

June 19, 2017

Tom Tebb
Co-Convener of the Icicle Work Group
Director, Office of the Columbia River
Washington State Department of Ecology
1250 Alder Street
Union Gap, WA 98903

Keith Goehner
Co-Convener of the Icicle Work Group
Chelan County Commissioner
400 Douglas Street, Suite 201
Wenatchee, WA 98801

Re: Conservation and Recreation Community Concern about Icicle Creek Water Resource Management Strategy

Dear Mr. Tebb and Mr. Goehner:

In anticipation of the release of a draft programmatic environmental impact statement (DPEIS) for the Icicle Creek Water Resource Management Strategy (Icicle Strategy), the 39 undersigned organizations would like to voice our collective concern regarding certain elements of the Icicle Strategy as well as composition and operation of the Icicle Work Group (IWG). We are gravely concerned that the DPEIS will not adequately address the environmental concerns documented through the scoping process. In light of new climate change impacts research, an IWG with increasingly limited environmental representation, and outstanding questions about how the Icicle Strategy will comply with federal law, including the Wilderness Act, we ask that you re-evaluate the proposed list of projects and craft an adequate range of DPEIS alternatives that will ensure compliance with the Wilderness Act, and will do no harm to the Alpine Lakes Wilderness, including its Enchantment Lakes region.

I. INADEQUATE EFFORT INVESTED IN VIABLE OPTIONS COMPLIANT WITH THE WILDERNESS ACT.

IWG has not adequately identified and explored viable options for improving stream flows that are compliant with the Wilderness Act. Since the PEIS scoping conducted in 2016, IWG appears undeterred from the construction proposed within the Alpine Lake Wilderness and its Enchantment Lakes region, despite the federal Wilderness designation and concomitant federal management requirements and responsibilities. Similarly, in nearly all feasibility and supporting documents related to these construction proposals, scant attention is paid to this mandate and it is seemingly brushed aside as something needed to coordinate with the U.S. Forest Service. All management actions within the Alpine Lakes Wilderness must be scrutinized through the lens of the federal mandate to manage these public lands as Wilderness. Furthermore, IWG has also failed to take the conservative step of exploring an alternative, or range of alternatives that: (1) does not seek to increase the amount of water removed from the Alpine Lakes Wilderness; (2) does not expand existing easements; (3) does not encroach on wilderness lands; and (4) does no harm to the values for which the Alpine Lakes Wilderness was established.

Of particular concern are the proposed expansions of Eightmile and Snow Lakes and the proposal to drill a tunnel between Upper and Lower Klonauqua Lakes. We object to any replacement of the dam structures that washed away decades ago at Eightmile Lake, and we object to any new dam construction at Eightmile and Snow Lakes, regardless of dam height.

These projects will adversely impact the values for which the Alpine Lakes Wilderness was established, and are in direct conflict with the Wilderness Act. Given the seemingly blatant dismissal of such conflicts, these projects should be removed from consideration within the forthcoming DPEIS. The Alpine Lakes Wilderness is 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.

II. THE ICICLE WORK GROUP 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 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 winter, 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, or for other reasons. While this “broad-based coalition” involves federal agencies, municipalities, tribes, and irrigation districts, it falls short in representation from the conservation and recreation community.

III. IWG NEEDS TO ACCOUNT FOR NEW CLIMATE CHANGE IMPACTS RESEARCH.

According to results presented to IWG by the University of Washington’s Climate Impacts Group (CIG) at the end of April 2017, the Icicle basin is projected to see a dramatic decrease in flows during the peak season, with an average decrease of 33 percent in June, 59 percent in July, 60 percent in August and 31 percent in September in the next 50 years. Projections show as much as a 75-78 percent decrease in the 2080s. This projected decrease is drastic, and is information IWG should have started with to ensure the projects and proposals presented in the Icicle Strategy make the most sense

based on climate trends. Given the new information, it is essential for IWG to take a fresh look at the project list and craft an adequate range of alternatives that does not just look to the Alpine Lakes Wilderness and its Enchantment Lakes region for more water. A suite of creative solutions is required—from changing the IPID’s point of diversion downstream, to lining canal ditches, to new fish hatchery improvements such as circular ponds that could reduce water consumption by 75 percent and other water conservation measures. Furthermore, a realistic projection of growth and development in the valley as well as orchard conversion is necessary to understand how water demand may fluctuate in the decades to come and how water delivery may need to adjust to future conditions.

In closing, the undersigned organizations reiterate our strong concerns about the current direction of the Icicle Work Group’s Icicle Strategy and we ask that the requests outlined in this letter are taken into consideration prior to the release of the Draft PEIS. In particular, in light of the recent climate change analysis and the non-compliance with the Wilderness Act, the proposed dam construction at Eightmile and Snow Lakes, and the Klonaqua Lakes Tunnel proposal should be removed from consideration within the upcoming Draft PEIS.

Sincerely,

Benjamin Greuel
Washington State Director
The Wilderness Society

Karl Forsgaard
President
Alpine Lakes Protection Society

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

Gus Bekker
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Middle Fork Recreation Coalition

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Save Our Sky Blue Waters

Bill Campbell
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Friends of Lake Kachess

Robert Angrisano
President
Kachess Homeowners Association

Denise Boggs
Executive Director
Conservation Congress

Jerry Watts
President, Board of Fire Commissioners
Kittitas County Fire District #8

Terry Montoya
President
Kachess Ridge Maintenance Association

Cc:

Patty Murray, U.S. Senator
Maria Cantwell, U.S. Senator
Dave Reichert, U.S. Representative
Jay Inslee, Office of the Governor
Brad Hawkins, Washington State Senator
Cary Condotta, Washington State Representative
Mike Steele, Washington State Representative
Jim Peña, Regional Forester, Region 6, U.S. Forest Service
Mike Williams, Forest Supervisor, Okanogan-Wenatchee National Forest
Icicle Work Group Members