



KARL FORSGAARD

Icicle Work Group releases DPEIS for comment

by Karl Forsgaard

On May 31, Chelan County and the State Department of Ecology announced the release of the Draft Programmatic Environmental Impact Statement (DPEIS) for the “Icicle Creek Watershed Water Resources Management Strategy.” The release initiates a 60-day public comment period, with a comment deadline of July 30. ALPS will be submitting comments on the DPEIS.

The DPEIS presents five action alternatives, all of which seek to construct dams and related structures and

manipulate water levels on seven lakes within the Alpine Lakes Wilderness: Colchuck, Eightmile, Upper and Lower Snow, Nada, Lower Klonauqua and Square Lakes. Creeks impacted by the manipulation include Eightmile, French, Icicle, Klonauqua, Leland, Mountaineer, Prospect and Snow Creeks.

One of the DPEIS alternatives proposes to drain an eighth lake, Upper Klonauqua, by installing a siphon or pump or blasting a tunnel between Upper and Lower Klonauqua Lakes.

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Above: Excavator at Eightmile Lake dam.

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In other words, Alpine Lakes Wilderness remains at risk of future water development, including negative impacts to the wilderness lakes, streams and ecosystem. These projects would set bad precedents for the National Wilderness System, and must be opposed.

This article will first describe DPEIS content, followed by Icicle Work Group background, recent events including the Eightmile dam “emergency,” and what you can do to comment on the DPEIS.

DPEIS content

The DPEIS describes six alternatives, including a No-Action alternative, IWG’s “Base Package” of component projects, and four other alternatives that combine “Base Package” components with other projects. The DPEIS and its appendices total 1,674 pages.

Alternative 1 is the IWG “Base Package” of component projects; it appears likely to be the agencies’ preferred alternative (“... this alternative represented the best recommendation available after four years of study by IWG members”).

Alternative 2 was developed by IWG “in response to SEPA scoping comments that requested examination of pump station options and omission of the Alpine Lakes Optimization, Modernization and Automation project.”

Alternative 3 “is a response to SEPA scoping comments that expressed a desire for an alternative that excluded projects within the Alpine Lakes Wilderness Area. ... It calls for a legislative change to waive impacts to instream flows when conservation and pump-exchange-based supplies cannot perfectly meet demand required to provide domestic reliability.”

Alternative 4 includes several egregious proposals for construction in the Wilderness: 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). 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. Like Eightmile “Restoration,” these projects run afoul of federal wilderness law and state water law. They are unprecedented in the National Wilderness System.

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 without building bigger dams in the Wilderness. However, like all of the alternatives, Alternative 5 includes the defective Eightmile “Restoration” project to make Eightmile dam higher than it has been since 1990, i.e., to enlarge Eightmile Lake.

The DPEIS is organized into chapters. Chapter 1 includes background information, purpose and need, and the IWG “guiding principles.” Chapter 2 provides narrative summaries of the alternatives. Chapter 3 describes the affected environment including earth, water resources, water use, fish and wildlife, vegetation, aesthetics, air quality, climate change, noise, land use, wilderness, shorelines, transportation, cultural resources and socioeconomics. Chapter 4 describes anticipated impacts of each alternative and mitigation measures. Short-term and long-term impacts are organized by resource, impact type, alternative, and project. The remaining

chapters list consultation and coordination efforts, references, and contributors

DPEIS Appendix A is a “SEPA Responsiveness Summary” that includes the May 2016 scoping comments, with a table summarizing comments and responses. Forms of the word “relinquishment” appear many times in the comments column, but never in the response column.

Appendix B is a report entitled “Eightmile Lake Storage Restoration Feasibility Study,” dated April 2018, prepared by Anchor QEA LLC and Aspect Consulting LLC. It was prepared for IPID and Chelan County.

Appendix C is a report entitled Feasibility Study – Alpine Lakes Optimization and Automation,” dated April 2018, prepared by Aspect Consulting LLC. It was prepared for Chelan County.

Appendix D is a table of “WDFW Priority Species and Preferred Habitats.” Appendix E consists of copies of easement agreements and deeds.

Appendix F is a report entitled “Changing Streamflow in Icicle, Peshastin and Mission Creeks,” dated May 12, 2017, by the UW Climate Impacts Group, followed by a series of “Flow Charts of Instream Flow Benefit per Alternative Based on Climate Change Modeling,” prepared by Aspect Consulting LLC.

Background

The co-lead agencies on the DPEIS (Ecology and Chelan County) are also co-conveners of the Icicle Work Group (IWG). One of the IWG goals is to extract more water for “new home construction” in the Wenatchee Valley. They also claim to solve instream flow problems in Icicle Creek near the Leavenworth National Fish Hatchery, to protect tribal fishing rights and improve irrigation reliability.

We appreciate the irrigators' need for water to irrigate their orchards and keep them productive. We do not object to the exercise of valid, existing water rights, but we question an assertion of water rights that have been relinquished or are otherwise invalid. 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.

The Alpine Lakes Wilderness 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. 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.

For several years, a coalition of more than 40 conservation and recreation organizations has co-signed comment letters submitted by ALPS to the IWG, including scoping comments two years ago for the DPEIS. For more history, see the last few years of *Alpine* (2017 issue No. 1; 2016 issue No. 1; 2015 issue No. 1; 2014 issue No. 1); they can be viewed on the ALPS website at: <http://www.alpinelakes.org/newsletters.html>.

In June 2017, ALPS and the Wilderness Society submitted to IWG a letter signed by 39 organizations, stating that IWG has not adequately identified and explored viable options for improving stream flows that are compliant with the Wilderness Act. The letter also said IWG falls short in representation from the conservation and recreation community. The letter cited

UW Climate Impacts Group projections of a dramatic decrease in flows during the peak season in the next 50 years. The letter concluded that 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 Klonauqua Lakes Tunnel proposal should be removed from consideration in the upcoming DPEIS (unfortunately, these bad projects are included in the DPEIS released a year later).

At the July 2017 meeting of IWG, it was announced that the DPEIS release would be postponed from July to October 2017 (it was later postponed several more times before being released on May 31, 2018).

At the July 2017 IWG meeting, ALPS reminded IWG of the issue of relinquishment of IPID water rights at Eightmile Lake, where there are only pieces of the former dam, and those pieces have not held water in decades (so an entirely new dam is what is being proposed at that site, not a "repair"). ALPS also said that the Eightmile "restoration" project will be litigated if there is any effort to make the dam higher than it has been, so the decision on the relinquishment issue would be made by a judge.

Also at that July 2017 meeting, ALPS said IWG appears to think that because Wilderness is undeveloped and not private property, it will cost less to do something in Wilderness, but IWG needs to shift its thinking and realize that because Wilderness is owned by everyone and has been designated for protecting wildness for future generations, it will actually cost more, not less, to do something in Wilderness (if it can be done there at all).

These ALPS comments were validated ten months later, when IPID discovered that its planned

method for getting an excavator to the dam (on the ground through the wilderness) was not going to be approved by the Forest Service, making the cost much higher (the excavator was flown in by a large helicopter).

In December 2017, ALPS submitted a letter signed by 33 organizations requesting that IWG conduct a public meeting in the Seattle area as part of the public involvement process for the upcoming DPEIS release, and allow a public comment period of at least 90 days. The letter was submitted to the Governor's office because IWG leadership had been non-responsive when these requests were made earlier in the year. The letter asked that the Seattle-area meeting be considered an official public meeting, announced in the same way, held and facilitated in the same way, and public comments treated the same way as proposed for the Leavenworth public meeting. However, IWG rejected these requests, providing only an unofficial informational meeting in the Seattle area, and a comment period of only 60 days.

Snow Lake valve NEPA process

In October 2017, two IWG member agencies (U.S. Bureau of Reclamation and U.S. Fish & Wildlife Service) released a draft Environmental Assessment (EA) under NEPA, to replace an existing water discharge control valve on the Upper Snow Lake tunnel. The EA said it was "routine operations and maintenance," which was not true, because the EA proposed to install a new valve that would be 60% larger than the existing valve, i.e. a 60% increase in the water discharge rate. Construction plans included up to 30 round-trip helicopters flights over a seven-to 21-day span. The EA falsely described a public scoping process

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Snohomish P.U.D. finally abandons Sunset Falls project

by Rick McGuire



Sunset Falls on the south fork Skykomish river.

After many wasted years, and millions of dollars, the Snohomish Public Utility District (P.U.D.) has finally shelved its plan to build a diversion and powerplant on the South Fork Skykomish river at Sunset Falls, a mile or two above the confluence of the North and South Forks of the Skykomish.

The plan was ill-conceived from the very start. Sunset Falls had been looked at in the past as a hydropower site and always rejected. The P.U.D. claimed that the project would have powered "thousands of homes." That highly misleading statistic was based on the best case scenario at high water

flows and everything running full tilt. The average power production would have been far less, and what power it would have produced would have come during the time of year when there is the least demand for it.

The project's output would have been a drop in the bucket compared to the total electric use in Snohomish County. The geology of the area is terrible. A number of clay slides, old and new, are present in the area and would have been a constant threat to the project had it been built. The P.U.D. was scraping the bottom of the barrel with Sunset Falls in

terms of damsites. There are very good reasons why Sunset Falls was always rejected in the past as a practical damsite.

Why, then, did the P.U.D. pour so much money into what was obviously a loser of a project? Some say it is "dam envy," a disease that seems to afflict mostly public utilities that purchase most or all of their power from the Bonneville Power Administration. For some reason, B.P.A. power seems insufficient to satisfy the empire building instincts often found in such agencies, though it

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satisfies actual electricity demand just fine.

Another reason may be that the real resource at Sunset Falls was not the Skykomish River so much as the bonding and borrowing capacity of the P.U.D. With its guaranteed, steady revenues from supplying electricity to Snohomish County, the P.U.D. is a lender's dream. P.U.D. managers commonly put their own interests ahead of their customers, even though P.U.D.'s were formed to "cut out the middleman" and supply inexpensive electricity to their customers. Such was the purpose of Snohomish P.U.D. when it was formed in 1949.

Much has changed over the intervening decades. P.U.D. managers often look forward to lucrative jobs with consultants who they have hired for efforts like that at Sunset. This often leads to horribly bad decisions, not just in Snohomish County but at public utilities all across North America. Perhaps the most egregious example among many is the Muskrat Falls dam in Newfoundland. The provincial electric utility ignored warning after warning that Muskrat Falls was a terrible place to put a dam. But they went ahead and built the hugely expensive dam, largely atop clay, and producing very little power.

Muskrat Falls was, however, a great deal for the financiers. So great that the average electricity bill in Newfoundland is now \$150 per month higher than before the Muskrat Falls project, and will stay that way forever. The parallels between Sunset and Muskrat Falls are chilling. Snohomish P.U.D.'s customers have dodged what would likely have been a very expensive bullet with the cancellation of the Sunset Falls project. Projects like Sunset and Muskrat Falls, and a number of

others, have called into question whether the whole concept of "public power" has lost its way. With private, investor owned utilities, directors and shareholders provide a brake on throwing money away on senseless projects, at least in theory. Most of the senseless, low power, high expense hydro projects in recent years have been proposed or built by public, not private, electric utilities.

Thankfully, Sunset Falls faced effective and persistent opposition. Residents of the area near Sunset Falls were practically unanimous in their opposition to it. Numerous environmental groups opposed it, and did all they could to shine some light on the misbegotten project. ALPS wishes to thank all those who stood against it year after year.

Snohomish P.U.D. has built other uneconomic low power hydro projects, most recently on Hancock and Calligan Creeks, both tributaries of the North Fork Snoqualmie. Sunset Falls was an order of magnitude greater in both scale and folly. ALPS, and other groups will need to remain vigilant. It is very unlikely that Snohomish and other public utilities are done with their push for more "green" low power projects. But for now, we can celebrate that the South Fork Skykomish won't be forced into expensive, and precarious pipes at Sunset Falls.

DNR plans new trail to Oxbow Lake in Middle Fork Snoqualmie

The Washington Department of Natural Resources is proposing a new trail to circle around the "Oxbow Lake" in the Middle Fork Snoqualmie valley. The trail will follow a loop route around the lake, and also provide access to the river.

The Oxbow Lake is a very unusual feature for the Cascades. Occupying a section of old Middle Fork riverbed, the lake appears to be fed by tributary streams on the west side of the river. Likely it receives water directly from the Middle Fork during high flow events.

The Oxbow looks similar to bayou or southern swamp forest, only with Northwest species instead of cypresses. ALPS members plan to review the route with DNR staff.

In other Middle Fork news, the road crowding problem is starting to be addressed by the "Trailhead Direct" shuttle program, which will initially provide transportation to Issaquah Alps and Mt Si trailheads. Service is planned to expand to Mailbox Peak in the lower Middle Fork. It is hoped that service can eventually be extended to include other Middle Fork trailheads, helping to solve the problem of too many cars on the narrow Middle Fork road.

ALPS turns 50

On October 6, 1968 a group of conservationists from the westside agreed to meet a similar group from the eastside. They hiked together to Hyas Lake, then retreated from the rain to Salmon La Sac campground to conduct some business. On that Sunday afternoon they formed a group of specific defenders spanning both sides of the Alpine Lakes area and agreed to call it the Alpine Lakes Protection Society.

Fifty years later – to the day – past and present ALPS members will meet again at the Salmon La Sac campground on October 6, 2018. This year it falls on a Saturday. No fireworks or brass bands, this will just be a get together to renew acquaintances and honor the day.

We plan to start gathering around 11 and eat lunch midday. If we can, we'll reserve the picnic shelter. Otherwise, just look for the group.

Lunch will be potluck. If you want to bring warm food, consider a stop at the deli in one of Cle Elum's groceries. Please bring your own plates, cutlery, and drinks.

ALPS has never been big on ceremony, and this will be no exception. If some old timers decide to wax eloquent about the occasion, we won't stop them, but don't expect a string of long boring speeches.

In the unlikely event that Salmon La Sac campground is closed that day, the backup plan is to meet in the picnic area at Lake Easton State Park.

Hope to see you!

Fred Beckey, 1923 – 2017

by Matt Perkins



Don Wilde, Fred Beckey and Pete Schoening at Cashmere Crags.

Fred Beckey passed away on October 30, 2017, at age 94. Known by all as “Fred,” he was the most prolific mountain climber ever to roam the American west. He invented a vagabond on-the-cheap lifestyle featured in the recent climbing movie about him, *Dirtbag*, and he enjoyed that lifestyle almost without a break for 80 years. He was also a scholar and produced an astounding collection of meticulously researched guidebooks, histories and, in 2011, his opus work: *Fred Beckey's 100 Favorite North American Climbs*.

In 1942, Fred and his brother Helmy shocked the climbing world with their audacious second ascent of Mount Waddington, in British Columbia (this peak had turned away many organized expeditions led by the strongest climbers of the day and these two youngsters just walked in and climbed it; Fred was 19 and Helmy was 17). His quest for unclimbed mountains and new routes led from Mexico to Alaska, and from the Pacific coast to the Rocky Mountains. He made more “first ascents” than anybody else ever has, and he had an eye

for “good” climbs, combining the ascent of a visually striking feature with enjoyable climbing terrain. He was driven, but he shied away from unnecessary risk — that's why he lived to age 94.

Fred did a lot of his early climbing in what is now the Alpine Lakes Wilderness. In particular, he returned again and again to the Enchantment Plateau where he bestowed many of the features with whimsical names: The High Priest, The Blop, The Boxtop. Fred also liked literature and culture and he published the Enchantment names based in Norse mythology that had been coined by local legends Peg and Bill Stark. As a result, we now have Aasgard Pass, Naiad Lake, and Valhalla Cirque.

Fred lived and breathed mountains. He studied them and he documented their natural history, their native inhabitants, and their exploration. His legacy inspires an interest in the wild. He is buried in Mountain View Cemetery, outside Leavenworth, Washington, with a view of his beloved Enchantments.

The unending saga of Travel Management in Okanogan Wenatchee National Forest

by Charlie Raymond

Growing recognition that off-road vehicle (ORV) use posed one of the most serious threats to sustainability in the National Forest System prompted the introduction of a national policy enunciated in the "Travel Management (TM) Rule" (<https://www.fs.fed.us/recreation/programs/ohv/final.pdf>) published in 2005 (November). The TM Rule requires that off-route (cross-country) motorized travel would be prohibited on all National Forest lands. Each National Forest would publish "Motorized Vehicle Use Maps" (MVUMs) showing designated routes (trails) and limited areas legally open for specified types of vehicles (motorcycle, ATV, 4X, Jeep). Time line was to implement the Rule including publication of MVUMs by end of 2009. The history has been long, and implementation in the Okanogan Wenatchee National Forest (OWNF) has still not been completed.

The Rule is highly significant for the Alpine Lakes Area (ALA), especially in the Cle Elum Ranger District of the OWNF. In some areas most trails are open to ORV use with impacts on the lands around the Alpine Lakes Wilderness affecting popular access routes, hiking areas and in some places remote boundary areas of the Wilderness.

In 2005 the OWNF began a sequence of steps toward implementing the Rule including public meetings presenting information about the Rule, explanations of its motivations and specific proposals for MVUMs as well as opportunities for public comment at critical steps. In spring of 2009 OWNF initiated a formal

NEPA process for decision with presentation of a formal proposed action for public comment. The OWNF set a target for publication of a DEIS late in 2009 or 2010 after additional analysis of comments on the proposed action. This timeline was pushed into the future multiple times until end of 2014 when the NEPA process was abandoned for a less rigorous Environmental Analysis (EA) that could be concluded more rapidly.

A Draft EA was published in June of 2016 setting out 4 Alternatives, a no-action Alternative (A) and 3 action Alternatives (B,C and D), all 3 banning motorized cross country travel except in areas identified on the relevant MVUM as required by the TM Rule. Within the ALA the action alternatives are all very close to status quo with regard to the trail system. Roads open to mixed use by highway-legal and off-road vehicles (motorcycle, ATV and WATV) are not proposed for the immediate ALA in any of the Alternatives, although these are significant issues in the wider OWNF. (The Draft EA including maps and related information is available at the Forest Service website <https://www.fs.usda.gov/project/?project=46467>.)

The Alternatives differ primarily with regard to along-road camping corridors open to motorized access with Alternative C having a very small proportion of roads so designated, Alternative D having a very large proportion and a "preferred" Alternative B being intermediate. The proposed camping corridors are 300' wide to each side of a road, excluding near-stream areas. While these corridors would maintain the

long appreciated car-camping opportunities, the misuse of vehicles within them could be every bit as damaging as in the past without careful management with resources for strong enforcement.

Since the Draft EA, the FS has been analyzing public comments with a recent target for Final EA and decision in December, 2017. While that is past, there is expectation of publication in the near future. That will be followed by a 45 day Objection Period, an additional 45 Objection Resolution Period (if there are objections) then signing of final decision. We don't know what the OWNF will present for MVUMs in its final EA decision, but something very close to Alternative B of the DEA seems likely.

So at this point in the ORV journey we can happily anticipate the long, overdue implementation of the signature stipulation of TM that cross-country motorized travel be explicitly/unequivocally illegal. On the other hand, it is disappointing that we have not progressed beyond the default trail system of 2005 with its problems of progressive deterioration of parts of motorized trails, associated environmental impacts and balance of hiking versus ORV recreation. Many people and organizations including ALPS provided input to the Forest Service about these problems with no recognizable consequence.

The TM Rule enables review of the MVUM by individual Ranger Districts, and our work continues. We have to hold the FS to the goals

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of the TM Rule that have not yet been fully accomplished. It is time for another broad assessment of conditions on motorized trails in the Alpine Lakes Area. We need to see how the new designation of camping corridors actually works. And there will be pressure to add new motorized trail and mixed-use with ATVs and WATVs on roads. Most of OWNF has not come to

grips with over-snow motorized travel (snowmobiles) in the context of the TR Rule.

The Alpine Lakes is certainly one place where we need to continue our attention. Let's not forget that the area around the Alpine Lakes Wilderness offers many great hiking opportunities often much quieter than the

common experience at the busy road heads and trails accessing the Wilderness. Give them a try! It is important for all of us to let the relevant District Ranger know about serious problems related to ORV use (as well as any success) that we recognize as we camp and hike in these areas.



KARL FORSCLAND

Klonaqua trail sign.

Olympic mountain goats to be moved to Alpine Lakes region of Cascades

by Rick McGuire

The National Park Service, U.S. Fish and Wildlife Service, and the Washington Department of Fish and Wildlife (WDFW) appear to be close to taking the much needed, long anticipated and long delayed step of completely removing the population of non-native, highly destructive mountain goats from the Olympic Mountains.

These goats were released into the goat-free Olympic Mountains about a century ago, to provide sport hunting opportunities. There are no records of exactly where they came from, but most experts seem to think they came from the norther Interior Ranges of British Columbia, and coastal Alaska.

These non native goats have been a growing problem ever since they were turned loose. Alpine plant communities in the Olympics evolved without goats. The goats' presence has been very destructive, especially to a number of uncommon, rare, or even unique plants, especially in the high elevations of the dry northeastern corner of the Olympics. Many places where these plants grow, or grew, have become goat wallows.

The near-total absence of predators has led to the Olympic

goat population growing at the phenomenal rate of eight percent per year. Some of their behaviors have become unnatural, including little or no fear of people, sometimes following people in hopes of getting salt from urine. One hiker was killed by an Olympic goat on Hurricane Ridge a few years ago. But the argument can certainly be made that the real problem there was humans invading the goats' home, not goats going after people.

It is good to see a plan to remove them totally from the Olympics after decades of dithering by the agencies. However, instead of simply eliminating the goats, a fair number will be transported into the Cascades. Although the same species of goats are native to the Cascades, these particular goats have lived in a non native environment for a century. There are worries that they could bring their problem behaviors with them.

WDFW has allowed far too much hunting of native Cascade goats, and their numbers have plummeted in recent years. It appears that WDFW sees moving

Olympic goats to the Cascades as a way of covering up their decades-long mismanagement of native Cascade goats. Many Olympic goats will be moved into the Alpine Lakes region of the central Cascades. WDFW plans over 100 helicopter flights, either into the Alpine Lakes Wilderness or just outside it.

While it is good to see these destructive animals finally eliminated from the Olympics, at least some people do not welcome WDFW's plan to move many of them here. It remains to be seen how much harm they might cause. Hikers may need to become more vigilant and aware of the danger, or at least annoyance, that they could present.

Unfortunately, helicopters will once again be declared the "minimum tool" necessary for use in the Wilderness. But even though some are uneasy about putting some of these Olympic goats into the Cascades, their elimination from the Olympics after years of effort almost certainly outweighs any problems that may arise from putting some of them into the Cascades.

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that had never occurred. The agencies allowed only a short, 15-day comment period on the draft EA; ALPS coordinated comments from a coalition of organizations.

The agencies then announced there would soon be a new comment period on the defective draft EA. The Revised Draft EA was released just before Christmas, with comments due after the New Year holiday in January 2018. ALPS again coordinated comments from a coalition. The agencies later announced the Snow Lake valve project would be postponed into 2019.

Eightmile “emergency” in Spring 2018

In March 2018, IPID declared an emergency regarding the Eightmile dam. IPID cited the Jack Creek Fire of 2017, the risk of increased runoff from the burned area, the risk of sudden failure of the Eightmile dam, and Ecology’s Dam Safety Office change of the dam’s hazard classification from “Low” to “High.” Chelan County also declared an emergency and directed the County Sheriff to alert the public and develop an Emergency Action Plan. ALPS monitored the emergency efforts to stabilize the Eightmile dam to ensure the stabilization activities address current safety concerns and not expanded water capacity.

In mid-March, IPID submitted a SEPA Checklist for its Eightmile “Emergency Repair/Replacement Project.” It proposed to start construction of a new dam by July 15 (after the lake level was lowered about 20 feet) and complete it by October 30, 2018, excavating about 7,000 cubic yards of material and placing about 200 cubic yards of concrete. IPID also issued a press release describing the emergency and stating it would “try to get the dam replaced this year.”

IPID also circulated a memo describing the project, proposing “to walk an excavator up to the lake without doing much damage to the forest.” IPID later said this would cost \$2,000 to \$3,000, compared with the more expensive option of \$100,000 to fly the excavator there by helicopter. In May, the Forest Service refused to allow IPID to “walk” the excavator through the Wilderness on the ground, so it was flown in. IPID had grossly underestimated the cost of that part of its project.

On March 23, Ecology’s Dam Safety Office directed IPID to prepare an incident report including details of its proposed repair work. On March 26, the Dam Safety Office wrote that the Eightmile Feasibility Study of June 2017 (prior version of DPEIS Appendix B) had geotechnical provisions that were “not acceptable to the DSO” and “unacceptable” and “not adequate”; additional requirements were specified by the State.

On March 30, 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).”

In mid-April, IPIS submitted a Scope of Work memo prepared by its consultant Anchor QEA. The memo proposed construction of a new dam between August and November. It did not acknowledge any necessity of obtaining permits from the U.S. Forest Service (IWG members have a history of such omissions; the Snow Lake valve EA barely mentioned the Forest Service).

On May 4, the Forest Service said it is bifurcating the “emergency” response from the separate project to repair and replace the dam. The Forest Service refused to authorize the latter for several reasons; IPID had not yet submitted a well-defined action plan; IPID had not perfected its 30% design drawings for a new dam; IPID needed to prove it has not relinquished part of its water rights; and IPID’s deed does not give IPID the right to “walk” an excavator across Wilderness lands to get to the dam site. The Forest Service also said it needs to look at impacts of raising the lake level with a higher dam, as well as the impacts of drawing down the lake level lower than it has been (by installing a new pipe at a lower level). The Forest Service said “the time is not yet ripe” for discussing a new dam at Eightmile. We appreciate the Forest Service actions to enforce our laws and protect the Alpine Lakes Wilderness.

By early May the snowmelt had filled the lake. Media reports of “recent” erosion of the earthen embankment at the dam may have been unwittingly referring to erosion that occurred in a 1990 flood, 28 years ago. The Forest Service consented to IPID’s proposed emergency abatement actions to widen and harden the dam’s spillway (the crest of the

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embankment) which did “not materially change the size and scope of the dam.” IPID flew an excavator to the site by helicopter on May 12 (see cover photo taken that date). By May 17, the spillway modification work was done (see before and after photos on page 13). Also on May 17, Ecology installed lake level monitoring equipment (two months after the emergency was declared). The County conducted a public meeting in Leavenworth about the dam emergency, and told the public that a breach of the dam was not imminent.

As we went to press in mid-June, a month after the excavator work at Eightmile, IPID had reportedly “paused” its design of a new siphon for emergency abatement at Eightmile until July or later, while attempting to remove the obstructions from its old pipe.

The DPEIS states (at p. 2-68):

“Because of the timing of IPID’s emergency declaration, the draft PIES [sic] does not contemplate this action’s impacts on the proposed alternatives. This may be evaluated further in the final PEIS.”

However, because there are so many huge gaps in the DPEIS, it should not proceed to the “final PEIS” stage yet. Rather, a revised Draft PEIS should be released to correct the deficiencies, supply the missing analysis and allow the public to comment on that new material.

Two weeks after it released the DPEIS, the State Department of Ecology wrote this 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.”

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 so much time and public funding since 2013 without determining such a fundamental question, especially since ALPS and others have been pounding this specific issue for years. The public cannot comment upon the merits of Ecology’s determination until after Ecology makes it and discloses it. This is another reason that preparation of a Final PEIS would be premature; the DPEIS should be revised to address the above deficiencies, and a Revised Draft PEIS should be released for public comment, before a Final EIS is prepared.

What you can do:

The Alpine Lakes Wilderness needs you! There is a public comment deadline of July 30. Submit your personal comments. Links to the DPEIS and information on how to comment are located on the Chelan County web site: <http://www.co.chelan.wa.us/natural-resources/pages/environmental-review>. In addition, let your elected officials (state and federal) know how important this issue is to you.

Attend the DPEIS public hearing and open house on Wednesday June 27, from 4:00 to 8:00 pm, at the Leavenworth Festhalle, 1001 Front Street, Leavenworth, WA.

Attend the Icicle Work Group’s informational meeting on Monday June 25, from 6:00 to 8:00 p.m. at the State Department of Ecology office in Bellevue, WA (3190 – 160th Avenue S.E.).

The Alpine Lakes Wilderness and these precedent-setting issues

have national significance. Please alert your out-of-state contacts and ask them to comment as well.

For more info, contact ALPS at alpinelakes.info@gmail.com

Points to include in your comments:

- Please tell the agencies that 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.
- 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.
- 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

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enlarge Eightmile Lake, and has never had any water rights at Upper Klonaqua Lake.

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- The DPEIS should be revised to address the above deficiencies. A Revised Draft PEIS should be released for public comment.



KARL FORSGAARD

Eightmile dam: above, before excavator work; below, after.



KARL FORSGAARD

Grizzly Plan back from dead?

After reports that the Interior Department had instructed the National Park Service and the U.S. Fish and Wildlife Service to discontinue work on the long-awaited plan to reintroduce grizzly bears to the North Cascades, things may have changed.

Interior Secretary Ryan Zinke appears to have put some life back into the plan. News reports have indicated that he wants work on the E.I.S. to continue. It is not clear whether this is a permanent commitment, or if it is likely to be at the same scale as originally proposed.

Grizzly bears were once abundant in the Cascades, but decades of commercial hunting followed by “sport” hunting have essentially eliminated them. A few bears have been spotted over the years, but there is no evidence of any real population. It may be that occasional bears wander down from British Columbia to the Cascades, finding food but not mates.

ALPS hopes that the reintroduction program will indeed go ahead, and will do what it can to promote it. The Cascades, north and central, deserve to have grizzly bears living among them again.

Changes to ALPS Board of Trustees

Readers may notice some changes to the ALPS Board of Trustees listed on the masthead of this issue of *The Alpine*.

After serving three years in the position of ALPS president, Karl Forsgaard has stepped down. Success and promotion at his “real” job have put more pressure and demands on Karl’s time. The need for more time at work has unfortunately meant less time for ALPS, so Karl has retired from the board of trustees. But Karl is still an active ALPS member, and very much involved in efforts to keep more water from being diverted out of the lakes of the Alpine Lakes Wilderness in the Icicle Creek watershed to feed new development in and near Leavenworth.

Karl has been very active over the years. Karl was the lead advocate in resisting expansion of ATV and ORV routes on Okanogan-Wenatchee National Forest lands, and blocking Forest Service plans to open up many huge new loops (combining roads and trails) for these motorized

vehicles. ALPS wishes to thank Karl for the countless hours he has put in, his string of successes as an environmental advocate and litigator, and we all hope that he can return to the board someday if circumstances permit. Rick McGuire has moved from the vice president position to that of president.

Additionally, Art Day, Don Parks and Bill Beyers have left the ALPS board, but remain on the board of the Alpine Lakes Foundation. ALPS and ALF are two completely separate corporations, and it was decided that it is in the best interest of both to draw a clearer line between the two. Don and Bill have been with ALPS since “before the beginning,” and, along with Art Day, intend to remain active as part of the Alpine Lakes Foundation. All three have accomplishments spanning decades that could fill an entire issue, or more. ALPS wishes to thank Art, Don and Bill for all they have done, and all they will continue to do as part of ALF.

Kachess SDEIS released for comment

The U.S. Bureau of Reclamation and the State Department of Ecology released a Supplemental Draft Environmental Impact Statement (SDEIS) for the Keechelus Reservoir to Kachess Reservoir Conveyance (KKC) and the Kachess Drought Relief Pumping Plant (KDRPP). These projects are part of the Yakima Basin Integrated Plan.

The KKC (also known as the K-to-K Pipeline) proposes building a four-mile tunnel to convey water from Lake Keechelus to Lake Kachess. Both of these lakes serve as reservoirs for downstream irrigators. The watershed above Lake Keechelus normally receives more precipitation than the storage capacity of the lake, and the excess water flows down the Yakima River early in the summer before irrigators need it. The tunnel would carry the surplus water from Lake Keechelus to Lake Kachess, which can store more water than it receives.

The KDRPP proposes to install pumps to withdraw as much as 200,000 acre-feet of water from Lake Kachess from below the level of the current gravity spillway. This would lower the lake level by about 80 feet below the current low pool elevation. Under the proposed plan this water would be withdrawn in drought years to provide junior water right holders. However, the SDEIS presents no alternative for mandatory conservation in the Yakima River basin to provide the 200,000 acre-feet of water estimated as necessary for drought relief.

Preliminary cost estimates for the six action alternatives range from \$282 million to \$704 million for construction and 100 years of operations and maintenance.

ALPS submitted comments on the initial DEIS three years ago (see Yakima Plan Update in *Alpine* 2015 No. 1), and we plan to submit comments on the SDEIS.

The 90-day comment period closes on July 11. The SDEIS may be viewed at <https://www.usbr.gov/pn/programs/eis/kdrpp/index.html> and <https://www.usbr.gov/pn/programs/eis/kkc/index.html>

For further information regarding this SDEIS or to submit comments, contact:

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ALPS board member Thom Peters at Lower Klonauqua Lake dam.



KARL FORSGAARD



alps

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Balanced rock on Mt. Stuart.



The newsletter of the Alpine Lakes Protection Society (ALPS). ALPS is dedicated to protection of the Alpine Lakes area in Washington's Cascades.

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