DEPARTMENT OF ECOLOGY
State of Washington

Scoping Summary Report

EIGHTMILE DAM REBUILD AND RESTORATION PROJECT

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PUBLICATION AND CONTACT INFORMATION

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ACRONYMS AND ABBREVIATIONS

CFR	Code of Federal Regulations
cfs	cubic feet per second
DAHP	Washington Department of Archaeology and Historic Preservation
DSO	Washington State Department of Ecology Dam Safety Office
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
Forest Service	U.S. Forest Service
FPEIS	Final Programmatic Environmental Impact Statement (
IPID	Icicle & Peshastin Irrigation Districts
IWG	Icicle Work Group
NEPA	National Environmental Policy Act
OCR	Office of Columbia River
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife

CHAPTER 1 INTRODUCTION AND PROJECT OVERVIEW

The Washington State Department of Ecology (Ecology) Office of Columbia River (OCR) is preparing a State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) for the Eightmile Dam Rebuild and Restoration Project. The EIS is being prepared to evaluate the environmental impacts associated with alternatives under consideration for rebuilding and restoring Eightmile Dam, located in Chelan County in the Icicle Creek Watershed near Leavenworth, Washington. Scoping is one of the initial steps in the EIS process and was conducted to solicit stakeholder input on the range of issues and potential alternatives to be addressed in the EIS. This report summarizes the public scoping comments received by Ecology between December 18, 2020 and February 1, 2021. Comments included written comments submitted via an online comment form, hardcopy letters sent via mail, emails, and oral comments provided at two scoping meetings held in January 2021. In addition to summarizing the comments received, this report also describes how issues raised by scoping comments will be addressed in the Draft EIS. Project-related information can be reviewed on the project website at: https://ecology.wa.gov/eightmile.

The project-level EIS is part of a phased review process under SEPA, following the 2019 Final Programmatic Environmental Impact Statement (FPEIS) for the Icicle Strategy issued by Ecology and Chelan County in January 2019. The Eightmile Dam project is one of several early actions to be implemented as part of the Icicle Creek Strategy, under the direction of the Icicle Work Group (IWG). The project proponent is the Icicle & Peshastin Irrigation Districts (IPID). Ecology's OCR will act as the lead agency for the project-level EIS and has determined this proposal is likely to have a significant adverse impact on the environment, and accordingly, an EIS is required under Revised Code of Washington (RCW) 43.21C.030(2)(c).

1.1 Project Overview

Eightmile Lake is one of four lakes in the Alpine Lakes Wilderness Area managed by the IPID to provide water storage. A small dam, low-level outlet pipe, and a slide gate at the outlet of Eightmile Lake allow for controlled releases of stored water to supplement flows in Icicle Creek, which increase water supply available during the low-flow periods that typically occur during the late summer months. Icicle Creek, a tributary to the Wenatchee River, provides water for agricultural irrigation, municipal and domestic use, aquatic habitat for wild and hatchery fish, and recreation. Because of the large size of the drainage basin relative to the storage volume in the lake, Eightmile Lake has a high potential for refill, even during dry years. The Eightmile Dam, high in the Alpine Lakes Wilderness Area, is a major source of stored water supporting streamflows in Icicle Creek, benefiting these uses.

The existing dam was constructed in the 1920s and consists of a rock masonry and concrete wall structure with an earthen embankment section. The infrastructure is more than 90 years old and requires improvements to operate in a safe, reliable way.

The following are the key concerns for Ecology's Dam Safety Office (DSO) and IPID:

- Limited Spillway Capacity
- 2017 Jack Creek Fire
- Low-Level Outlet Failure

Following the Jack Creek fire in 2017, DSO elevated the hazard classification of the dam from low to high. This hazard classification means that dam failure would threaten human lives and/or cause substantial economic or environmental damage. Because of these concerns, IPID declared an

emergency at Eightmile Dam on March 13, 2018. The dam was repaired in 2018 to temporarily increase safety by widening and hardening the spillway and by replacing a segment of the low-level outlet pipe that had collapsed. While the repairs made it possible to lower the lake and provide additional spill capacity, the infrastructure does not currently meet DSO's requirements for dam safety or IPID's needs. As a result of these ongoing safety concerns, DSO is requiring that the outlet gate be kept open to reduce the volume of water stored and thus reduce the risk of failure during the winter and early spring.

The IPID has an easement agreement with the U.S. Forest Service that grants IPID limited privileges, including the ability to maintain and repair its reservoirs within the Alpine Lakes Wilderness Area. In the 1990s, the IPID exchanged land that is now within the Wilderness Area for this deeded area. This area is called the Special Warranty Deed Area.

Project Objectives

IPID's proposed rebuild and restoration of the Eightmile Dam has three objectives:

1. Restore the storage capacity of Eightmile Lake so that it meets IPID's irrigation and storage needs.
2. Comply with DSO regulations for a high hazard dam.
3. Provide additional water to enhance instream flow volumes in Icicle Creek and potential mitigation of new beneficial uses.

IPID holds a 1926 adjudicated water right to store 25 cubic feet per second (cfs) of water at Eightmile Lake. Downstream public safety is a paramount concern and high priority. Erosion of the earthen embankment portion of the dam structure has reduced the active storage available for release by gravity without pumping or siphoning to less than 1,400 acre-feet under current conditions. Rebuilding the dam would restore the storage capacity to meet IPID's irrigation needs and could provide additional water to enhance instream flows.

Eightmile Dam would be one of the first of several projects to be implemented under the Icicle Creek Water Resource Management Strategy at the direction of the IWG. The multi-stakeholder group is working to identify and evaluate projects that will increase instream flows and improve water management in the Icicle Creek Subbasin. The group has adopted Guiding Principles that represent the collective goals established by the group for improving water management in the Icicle Creek Subbasin. The proposed Eightmile Dam Rebuild and Restoration Project would help meet the Guiding Principles of the Icicle Creek Strategy.

1.2 Alternatives

Two spillway design alternatives as well as two construction methods were described for consideration during scoping. The alternatives, along with operational considerations, are described further on the project website: https://ecology.wa.gov/eightmile. Considering stakeholder input and other factors, proposals that include dam construction outside the Special Warranty Deed Area have been eliminated from consideration in the EIS.

As required by SEPA, the EIS will also evaluate a No Action Alternative. The No Action Alternative serves as the baseline condition, against which the action alternatives are compared and is intended to illustrate the most likely scenario if the project is not implemented.

As a result of the scoping comments received, a third alternative has been added and will be evaluated in the EIS.

Alternative 1: Narrow Spillway with Gates

This alternative includes replacement of the existing dam with an earthen embankment and reinforced concrete dam structure equipped with automated control gates over the primary spillway. Three 4-foot-high, 20-foot-long automatic level control gates would be installed on top of the primary spillway, which would have a hard crest elevation of 4,667 feet. The gates would allow IPID to control the water level within the top 4 feet of the lake. When additional water supply is needed, IPID would raise the gates in the late spring or early summer to raise the lake to elevation 4,671 feet prior to releasing the water in the late summer. The gates would automatically lower if the lake level gets too high to protect the dam and prevent overtopping. For example, if a storm occurs when the gates are up and the lake is full, the gates would automatically lower to pass peak flows generated by the storm. This design would allow for a narrow primary spillway (60 feet wide) and therefore a smaller dam footprint compared to the wide spillway alternative (described below).

During extreme storm events, the lake would continue to rise above the primary spillway. Two 10-foot wide intermediate spillways on either side of the primary spillway would provide 20 feet of additional spillway width at an elevation of 4,671.5 feet. A secondary spillway would be created in a low spot south of the main dam structure by hardening an existing channel. The secondary spillway would have a crest elevation of 4,673 feet. The spillways would provide capacity to pass the design storm event (a storm that has the probability of occurring once in one million years) while maintaining the freeboard in the lake required by DSO.

Water would be released from the lake through a new 30-inch diameter low-level outlet pipe/siphon. The low-level outlet pipe/siphon would extend from an inlet submerged in the lake approximately 150 feet west of the new dam structure to an outlet in the Eightmile Creek channel approximately 314 feet downstream of the new dam structure. This would allow the lake to be drawn down to a low water surface elevation of 4,636 feet during drought conditions, which would allow access to stored water without pumping. The low-level outlet pipe would be located entirely within the Special Warranty Deed Area. IPID would release water during the late summer to maintain the water supply available for authorized diversions and instream flows in Icicle Creek. Releases through the low-level outlet pipe would be controlled by an automated plug valve at the downstream end of the pipe. IPID would have the ability to adjust the valve remotely to release the flows needed to meet downstream water supply and instream flow needs.

The primary spillway gates and low-level outlet valve at the lake would be powered by batteries charged by a solar panel. Lake levels, gate and valve positions, and other controls would be monitored remotely, and the equipment would be operated via radio signal requiring an antenna, which would be located at the dam site, and a transmitter located on a ridge outside the Wilderness. The controls and monitoring equipment would be concealed as much as possible to protect the equipment and preserve, to the extent possible, the aesthetic values of the Alpine Lakes Wilderness Area.

Alternative 2: Wide Spillway without Gates

This alternative includes replacement of the existing dam with an earthen embankment and reinforced concrete dam with a primary spillway length of 180 feet. The primary spillway would be fixed and completely passive. No gates or automatic equipment would control the spillway or adjust the spillway crest elevation. This would result in a wider spillway and a larger footprint than the narrow spillway alternative because the primary spillway would have 4 feet more of vertical spillway capacity. There would be no intermediate spillways. The primary spillway would have a hard spillway crest at an elevation of 4,671 feet.

During extreme storm events, the lake would flow over the entire length of the primary spillway. A secondary spillway, the same as the narrow spillway alternative, would be created in a low spot

south of the main dam structure by hardening an existing channel. The secondary spillway would have a crest elevation of 4,673 feet. The spillways would provide enough capacity to pass the design storm event while maintaining the freeboard in the lake required by DSO.

As with the narrow spillway alternative, water would be released from the lake through a new 30-inch diameter low-level outlet pipe/siphon. The operation and configuration of the low-level outlet pipeline would be essentially the same described for the narrow spillway alternative, with the low-level outlet pipe being located entirely within the Special Warranty Deed Area.

NEW: Alternative 3: Narrow Spillway without Gates

As noted below in Section 3.4, a number of scoping comments were received that suggested that the EIS should include an alternative dam design that meets the existing spillway elevation of 4,667 feet and does not allow Eightmile Lake to be lower than its historic low levels. As a result, Alternative 3 has been developed and will also be evaluated in the EIS.

Under Alternative 3, the dam type and configuration would be almost identical to that of Alternative 1, having a narrow spillway and a concrete spillway apron, but with no mechanical gates. The mechanical gates that are included as part of Alternative 1 would allow IPID to store up to a maximum water surface elevation of 4,671 feet with the gates activated. Alternative 3 would not have any gates and would only be designed to store water up to a maximum water surface elevation of 4,667 feet. This alternative would have the same footprint as Alternative 1. Because Alternative 3 would not have mechanical gates, the primary spillway would include one continuous 60-foot-wide primary spillway section with a crest elevation of 4,667 feet. The secondary spillway for Alternative 3 would be identical to that described for both Alternatives 1 and 2.

The maximum volume of water that could be stored for release by the dam would be less with Alternative 3 than for the other two action alternatives. Alternative 3 would not meet all of the applicant's objectives because there would be less potential water storage available for release to ensure against drought conditions. This alternative would require pumping to access water storage greater than approximately 1,700 acre-feet.

Operation

In general, operation of Eightmile Dam would be as follows under either action alternative:

- The lake would be allowed to fill annually through mid-July each year.
- IPID would then open the valve on the low-level outlet to start releasing water, as needed to meet downstream needs.
- IPID would close the valve on the low-level outlet at the end of the irrigation season (fall timeframe).
- Similar to existing dam conditions, the lake level would typically continue to drop due to seepage through the soils under the dam until early fall storms begin to refill the lake.
- The lake would refill through the winter and spring.

Under either alternative, the drawdown would be limited to an elevation of 4,642 feet during non-drought years and 4,636 feet during declared drought conditions (roughly once every 5 years). In addition, there is a known natural leak in the earthen materials that compose the lower most portion of the dam. The maximum drawdown would release 2,000 acre-feet. IPID would regulate the lake so

that the water elevation does not fall below the target elevation as of October 1 of each year, unless releases are needed after October 1 due to drought. The lake would only be lowered to the low-water surface elevation in drought years in late-September to early-October.

IPID would limit the release of water for non-district purposes to be consistent with water volumes determined through a decision-making process and resulting water management tool to be created by the IWG and approved by the co-conveners (Ecology and Chelan County). This tool will set the total water quantity to be released each year under the existing water right for non-district purposes and the minimum elevation of the lake. This decision support tool will also direct the instantaneous release amounts and timing of releases. IPID would reserve the right to lower the lake beyond such limits if needed for district purposes but not below 4,642 feet, unless a drought is declared by the state.

Under the narrow spillway alternative, the water surface elevation in the lake would typically be held at a maximum elevation 4,667 feet except for a few weeks during the late spring and early summer when IPID would raise the gates over the primary spillway to capture additional runoff and raise the lake to a maximum water elevation of 4,671 feet. IPID would typically raise the gates in May and begin to draw down the lake in July. The gates would be lowered once the lake level is drawn down below the bottom of the gates (4,667 feet). Under the narrow spillway alternative, if the gates are raised and the lake fills, the gates would automatically lower to prevent the lake level from rising above 4,671 feet. During a storm, the gates would lower to provide additional spillway capacity to pass peak storm flows.

Under the wide spillway alternative, the spillway would be passive, meaning that there would be no gate or other adjustable controls. The lake would flow over the primary spillway when the lake fills to an elevation above 4,671 feet.

Construction Methods – Applicable to All Action Alternatives

Construction of the proposed project would require the transport of construction equipment and materials into and out of the Alpine Lakes Wilderness Area. Construction would require substantial earthwork, including the excavation and placement of large rock. Completing the work would require heavy construction equipment, such as excavators or other earthmoving equipment. Initially, two potential construction methods were identified for mobilizing equipment and materials to and from the site: (1) helicopter transport, and (2) overland vehicle transport. These methods were proposed for construction, and a combination of methods was also possible. Non-motorized wilderness ground transport (i.e., pack equipment and materials in and out using humans and pack animals, with no use of motorized equipment) could be used to supplement either method for the lighter equipment and materials able to be transported in smaller quantities.

As a result of scoping comments and ongoing discussions, IPID has removed overland ground-based vehicle transport through the Wilderness as a possible construction method. IPID is exploring improvements to a short section of a closed Forest Service Road, but improvements to the road would stop short of the Wilderness. This short section of ground access would facilitate worker access, equipment and supply loading and drop off, and vehicle parking that is away from the trailhead. Access to this location would ease congestion at the trailhead and reduce the elevation and distance for hiking and packing to the dam site.

No Action Alternative

Under the No Action Alternative, the dam would be left as is, with a primary spillway elevation of 4,667 feet, and would continue to operate in its current state and manner. This leaves the dam vulnerable to failure, which could threaten human lives downstream and create economic hardship

for the IPID. Should a dam failure occur, residences, public infrastructure, and wilderness habitat would be damaged or destroyed. DSO currently requires IPID to leave the low-level outlet gate open during the winter and early spring to reduce the risk of a dam failure. The operation of the dam in this manner is not consistent with DSO regulations, does not meet the DSO's safety requirements for a high hazard dam, and would ultimately result in enforcement action by the DSO. The No Action Alternative does not meet IPID objectives for water storage capacity for operational and irrigation water delivery.

Because of the hazard the dam presents, it is possible that some emergency action could be required in the future to address the dam's deficiencies if neither of the action alternatives is implemented. However, it is not possible to predict with certainty what that action or what its effects would be. Consequently, for purposes of the EIS analysis, it is assumed that the existing state of the dam and its operation remain unchanged.

CHAPTER 2 SCOPING PROCESS

2.1 Scoping Overview

Scoping is one of the earliest steps in the EIS process, as mandated by SEPA (Washington Administrative Code [WAC] 197-11-408) and includes a public comment period. The purpose of scoping is to determine the range, or "scope," of issues to study in the EIS. Pursuant to SEPA, Ecology notified the public of the intent to prepare an EIS so that agencies, tribes, communities, organizations, and members of the public have an opportunity to comment on the scope of the impacts and range of alternatives to be analyzed. Ecology conducted a scoping comment period from December 18, 2020 to February 1, 2021.

The scoping comment period is the first of two formal opportunities in the SEPA process for the public to provide comments. The public will have a second opportunity after the publication of the Draft EIS. The public comment period for the Draft EIS is expected to take place during the fall of 2021.

Table 2-1. Schedule and Timeline for the EIS Process

Timeframe	Activity
December 2021	Alternatives Developed
Dec 18, 2020- Feb 1 2021	Extended comment period for EIS Scoping
January 13 and 21	Public Scoping Meetings
Spring 2021	Collaboration with forest Service on Joint NEPA/SEPA Determination
June 25	Scoping Summary Released with new alternative
October	Draft EIS published
October-December	Public Comment Period
November	Public Meetings on Draft EIS
March 2022	Final EIS published

2.2 Notification and Outreach Activities

Ecology conducted the following notification and outreach activities to notify agencies, tribal governments, and members of the public and stakeholders of the scoping comment period and public scoping meetings. Ecology developed both a Scoping Notice and Legal Notice (see Appendices A and B). The follow lists the different methods that information was shared with the community:

- Multi-week posting on the project website: (https://ecology.wa.gov/eightmile).
- Postcard notifications mailed to landowners with parcels adjacent to or within 500 feet of Icicle Creek between Forest Service Road 7601 and the confluence with the Wenatchee River, as well as any parcels within the Federal Emergency Management Agency (FEMA) flood zone of Icicle Creek, if not already included.
- Legislative briefing for State Representatives Brad Hawkins, Keith Goehner, and Mike Steele.
- Tribal outreach to representatives from the Yakama Nation and Confederated Tribes of the Colville Reservation.

- SEPA Register posting and SEPA agency distribution email.
- December 18, 2020 press release and SEPA public notice published in *Wenatchee World*, *Leavenworth Echo*, and *Cashmere Record* news outlets.
- Email announcement to those who had indicated interest in the project issue previously (Programmatic EIS email list from December 2018) and potentially interested parties identified by the Forest Service's Wenatchee River Ranger District (March 2019 National Environmental Policy Act [NEPA] email list, Forest Service Wilderness partner and stakeholder list).
- Email to the IWG and meeting announcement at the IWG meeting.
- Email notification to Chelan County Commissioners.
- Social media: Twitter posts on December 18, 2020 and January 21, 2021.

2.3 Scoping Meetings

Scoping meetings provided an opportunity for the public to comment orally. Two public scoping meetings were held during the scoping period and followed similar formats. Because of COVID-19, Ecology held these meetings virtually. Each meeting consisted of a presentation by Ecology and project team members describing the proposed alternatives and the EIS process; and ended with a public comment session. The meetings were recorded and transcripts produced. The meeting presentation is on the project website. The meetings were:

- January 13, 2021, 3:00 – 6:00 pm via Zoom
- January 21, 2021, 5:00 – 8:00 pm via Zoom

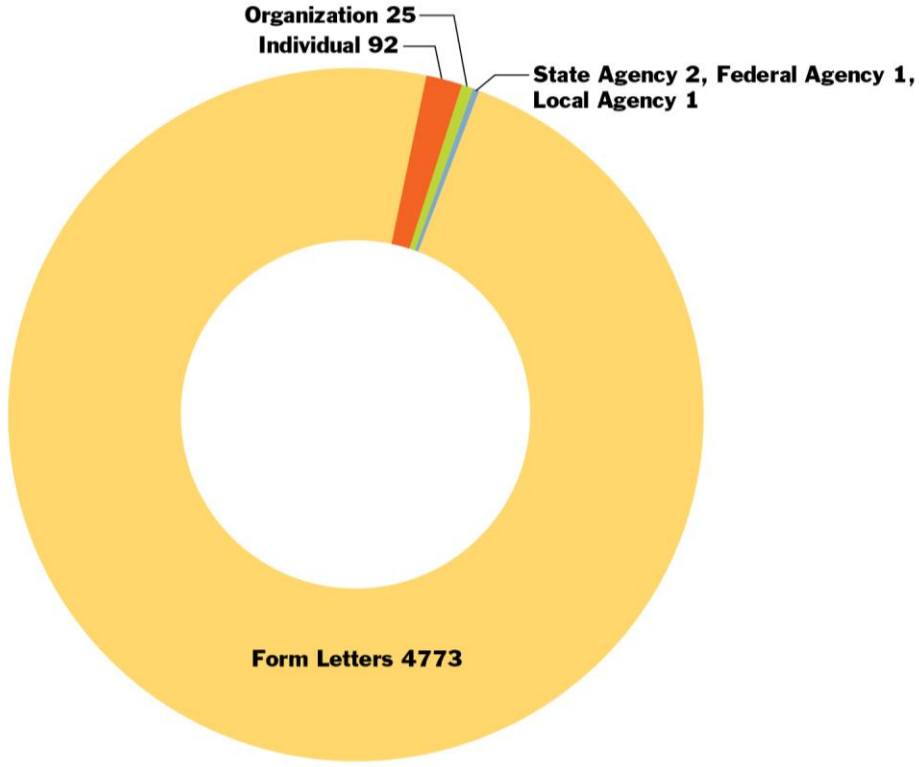
The first scoping meeting was attended by 35 people, and 62 people attended the second meeting.

CHAPTER 3 SUMMARY OF SCOPING COMMENTS

3.1 Overview of Comments

This section of the report summarizes all comments received during the scoping period. Comments were received via the online comment form, email, oral comments at scoping meetings, and hardcopy letters. All correspondence (also referred to herein as "submissions") and their attachments were reviewed and are included in this summary. Over the 47-day scoping period, 4,894 submissions were received by Ecology; of these, 121 were unique submissions and 4,773 were form letter submissions (Figure 3-1). Unique submissions were submitted by federal, state, and local agencies; organizations; and individual members of the public. Some organizations and individuals provided more than one submission.

Figure 3-1. All Submissions by Type



The names of organizations and government agencies who provided a submission are listed in Table 3-1.

Table 3-1. Unique Commenters

Type	Name
Federal Agencies	U.S. Fish and Wildlife Service – Leavenworth Fisheries Complex
State Agencies	Washington Department of Archaeology and Historic Preservation (DAHP)
	Washington Department of Fish and Wildlife (WDFW) Region 2
Organizations	Alpine Lakes Foundation
	Alpine Lakes Protection Society[1]
	American Rivers
	Center for Environmental Law and Policy
	Friends of Leavenworth
	Friends of the Enchantments
	Icicle Creek Watershed Council
	Icicle Fund
	Overlake Fly Fishing Club
	Sierra Club
	The Mountaineers
	The Wilderness Society
	Trout Unlimited
	Washington Trails Association
	Washington Wild[2]
	Wilderness Watch
	Wise Use Movement
	Icicle & Peshastin Irrigation Districts
	Peshastin Irrigation District

[1] Alpine Lakes Protection Society's submission was cosigned by 31 organizations; see Table 3-2.
[2] Washington Wild's submission was cosigned by 27 additional organizations; see Table 3-2.

Two letters from organizations had multiple cosigners; the cosigners of these letters are listed in Table 3-2.

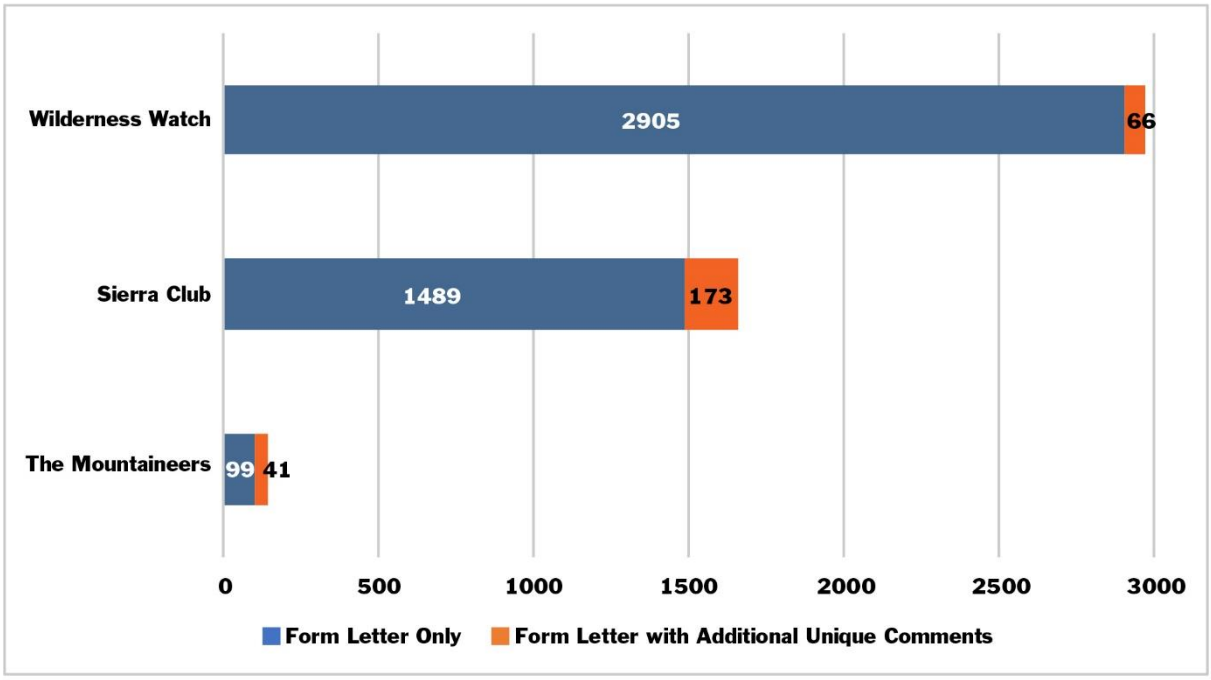
Table 3-2. Cosigning Organizations

Alpine Lakes Protection Society	Washington Wild
Alliance for the Wild Rockies	Access Fund
Aqua Permanente	American Alpine Club
Center for Environmental Law & Policy	American Whitewater
Conservation Congress	Conservation Northwest
Doug Scott Wilderness Training	Defenders of Wildlife
East Kachess Homeowners Association	El Sendero Backcountry Ski and Snowshoe Club
El Sendero Backcountry Ski & Snowshoe Club	Friends of Heybrook Ridge
Federation of Western Outdoor Clubs	Icicle Brewing Company (Leavenworth)
Friends of Bumping Lake	Issaquah Alps Trails Club
Friends of Enchantments	Kittitas Audubon
Friends of Lake Kachess	Mountains to Sound Greenway Trust
Friends of the Bitterroot	Native Fish Society
Friends of the Clearwater	North Cascades Audubon
Friends of Wild Sky	North Cascades Conservation Council
Great Old Broads for Wilderness	North Central Washington Audubon Society
Icicle Creek Watershed Council	Olympic Forest Coalition
Issaquah Alps Trails Club	Olympic Park Associates
Kachess Community Association	Sierra Club - Washington State Chapter
Kittitas Audubon Society	The Mountaineers
MidFORC	The Wilderness Society
North Cascades Conservation Council	Washington Climbers Coalition
North Central Washington Audubon Society	Washington Trails Association
Olympic Forest Coalition	Washington Wildlife Federation
River Runners for Wilderness	Wenatchee Valley Fly Fishers
Save Lake Kachess	Wild Water River Guides (Leavenworth)
Save Our Sky Blue Waters	Winter Wildlands Alliance
Seattle Audubon Society	Women for Wild Lands
Spokane Mountaineers	
Spring Family Trust for Trails	
Wild Fish Conservancy	
Wilderness Watch	

Of the total 4,894 submissions received by Ecology during the scoping period, 4,773 were form letter submissions from individuals on behalf of three organizations: Sierra Club (1,662 total), The Mountaineers (140 total), and Wilderness Watch (2,971 total). Form letters from the Wilderness

Watch received after the close of scoping were not counted in this total. Figure 3-2 summarizes these submissions. Most commenters used the standard form letter; however, some individuals provided a few sentences of personalized comments. Personalized comments primarily expressed value in preserving the Alpine Lakes Wilderness, or nature in general, as well as a value for recreation. A few commenters requested that the dam be removed, while others requested that the dam footprint not be expanded, or that overland transport not be used during construction.

Figure 3-2. Form Letter Submissions by Organizations



3.2 Comment Review Methodology

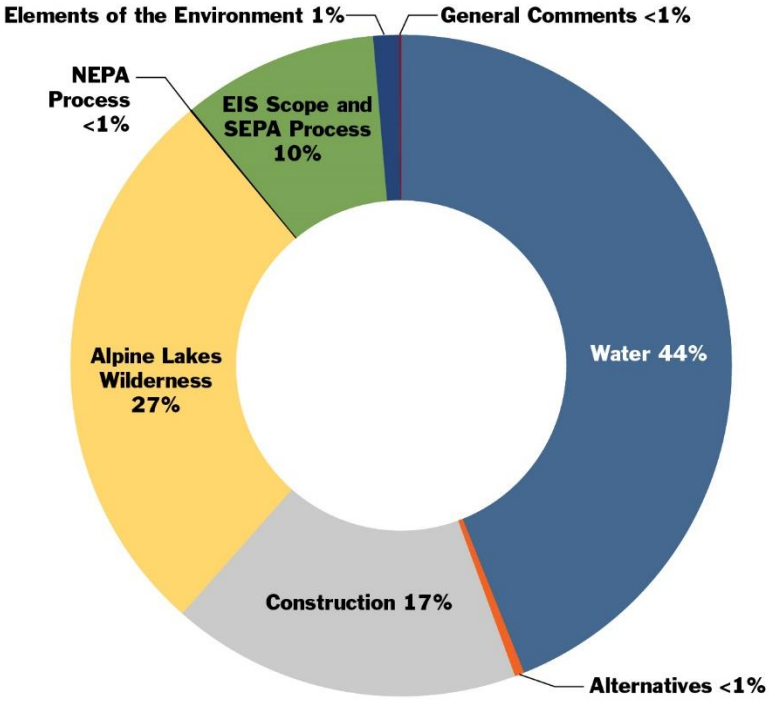
Comments received during scoping will be used to inform the analysis presented in the EIS. Based on a review of the comments received, there were 17,624 comments in the 4,894 submissions. All comments received through the scoping process were reviewed and categorized by the topics and subtopics identified in Table 3-3. Many of these topics are overlapping, and best professional judgement was used to classify a given comment into an appropriate category. Each comment was only counted in one category to produce the statistics provided throughout this report. The statistics are presented to give a sense of the overall scale of the topics that were raised relative to other topics; given the overlap among various topics, however, the numbers presented should not be interpreted as precise or absolute. The purpose of this report is to summarize comments received, and does not indicate any position by Ecology regarding the stated information. Comments will be considered and addressed in the Draft EIS as appropriate. This summary highlights the most common topics.

Table 3-3. Comment Topics and Subtopics

Topic	Subtopic
Water	Water Rights
	Water Conservation
	Water Quantity / Irrigation
	Water Quality
Alternatives	No Action
	Dam Rebuild
	Dam Removal
	Other – Additional alternative
Construction	N/A
Alpine Lakes Wilderness	N/A
NEPA Process	N/A
EIS Scope and SEPA Process	N/A
Elements of the Environment	Wildlife and Habitat
	Aquatic Species and Habitat
	Recreation
	Public Safety
	Historic and Cultural Resources
	Economics
	Other Elements
General Comments	N/A

Figure 3-3 illustrates the percentage of comments related to the major topics.

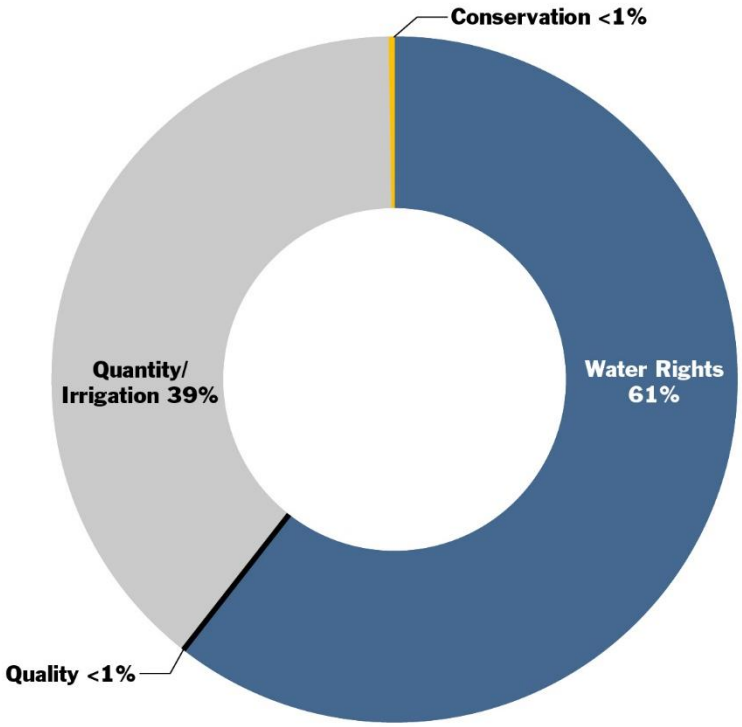
Figure 3-3. Overview of Comments by Major Topic



3.3 Water

In total, 7,745 comments addressed Water-related issues. Most commonly, commenters requested that the EIS analysis do the following: establish and evaluate the current Water Rights of IPID; evaluate and report on where exactly the proposed increase in water quantity due to the reconstructed Eightmile Dam will be allocated; and describe the extent to which demand for water from Icicle Creek could be reduced by increasing efficiency and conservation of water. Figure 3-4 summarizes the percentage of comments related to Water by subtopic.

Figure 3-4. Water Comments by Subtopic



3.3.1 Water Rights

Overall, 4,690 of the comments received on Water addressed issues on Water Rights.

- Regarding the Water Rights for IPID from Eightmile Lake, many commenters requested that Ecology should, as part of the EIS, formally determine if part of IPID's water right has been relinquished through a Tentative Determination of Water Rights and an extent and validity determination.
- Many commenters indicated that these determinations should happen before the preparation of the Draft EIS to ensure that alternatives are designed to store the amount of water that IPID has a legal right to use.
- Many comments reference the Western Water Law, with its “use it or lose it” principles, as relevant to determining IPID’s water rights going forward.
- Multiple commenters stated their belief that IPID has not utilized all of its water right for more than 5 years and that the amount not used should be relinquished. Some stated that

IPID has not utilized its full water right since 1990, when damages occurred to the Eightmile Dam.

- Several commenters stated that they believe IPID only needs 50 percent of its existing water right and that the rest should be relinquished.
- Many raised concerns about the current validity of IPID's water rights since they rely on the 1929 adjudication of water.
- Multiple commenters questioned if IPID were to utilize its full water right, how the excess water previously not utilized would be used. Commenters also questioned whether this excess water from the water right would be used for non-irrigation purposes, including domestic water supply in Leavenworth. Several commenters requested that the EIS clearly describe how water in excess of IPID needs would be used, and asked about whether additional water could be utilized for uses other than irrigation.
- Multiple commenters asked for additional clarity on whether the water rights determination would be considered binding and how it would be factored into the SEPA process.
- One commenter requested that Ecology, as part of the EIS, identify if the Purpose of Use of the water rights would be changed for "excess" water to be used for instream flows and municipal use.
- One commenter stated that there is no current legal reason for an extent and validity determination at this time because if IPID decides to transfer a portion of its water right to the state, an extent and validity determination will be conducted then.
- Another commenter asked that Ecology recognize the existing benefits of water rights for agriculture and economic benefits in the region.

Comment Consideration in Draft EIS:

- Ecology will provide a discussion of Water Rights and the status and implications of IPID's water rights in the Draft EIS, in the Water Rights section. IPID has not yet filed a Water Rights Change Application, so analyses described in the EIS will be based on preliminary information. Some level of detail that has been requested is not available, but the issue of the Districts' water rights will be comprehensively addressed in the Draft EIS.

3.3.2 Water Conservation

Overall, 21 of the comments received on Water addressed issues on Water Conservation.

- Most of the comments on Water Conservation stated that the EIS should address the extent to which demand for water from Icicle Creek could be reduced by increasing efficiency and conservation of water. Commenters stated that this could be achieved by "tightening up" water delivery and consumption infrastructure in the Leavenworth area, demand management efforts, and recalculating future demand.
- Multiple commenters stated that they believe water conservation efforts should take priority over rebuilding the dam.
- Some commenters thought that the City of Leavenworth and Chelan County should commit to specific water conservation measures to reduce demand.
- Other commenters stated that irrigators should practice more water conservation practices to reduce demand.

- A few commenters discussed the conservation measures that irrigators and IPID have already taken, including installing solid PVC lines in orchards, soil monitoring, and piping about 7 miles of ditch and replacing about 2,000 feet of concrete liner per year.
- One commenter suggested including a Water Conservation and Efficiency Plan in the EIS.
- One commenter stated that all of the proposed alternatives, except the No Action Alternative, should have a water conservation component, and a Water Conservation Only alternative should be developed and analyzed in the EIS.
- A commenter stated that the area should not be exploited to provide water to areas that have been over-allocated and could better use conservation methods.
- A commenter noted that IPID has committed to conserve 10 cfs, and as part of that commitment has doubled the canal maintenance fund that is used to purchase materials.

Comment Consideration in Draft EIS

- Water conservation will be discussed in the Water Resources section of the Draft EIS, and water conservation measures will be incorporated into all of the action alternatives. Water Conservation currently being undertaken by the City of Leavenworth and IPID will be generally described as well.

3.3.3 Water Quantity/Irrigation

Overall, 3,030 of the comments received on Water addressed issues on Water Quantity and Irrigation.

- The predominant theme among these comments was a need for the EIS to evaluate and report on the allocation of the proposed increase in water withdrawal from Eightmile Lake from the dam rebuild. Most of the commenters expressed this opinion, noting that this increase in water should not be used for irrigation outside of the Icicle Creek Watershed and should not be used toward development in the City of Leavenworth, including new home construction and domestic water supply.
- Many commenters stated that there should not be an increase in water extraction at Eightmile Lake from increasing the height of the dam or by a lowering of the outlet pipe.
- Commenters stated that the existing height of the dam is 4,667 feet. Commenters stated that raising the dam allows for impounding additional water that has historically contributed to spring and storm instream flows.
- One commenter questioned the legality of IPID's proposal to increase the dam height and lower the outlet pipe.
- Another commenter stated that the Forest Service does not have the authority to approve a dam elevation higher than 4,671 feet, or an outlet pipe elevation lower than the current 4,648 feet.
- Some commenters believe that there should be no water storage within the Alpine Lakes Wilderness Area and feel that the EIS should consider other options outside of designated Wilderness Areas to increase water availability.
- Commenters also requested that the EIS examine how all water withdrawn from the wilderness will be used and if any of it will be used to benefit instream flows.

- Some commenters were concerned with both the short- and long-term impacts that climate change will have on water that is available for Eightmile Lake and feel that these impacts should be addressed in the EIS.
- Other comments asked that the EIS address the current and historic instream flows for Icicle Creek and if the alternatives would have an impact on these flows.
- One commenter requested that the EIS include the metering requirements listed in Order No. DE 02 WRCR-3725 dated March 29, 2002, from Ecology to the Icicle Irrigation District, as an additional phase to this project.
- Another commenter wants the EIS to include a performance audit of the OCR because the state's water policy and role in water policy are in need of reform.
- Several comments supported increasing water quantity, stating that the ability to draw water in the late summer would benefit both irrigators and fish. Many of these commenters also stated that the increased water quantity in the late summer will be necessary in the future due to climate change. These commenters want the EIS to focus on what the downstream effects to irrigators would be under each of the proposed alternatives. One commenter believed that the increased water quantity will be necessary to accommodate the increase in population in Chelan County.
- A few commenters stated that if any water from the project is used to enhance streamflows in Icicle Creek, it should not also be used for the fish hatchery. Several commenters stated that fish hatchery redesign should improve the efficiency of the water usage, but maintaining water in Icicle Creek by bringing water from the Wenatchee River must be developed.

Comment Consideration in Draft EIS

- Water quantity will be discussed in the Water Resources section of the Draft EIS, and irrigation practices will be discussed in the Economics section. Instream flows will be described in the Water Resources section. Impacts related to climate change will be addressed in the Water Resources section. The state's water policy is outside the scope of this EIS.

3.3.4 Water Quality

Overall, very few (4) comments spoke directly to Water Quality.

- One commenter requested that Ecology, as part of the EIS, evaluate the water quality, silt, and sediment issues with the rebuild of Eightmile Dam and what impacts this might have on aquatic species within Eightmile Lake, Eightmile Creek, Icicle Creek, and, if appropriate, the Wenatchee River.
- Another commenter requested that Ecology, as part of the EIS, review past violations of the federal Clean Water Act by the Leavenworth National Fish Hatchery.
- One commenter requested that Ecology, as part of the EIS, perform a study of high-altitude lake/reservoir releases on water quality and aquatic communities, and the effect of storing water in and releasing it from lakes/reservoirs in Wilderness Areas.
- Another commenter referenced upper Icicle Creek as having limited loading capacities for nutrients and cited worries about phosphorus levels.

Comment Consideration in Draft EIS

- Water quality will be discussed in the Water Resources section of the EIS, and aquatic species will be addressed in the Wildlife and Aquatic Species and their Habitats section of the EIS. Operation of the Leavenworth National Fish Hatchery are outside the scope of this EIS.

3.4 Alternatives

Overall, 82 comments addressed project alternatives.

Many of the comments on this topic stated that the alternatives should be expanded to include restoring the dam to its previous conditions to meet DSO standards, dam removal, and expanding the No Action Alternative.

- One commenter cited the SEPA Handbook, stating that an EIS should evaluate the proposal, the no-action alternative, and other "reasonable alternatives." WAC 197-11-440(5) defines reasonable alternatives as "*actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation*," and if the proposal's objective is to ensure the safety of the Eightmile Lake and Dam, more alternatives need to be examined (such as a design that only allows drawdown to the historic level).

3.4.1 No Action Alternative

- Many commenters stated that they believe the No Action Alternative is either not feasible or is not legal because it does not meet DSO standards and would continue to threaten human life downstream.
- Some commenters stated that a true "no-action" alternative would be one that makes the dam compliant with DSO's standards at the existing dam height.
- Some comments provided specific information stating that the No Action Alternative should be designed to 1990 dam conditions, including a spillway elevation of 4,667 feet, an outlet pipe intake level of 4,648 feet, and a wide spillway design without gates.
- One commenter requested that the EIS examine the impacts the currently proposed No Action Alternative would have on the broader Icicle Creek Strategy.

Comment Consideration in Draft EIS

- Further discussion of the No Action Alternative will be provided in Chapter 2 (Project Alternatives) of the EIS. A third action alternative with a spillway elevation of 4,667 will be evaluated in the EIS.

3.4.2 Dam Rebuild Alternatives

- Many commenters requested adding an alternative to rebuild the dam to meet DSO standards, but not increase the amount of water that can be withdrawn from Eightmile Lake nor increase the footprint of the dam.
- Some commenters stated that an alternative should be designed to allow water storage to equal only the amount of IPID's water rights.

- One commenter stated that the EIS should include a "water right relinquishment" alternative.
- Some commenters stated that the EIS should include an alternative dam design that does not allow Eightmile Lake to be lower than its historic low levels, and referenced dam design from 1976 conditions (a narrow spillway with gates, spillway elevation of 4,671 feet, and an outlet pipe intake level of 4,648 feet). This would present an alternative that allows IPID to access ~1,700-acre feet of water, which they stated exceeds the Districts' planned future needs.
- Many commenters requested that any Eightmile Dam reconstruction not increase the existing footprint of the dam.

Comment Consideration in Draft EIS

- Further discussion of the dam rebuild alternatives will be provided in Chapter 2 (Project Alternatives) of the EIS. A third action alternative with a spillway elevation of 4,667 will be evaluated in the EIS.

3.4.3 Dam Removal Alternative

- Multiple commenters suggested that an additional alternative be added that removes the dam.
- Commenters stated that since the dam is located in a Wilderness Area, it should be restored to natural conditions.
- Advocates for full dam removal suggested securing water outside the Wilderness Area, including pumping from the Wenatchee River to supplement flows from Icicle Creek, additional conservation approaches, or finding another water storage site outside the Alpine Lakes Wilderness Area and the Districts' easement as a viable alternative to replacing the dam.
- One commenter stated that not including a dam removal alternative would put Ecology and IPID at significant risk because future litigation will likely require that this alternative be examined.

Comment Consideration in Draft EIS

- Further discussion of dam removal will be provided in Chapter 2 (Project Alternatives) of the EIS.

3.4.4 Other Comments on Alternatives

- Other commenters stated that either of the proposed action alternatives would be the best path forward for Eightmile Dam, with some preferring Alternative 2.
- One commenter suggested further consideration of how the two action alternatives can be modified to improve water temperature benefits through placement of the inlet at depth.
- A handful of commenters asked clarifying questions about the alternatives that should be addressed in the EIS. For example, *"For each alternative, what is the difference in and time period of construction impacts to (1) the lake, lakeshore, and stream environment and (2) the experience of recreational users of the lake and the trail to the lake?"*

- One commenter asked that the EIS include maps, diagrams, and photos to clearly show the current situation (including the place of diversion and amount of water diverted) at the lake and other project locations, and how that would change under the proposed action(s) under each alternative.
- Two questions related to what the power source would be for the automated components of the dam, with one commenter noting that Alternative 2 has fewer "mechanical" components that could break when exposed to multiple seasons of snow/seasonal wear.

Comment Consideration in Draft EIS

- Anticipated construction methods and durations will be described in Chapter 3 (Alpine Lakes Wilderness) of the EIS. Potential impacts on Eightmile Lake and streams will be discussed in the Water Resources section. Potential impacts on recreational users will be described in the Recreation section, as well as the Economics section. The EIS will include a number of graphics, diagrams, and photographs throughout the document to illustrate various points. Visual simulations of the alternatives will be prepared and presented in Project Alternatives section of the EIS to help visualize the possible alternatives.

3.5 Construction

Over 3,015 comments were received on the topic of Construction of Eightmile Dam and the associated activities.

- Many of these commenters requested that an access road, either paved or gravel, not be constructed to access the project site because of the potential impacts on the environment and conflicts with the Wilderness Act.
- Many commenters also requested that no mechanized overland land vehicles be used to bring in materials and machinery, with either helicopters or pack animals used instead.
- Comments on the construction process requested that the EIS address all ground disturbance associated with the Eightmile Dam reconstruction and potential access, including but not limited to:
    - Cleared areas needed for the storage and use of construction equipment, materials, and supporting elements at the dam site as well as within the Wilderness Area.
    - Construction of temporary facilities to house and support construction workers, including shelter and sanitation facilities.
    - All road access issues.
- There were many individual suggestions for construction, including aligning the timing of dam construction to coincide with low visitor use and non-nesting and denning seasons.
- One commenter stated that the Forest Service should require a contract with IPID for a temporary easement for an unpaved road to the project site.
- Another commenter requested that the EIS provide an analysis of the environmental impacts from any proposed road into Eightmile Dam as well as the staging area for helicopter use, including air quality, water quality (including sediment), energy costs, impacts on fish and wildlife (including species listed under the Endangered Species Act [ESA]), and recreation.

- One commenter requested that the EIS identify the construction standards to mitigate for hazardous materials and spills.
- One commenter stated that they oppose the construction of new primary and secondary spillways at Eightmile Lake due to the associated construction impacts.
- Multiple questions were asked about the construction process, such as if there are alternative methods of construction other than large machinery.
- One commenter asked how the geographic extent and degree of impacts on wilderness users would differ between helicopter and overland transport for each alternative.
- One commenter asked how construction of Eightmile Dam would comply with the "Leave No Trace" principles applied by the Forest Service within the Alpine Lakes Wilderness Area for recreational users.
- Another asked how dam maintenance would be performed, what method of access would typically be used, what the schedule would be, and if any provisions would be made for accessing the dam for maintenance.
- A commenter in favor of mechanized construction requested the use of an excavator to perform reconstruction since they believe that this would provide the best long-term solution.
- Another commenter stated that bringing in an excavator would not necessarily require building a road; rather, the excavator can move rocks and trees to access the lake, which would result in fewer construction days overall. It was also noted that a large amount of cement would be needed to repair the dam, which is not easily feasible by pack animal or air travel.
- One commenter noted that the Special Warranty Deed for Eightmile Dam specifically states:

  "Expecting and reserving to the grantor, its successors and assigns, a nonexclusive, perpetual easement across, through, along and upon the property described herein for the purposes of maintenance, repair, operation, modification, upgrading and replacement of all facilities presently located in or upon the property described herein, together with a nonexclusive right of ingress to and egress from all such facilities for all such purposes, in accordance with the Rules and Regulation of the Secretary of Agriculture, 36 CFR 251.17 and 251.18, attached hereto and made a part hereof, in such manner as not unreasonably to interfere with its use by the United States, its authorized users or assigns, or cause substantial injury thereto. The Grantor may exercise the rights hereunder by any means reasonable for the purposes described, including but not limited to the use of motorized transportation and equipment, or aircraft. These rights include the right to regulate water level of all facilities located upon the property described herein. In performing maintenance, repair, operation, modification, upgrading and replacement of facilities located in or upon the property described herein, the grantor will not without the prior written consent of the Forest Service, which consent shall not unreasonably be withheld, materially increase the size or scope of the facilities. The United States of America shall charge no fee for the exercise of the rights reserved or granted hereunder, nor shall it require any further permission for the Grantor to exercise the rights granted or reserved herein."

Comment Consideration in Draft EIS

- Construction methods and proposed timing will be discussed in Chapter 3 (Alpine Lakes Wilderness) of the EIS. Chapters 1 (Introduction and Background) and 2 (Project Alternatives) of the EIS will provide a discussion of the need for the dam and proposed alternatives to comply with DSO safety requirements.

3.6 Alpine Lakes Wilderness

In total, 4,841 comments were received that expressed concern about the potential impacts of the project on a designated Wilderness Area.

3.6.1 Wilderness Act

- Commenters requested that Ecology consider the statutory language within the 1964 Wilderness Act, as Eightmile Lake is located within the Alpine Lakes Wilderness, a federally designated Wilderness Area. Most of these commenters stated that the project must be in compliance with the Wilderness Act and that they believe mechanized travel and road construction through the wilderness would not adhere to the Act.
- Some commenters requested that all machinery be flown in via helicopter to reconstruct the dam or carried in via pack animal (not just for the area to access the dam, but also in any staging grounds for machinery or aircraft in rehabilitating the dam).
- Many of the commenters reference Section 4(c) of the Wilderness Act, which states, "*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, 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, not landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area*." These commenters also requested that Ecology follow the Forest Service Minimum Requirement Analysis standard for actions otherwise prohibited in designated Wilderness Areas and by Section 4(c) of the Wilderness Act.
- Multiple commenters expressed concern for the potential need for motorized pumps at Eightmile Lake and the associated infrastructure (like generators) that need to be evaluated within the scope of the EIS and the Wilderness Act.
- Multiple commenters requested that Ecology work with the Forest Service to ensure that no project alternative requires Presidential authorization, and to provide the necessary legal analysis within the EIS so that this will not be the case.
- Some commenters requested that any reconstruction activities at any of the dams in the Alpine Lakes Wilderness be done so that there is minimal impact of the area.
- Some commenters requested an alternative that eliminates or reduces activities that are prohibited within the Wilderness Act. One commenter stated that since Ecology does not have experience with the management of Wilderness Areas, they do not have knowledge to bring forward wilderness-appropriate alternatives.

Comment Consideration in Draft EIS

- Wilderness Act considerations and compliance will be discussed in Chapter 3 of the EIS.

3.6.2 Other Plans and Policies

- In addition to the Wilderness Act, other statutory regulations that commenters requested Ecology consider for the EIS include the 1976 Alpine Lakes Wilderness Management Act and the 1981 Alpine Lakes Wilderness Management Plan.
- Multiple commenters referenced the Alpine Lakes Wilderness Management Plan and the Okanogan-Wenatchee National Forest Land Resources Management Plan, stating that the project does not comply with management directions in these plans.
- Several commenters also stated that the above mentioned plans and acts add multiple layers of protection to the area.
- One commenter stated that the project would not comply with the Alpine Lake Management Plan as it relates to the operation and maintenance of water diversions structures that were explicitly identified in the Icicle Basin of the Wilderness Area.
- Another commenter requested that Ecology evaluate the stipulations of the 1964 Wilderness Act, the 1976 Alpine Lakes Wilderness Management Act, and the 1981 Alpine Lakes Wilderness Management Plan to first determine the legality of increasing storage capacity and raising the lake level above its traditional height

Comment Consideration in Draft EIS

- Consideration and compliance with the Wilderness Act, the Alpine Lakes Management Act, and the Alpine Lakes Wilderness Management Plan will be discussed in Chapter 3 (Alpine Lakes Wilderness) of the EIS. Ecology will consult with the US Forest Service as needed on the Wilderness Act, the Alpine Lakes Management Act, and the Alpine Lakes Wilderness Management Plan.

3.7 NEPA Process

Eighteen comments requested that a joint NEPA/SEPA EIS be prepared because of the need to enter a designated Wilderness Area and National Forest for construction of the dam.

- Several commenters also requested that the Forest Service be the co-agency lead for this effort. One commenter requested that the Forest Service perform a NEPA "Hard Look" analysis on the proposed alternatives as part of the NEPA process.
- Most of the commenters on this topic stated that a SEPA EIS on its own is insufficient.

Comment Consideration in Draft EIS

- Chapter 1 (Introduction and Background) will describe the SEPA responsibilities being undertaken by Ecology and the NEPA responsibilities being undertaken by the US Forest Service. Chapter 3 (Alpine Lakes Wilderness) of the EIS will provide a discussion of compliance with NEPA regulations and the role of the US Forest Service in this project. Ecology will continue to work with the US Forest Service to ensure environmental analysis for the project meets NEPA requirements.

3.8 EIS Scope and SEPA Process

In total, 1,684 comments addressed the scope of the EIS or the SEPA process.

- Most of these commenters stated that the scope of the EIS should be expanded to include the other dams within the Alpine Lakes Wilderness: Lake Colchuk, Lake Klonaqua, and Square Lakes, which were recently designated as high hazard dams.
- Some of these commenters stated that no dam reconstruction should occur at any of the dams within the Alpine Lakes Wilderness, with others stating that Eightmile Dam should be the only dam considered for reconstruction due to its proximity to the Icicle Creek Trail.
- One commenter noted that the scope of the EIS should be expanded to all of the lakes in the Alpine Lakes Wilderness so that they can be reconstructed at the same time.
- Other comments said that the scope of the EIS is too narrow but did not provide specifics on how it should be expanded.
- Multiple commenters also requested that Ecology not take any precedent-setting actions for the project that could impact other dams within the Alpine Lakes Wilderness or the use of motorized machinery in other Wilderness Areas throughout the United States.
- One commenter believes that the scope of the EIS is too large and the items within it need to be more clearly defined.
- Two commenters attached comment letters previously submitted for the Programmatic EIS stating that they were still relevant and should be examined for the scope of the Eightmile Dam EIS.
- Other commenters requested that that the full EIS scope be released to the public in advance of the Draft EIS to increase transparency for the SEPA process.
- Some commenters asked Ecology to provide details of which agencies are responsible for the various actions that will take place at the project site as part of the EIS.
- One commenter requested that Ecology's OCR be removed from the preparation of the any EIS for this project because of its aggressive pursuit of new water rights in the Columbia River Basin.

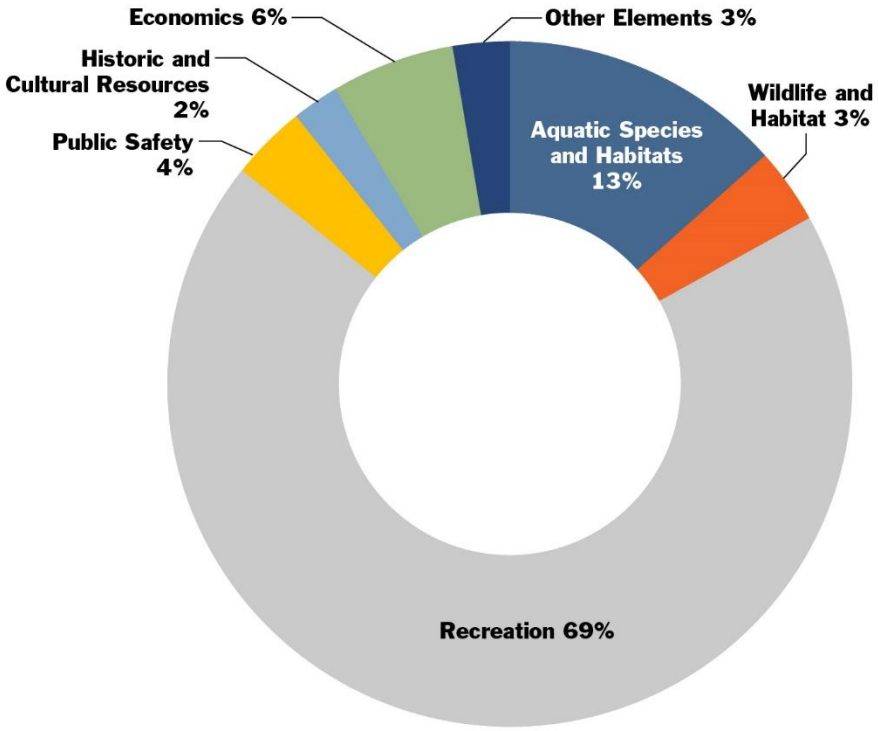
Comment Consideration in Draft EIS

- Discussion of dams other than Eightmile Dam is outside the scope of this EIS. Review of the other dams in the Wilderness Area will not be included as part of this analysis. The Draft EIS will detail which agencies will be responsible for various actions and approvals. Ecology is the SEPA lead agency for this project because of the dam permits that will be required for construction (WAC 197-11-938(8)).

3.9 Elements of the Environment

During the scoping period, 224 comments addressed elements of the environment, covering: Aquatic Species and Habitats, Wildlife and Habitat, Recreation, Public Safety, Historic and Cultural Resources, Economics, and Other Elements. A breakdown of the percent of comments received under each of these subtopics is illustrated in Figure 3-5.

Figure 3-5. Elements of the Environment Comments by Subtopic



3.9.1 Aquatic Species and Habitat

Of the 224 comments, 30 specifically addressed potential impacts on the Aquatic Resources and Fish within the project area.

- Most of these commenters requested that the EIS evaluate any potential impacts from the alternatives on the ecology and aquatic life in Eightmile Lake and Eightmile Creek.
- Many commenters requested that current baseline data on water quality be established, in collaboration with Yakama Nation and Colville Confederated Tribes, to conduct relevant instream flow studies and desktop analyses of existing data that would help determine the ideal instream conditions throughout the year.
- Additionally, commenters stated that the known fish species present in Eightmile Lake and Eightmile Creek should be identified within the scope of the EIS.
- Commenters requested that the EIS evaluate how the enhanced storage of the Eightmile Lake (by lowering the intake) and future management of the lake (which the commenters assert would draw down the water level in the fall season below what has been traditionally done) would affect the lake trout population. They requested that the EIS include an assessment and comparison of habitat quality and quantity affected by the construction of each alternative.
- A few commenters questioned the impacts of the project on lake trout as they have a very low tolerance to changes in temperature, oxygen, and depth.
- A few commenters requested that the EIS analyze impacts on benthic macroinvertebrates.

- Multiple commenters believe that removing Eightmile Dam would either have positive or negative effects on aquatic species within Eightmile Lake and Eightmile Creek.
- Some commenters believe that the sediment built up behind the dam would negatively affect downstream aquatic species and that this sediment should be evaluated. They also want the EIS to describe measures to minimize or prevent the spread of non-native fish from the Eightmile Lake system.
- Other commenters thought the proposed action would have positive benefits, such as positive net fill, that should be quantified for the calculation of total project habitat impacts, toward a goal of achieving no net loss. They also stated that with the introduction of migratory fish within the Icicle Creek Watershed, the water is needed more than ever.
- One commenter expressed concern about the potential for lake trout to spread downstream under the No Action Alternative and the consequent impacts that would have on bull trout.

Comment Consideration in Draft EIS

- Aquatic species will be described in the Wildlife and Aquatic Species and their Habitats section of the EIS.

3.9.2 Wildlife and Habitat

Eight comments referenced the potential impact on the Wildlife and Habitat of the project area.

- Most of the commenters requested that the EIS provide an analysis of fish and wildlife, including insect abundance and showing these populations over time since the construction of Eightmile Dam.
- Multiple commenters recommended evaluating and mitigating any impacts on amphibians and benthic invertebrates in Eightmile Lake, Eightmile Creek, and Icicle Creek.
- Multiple commenters are worried about impacts on rarer species such as the golden eagle, wolverine, and northern spotted owl, along with mule deer, black bear, and mountain goat.
- One commenter expressed concern on sensitive and subalpine flora and rare and endangered plant species such as Tweedy's lewisia.
- One commenter said that the project would likely result in irreparable damage to this area.

Comment Consideration in Draft EIS

- Potential impacts on fish and wildlife will be discussed in the Wildlife and Aquatic Species and their Habitats section of the EIS. Potential impacts on wildlife and flora, including rare species, will also be discussed in this section of the EIS.

3.9.3 Recreation

In total, 154 comments addressed impacts on Recreation.

- The commenters had a variety of opinions and concerns, with some believing that any dam rebuilding activities would make little difference on the recreational experience of Eightmile Lake, while others believe these activities would have profound, adverse effects on recreation.

- Multiple commenters were concerned that the needs of hikers and other recreationists were not adequately being considered in the EIS.
- Many commenters requested that any alternative consider and avoid any potential long-lasting disruptions to recreation or wilderness in the project area.

Many commenters asked clarifying questions they would like to have answered within the EIS.

- Multiple commenters asked that more detail on trail closures, trailhead and parking impacts, and construction staging areas be included with information about the alternatives.
- One commenter asked about how construction would influence the availability of camping permits on or near Eightmile Lake.
- One commenter wanted to know what the impacts on campsites at the lake would be under all alternatives.

Comment Consideration in Draft EIS

- Potential impacts on recreation will be described in the Recreational Resources and Economics sections of the EIS.

3.9.4 Public Safety

Most of the 8 comments about Public Safety stated that the commenters understand and appreciate the IPID's need to repair the irrigation infrastructure at Eightmile Lake to ensure the public safety by meeting dam safety requirements.

- One commenter stated they support the use of electronic remote operation tools for safety and practicality at Eightmile Dam.
- One commenter asked why there are structures in the flood zone of Icicle Creek and what is being done to prevent or mitigate the continuation of this practice.
- Another commenter asked that a history and analysis of spring runoff levels be included in the EIS, along with information about the replanting/reforesting that has happened in the basin post-Jack Creek fire to help with runoff.
- One commenter was interested in seeing more information in the EIS about impacts of dam failure on downstream residents (both year-round and seasonal homes).

Comment Consideration in Draft EIS

- Compliance with DSO's safety requirements will be described in Chapters 1 (Introduction and Background), 2 (Project Alternatives), and the Public Safety section of the EIS. Potential impacts resulting from dam failure will be described in Chapter 2 (Project Alternatives), as well as throughout the EIS as appropriate in the elements of the environment. The allowance for development in the flood zone of Icicle Creek is outside of the scope of this EIS.

3.9.5 Historic and Cultural Resources

Five comments spoke directly to the potential project impacts on Cultural Resources.

- Most of these commenters requested that the EIS 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, as well as both the wild fish and hatchery fish bred to mitigate

for the construction of the Grand Coulee Dam and other mid-Columbia dams, which eliminated spawning habitat for huge numbers of wild salmon and other fish species.

- Some commenters requested that Ecology consult with tribal entities, including the Yakama Nation and the Colville Confederated Tribes, in addition to the federal and state agencies. These commenters also requested that the EIS include a plan to address how it will honor Tribal Treaty Rights within the project area.
- One commenter noted the potential for cultural resources to be present at the site, and that the site hasn't been adequately surveyed.

Comment Consideration in Draft EIS

- Tribal fisheries resources will be described in the Wildlife and Aquatic Species and their Habitats section, and Economics section, of the EIS. Tribal Treaty Rights will be described in the Historic and Cultural Resources section of the EIS. Cultural Resources will be described in the Cultural Resources section of the EIS.

3.9.6 Economics

Thirteen comments addressed the potential impacts on economics.

- Most of these commenters requested that a clear and publicly available cost-benefit-analysis be performed on the project and that this info be available before the Final EIS.
- Multiple commenters want the EIS to include more clarity on who would pay for the alternatives if they were selected. Some commenters stated they believe that taxpayer dollars should not be used to build a dam that allows additional water to be used until it is determined that IPID still has the rights to that water.
- One commenter asked how IPID would afford future repairs needed for Eightmile Dam and other structures in the system.
- Another commenter discussed the economic effects of losing orchards if they do not receive enough water for irrigation.

Comment Consideration in Draft EIS

- The economic analysis will be available to the public in the Economics section of the Draft EIS, and will include a discussion of potential economic impacts on agricultural resources. Financing for the dam construction, as well as IPID maintenance plans, will be described in Chapter 2 (Project Alternatives) of the EIS.

3.9.7 Other Elements

In addition, there were three comments on visual resources, two on cumulative impacts, and one on geologic resources.

- Comments on visual resources generally stated that there is no mention of how the final project will look and that the visual analysis will be critical to the public's acceptance of the project.
- One commenter stated that Ecology must work with the Forest Service to ensure that there are no adverse effects to the outstanding and remarkable values of Icicle Creek since it may be eligible as a potential Wild and Scenic River segment.

- A few commenters stated that direct, indirect, and cumulative impacts of the proposed project must be assessed. Commenters stated that cumulative impacts are those "*that result from the incremental impact of the action when added to other past, present and reasonable foreseeable future actions.*"
- Another commenter requested that an impartial geomorphologist determine if Eightmile Lake is a suitable long-term location for a dam because the lake is formed by a landslide.

Comment Consideration in Draft EIS

- The action alternatives will be described in Chapter 2 (Project Alternatives) of the EIS, accompanied by visual simulations. Direct, indirect, and cumulative impacts will be evaluated for each element of the environment and discussed in the Draft EIS. Potential effects to the outstanding and remarkable values of Icicle Creek will be discussed in Chapter 3 (Alpine Lakes Wilderness) of the EIS. The Geology section of the EIS will discuss the long-term stability of the site with regard to existing landslide deposits as well as the potential for future events.

3.10 General Comments

Approximately 15 general comments did not fit within any one particular category, often covering a range of topics.

- Multiple comments emphasized people's connection to the Wilderness Area. Commenters requested that Ecology continue to work closely with the IWG, Yakama Nation, Colville Confederated Tribes, and other stakeholders throughout the SEPA process to ensure that concerns are being addressed.
- Another commenter asked for clarification about what organization will be responsible for determining, monitoring, and permitting actions within the Special Warranty Deed Area.
- Some commenters stated that repairing the dam would improve and restore the natural environment, protect downstream infrastructure and life, as well as provide stable high-paying jobs.

Comment Consideration in Draft EIS

- Chapter 1 (Introduction and Background) will provide a summary of Ecology's ongoing work with the Icicle Creek Water Resource Management Strategy and IWG. A discussion of agencies and their responsibility and jurisdictions will be included in Chapter 1 of the EIS.

CHAPTER 4 NEXT STEPS

Ecology has reviewed all of the scoping comments received and will use them as appropriate to shape the environmental analysis included in the Draft EIS.

4.1 Draft EIS Publication and Review

The Draft EIS, anticipated to be published in the Summer/Fall of 2021, will be available for public review and comment. Following publication of the Draft EIS, organizations, agencies, tribes, and the public will have an opportunity to comment on the content of the document. Two public hearings will be held during the Draft EIS comment period. Notice of the public hearings and the public comment period will be posted on Ecology's SEPA Register and will be sent directly to all parties who submitted scoping comments, tribes, agencies with jurisdiction, and those who have specifically asked to receive notices about the project. Notice will also be posted on the project website (https://ecology.wa.gov/eightmile). After the Draft EIS comment period, Ecology will prepare the Final EIS, which will identify a preferred alternative.

Appendix A: Scoping Notice

Washington State Department of Ecology

Determination of Significance and Request for Comments on Scope of the EIS

Eightmile Dam Rebuild and Restoration Project

Background

In February 2019, a Final Programmatic Environmental Impact Statement (FPEIS) was issued by the Washington Department of Ecology (Ecology) and Chelan County, evaluating the Icicle Creek Water Resource Management Strategy. That FPEIS was the culmination of nearly three years of evaluating strategies to improve instream flows, improve sustainability of the Leavenworth National Fish Hatchery, protect tribal and non-tribal fish harvest, improve municipal and domestic water supply and agricultural reliability, enhance Icicle Creek habitat, and comply with State and Federal Law including the Wilderness Act within the Icicle Creek Subbasin. The FPEIS evaluated five program alternatives, and the SEPA non-project action was the adoption of the program called to Icicle Strategy, intended to provide a program of integrated long-term water resource management and habitat restoration actions. The Eightmile Dam Rebuild and Restoration Project is one of several early actions to be implemented as part of the Icicle Creek Strategy, and as such is the first project-level EIS undertaken in this phased review process under SEPA.

Eightmile Lake is one of four lakes in the Alpine Lakes Wilderness Area managed by Icicle and Peshastin Irrigation Districts (IPID) to provide water storage. A small dam, low-level outlet pipe, and a slide gate at the outlet of Eightmile Lake allow for controlled releases of stored water to supplement flows in Icicle Creek, which increase water supply available during low flow periods typically occurring during the late summer months. Icicle Creek, a tributary to the Wenatchee River, provides water for agricultural irrigation, municipal and domestic use, aquatic habitat for wild and hatchery fish, and recreation. Eightmile Lake, high in the Alpine Wilderness Area, is a major source of stored water supporting streamflows in Icicle Creek, benefiting these uses.

The existing dam was constructed in the 1920s and consists of a rock masonry and concrete wall structure with an earthen embankment section. The infrastructure is more than 90 years old and requires improvements to operate in a safe, reliable way.

The following are the key concerns for Ecology Dam Safety Office (DSO) and IPID:

- **Limited Spillway Capacity** –The spillway overtopped and eroded the earthen embankment portion of the dam more than 25 years ago. This has limited IPID's ability to refill the lake to the historical spillway elevation and increased the potential for additional erosion and failure of the earthen embankment portion of the dam.
- **Jack Creek Fire** – The August 2017 Jack Creek Fire burned trees and vegetation within the Eightmile Lake watershed down to the shoreline of the lake. This has increased peak runoff into Eightmile Lake, which combined with debris piling up on the dam, could increase the risk of dam failure.
- **Low-Level Outlet Failure** – The low-level outlet pipe at the lake is approximately 300 feet long and consists of pipe that varies in size and composition. The oldest section was replaced as

part of emergency repairs completed in 2018. The pipe now functions adequately, but still requires replacement for long term operations.

Following the 2017 fire, DSO elevated the hazard classification of the dam from low to high. This hazard classification means that dam failure would threaten human lives and/or cause substantial economic or environmental damage.

Due to these concerns, IPID declared an emergency at Eightmile Dam on March 13, 2018. The dam was repaired in 2018 to temporarily increase safety by widening and hardening the spillway and by replacing a segment of the low-level outlet pipe that had collapsed. While the repairs made it possible to lower the lake and provide additional spill capacity, the infrastructure does not currently meet DSO's requirements for dam safety or IPID's needs. As a result of these ongoing safety concerns, DSO is requiring that the outlet gate be kept open to reduce the volume of water stored and thus reduce risk of failure during the winter and early spring.

Objective

IPID's proposed replacement of the Eightmile Dam has three objectives:

1. Restore the storage capacity of Eightmile Lake so that it meets IPID's irrigation and storage needs.
2. Comply with DSO regulations for a high hazard dam.
3. Provide water to enhance Icicle Creek instream flows and allow for potential mitigation of new beneficial uses.

IPID holds a 1926 adjudicated water right to store 25 cfs of water at Eightmile Lake.

Environmental Review

The project-level Environmental Impact Statement (EIS) is part of a phased review process under the State Environmental Policy Act (SEPA), following the 2019 FPEIS for the Icicle Strategy issued by Ecology and Chelan County. The Eightmile Dam project is one of several early actions to be implemented as part of the Icicle Creek Strategy, under the direction of the Icicle Work Group. The project proponent is IPID. Ecology's Office of Columbia River (OCR) will act as the lead agency for the project-level EIS and has determined this proposal is likely to have a significant adverse impact on the environment, and accordingly, an Environmental Impact Statement (EIS) is required under Revised Code of Washington (RCW) 43.21C.030(2)(c). Ecology Office of Columbia River (OCR) is the lead agency under the State Environmental Policy Act (SEPA) and is leading the development of the Environmental Impact Statement (EIS) for the dam replacement project in accordance with Washington Administrative Code (WAC) 197-11.

Scoping

Scoping is the first step in the EIS process, as mandated by SEPA (WAC 197-11-408) and includes a public comment period. The purpose of scoping is to determine the range, or "scope," of issues to study in the EIS. Pursuant to SEPA, Ecology is notifying the public of the intent to prepare an EIS so that agencies, tribes, communities, organizations, and members of the public have an opportunity to comment on the scope of the impacts to be analyzed.

There are two spillway design alternatives, two construction options, and a No Action Alternative under consideration. Considering stakeholder input and other factors, proposals that extend outside the deeded land area have been eliminated from consideration in the EIS.

Alternatives

Narrow Spillway with Gates (formerly Alternative 1A)

This alternative includes replacement of the existing dam with an earthen embankment and reinforced concrete dam structure equipped with automated control gates over the primary spillway. Three four-foot-high, 20-foot long automatic level control gates would be installed on top of the primary spillway, which would have a hard crest elevation of 4,667.0 feet. The gates would allow IPID to control the water level within the top 4 feet of the lake. When the need for additional water supply is anticipated, IPID would raise the gates in the late spring or early summer to raise the lake to elevation 4,671.0 feet prior to releasing the water in the late summer. The gates would automatically lower if the lake level gets too high to protect the dam and prevent overtopping. This design includes a 60-foot wide primary spillway.

This alternative includes two 10-foot wide intermediate spillways on either side of the primary spillway at elevation 4,671.5 feet to accommodate extreme storm events. A secondary spillway would be created in a low spot south of the main dam structure by hardening an existing channel, with a crest elevation of 4,673.0 feet. The spillways would provide capacity to pass the design storm event (a storm that has the probability of occurring once in 1,000,000 years) while maintaining the freeboard in the lake required by DSO.

Water would be released from the lake through a new 30-inch diameter low-level outlet pipe/siphon, extending from an inlet submerged in the lake approximately 150 feet west of the new dam structure to an outlet in the Eightmile Creek channel approximately 314 feet downstream of the new dam structure. This would allow the lake to be drawn down to a low water surface elevation of 4,636 feet during drought conditions, which would allow access to stored water without pumping. The low-level outlet pipe would be located entirely within the special warranty deed area. IPID would release water during the late summer to maintain the water supply available for authorized diversions and instream flows in Icicle Creek, controlled by an automated plug valve at the downstream end of the pipe. IPID would have the ability to adjust the valve remotely to release the flows needed to meet downstream water supply and instream flow needs.

The primary spillway gates and low-level outlet valve at the lake would be powered by batteries charged by a solar panel. Lake levels, gate and valve positions, and other controls would be monitored remotely and the equipment would be operated via radio signal requiring an antenna, both of which would be located at the dam site and concealed as much as possible.

Wide Spillway without Gates

This alternative includes replacement of the existing dam with an earthen embankment and reinforced concrete dam with a primary spillway length of 180 feet, resulting in a wider spillway and larger footprint than the Narrow Spillway alternative. The primary spillway would be fixed and completely passive, without gates or automatic equipment. The primary spillway would provide the capacity to accommodate the design storm event, and intermediate spillways would not be needed. The primary spillway would have a hard spillway crest at an elevation of 4,671.0 feet.

During extreme storm events, the lake would flow over the entire length of the primary spillway. Similar to the Narrow Spillway Alternative, a secondary spillway would be created in a low spot south of the main dam structure by hardening an existing channel. The secondary spillway would have a crest elevation of 4,673.0 feet. The spillways would provide enough capacity to pass the design storm event while maintaining the freeboard in the lake required by DSO.

As with the Narrow Spillway Alternative, water would be released from the lake through a new 30-inch diameter low-level outlet pipe/siphon. The operation and configuration of the low-level outlet pipeline would be essentially the same described for the Narrow Spillway Alternative.

Construction – Applicable to both Action Alternatives

Construction of the proposed project would require transport of equipment and materials into and out of the Alpine Lakes Wilderness Area. Two potential methods have been identified for mobilizing equipment and materials: 1) Helicopter transport, and 2) Overland transport. A combination of methods is also possible. These methods could be used for either action alternative. Non-motorized wilderness ground transport (i.e., pack equipment and materials in and out using humans and pack animals, no use of motorized equipment) could be used to supplement either transport options.

No Action Alternative

The No Action Alternative serves as the baseline condition against which the Action Alternatives are compared and is intended to illustrate the most likely scenario if the project is not implemented. Under the No Action Alternative, the dam would be left as is, with a primary spillway elevation of 4,667 feet, and would continue to operate in its current state and manner. This would leave the dam vulnerable to failure which would threaten human lives downstream, and create economic hardship for the IPID. Should a dam failure occur, residences, public infrastructure and wilderness habitat would be damaged or destroyed. DSO currently requires IPID to leave the low-level outlet gate open during the winter and early spring to reduce the risk of a dam failure. The operation of the dam in this manner is not consistent with DSO regulations, does not meet the DSOs safety requirements for a high hazard dam, and would ultimately result in enforcement action by DSO. The No Action Alternative does not meet IPID objectives for water storage capacity for operational and irrigation water delivery.

Elements for Analysis

Ecology has preliminarily identified the following natural and built environment elements for analysis in the EIS:

- Water Resources
- Geologic Resources
- Wetlands and Vegetation
- Terrestrial and Aquatic Resources
- Recreation Resources
- Aesthetic Resources
- Environmental Health
- Historic and Cultural Resources
- Environmental Justice
- Tribal Rights and Interests
- Economics
- Public Safety

The EIS will evaluate the proposal's compliance with applicable regulations and will analyze cumulative impacts for relevant environmental elements.

Commenting

Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, probable significant adverse impacts, mitigation measures, and licenses or other approvals that may be required. An expanded scoping process is being provided pursuant to the Washington Administrative Code (WAC) 197-11-410, and will include two public scoping meetings. Due to COVID-19, these meetings will be held virtually.

Virtual Public Scoping Meeting Dates, Times, and Virtual Details
Wednesday January 13, 2021 3:00 - 6:00 PM
https://rossstrategic.zoom.us/webinar/register/WN_aK5AI9EcRFO9asD4_wpqPw

Thursday January 21, 2021, 5:00 – 8:00 PM
https://rossstrategic.zoom.us/webinar/register/WN_BiYXfsmrQ-erYHgAFd6qnwe

Scoping and Comment Period: The comment period opens Friday December 18, 2020. The deadline for submitting your comments is Monday February 1, 2021. All comments related to project scoping must be submitted by this date. Comments may be submitted orally at the virtual scoping meetings or in writing.

Written comments may be submitted:
Online at https://ecology.wa.gov/eightmile
By mail to:
Department of Ecology
Central Regional Office
Attn: Melissa Downes
1250 West Alder Street
Union Gap, WA 98903

Project-related information can be reviewed on the project website at:
https://ecology.wa.gov/eightmile
For questions about the project, or the scoping process, please email: melissa.downes@ecy.wa.gov

Date of Issue: December 18, 2020

Appendix B: Legal Notice

DETERMINATION OF SIGNIFICANCE (DS) AND REQUEST FOR COMMENT ON THE SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

Name of Proposal: Eightmile Dam Rebuild and Restoration Project
Project Proponent: Icicle and Peshastin Irrigation Districts (IPID)

Location: Eightmile Dam is located in the Alpine Lakes Wilderness Area, approximately 15 miles west of Leavenworth, WA. The site is accessible via an approximately 3-mile pedestrian trail. The trailhead is located on Forest Service Road 7601 accessible via Icicle Road, within Township 24N, Range 16E WM, Section 33.

Description: The existing dam was constructed in the 1920s. The dam is owned and operated by IPID. The dam was damaged more than 25 years ago when the spillway was overtopped and the earthen embankment eroded, limiting IPID's ability to refill the lake to the historical spillway elevation, and resulting in increased potential for additional erosion and failure.

Additionally, the Jack Creek Fire in 2017 burned trees and vegetation in the Eightmile Lake basin that led to unstable conditions and the potential for high run-off or flash flooding, adding to the risk of dam failure. In 2018, Washington Department of Ecology's (Ecology) Dam Safety office (DSO) worked with IPID and Chelan County to temporarily repair the dam and address the immediate threat of dam failure. The repairs do not meet current dam safety requirements and those requirements necessitate rebuilding the dam.

IPID proposes to rebuild and restore Eightmile Dam to meet the following objectives:

- Restore the storage capacity of Eightmile Lake to meet IPID irrigation and storage needs;
- Comply with DSO regulations for a high hazard dam;
- Provide water to enhance Icicle Creek instream flows and allow for potential mitigation of new beneficial uses.

IPID has developed design alternatives for rebuilding the dam with guidance from the DSO.

EIS Required: The project-level EIS is part of a phased review process under the State Environmental Policy Act (SEPA), following the 2019 Final Programmatic Environmental Impact Statement for the Icicle Strategy issued by Ecology and Chelan County. The Eightmile Dam project is one of several early actions to be implemented as part of the Icicle Creek Strategy, under the direction of the Icicle Work Group. The project proponent is IPID. Ecology's Office of Columbia River (OCR) will act as the lead agency for the project-level EIS and has determined this proposal is likely to have a significant adverse impact on the environment, and accordingly, an Environmental Impact Statement (EIS) is required under Revised Code of Washington (RCW) 43.21C.030(2)(c). The EIS will include a range of reasonable alternatives and will evaluate probable significant adverse impacts. The lead agency has identified the following action alternatives for evaluation in the EIS:

- Narrow Spillway with Gates
- Wide Spillway without Gates

Both alternatives would have a low-level outlet pipe located entirely within the area delineated by IPIDs Special Warranty Deed with the US Forest Service.

Two methods for construction access will be evaluated including:

- Helicopter transport
- Overland vehicle transport

Non-motorized wilderness ground transport (i.e., pack equipment and materials in and out using humans and pack animals, no use of motorized equipment) could be used to supplement either transport option.

As required by SEPA, the EIS will evaluate a No Action Alternative. This alternative has been developed to serve as the baseline condition for comparison with the action alternatives, and to describe impacts if the proposed project is not constructed.

Additional information is available on the project website at https://ecology.wa.gov/eightmile.

EIS Scoping and Public Comment: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, probable significant adverse impacts, mitigation measures, and licenses or other approvals that may be required. An expanded scoping process is being provided pursuant to the Washington Administrative Code (WAC) 197-11-410, and will include two public scoping meetings. Due to COVID-19, these meetings will be held virtually.

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For questions about the project, or the scoping process, please email: melissa.downes@ecy.wa.gov
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