch letter (comment number 379).
267-2	Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
<b>Comment Letter No. 268 – Loren Amelang</b>	
268-1	See response to Wilderness Watch letter (comment number 379).
268-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 269 – Louise Wallace</b>	
269-1	See response to Wilderness Watch letter (comment number 379).
269-2	Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5. One of the primary goals of the Icicle Strategy is to improve instream flow and enhance habitat for salmonids.
<b>Comment Letter No. 270 – Lynn Welch</b>	
270-1	See response to Wilderness Watch letter (comment number 379).
270-2	Your support of natural watersheds is noted.
<b>Comment Letter No. 271 – Maggie Frazier</b>	
271-1	See response to Wilderness Watch letter (comment number 379).

272-2	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles. The Alternatives are described throughout Chapter 2 and the Guiding Principles are described in section 1.5.</p> <p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams.</p> <p>The dams at Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes are upstream of natural passage barriers.</p>
<b>Comment Letter No. 272 – Maija Dravnieks</b>	
272-1	See response to Wilderness Watch letter (comment number 379).
272-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 273 – Martha Jo Willard</b>	
273-1	See response to Wilderness Watch letter (comment number 379).
273-2	The Icicle DPEIS does not contain energy development elements. Your comment regarding fossil fuels does not appear to be relevant to the DPEIS being considered.
<b>Comment Letter No. 274 – Martha Stevens</b>	
274-1	See response to Wilderness Watch letter (comment number 379).
274-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 275 – Mary Leon</b>	
275-1	See response to Wilderness Watch letter (comment number 379).
275-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams.</p> <p>Impacts to surface water resources are described in Sections 4.3. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 276 – Marya Bradley</b>	
276-1	See response to Wilderness Watch letter (comment number 379).
276-2	<p>The co-leads have held several public meetings and open houses regarding the Icicle Strategy. Furthermore, all IWG meetings are open to the public. More information regarding public involvement are included in sections 1.9.3.4 and 5.1.</p> <p>Your support for the least harm is noted.</p>
<b>Comment Letter No. 277 – Maryann Foss</b>	
277-1	See response to Wilderness Watch letter (comment number 379).



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277-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 278 – Maureen Knutsen</b>	
278-1	See response to Wilderness Watch letter (comment number 379).
278-2	<p>Impacts to Water Quality are described in Sections 4.5. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Water Quality impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 279 – Michael and Barbara Hill</b>	
279-1	See response to Wilderness Watch letter (comment number 379).
279-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>The Icicle Strategy does not include any energy development elements.</p>
<b>Comment Letter No. 280 – Michelle Rice</b>	
280-1	See response to Wilderness Watch letter (comment number 379).
280-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>One of the primary goals of the Icicle Strategy is to improve instream flow and habitat for salmonids. The goals of the Icicle Strategy, known as the Guiding Principles are detailed in section 1.5.</p>
<b>Comment Letter No. 281 – Mike Hemphill</b>	
281-1	See response to Wilderness Watch letter (comment number 379).
281-2	Your comment is noted. This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan.
<b>Comment Letter No. 282 – Nina Council</b>	
282-1	See response to Wilderness Watch letter (comment number 379).
282-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>One of the primary goals of the Icicle Strategy is to improve instream flow and habitat for salmonids. The goals of the Icicle Strategy, known as the Guiding Principles are detailed in section 1.5.</p>

<b>Comment Letter No. 283 – Pamela Nelson</b>	
283-1	See response to Wilderness Watch letter (comment number 379).
283-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation.</p> <p>Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 284 – Patricia Always</b>	
284-1	See response to Wilderness Watch letter (comment number 379).
284-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>Impacts to Indian Sacred Sites and Indian Trust Assets are described in Sections 4.22 and 4.24. This analysis found no significant impacts to these resources. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 285 – Randall Potts</b>	
285-1	See response to Wilderness Watch letter (comment number 379).
285-2	<p>The DPEIS is a draft programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles. The Alternatives are described throughout Chapter 2 and the Guiding Principles are described in section 1.5.</p> <p>Impacts to ecosystem resources are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; and 4.18. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 286 – Robert Bauer</b>	
286-1	See response to Wilderness Watch letter (comment number 379).
287-2	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles. The Alternatives are described throughout Chapter 2 and the Guiding Principles are described in section 1.5. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 287 – Robert Fritsch</b>	
287-1	See response to Wilderness Watch letter (comment number 379).

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287-2	Impacts to surface water are described in Sections 4.3. At the programmatic level, impacts were found to be less than significant for the alternatives considered. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 288 – Rose Jenkins</b>	
288-1	See response to Wilderness Watch letter (comment number 379).
288-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 289 – Ruth Parcell</b>	
289-1	See response to Wilderness Watch letter (comment number 379).
289-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 290 – Scott Elliott</b>	
290-1	See response to Wilderness Watch letter (comment number 379).
290-2	Impacts to Recreation and Socioeconomics are described in Sections 4.15 and 2.24. The PEIS found no significant impacts were likely to result from the alternatives considered. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 291 – Teresa Hayes</b>	
291-1	See response to Wilderness Watch letter (comment number 379).
291-2	The co-leads are not aware of any scientific literature that demonstrates water management increases drought. Impacts to surface water are described in Sections 4.3. The PEIS found no significant impacts were likely to result from the alternatives considered. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 292 – Thelma Nelson</b>	
292-1	See response to Wilderness Watch letter (comment number 379).
292-2	Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.
<b>Comment Letter No. 293 – Theo Giesy</b>	
293-1	See response to Wilderness Watch letter (comment number 379).

293-2	This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Should a permitting agency determine that additional information is required to understand the impacts of a specific proposal, a project level EIS will be required.
<b>Comment Letter No. 294 – Amy Derocher</b>	
294-1	See response to Sierra Club letter (comment number 380).
294-2	Your concerns regarding the Eightmile Lake Storage Restoration project is noted. USFS is an active member of the IWG, and regularly attends meetings. The co-leads will coordinate with the USFS on any projects that occur within ALWA to ensure compliance with all applicable regulations. We have referenced applicable regulations and permitting actions in Table 5-2.
<b>Comment Letter No. 295 – Larry Oneil</b>	
295-1	See response to Sierra Club letter (comment number 380).
295-2	<p>The efficacy of the various alternatives under climate change scenarios are discussed at the programmatic level in section 4.13 and Appendix F of the DPEIS. All action alternatives are expected to reach instream flow goals under low, medium, and high climate change scenarios in 2080, except Alternative 3.</p> <p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p>
<b>Comment Letter No. 296 – Catherine Buchanan</b>	
296-1	See response to Washington Wild letter (comment number 381).
296-2	<p>This PEIS is prepared under SEPA not NEPA. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2.</p> <p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p>
<b>Comment Letter No. 297 – Cheyenne Lively</b>	
297-1	See response to Washington Wild letter (comment number 381).
297-2	<p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Chapter 2 contains descriptions of the alternatives and section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>One of the primary goals of the Icicle Strategy is to improve instream flow and habitat for salmonids. The goals of the Icicle Strategy, known as the Guiding Principles are detailed in section 1.5.</p> <p>Impacts to Indian Sacred Sites and Indian Trust Assets are described in Sections 4.22 and 4.24. This analysis found no significant impacts to these resources. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 298 – Christina Durtschi</b>	
298-1	See response to Washington Wild letter (comment number 381).

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298-2	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles. The Alternatives are described throughout Chapter 2 and the Guiding Principles are described in section 1.5.</p> <p>Impacts to Wilderness Character and Fish are described in Sections 4.17 and 4.7. Impacts were found to be less than significant. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>Baseline information regarding water use is described in Section 3.6.</p> <p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p>
<b>Comment Letter No. 299 – Courtney Carlisle</b>	
299-1	See response to Washington Wild letter (comment number 381).
299-2	<p>Socioeconomic Impacts are described in Sections 4.24. Impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 300 – Jace Bylenga</b>	
300-1	See response to Washington Wild letter (comment number 381).
300-2	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
<b>Comment Letter No. 301 – Mary Gallagher</b>	
301-1	See response to Washington Wild letter (comment number 381).
301-2	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
<b>Comment Letter No. 302 – Nicole Marcotte</b>	
302-1	See response to Washington Wild letter (comment number 381).

DPEIS COMMENTS & RESPONSES

302-2	<p>Impacts to ecosystem resources and wilderness character are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.17. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p> <p>Your comment supporting wilderness protections is noted.</p> <p>Impacts of the alternatives on climate change are discussed at the programmatic level in section 4.13 of the DPEIS. The action alternatives are not anticipated to have a significant increase in greenhouse gas emissions.</p>
<b>Comment Letter No. 303 – Carlie Miller</b>	
303-1	See response to Washington Trails Association letter (comment number 383).
303-2	<p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p> <p>The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. A more detailed analysis of projects included in the Preferred Alternative will occur during project level analysis where appropriate.</p>
<b>Comment Letter No. 304 – David Johnshoy</b>	
304-1	See response to Washington Trails Association letter (comment number 383).
304-2	<p>Your support for conservation measures is noted. All action alternatives analyzed in the PEIS include domestic and agricultural conservation elements. Additional conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2. IPID conservation goals have been developed and are described in the newly released CWCP, which has been incorporated into the FPEIS by reference.</p>
<b>Comment Letter No. 305 – Douglas Hedrick</b>	
305-1	See response to Washington Trails Association letter (comment number 383).
305-2	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p> <p>The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles. The Alternatives are described throughout Chapter 2 and the Guiding Principles are described in section 1.5.</p>
<b>Comment Letter No. 306 – Fit Cahall</b>	
306-1	See response to Washington Trails Association letter (comment number 383).
306-2	Your support for the No-action Alternative is noted.
<b>Comment Letter No. 307 – Ingra Walker</b>	
307-1	See response to Washington Trails Association letter (comment number 383).

**ICICLE CREEK SUBBASIN**  
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307-2	<p>Your support for no changes at Eightmile Lake are noted.</p> <p>Impacts to ecosystem resources and aesthetics are described in Sections 4.2 through 4.5; 4.7 through 4.10; 4.12; 4.18; and 4.11. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 308 – Jacob Gunn</b>	
308-1	See response to Washington Trails Association letter (comment number 383).
308-2	None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 309 – Jean Coy</b>	
309-1	See response to Washington Trails Association letter (comment number 383).
309-2	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p> <p>Impacts to recreation and aesthetics are described in Sections 4.15 and 4.11. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 310 – Judy Knold</b>	
310-1	See response to Washington Trails Association letter (comment number 383).
310-2	Impacts to recreation and wildlife are described in Sections 4.15 and 4.9. No significant impacts were found at the programmatic level. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 311 – Kevin Shipe</b>	
311-1	See response to Washington Trails Association letter (comment number 383).
311-2	Socioeconomic Impacts and impacts to recreation are described in Sections 4.24 and 4.15. The analysis provided in this PEIS is programmatic nature and is intended to provide a comprehensive understanding of the impacts of implementing a plan or policy, not specific project level issues. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 312 – Manuela Giese</b>	
312-1	See response to Washington Trails Association letter (comment number 383).
312-2	Members of the PEIS team have read Cadillac Desert.
<b>Comment Letter No. 313 – Mark Salser</b>	
313-1	See response to Washington Trails Association letter (comment number 383).
313-2	<p>Your comment supporting wilderness protections is noted.</p> <p>Your concern regarding enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>

<b>Comment Letter No. 314 – Michaela Mansfield</b>	
314-1	See response to Washington Trails Association letter (comment number 383).
314-2	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles.</p> <p>Under several of the alternatives considered in the PEIS, modified storage is included. There are no alternatives that include construction of new dams. Section 3.3 provides a baseline discussion of surface water resources in the watershed.</p> <p>Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.</p> <p>Impacts to Recreation are described in Sections 4.15. Storage enhancement elements of Alternative 4 are expected to cause seasonal inundation of some campsites and sections of trail lasting about a month in early summer. No other projects considered under the action alternatives are expected to result in trail or campsite inundation.</p> <p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
<b>Comment Letter No. 315 – Robert Pasko</b>	
315-1	See response to Washington Trails Association letter (comment number 383).
315-2	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles.</p> <p>Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 316 – Robert Schutzner</b>	
316-1	See response to Washington Trails Association letter (comment number 383).
316-2	<p>This is a programmatic EIS, which is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan. The PEIS examined five action alternatives and a No-action Alternative. Each alternative included a suite of projects and elements aimed at meeting the Icicle Strategy goals, known as the Guiding Principles.</p> <p>Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 317 - Rachel Swerdlow</b>	
317-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 318 - Roberta Daniels</b>	
318-1	Your comment in support for storage enhancement is noted.
<b>Comment Letter No. 319 – Alyssa Barton</b>	
319-1	See response to Sierra Club letter (comment number 380).
319-2	The Icicle Strategy seeks to strike a balance between these long-standing issues in Icicle Creek. The objectives of the Icicle Strategy are to improve instream flows, improve the sustainability of Leavenworth National Fish Hatchery, protect tribal and non-tribal fish harvest, improve domestic supply, improve agricultural reliability, enhance Icicle Creek habitat, and comply with State and Federal Law, including the Wilderness Acts. Details about these objectives, known as the Guiding Principles, are provided in section 1.5.



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319-3	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 320 – Andrea Carter</b>	
320-1	See response to Sierra Club letter (comment number 380).
320-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 321 – Aylin Llona</b>	
321-1	The objectives of the Icicle Strategy are described in section 1.5 of the PEIS: improve instream flows, improve the sustainability of Leavenworth National Fish Hatchery, protect tribal and non-tribal fish harvest, improve domestic supply, improve agricultural reliability, enhance Icicle Creek habitat, and comply with State and Federal Law, including the Wilderness Acts within the Icicle Creek Subbasin, Chelan County, Washington. Your support for preservation is noted.
321-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 322 – Barry Truman</b>	
322-1	Your comment is noted. Damming the Potomac River was not included in the alternatives considered in the PEIS because it would likely not meet the objectives of the Icicle Strategy, which are described in section 1.5 of the PEIS: improve instream flows, improve the sustainability of Leavenworth National Fish Hatchery, protect tribal and non-tribal fish harvest, improve domestic supply, improve agricultural reliability, enhance Icicle Creek habitat, and comply with State and Federal Law, including the Wilderness Acts within the Icicle Creek Subbasin, Chelan County, Washington.
322-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 323 – Chris Gnehm</b>	
323-1	See response to Sierra Club letter (comment number 380).
323-2	The programmatic EIS is intended to provide a comprehensive understanding of the impacts of implementing an integrated water resource management plan in Icicle Creek Subbasin. More specific details regarding if any trees would need to be removed would be identified once the projects are better defined. Vegetation impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 324 – Daniel Erickson</b>	
324-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 325 – Denise Mahnke</b>	
325-1	See response to Sierra Club letter (comment number 380).
325-2	Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes. Alternative elements that focus on storage reoperation and dam modification are intended to increase streamflow for salmonids in lower Icicle Creek and improve reliability of the domestic water supply. Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 326 – Dorothy Hiestand</b>	
326-1	Your comment supporting wilderness protections is noted.

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326-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 327 – Ellen Lyons</b>	
327-1	See response to Sierra Club letter (comment number 380).
327-2	The PEIS reviewed the wildlife and fish impacts of the proposal in Section 4.9 and 4.7. Wildlife impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 328 – Gerry Smith</b>	
328-1	Your comment supporting wilderness protections is noted.
328-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 329 – James Davis</b>	
329-1	The goals of the Icicle Strategy are described in section 1.5 of the PEIS: improve instream flows, improve the sustainability of Leavenworth National Fish Hatchery, protect tribal and non-tribal fish harvest, improve domestic supply, improve agricultural reliability, enhance Icicle Creek habitat, and comply with State and Federal Law, including the Wilderness Acts within the Icicle Creek Subbasin, Chelan County, Washington.
329-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 330 – Janet Way</b>	
330-1	<p>The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. These lakes and tributaries are already dammed and already experience increased flow and draw down at least once out of every five years if not more frequently, so natural conditions do not currently exist. Discussion of baseline conditions in the tributaries are located in Section 3.3.1, 3.3.2, and 3.5.2.</p> <p>The PEIS reviewed the groundwater, habitat, and water quality impacts of the proposal in Section 4.4, 4.7, 4.8, 4.9, and 4.5. These resource impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
330-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 331 – Kate Butt</b>	
331-1	See response to Sierra Club letter (comment number 380).
331-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 332 – Kevin Jones</b>	
332-1	See response to Sierra Club letter (comment number 380).
332-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 333 – Kristeen Penrod</b>	
333-1	Your support for dam removal is noted. Per WAC 197-11-789, a reasonable alternative is an action that could feasibly attain the proposal's objectives, but at a lower environmental cost. Reservoir removal did not receive additional consideration because it was determined that it could not attain the Icicle Strategy's objectives. Detail on this decision is provided in Section 2.11. The Icicle Strategy's objectives are the Guiding Principles, as described in section 1.5.
333-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 334 – Kristen Long</b>	
334-1	See response to Sierra Club letter (comment number 380).

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334-2	<p>No photo was included in this comment. Therefore, we are not able to include it in the public record.</p> <p>Your comment appears to be related to emergency repairs at Eightmile Dam. The emergency repairs at Eightmile Dam are not part of this proposal, with SEPA review occurring under a separate pathway.</p> <p>Alternative 1, 2, 4, and 5 of the Icicle Strategy does include alteration of the Eightmile Dam. The PEIS reviewed the wildlife impacts of the proposal in Section 4.9. Wildlife impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.</p>
<b>Comment Letter No. 335 – Kristina Fury</b>	
335-1	The PEIS reviewed the impacts of the proposal at the programmatic level throughout Chapter 4. This analysis included socioeconomic and climate change impacts. These impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
335-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 336 – Mark Stewart</b>	
336-1	See response to Sierra Club letter (comment number 380).
336-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 337 – Matt Knox</b>	
337-1	See response to Sierra Club letter (comment number 380).
337-2	Your support for wilderness protection is noted. Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process or irrigation drought resiliency, if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored.
<b>Comment Letter No. 338 – Mayellen Henry</b>	
338-1	Your comment supporting wilderness protections is noted.
338-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 339 – Menno Sennesael</b>	
339-1	See response to Sierra Club letter (comment number 380).
339-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 340 – Niels and Susan Andersen</b>	
340-1	See response to Sierra Club letter (comment number 380).
340-2	Your comment supporting the Alpine Lakes is noted.
<b>Comment Letter No. 341 – Oliver Dunn</b>	
341-1	Your comment supporting wilderness protections is noted.
341-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 342 – Patrick Conn</b>	
342-1	Your support for preservation is noted.
342-2	See response to Sierra Club letter (comment number 380).

<b>Comment Letter No. 343 – Paul Fior</b>	
343-1	See response to Sierra Club letter (comment number 380).
343-2	<p>None of the action alternatives propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.</p> <p>Your support for conservation is noted. Conservation projects are included in all action alternatives considered in the PEIS.</p>
<b>Comment Letter No. 344 – Paul Granquist</b>	
344-1	The construction footprint of the projects within the Alpine Lakes Wilderness Area are compact, and the duration of construction would be limited and timed to minimize impacts. The PEIS analyzes the impacts of construction at the programmatic level in Chapter 4 under short-term impacts for each resource. This analysis found that the impacts of construction for each alternative would be less than significant with appropriate mitigation. The impacts of construction will also be reviewed during project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
344-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 345 – Rachel Thomas</b>	
345-1	The goals of the Icicle Strategy are described in section 1.5 of the PEIS: improve instream flows, improve the sustainability of Leavenworth National Fish Hatchery, protect tribal and non-tribal fish harvest, improve domestic supply, improve agricultural reliability, enhance Icicle Creek habitat, and comply with State and Federal Law, including the Wilderness Acts within the Icicle Creek Subbasin, Chelan County, Washington.
345-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 346 – Rose Lagerberg</b>	
346-1	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 347 – Shanna Sierra</b>	
347-1	Your comment supporting wilderness protections is noted.
347-2	See response to Sierra Club letter (comment number 380).
<b>Comment Letter No. 348 – Sigrid Asmus</b>	
348-1	See response to Sierra Club letter (comment number 380).
348-2	<p>Your comment supporting wilderness protections is noted.</p> <p>Your concern over the cost is noted. The FPIES does not authorize any spending, and estimated costs are included to aid in the decision-making process.</p>
<b>Comment Letter No. 349 – Sue Tiffany</b>	
349-1	See response to Sierra Club letter (comment number 380).
349-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 350 – Suzanne Davis</b>	
350-1	See response to Sierra Club letter (comment number 380).
350-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 351 – Tanya Lawson</b>	
351-1	See response to Sierra Club letter (comment number 380).

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351-2	Your concern over the cost is noted. The FPIES does not authorize any spending, and estimated costs are included to aid in the decision-making process.
<b>Comment Letter No. 352 – Venard Trevisanut</b>	
352-1	See response to Sierra Club letter (comment number 380).
352-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 353 – Barbara Cunningham</b>	
353-1	See response to Wilderness Watch letter (comment number 379).
353-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 354 – Barbara Cunningham (2)</b>	
354-1	See response to Wilderness Watch letter (comment number 379).
354-2	Your comment supporting Alternative 5 and wilderness protections is noted.
<b>Comment Letter No. 355 – Cassandra Bufano</b>	
355-1	Your comment supporting wilderness protections is noted.
355-2	See response to Washington Trails Association letter (comment number 383).
<b>Comment Letter No. 356 – Jennifer Schultz (2)</b>	
356-1	See response to Wilderness Watch letter (comment number 379).
356-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 357 – Mark and Susan Vossler</b>	
357-1	See response to Wilderness Watch letter (comment number 379).
357-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 358 – Mark and Susan Vossler (2)</b>	
358-1	See response to Wilderness Watch letter (comment number 379).
358-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 359 – Mary Johnson</b>	
359-1	See response to Wilderness Watch letter (comment number 379).
359-2	Your support for protecting waterways and wilderness is noted.
<b>Comment Letter No. 360 – Nancy Anderson</b>	
360-1	See response to Wilderness Watch letter (comment number 379).
360-2	Your comment supporting wilderness protections is noted. The PEIS reviewed the wildlife impacts of the proposal in Section 4.9. Wildlife impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 361 – Robert Havrilla</b>	
361-1	See response to Wilderness Watch letter (comment number 379).

361-2	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in the 1990s. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur at project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative.</p> <p>Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.</p>
<b>Comment Letter No. 362 – Robert Havrilla (2)</b>	
362-1	See response to Wilderness Watch letter (comment number 379).
362-1	<p>Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Alternative elements that focus on storage reoperation and dam modification are intended to increase streamflow for salmonids in lower Icicle Creek and improve reliability of the domestic water supply.</p>
<b>Comment Letter No. 363 – Edith Lie</b>	
363-1	See response to Wilderness Watch letter (comment number 379).
363-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 364 – Linda Carroll</b>	
364-1	See response to Wilderness Watch letter (comment number 379).
364-2	Your recreational use of the Alpine Lakes Wilderness Area is noted.
<b>Comment Letter No. 365 – Bruce Turcott</b>	
365-1	See response to Washington Wild letter (comment number 381).
365-2	Your recreational use of the Alpine Lakes Wilderness Area is noted.
<b>Comment Letter No. 366 – Tim McNulty</b>	
366-1	See response to Washington Wild letter (comment number 381).
366-2	<p>Square, Lower Klonaka, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Alternative elements that focus on storage reoperation and dam modification are intended to increase streamflow for salmonids in lower Icicle Creek and improve reliability of the domestic water supply.</p>
<b>Comment Letter No. 367 – Thom Peters</b>	
367-1	See response to Washington Wild letter (comment number 381).
367-2	None of the alternatives considered in the PEIS include elements or projects that would move irrigation water to domestic use.
<b>Comment Letter No. 368 – Susan Cuturilo</b>	
368-1	See response to Washington Wild letter (comment number 381).

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368-2	<p>Square, Lower Klonauqua, Eightmile, Colchuck, Nada and Snow Lakes have been artificially enlarged by dam structures built between 1920 and 1940 (depending on the site), and lake levels are currently managed for agricultural water supply. Section 3.3 describes the baseline conditions of these lakes.</p> <p>Alternative elements that focus on storage reoperation and dam modification are intended to increase streamflow for salmonids in lower Icicle Creek and improve reliability of the domestic water supply.</p>
<b>Comment Letter No. 369 – Shirley Sonnichsen</b>	
369-1	See response to Washington Wild letter (comment number 381).
369-2	Your comment supporting wilderness protections is noted. Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
<b>Comment Letter No. 370 – Seth Rolland</b>	
370-1	See response to Washington Wild letter (comment number 381).
370-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 371 – Scott Elliott</b>	
371-1	See response to Washington Wild letter (comment number 381).
371-2	The PEIS reviewed the socioeconomic impacts of the proposal in Section 4.24. Socioeconomic impacts will undergo project level analysis for projects included in the Preferred Alternative, which will include more detailed analysis where appropriate.
<b>Comment Letter No. 372 – Peter Carskaddan</b>	
372-1	See response to Washington Wild letter (comment number 381).
372-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 373 – Mr. Shelley Dahlgren, PhD</b>	
373-1	See response to Washington Wild letter (comment number 381).
373-2	Your support for wilderness protection is noted. Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process or irrigation drought resiliency, if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored.
<b>Comment Letter No. 374 – Michael Siptroth</b>	
374-1	See response to Washington Wild letter (comment number 381).
374-2	Your comment supporting wilderness protections is noted. One of the objectives of the Icicle Strategy is to improve instream flow and habitat for salmonid species.
<b>Comment Letter No. 375 – Julie Stohlman</b>	
375-1	See response to Washington Wild letter (comment number 381).

## DPEIS COMMENTS &amp; RESPONSES

375-2	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in the 1990s. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made by the USFS and IPID. Per USFS's comment letter (Letter 4), this will occur at project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation on the Preferred Alternative.</p> <p>Your comment supporting wilderness protections is noted.</p>
<b>Comment Letter No. 376 – Emily Myette</b>	
376-1	See response to Washington Wild letter (comment number 381).
376-1	<p>The PEIS analyzed five alternatives. Under Alternative 1, 2, and 5, the dam at Eightmile Lake would increase in height by four feet to the historic operating level. Under Alternative 3, no action would occur at Eightmile Lake under the Icicle Strategy, although project proponents might pursue the storage restoration project independently of the Icicle Strategy. Under Alternative 4, the dam would be rebuilt up to 10 feet higher. A programmatic analysis of the aesthetic impacts is provided in Section 4.11. Restoration of Eightmile Lake is included in the Preferred Alternative.</p>
<b>Comment Letter No. 377 – Denise Harnly</b>	
377-1	See response to Washington Wild letter (comment number 381).
377-2	Your comment supporting wilderness protections is noted.
<b>Comment Letter No. 378 – Bob Aegerter</b>	
378-1	See response to Washington Wild letter (comment number 381).
378-2	<p>Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.</p>
<b>Comment Letter No. 379 – Wilderness Watch</b>	
379-1	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p>
379-2	Your support for public lands and wilderness is noted.
379-3	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation. Currently, coordination with USFS on Wilderness issues occurs at IWG meetings. USFS is an active member of the IWG, and regularly attends meetings.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p>
379-4	<p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>



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379-5	Your support for Alternative 5 and the Full IPID Piping and Pump Exchange are noted.
379-6	One of the guiding principles is to increase instream flow and domestic water supplies, which would require a water right permitting action. Water right transfers and changes in purpose of use are provided for in Chapter 90.03 RCW.  The Icicle Strategy is not seeking to increase water supplies at LNFH with water from IPID's storage rights.
379-7	The cost estimates included in the PEIS are programmatic in nature and reflect the co-leads best estimate of cost to date. This is why contingencies have been included in all costs. To address cost overrun concerns of work in the wilderness area, an additional 25-percent contingency has been added to all projects proposed in the wilderness area in the FPEIS.
379-8	The objective of the PEIS is to analyze changes to current conditions at a programmatic level to provide a comprehensive understanding of the impacts of implementing the Icicle Strategy. Discussion of baseline conditions in the tributaries is located in Section 3.3.1, 3.3.2, and 3.5.2. The PEIS found that increased frequency of releases not likely to have a significant adverse impact. Increased flows in late summer are widely believed to be beneficial to aquatic species. A more detailed analysis on the impacts of increased frequency of releases will occur during project level analysis where appropriate.
<b>Comment Letter No. 380 – Sierra Club</b>	
380-1	You comment in support of public lands and wilderness is noted.
380-2	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.
380-3	You comment in support of public lands and wilderness is noted.
<b>Comment Letter No. 381 – Washington Wild</b>	
381-1	None of the action alternative propose projects within the Enchantment Basin, although there are proposed changes within the ALWA under Alternative 1, 2, 4, and 5. Your comment supporting wilderness protections is noted.  Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.  Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.

381-2	<p>The USFS granted easements to IPID in exchange for IPID deeding over their private property to the USFS for inclusion in the ALWA in 1990. Limitations on the IPID easements at the Alpine Lakes is a determination that will be made between IPID and USFS. Per USFS's comment letter (Letter 4), this will occur during project level planning. The IWG and co-leads will work with the USFS on this issue as they move to project level review and implementation. Currently, coordination with USFS on Wilderness issues occurs at IWG meetings. USFS is an active member of the IWG, and regularly attends meetings.</p> <p>An extent and validity analysis, which is completed to determine if a water right or a portion of a water right has been relinquished by non-use or abandoned, is triggered by a water right permitting action. There are several exemptions to relinquishment, which would be reviewed during an extent and validity analysis. At this point, there has been no water right permitting action that has triggered an extent and validity review. The process and timing of an extent and validity analysis is provided in Water Resources POL-1120.</p> <p>The co-leads recognize that NEPA will be required on projects that have a federal nexus, such as permitting actions or funding. NEPA integration and review is discussed in Section 1.9.3.2 and potential permitting requirements are discussed in Table 5-2. Per the USFS comment letter, coordination will occur at the project level for any projects that may have permitting actions required by USFS. Project level of detail regarding permitting and NEPA integration will be provided during project level review as needed.</p>
381-3	<p>Alternative 3 was included in the PEIS in an effort to provide an offsite/non-wilderness alternative. However, in an attempt to be fully transparent, the co-leads including information about the intent of the irrigation district to pursue Eightmile Lake Storage Restoration outside the Icicle Work Group process if it is not selected as part of the preferred alternative. This is discussed in section 2.3.1 of the PEIS. Including this information does not preclude or prevent the dam on Eightmile Lake being repaired rather than restored, so long as it would not have additional adverse impacts not analyzed in the PEIS.</p>
381-4	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p>
<b>Comment Letter No. 382 – The Wilderness Society</b>	
382-1	<p>Your comment supporting wilderness protections is noted.</p> <p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>
382-2	<p>IPID's water rights are described in Section 3.6. The additional water rights required to implement Alternative 4 is discussed in Section 4.6.</p>
382-3	<p>Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.</p>
<b>Comment Letter No. 383 – Washington Trails Association</b>	
383-1	<p>Your comment supporting wilderness protections is noted.</p>
383-2	<p>Your concern regarding storage enhancement elements in Alternative 4 is noted. This alternative has not been selected as the Preferred Alternative in the FPEIS.</p>

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383-3	Per WAC 197-11-405 a supplemental draft EIS is required if there are substantial changes to the proposal so that the proposal is likely to have significant adverse environmental impacts; or there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. New information has not been found nor has the proposal changed in a way that new probable significant adverse environmental impacts are likely.
<b>Comment Letter No. 384 – Unknown Template Email</b>	
	There is no comment.
<b>Comment Letter 385 – Gena Di Labio &amp; Teresa Dix</b>	
385-1	Impacts of the alternatives on climate change and efficacy of the alternatives under climate change conditions are discussed at the programmatic level in section 4.13 of the DPEIS. The action alternatives are not anticipated to have a significant increase in greenhouse gas emissions.
385-2	Impacts to aesthetics, vegetation, and wildlife are described in Sections 4.11, 4.8, and 4.9. No significant impacts were found at the programmatic level. These resources will undergo project level analysis for project included in the Preferred Alternative, which will include more detailed analysis where appropriate.
385-3	Your comment supporting wilderness protections is noted.
385-4	Any project pursued under the Icicle Strategy will need to comply with federal and state laws. Based on programmatic level analysis and information made available by IPID and the USFS, the alternatives considered in the PEIS appear to meet this criterion. Additional analysis and coordination with regulatory agencies will occur at the project level and during project permitting to ensure compliance with all federal and state laws.
385-5	Your support for expanded conservation measures is noted. Conservation is an important element of the Preferred Alternative. Additional detail regarding conservation measures have been added to the Domestic Conservation Project, as described in Chapter 2.5.4. IPID recently completed its CWCP, which details efficiency upgrades that can be made to improve streamflow by reducing IPID's diversion on Icicle and Peshastin Creeks. The CWCP is incorporated in the FPEIS by reference. Similarly, the City of Leavenworth has an up-to-date conservation section in its water system plan. More detail on the Domestic Conservation portion of the Icicle Strategy is expected during project development, review, and permitting.
385-6	See response to comment 385-5.
385-7	See response to comment 385-2, 385-3, and 385-5.