



Protect America's Climbing

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

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

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.

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.

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

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

Our organizations are concerned about the following projects:

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.

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 5-1 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.

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.

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.

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.

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.

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.

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.

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

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.

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