



ALPINE LAKES

protection society

October 31, 2016

Via email to: mike.kaputa@co.chelan.wa.us

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

RE: **Icicle Creek Water Resource Management Strategy – SEPA scoping**

Dear Director Kaputa:

Alpine Lakes Protection Society (ALPS) submits these supplemental comments on the Icicle Creek Water Resource Management Strategy. This supplements our May 11, 2016 SEPA scoping comment letter. In particular, these supplemental comments relate to the new information presented by Icicle Work Group (IWG) at the public informational meeting in Seattle on July 18, 2016, and discussions at the IWG site visit to Eightmile Lake in the Alpine Lakes Wilderness on September 17, 2016. Thank you for arranging the meeting, and the hike to the lake.

IWG admits “IPID doesn’t need any more water”

In July, IWG admitted (on its slide # 11) that “IPID doesn’t need any more water.” Because IPID does not need any more water, keeping Alpine Lakes Wilderness lakes at their current capacities does not conflict with IPID or the orchard industry of the Wenatchee River valley. IWG wants more water for the dewatered stretch of Icicle Creek near the hatchery, and for Leavenworth domestic use (including construction of new suburban developments in the area), not for irrigation of orchards.

SEPA “bait & switch” tactic, resurrecting the Klonaqua tunnel etc.

As discussed at Eightmile Lake, we object to IWG’s SEPA scoping tactics. In May, IWG conducted public SEPA scoping on a “Base Package” from which IWG had removed prior proposals for the Klonaqua tunnel, Eightmile expansion above the prior dam height, and Upper Snow Lake expansion, so the public was not asked to comment on the removed proposals. Then in July, IWG revealed that the upcoming SEPA Draft EIS will include not only the Base Package as an alternative, but also an alternative with the Base Package plus the Klonaqua tunnel, Eightmile expansion above the prior dam height, and “Upper Snow Storage Enhancement” (per IWG slide #13 shown in Seattle on 7/18/16).

This kind of maneuver is commonly called “bait & switch.”

As discussed, these resurrected proposals don’t make sense because the Klonaqua tunnel violates the Wilderness Act, the Eightmile and Snow expansions require approval of the President, they will generate enormous opposition statewide and nationally, and they are very unlikely to happen. IWG should think about the reasons *why* it removed the Klonaqua tunnel from the Base Package last year.

Inconsistent application of so-called “Guiding Principles”

We also question why IWG’s 7/18/16 slides said certain other alternatives “are not being considered,” including changing IPID’s point of diversion; Aspect Consulting said that alternative could not be considered because it would not meet all of IWG’s nine “Guiding Principles” because IPID doesn’t want to incur the cost. IWG is being illogical about use of its “Guiding Principles” for DEIS alternatives; the proposed Klonauqua tunnel and Eightmile expansion are far more violative of the “Guiding Principles” (specifically the “Guiding Principle” about Wilderness Act compliance).

Oblivious to wilderness values, IWG even attempted to rename the lakes. It is alarming that IWG seems unaware of how many people in this State feel strongly about Alpine Lakes Wilderness. Just try to explain how the Klonauqua tunnel honors the “Guiding Principle” on wilderness.

We also object to IWG’s recent use of the word “expansive” in descriptions of the 1990 easement at Eightmile Lake (for example, IWG’s 7/18/16 slide #9 says IPID retained “expansive” easements in the IPID-USFS land exchange; however, the word “expansive” is not in the easement). IWG is setting unrealistic expectations in the Wenatchee River Valley, promoting future wilderness lake expansions that it cannot deliver.

Public lands around the Wenatchee River Valley provide many recreation activities that contribute significantly to the local economy. The Alpine Lakes Wilderness is an extremely valuable component of this, and its lakes are very popular with hikers and other visitors, *because* they are in the Wilderness. Rather than trying to expand wilderness lakes (thereby undermining their wilderness character), a better approach would be to more efficiently manage our water needs in ways that avoid damaging the wilderness lakes. Our May 11 letter recommended aggressive water conservation measures as a mechanism to provide for future water supplies in the Wenatchee Valley. If we recognize the Icicle watershed’s natural limits and adjust our activities to them, we can better sustain the region’s livability and economy over the long term.

Relinquishment at Eightmile

At Eightmile Lake, IPID pointed out some 20-foot-tall trees that have been growing where the earthen upper part of the dam formerly stood, before it washed away decades ago.

Icicle Work Group’s gag rule

Icicle Work Group has a gag rule; Work Group members are prohibited from publicly criticizing Work Group decisions. That is not acceptable. If ALPS were a member of the Work Group, we would have been prohibited (by the gag rule) from writing this letter.

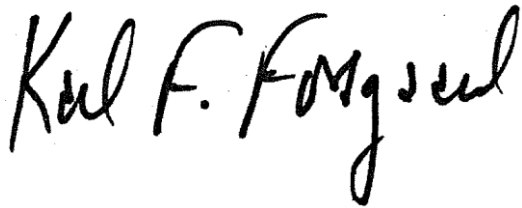
The Center for Environmental Law & Policy (CELP) resigned from the Icicle Work Group because of the gag rule. CELP’s July 20, 2015 resignation letter (attached) explains CELP’s objections to the gag rule in detail. Apparently the Work Group has never written a substantive response to CELP’s resignation letter. Please let me know if you disagree with anything in CELP’s letter.

Next steps

It is better to discuss this now, when IWG still has months left to draft a better DEIS. Otherwise, a worse DEIS would waste everyone's time and resources fighting about inflammatory, implausible ideas like drilling the Klon aqua tunnel. Please let me know if you would like to discuss this further.

Thank you for considering these comments.

Sincerely,
ALPINE LAKES PROTECTION SOCIETY

A handwritten signature in black ink that reads "Karl F. Forsgaard". The signature is written in a cursive, slightly slanted style.

Karl Forsgaard, President

Attachment

cc: Icicle Work Group members
ALPS Board members
SEPA scoping commenters
Elected officials