

From: <cgopher4582@charter.net>
To: <storagestudy@pn.usbr.gov>
Date: Sat, Mar 1, 2008 4:53 AM

I definitely do 100 percent beleave in the black rock reservoir. We need it during the time when there are drought times and the salmon wont get confused they are not as dumb as those people think they are, I mean those people are not salmon them selve ARE THEY. The black rock reservoir is worth the cost and it would pay for it self the very first time when we and the farmers around here get a drought.

Thank you for taking the time to read my opinion.

Carl M. Jensen
507 N 4th Av #602
Pasco, Wa. 99301

509-494582

From: James Roberts <jimrobj@yahoo.com>
To: <storagestudy@pn.usbr.gov>
Date: Sat, Mar 1, 2008 1:47 AM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 1, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

alternatives to new dams, including water conservation and efficiency, more robust water markets, aquifer recharge, or a combination thereof.

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Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Mr. James Roberts
215 S Ellis St
Palouse, WA 99161-8700

From: Brian Bouvia <bbouvia@hotmail.com>
To: <storagestudy@pn.usbr.gov>
Date: Sun, Mar 2, 2008 9:49 AM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 2, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

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Sincerely,

Mr. Brian Bouvia
318 28th Ave SE
Puyallup, WA 98374-1237

From: "Marshall Goldberg" <mfgold@comcast.net>
To: <storagestudy@pn.usbr.gov>
Date: Sun, Mar 2, 2008 11:17 AM
Subject: Public Comment on Proposed Black Rock Dam

To Whom It May Concern:

I am writing to express my opposition to the proposed Black Rock Dam.

The dam will be located 5 miles above the Hanford Nuclear Reservation (HNR). This is an earthquake prone area. Such an event could cause the dam to collapse and then wash across the HNR, thereby releasing nuclear waste downstream. Since the HNR has not been cleaned up, this prospect is especially worrisome. Moreover, seepage from this dam would accelerate the Columbia River migration of the radioactive waste plumes that are currently under the HNR.

Given this potential for such an egregious environmental catastrophe, I believe a decision to approve this project would be reprehensible and completely irresponsible.

Marshall Goldberg, M.D.
Oak Harbor, WA

From: Eldon Ball <eldonball@juno.com>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 3, 2008 8:43 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 3, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

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We need a national population policy! Then we wouldn't run out of resources!

Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Mr. Eldon Ball
3022 NE 140th St Apt 121
Seattle, WA 98125-3588

Received in Mailroom

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27 February 2008, Yakima, Washington

Kim McCartney
Upper Columbia Area Office
1917 Marsh Road
Yakima, Washington 98901

Dear Mr. McCartney:

Thank you for your time on Wednesday evening, 27 February 2008.

Here are the questions I could not find the answers to (admittedly my search was limited) in the documents on the CDs I received. If you could provide me with paper copies or where to find the answers on the disks, I would appreciate it.

- 1) Water pumped into storage, especially if it is to be held for long periods, will disappear from storage due to evaporation or leakage (infiltration). As a result the amount of water available for use will be diminished (the leakage will reappear elsewhere, potentially in places where it may be recovered but at a lower elevation so that the energy of pumping it will have been wasted). Have the losses been estimated as a fraction of the water pumped and across the multiyear storage scenario?
- 2) Climate scientists are warning us not to use the past as a guide for the future, but are not providing clear guidance on what to expect in the future - either changes in total annual precipitation for an area or the form and availability (what fraction will be snow and when would it be expected to melt). How sensitive to different possible future climates are the models for increasing storage?

Thank you for your help in finding the answers to these questions.

Sincerely,



phelps freeborn
3408 Taylor Way
Yakima, Washington 98902

Received in Mailroom

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27 February 2008

Yakima, Washington

Yakima River Basin Water Storage Feasibility Study Draft PR/EIS

The problem which the Yakima River Basin Water Storage Feasibility Study is to consider is: how do we address the mismatch between the irrigation water consistently available and the area currently under irrigation. That is our "wants" appear to be greater than "is possible" using water from the Yakima River. There are two approaches to "solving" the problem - 1) increasing the amount of water available during years with low precipitation (including years with adequate precipitation but too much run off early in the season which cannot be captured by the existing storage facilities) and 2) reducing the area under irrigation to match the water available.

As I understand the situation, the Bureau of Reclamation can study the first approach but not the second, but Ecology can consider both.

Many of the speakers on Wednesday evening, 27 February 2008, explicitly or implicitly stated that they would not consider the second approach and most of them equated the second approach with totally eliminating irrigated agriculture in the basin. Many of the speakers also assumed that growth in agriculture and population, etc., was inevitable, good and necessary.

The earth is finite and as Malthus pointed out centuries ago, growth cannot continue indefinitely when there is only a finite resource available, e.g., water or land. The current world population has exceeded the expectations of people like Paul Ehrlich due to the Green Revolution and related advances. Unfortunately, most of the advances have significant (often not obvious or hidden) costs. The ones I am aware of include: overappropriation of water (see "When the Rivers Run Dry" by Fred Pearce, for several examples, both surface and groundwater), contamination of rivers and other waters by pesticides, and increases in nutrients in surface waters due to the use of fertilizers imported into the drainage from elsewhere resulting in deterioration of water quality (for example, the Yakima River from Prosser to the mouth). As a species, we are smart enough to understand these problems, the challenge is are we smart enough to change our practices and forestall even worse problems which are likely to result from continuing to believe in indefinite growth.

The problem to be solved is that the amount of precipitation which lands in the Yakima Basin is finite and our desires are potentially infinite (certainly more than is consistently available). This same problem is true of the larger Columbia Basin, with proposals to take Columbia River water to meet the desires in the Odessa basin and the Umatilla, Oregon area. In the United States, water problems of insufficient water availability are widespread: the depletion of the Ogallala Aquifer, the shortfall in the Colorado Basin, the drought in the southeastern United States this year, and there have been terribly water short years in many areas of the United States in the past decade or so which I cannot cite by date. The problem in the Yakima Basin is not unique. So, if we "solve" the problem for the Yakima River by taking water from the Columbia River (there is a contention that it will only be "rerouted" through the Yakima River with no net loss to the Columbia below the mouth of the Yakima which is approximately true but does not appear to be correct - evaporative losses from the increased storage won't be returned to the river and in water short years there will be a net transfer out of the Columbia, perhaps at a time which is "less" critical for flow in the river), this model cannot be applied to all of the areas with water shortages now, and it will be more true in the future if populations and desires continue to grow.

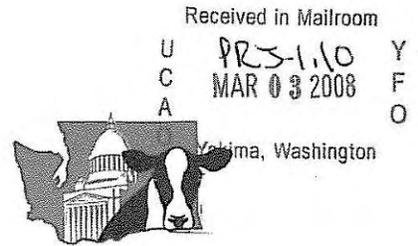
The solution to the problem for the Yakima Basin should be a solution which can be widely applied, that is not a solution of the sort characterised as "robbing Peter to pay Paul". That is water use in the Yakima Basin should be limited to the water available in the basin and not create the nightmares currently plaguing California as a result of their attempts to move water across long distances and many watersheds.

There are several potential approaches to reducing the water needs in the basin to match the water available. These include: 1) foregoing the fisheries (one speaker clearly did not want to see this approach taken and I agree - we should leave a healthy environment with as wide a diversity as we inherited to our descendants), 2) having the government buy out enough



**Hop Growers of Washington
WA State Dairy Federation**

P O Box 1207 • Moxee, WA 98936
509-453-4749 • Fax 509-457-8561
E-mail: steve@wahops.org



February 27, 2008

US Bureau of Reclamation
Attn: David Kaumheimer
1917 Marsh Road
Yakima, WA 98901

RE: Comments On Recent Storage Study

I represent hop and dairy producers in the Yakima Basin. Nearly all of these producers use water from the Reclamation project through local irrigation districts. Combined, these industries generate close to one half billion dollars in farm gate value annually.

As these agricultural activities require huge amounts of inputs, those dollars help to stimulate our local, state and national economies.

These industries, like most agricultural operations, require a source of stable inputs. As testimony to the structure present in the Yakima Valley, agricultural inputs such as land, equipment, transportation and "water" have been available that allow for these industries to become established and maintained. Without input stability, these industries can not operate.

Since 1977, the Yakima Basin has had severe water shortages. In the beginning, these shortages were primarily due to weather. Since that time, water shortages have come more frequently, mostly due to weather, but also due to additional demands on our water sources, exasperating the situation.

The state sponsored watershed plan known as the 2514 process, after the House Bill that created it, completed a multi-year water study a couple of years ago. This study cost nearly \$3 million and acquired the services of some of the best water consultants in the state. The study found that there was a shortage of water in the Yakima Basin. Those shortages were identified as for fish, people and agriculture. It is my understanding that the BOR studied some of the same elements in their process that brought us here today.

This study found that the basin can be short approximately 475,000 acre feet of water annually. It also found that conservation measures can not meet this requirement for water, can't even come close to meeting it. The study also found

that there was little support for on-stream storage facilities. The Black Rock reservoir met the qualifications of an off-stream storage site.

The study that we are commenting on today has found that the cost-benefit ratio for the Black Rock project is not positive. However, since the BOR has restrictive guidelines, it did not take into account all of the elements that would affect the outcome. Other studies have found that by taking these "undocumented" elements into account, the ratio could be positive.

It seems ironic that the issue of fish restoration was not fully taken into account as the BOR works on fish enhancement and passage issues, as we speak today. One would think there would be a high value placed on fish with all of the resources going into this effort and all of the litigation that has transpired in the past. One would think that crops would have a very high value as we look at less than a 30 day world supply of wheat, and shortages of acreages to grow crops such as hay, corn and hops.

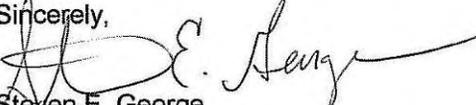
Not only do fish and agriculture need ample water supplies, but "people" will need water as our communities continue to grow. Static or declining communities do not flourish. Taking water from current allocations for other uses does not address our water shortage issue, it only diminishes the value from where it was taken.

Water storage sites and management structures have been studied in the Yakima Basin for years. We know how much water we need, and we know where it is needed today, and into the future. The Black Rock Reservoir is the only alternative that meets these requirements, both in the amount of water it can generate, and being located in the least environmentally sensitive area in the Basin. If all economic considerations were taken into account, it could likely have a very positive return ratio.

Water management and supply in the Yakima Basin continues to be precarious. Some of these issues should have been addressed when the Reclamation project was initiated, but they were not leaving one to wonder what liability the BOR has, and if this liability will translate into future litigation. The Yakima Basin continues to rely on water storage structures that were build over 80 years ago, that can not meet today's demand, nor that of the future. Millions of dollars have been spent on studying this situation. We know what needs to be done. Its time the Yakima Basin embarked on an adequate, stable water supply. A no-action recommendation is not acceptable, nor is a plan that will not meet current and future water needs.

Thank you for your time concerning this matter. Please feel free to contact me if you have any questions.

Sincerely,



Steven E. George
Governmental Affairs

- c. Congressman Doc Hastings
Governor Christine Gregoire
Jay Manning, Director, Dept. of Ecology

Received In Mailroom
U C A O PRS-110 Y F O
MAR 03 2008
Yakima, Washington

520 Carpenter Rd.
Granger, WA 98932
Feb. 27, 2008

U.S. Bureau of Reclamation
Department of the Interior
1917 Marsh Rd.
Yakima, WA 98901-2058
Attn. Mr. David Kaunheimer

Dear Sirs:

As a landowner and a farmer on the Roza Irrigation District I wish to weigh in on behalf of the proposed Black Rock Storage reservoir.

We simply must have more storage available in the Yakima basin. I have suffered through several droughts since I took over the family farm in 1975 after the death of my father. The last one in 2005 just about ruined me. What was totally ruined was a beautiful new seeding of alfalfa planted the preceding fall.

The benefits to salmon and to recreation have not been valued in the study. I realize it is difficult to do. With the growth of the city of Yakima there will be an increasing demand for the municipal water supply.

Yours truly,

Bruce A. Johnson
Bruce A. Johnson

From: Jennifer Pickering <jennifer.pickering@cingular.com>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 3, 2008 12:42 PM
Subject: No on Black Rock Dam Proposal

Mar 3, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

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The State of Washington, on the other hand, does take a look at these non-structural water management alternatives. The final draft of the study should provide a full analysis of these alternatives to new dams, and they should be considered as joint federal-state alternatives rather than as state alternatives only. Anything less will delay and confuse implementation of smarter water management policies in the Yakima River basin.

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Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Mrs. Jennifer Pickering
16921 NE 166th St
Woodinville, WA 98072-8900

From: Jayne Reed <kkjreed@mindspring.com>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 3, 2008 10:14 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 4, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

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Sincerely,

Ms. Jayne Reed
450 S Fork Rd
Garden Valley, ID 83622-1028

Received in Mailroom

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Yakima, Washington

SIMPSON BROS. FARMS, INC.
391 MILLER RD.
MABTON, WA 98935
(509) 894-4438

February 27, 2008

Mr. David Kaumheimer
1917 Marsh Road
Yakima, WA 98901-2058

Mr. Kaumheimer,

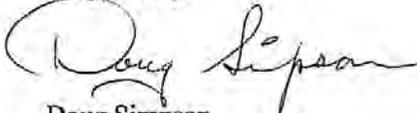
As a third generation farmer in the Yakima Valley, I believe our future hinges on additional water storage.

It wasn't that long ago target flows at Parker were 100-150 cfs. Today we are seeing flows set at 300 to 400 cfs. I believe even in 2005, an extreme drought year, 300 cfs was the target and many times reached 400 cfs. This water was left in the river to enhance fish, not a bad thing, but it came out of the bucket of the irrigators, not new storage.

If the Yakima Basin is to become the major restoration area for salmon recovery as some would argue, how much more water are we talking about?

Today irrigation districts and the farmers they serve are spending millions each year to conserve what water we have and improve return flows. Conservation alone won't solve these future demands.

Respectfully,


Doug Simpson

2/29/08
U.S. Bureau of Reclamation,

I urge you to oppose the
Black Rock Dam - No More
Dams on Columbia - let the river
flow & salmon swim!! This
dam would be dangerously close
to nuclear waste at Hanford -
clean up Hanford as priority!!
Neither Black Rock nor Wynne
Dam & pump exchange are
cost effective - stop wasting
public money. Invest in smart,
small scale, cost effective
water policies & projects only.

Sincerely, Michael S. Smith

From: Alexa Brown <elixer07@msn.com>
To: <storagestudy@pn.usbr.gov>
Date: Wed, Mar 5, 2008 12:48 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 5, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

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Sincerely,

Ms. Alexa Brown
1652 25th Pl NE Unit 103
Issaquah, WA 98029-2607

Received in Mailroom
U C A O
MAR 06 2008
Y F O
Yakima, Washington

cc'd
To Governor Chris Gregoire and

→ To U.S. Bureau of Reclamation, Upper Columbia

RE: Black Rock Dam

I'm writing to oppose the Black Rock Dam as its location is just five miles above the Hanford Nuclear Reservation in an earthquake prone area. The additional risks of adding a dam to an already huge environmental problem is irresponsible to say the least. I'm very concerned about Hanford already!

The return on each dollar spent on the Black Rock Dam is 16 cents, on Wymer Dam 29 cents and Wymer Dam pump exchange seven cents according to U.S. Bureau of Reclamation and WA Dept. of Ecology.

While the State has a duty to protect and allocate water for the common good, these series of new dam proposals just are not sensible water policies.

Regards,

Jeanne Poirier

Jeanne Poirier
P.O. Box 228
Cashmere, WA 98815

From: "Sally Meredith" <Smeredith@cvbankwa.com>
To: <storagestudy@pn.usbr.gov>
Date: Fri, Mar 7, 2008 12:32 PM
Subject: comment on Black Rock

<<black rock.doc>>

Sally A. Meredith
Central Valley Bank
Vice President / Loan Officer
Phone (509) 576-0424
smeredith@cvbankwa.com

CONFIDENTIAL AND PROPRIETARY:

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March 7, 2008

US Bureau of Reclamation
Attn: David Kaumheimer
1917 Marsh Road
Yakima, WA 98901

RE: Comments on Black Rock Storage Study

Mr. Kaumheimer:

As President of Central Valley Bank for 21 years, I felt it necessary to comment on the limited scope of the feasibility study.

Central Valley Bank is a \$130 million community bank serving Yakima and Kittitas counties with six branches. Our primary lending focus is on agricultural (47% of loan portfolio), construction, and commercial lending. The area we serve has 37 different major crops with varying needs for water, which the Yakima Basin drainage has not been able to meet on several occasions.

The Black Rock reservoir would utilize excess water from the Columbia River to provide a stable water supply each year. The main economic benefits to the area not considered in the study are:

The Yakima economy continues to expand in the commercial business arena with a growing need for water.

The wine industry is creating new opportunities for expanding our recreational visibility, with tourism playing a major role in our economic expansion. As a fisherman, the benefit to providing fish with adequate stream flow is critical to the Yakima River trout habitat. The reservoir would provide recreational benefits to all of us for many generations. Land values and loan performance have been negatively impacted in drought years, actually forcing agricultural growers out of business. The continued viability of agriculture in the future is dependent on a stable water source.

We are proud of the economic achievements accomplished by a number of groups working together the past five years. The area population is growing with increasing demands on the existing water storage, both from business and residential development. You need to act now to correct the problem by funding the Black Rock project, which is key to our future. If we wait for the next drought, it will be too late.

Thank you for your consideration in expanding the focus of the study to include all the benefits of this new reservoir.

Respectfully,

D. Michael Broadhead
President

From: Michael O'Brien <alpinepainting@hotmail.com>
To: <storagestudy@pn.usbr.gov>
Date: Sat, Mar 8, 2008 9:04 AM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 8, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study).

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Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Mr. Michael O'Brien
18214 W Spring Lake Dr SE
Renton, WA 98058-0604

From: Julie O'Donnell <julieo@efn.org>
To: <storagestudy@pn.usbr.gov>
Date: Sun, Mar 9, 2008 9:08 AM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 9, 2008

Gerald and Derek Kelso and Mr. Sandison

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alternatives to new dams, including water conservation and efficiency, more robust water markets, aquifer recharge, or a combination thereof.

The State of Washington, on the other hand, does take a look at these non-structural water management alternatives. The final draft of the study should provide a full analysis of these alternatives to new dams, and they should be considered as joint federal-state alternatives rather than as state alternatives only. Anything less will delay and confuse implementation of smarter water management policies in the Yakima River basin.

One thing is clear from the draft study: the proposed Black Rock dam should be removed from further consideration. The \$6.7 billion proposed dam would drain resources from more sensible and efficient tools to improve water management and fish and wildlife habitat. On top of that, the leaky reservoir would likely cause radioactive groundwater underneath the Hanford nuclear reservation to reach the Columbia River, contaminating the river and the water supply for downstream communities. The Black Rock proposal should be abandoned now. There is no need to spend any additional taxpayer dollars studying this risky and expensive proposal.

Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Ms. Julie O'Donnell
10046 13th Ave NW
Seattle, WA 98177-5214

From: <bobpatcolyer@aol.com>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 10, 2008 4:13 PM
Subject: New dams on the Columbia River

?? I can think of MANY MORE projects on which to spend the taxpayers' dollars than the proposed Black Rock Dam, the Wymer Dam, and the Wymer Dam pump exchange.? According to the Sierra Club the return on the dollar for each project is pitifully LOW.? Plus there is potential danger to the Columbia River from

water seeping from behind the Black Rock Dam, through the Hanford Nuclear Reservation and into the Columbia River, carrying with it radioactive waste.

?? The people of Washington have infinitely more pressing problems than one more dam on the Columbia, especially when four dams far upstream are of questionable value.? How about spending money on the poor, the working poor, the mentally unstable, those having no health insurance, the schools?? Spending millions of dollars on yet another dam while ignoring the very real problems of thousands of people is morally WRONG.

?? Please re-consider such wasteful projects and veto them.? Respectfully, Pat Colyer, a Washington State inhabitant, voter and taxpayer

From: <Bluebot1@aol.com>
To: <storagestudy@pn.usbr.gov>
Date: Tue, Mar 11, 2008 5:06 PM
Subject: black rock dam

Dear USBR,

I'm writing to express my opposition to the Black Rock Dam, the Wymer Dam and the Wymer Dam pump exchange. These dams, according to the U.S. Bureau of Reclamation and the Washington Department of Ecology will return much less in benefits than they will cost to build and operate.

Perhaps more importantly, The Black Rock Dam is sited on 5 miles above the Hanford Nuclear Reservation in an area that is earthquake prone. Should this dam be built and then collapse, water could flood across the nuclear reservation releasing reactive waste that cause severe damage from the Quad Cities to Astoria, Portland and Vancouver. Even were that now to happen, flumes of radioactive wastes are already are moving toward the Columbia river. Dam seepage would only exacerbate this problem.

Thank you for your time and consideration of my comments.

Sincerely,

Joe Ginsburg
12210 Densmore Ave. N.
Seattle, WA 98133-7729

3/8/08

U.S. Bureau of Reclamation
Upper Columbia Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Received in Mailroom
U C A O MAR 11 2008 Y F O
Yakima, Washington

To Whom it May Concern:

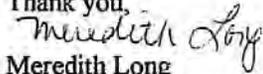
I am writing to you regarding the Black Rock Dam project.

The Black Rock Dam proposal does not make economic sense. It would return just 16 cents for each dollar spent to build and operate it. These figures, from the Department of Ecology and U.S. Bureau of Reclamation, indicate to me that in these recessionary times, this would not be a wise investment.

The location proposed for the dam 5 miles above the Hanford Nuclear Reservation also does not make sense. This is an earthquake prone area so the risk of collapse cannot be discounted. If the dam were to collapse, a radioactive wave from Hanford would be released across the area ranging from the Quad Cities to Portland and even to Astoria. Then there is dam seepage. Dam seepage has the potential for accelerating the plumes of radioactive waste already migrating toward the Columbia River.

I oppose this dam for the reasons cited above. I also oppose the proposed Wymer Dam and Wymer Dam pump exchange because they too would not be economically viable.

Please do not build these dams. Please support more sensible water policies for our state.

Thank you,

Meredith Long
45 Chukar Lane
Riverside, WA 98849

PRS-1.10
Received in Mailroom
U C A O
MAR 12 2008
Y F O
Yakima, Washington

Date: March 3, 2008
To: USBOR
RE: Storage Study Black Rock Project
Written Testimony

Gentlemen

I'm writing this letter in support of the Black Rock Reservoir because it's vital to the future economic well being of the Yakima Valley. I'm the General Manager/CEO of Bleyhl Farm Service, Inc. in Grandview, WA. We are a farm supply cooperative that operates primarily in Lower Yakima Valley. We sell farm inputs (energy, agronomy and orchard/vineyard supplies to 1,000 farmer/patrons with total sales in 2007 of \$56.0 million. We have over 90 full time employees at our locations in the valley with an annual payroll of \$4.7 million with benefits. Having enough water to support production agriculture, population growth in our cities/county and a healthy fishery on the Yakima River is a concern our organization takes very serious. We do know that we don't have enough water infrastructures in place to protect us from a drought situation, the growth in population and increase water that might be legislated for fish survival.

Points that we have a great concern with:

1. We have had numerous drought years over the past 35 years in the Yakima Valley that have had a real negative impact on our farm supply business, farmers and other business's. The economic impact often takes years to get over for both businesses and farmers in the region. **Does your Feasibility Study define what the true cost is to all of us who live in the Yakima Valley during a drought year?** The pain of drought is not just one year, but also includes the time of recovery. This could reach in the hundreds of millions of dollars with the value of our crops today.
2. **Does the USBR currently have enough water in its distribution system to deliver water to all that have contracts on a normal water year? It's my understanding that federal law mandates that additional water has to be left in the Yakima River for fish, so where is this water going to come from on a drought year to take care of all of us who live in this watershed? In addition of we have a short water year and legislation at some point mandates even more water for fish, where is the water going to come from?**
3. The YBSA has been studying the basin water storage for decades and more studies won't solve the problem. The Columbia River water exchange is the best way to protect us from drought that may occur every other year according climatic change models. Black Rock is a good solution for the fish, agriculture and the communities along the Yakima River Basin.

Sincerely,

Greg Robertson
CEO/General Manager
Bleyhl Farm Service, Inc.
940 E. Wine Country Rd.
Grandview, WA 98930
509 882 2248
greg@bleyhl.com

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February 28, 2008

Black Rock Reservoir Proposal

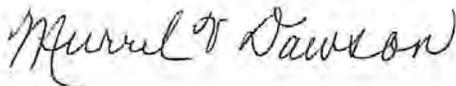
The proposal to build the Black Rock Reservoir is extremely short sighted to say the least. The astronomical cost of the project and the impact on the environment not only at the site of the reservoir but the paths of the pipelines are not the main points of concern.

Please research the history of other projects that have been proposed that would have impacted the Hanford Reservation. Two examples that come to mind were the Ben Franklin Dam to be placed across the Columbia River near the 300 Area and the burial site for hazardous waste (BWIP) that was proposed in the Cold Creek Valley near the 200 East and 200 West areas. These projects were halted when it was made apparent that the geology and ground water would not allow either project to continue.

Pay attention to these facts. Listen to the geologists and sciences that have studied the problem of radioactive contamination under Hanford. All the real estate development, additional water for farmers, and economic growth will disappear if the water from Black Rock were to cause this contamination to reach the Columbia River. Such a happening would impact the entire Northwest and bring our now thriving area to a halt.

Murrel Dawson
9614 Vincenzo Drive
Pasco, WA 99301

Phone: (501) 551-9920
jmdawson@clearwire.net



From: "Rick Glenn" <RGlenn@awbank.net>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 31, 2008 12:11 PM
Subject: Storage study comments

Hi,

I just received my water bill from the city of Yakima. They charge \$9.35 every 2 months for a billing charge. In addition to the billing fee, they charge \$1.20 per 100 cubic feet of water, which translates to \$523 per acre foot.

Why did you use \$235 per acre foot for municipal water value when the current market value is \$523? That is only 45% of the current market rate.

What would be the effect on the cost of construction if the project was completed in 4 years instead of 10 years? Is the 35 % overhead charged by the BOR a negotiable item?

Rick Glenn
Commercial Loan Officer
AmericanWest Bank
127 W. Yakima Avenue
Yakima, Washington 98902
Fax: (509)-457-0756
Phone: (509)-494-1766

Oral agreements or oral commitments to loan money, extend credit, or to forebear from enforcing repayment of a debt are not enforceable under Washington Law.

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PR-3-1.10
Received in Mailroom
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Yakima, Washington

March 11, 2008

Bureau of Reclamation
Upper Columbia Office
Mr. David Kraumheimer, Env. Proj. Manager
1917 Marsh Road
Yakima, WA 98901-2058

Mr. Kraumheimer:

Am writing to express my concern about the proposed Yakima River Basin water storage plans. The cost of the Black Rock Dam is 6.7 billion plus.... and estimated return is 16 cents on the dollar... Not profitable.. Wonder if developers will be the big winners?

Also have concerns about dam & reservoir seepage into the radioactive wastes under the Hanford Reservation that are moving into the Columbia River. Surely this will hasten the movement of these wastes... and with Federal financial crunch, the cleaning up of these wastes is not a top federal priority..

I urge you to reconsider your plan for this reservoir and the dams. Thank you..

Sincerely,
Gwen Rawlings
Gwen Rawlings
7 South Reed
Kennewick, WA 99336

PRJ-110
Received in Mailroom
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MAR 12 2008
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Yakima, Washington

Date: March 3, 2008
To: USBOR
RE: Storage Study Black Rock Project
Written Testimony

Gentlemen

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Points that we have a great concern with:

1. We have had numerous drought years over the past 35 years in the Yakima Valley that have had a real negative impact on our farm supply business, farmers and other business's. The economic impact often takes years to get over for both businesses and farmers in the region. **Does your Feasibility Study define what the true cost is to all of us who live in the Yakima Valley during a drought year?** The pain of drought is not just one year, but also includes the time of recovery. This could reach in the hundreds of millions of dollars with the value of our crops today.
2. **Does the USBR currently have enough water in its distribution system to deliver water to all that have contracts on a normal water year? It's my understanding that federal law mandates that additional water has to be left in the Yakima River for fish, so where is this water going to come from on a drought year to take care of all of us who live in this watershed? In addition of we have a short water year and legislation at some point mandates even more water for fish, where is the water going to come from?**
3. The YBSA has been studying the basin water storage for decades and more studies won't solve the problem. The Columbia River water exchange is the best way to protect us from drought that may occur every other year according climatic change models. Black Rock is a good solution for the fish, agriculture and the communities along the Yakima River Basin.

From: "EDGAR A MEYER" <emeyer2@verizon.net>
To: <storagestudy@pn.usbr.gov>
Date: Thu, Mar 13, 2008 7:46 PM
Subject: Black Rock Dam proposal

Just the threat of groundwater movement from a large reservoir to the radioactive-contaminated water under the Hanford area adding to the risk of Columbia River contamination should end this proposal.

Thank you for considering this view.

Edgar A Meyer M.D.
105 Chase Ave.
Cashmere, WA
98815

From: "Dennis Neuzil" <dennisneuzil@foxinternet.com>
To: <storagestudy@pn.usbr.gov>
Date: Thu, Mar 13, 2008 1:46 PM
Subject: Reject Black Rock and Wymer dam proposals

Dear US Bureau of Reclamation Upper Columbia Office:

Please reject and drop the Black Rock and Wymer dam proposals. These dam proposals are both ecologically and economically unsound and do not support sound water resources policy for Washington state and the Pacific Northwest.

Dennis Neuzil, Dr.Eng., P.E.
Civil Engineer, retired
2307 - 94th Avenue NE
Clyde Hill, WA 98004
Tel 425-455-1419 (Fax 425-454-9122)
Email: dennisneuzil@foxinternet.com

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Black Rock Reservoir Public Comment

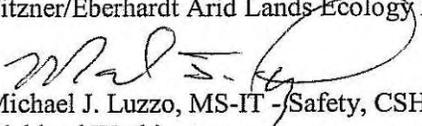
3/3/2008 Yakima, Washington

The use of the proposed Black Rock Reservoir for water storage and recreational use would not be of beneficial use for the Hanford Reach area. While great support for this has come out of the Yakima Valley, the Yakima Valley is not the only area that this proposal would affect. The US Bureau of Reclamation has conducted at least one study of the effects of Dam Overtopping via the Grand Coulee Dam. This researcher intends to submit a Freedom of Information Act request for this study¹. For this definitely might have far reaching consequences for this project. There were several examples of studies of the use of a concrete face on the dam; which is what this researcher was concerned with². This helps answer the nature of the question that was asked during the open forum; would an earthen and rock dam of this size hold? It seems that USBR employed engineers may already have addressed this issue; both in this study done by Ms Frizell and within the text of the Yakima River Water Basin Feasibility Study.

A second area of concern is that the Rattlesnake Hills are located over an anticline. Miocene Epoch Basalt flows underlie the geology of this area of Washington State. These inclines are folded upwards. Survey of literature for the geological features of the Pasco Basin serves to highlight this issue. Basalt is overlain by the Ringgold Formation, which is composed of closely packed particles. This is overlain by debris left by the Spokane Floods and Glacial Lake Missoula. This is composed of loose gravel and loess soil³. Last of all is top geological layer that is termed the Touchet Formation. This layer is found in irregular patches throughout the Pasco Basin. The ridges of most concern for this proposed project would include the Ahtanum and Rattlesnake Ridges. Both of which are part of the Rattlesnake Hills. The Hanford Reach is located south of the Columbia River and East of the Yakima Valley. The Rattlesnake Hills divide these two synclinal valleys. For this is an example of where an anticline transitions into a syncline; therefore increasing the likelihood of ground water seepage to increase⁴; as was noted in the available literature⁵. This researchers concern is for what is located with is the Hanford Reach. The Hanford Reach sits on that which is presently left from the old Manhattan Projects' Hanford site. On this site are buried radioactive byproducts of the Cold War era Hanford Project⁶. Present day technology is being used to glassify this combination of liquid storage in tanks. A second area of concern can also include construction materials that would date from this era. The elevation of the Black Rock reservoir will be higher that this area of cleanup⁷. So the concern is that possible groundwater seepage would raise the water table of this area. This could conceivably cross contaminate the Columbia River Watershed immediately below the area of the Hanford Reach. Review of published hazardous waste literature and the US Bureau of Reclamation's own literature would seem to support this conjecture.

Last of all, the Black Rock Dam Project should have included input from the US Department of Energy, US Fish and Wildlife Service and the Washington Department of Ecology. This researcher spoke with only someone from the Department of Ecology. This researcher has past experience in laying out sampling strategies and monitoring environmental projects. The Washington Department of Ecology was helpful in the area of finding highlighted areas of suspect plumes. So the final question that will be asked is

if monitoring wells could be located in the Western end of the Hanford Reach in the Fitzner/Eberhardt Arid Lands Ecology Reserve Unit.


Michael J. Luzzo, MS-IT - Safety, CSHO
Richland Washington

¹ Ms. Debby Nelson (Administrative Officer; telephone number 509-633-9518) of the US Bureau of Reclamation and Grand Coulee Dam stated the following. A letter must be submitted to the Project Manager for this. The address for the Grand Coulee Dam Project Manager is

David Murillo, Power Manager
Grand Coulee Power Office
PO Box 620
Grand Coulee, Washington
99133-0620

² Refer to Ms. Kathy Frizell; Hydraulic Engineer US Bureau of Reclamation.
http://www.usbr.gov/pmts/hydraulics_labkfrizell/index.html

³ Alt David D and Donald W. Hyndman Roadside Geology of Washington, 1994, pp. 169-176, Mountain Press Publishing Company, Missoula Montana

⁴ US Department of Interior, US Bureau of Reclamation and Washington State Department of Ecology, Yakima River Water Storage Feasibility Study, pp. 4-32 - 4-33, January 2008

⁵ US Department of Interior, Yakima River Water Storage Feasibility Study, Modeling for Cold Creek, Page 4-37

⁶ Washington Department of Ecology, Ecology Publication # 08-05-001, Cleaning Hanford's' Groundwater or www.ecy.wa.gov/programs/nwp and Alt Roadside Geology of Washington pp. 196-197

⁷ Executive Summary Black Rock Storage Enhancement Initiative Potential T & E Impacts, Black Rock Reservoir Progress Report for Benton County Sustainable Development October 21, 2002

Literature Reviewed; But Not Cited

Sullivan F. P., Environmental Law Handbook, pp. 128-141, 179-180, 2003, 17th Edition, Government Institutes, Rockville Maryland

Areas reviewed included RCRA, Subtitle C, Hazardous Waste Management Program, RCRA Subtitle I, Underground Storage Tanks (Exclusions), Clean Water Act and the Atomic Energy Act of 1954

Leonard, Jack E. and Gary D. Robinson, Managing Hazardous Materials, 2002, pp. 357-398, and 579-600, Institute of Hazardous Waste Management, Rockville Maryland

Literature was reviewed for hazardous materials management procedures. These included Managing Water Discharges and Radioactive Materials

Received in Mailroom
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A F
O O Yakima, Washington

Wednesday, March 12, 2008

Bureau of Reclamation
Mr. David Kaumheimer
Environmental Program Manager
1917 Marsh Road
Yakima, Wash. 98901-2058

Dear Mr. Kaumheimer:

Thank you for a copy of and an opportunity to comment on your recent report entitled "Draft Planning Report/Environmental Impact Statement, Yakima River Basin Water Storage Feasibility Study." I suspect I am like most who received it who are simultaneously impressed with its breadth while finding their limited expertise leaves them relying upon it mainly as a learning document rather than something they feel comfortable making a point-by-point critique.

So, in general, I will say I find it exceedingly well done and I want to pass along my congratulations and thanks to you at your staff at Reclamation; the staff Department of Ecology and all others who aided in its preparation. I am on firm record as opposed to the Black Rock components covered by this study, and in the past have voiced suspicions that Reclamation would bias the study to justify this project so the Bureau could return to the glory days of dam building. I was wrong to have that suspicion and I have apologized for that attitude and apologize again after reviewing this exceptional document. It is very professional and very objective. I fail to see how anyone can fault it in any meaningful way, although I note the irony that some are now asserting bias by Reclamation *against* Black Rock! You must thinking of the adage: "You can't please all the folks all the time."

I do note the Black Rock advocacy group, the Yakima Basin Storage Alliance (hereafter referred to as "Alliance"), continues to question the study and has called for the folks in the Yakima Valley to rise up in protest. In sum, the Alliance has essentially called for diminishing the factual and scientific review because the cause is perceived by its member as no where on that basis and instead is turning the issue into a political cause, or a lobbying campaign. The *Yakima Herald-Republic* (2/3/2008) has likewise called for strong public comment in favor of Black Rock. While the Alliance bills itself as a "grassroots" organization composed of thousands of folks, the spokesmen and leaders are composed almost entirely of the business, agricultural and political elites of the Valley.

Since the Alliance has chosen that course, I tailor my remarks accordingly. I am not sure what the estimated cost of the Black Rock component is because every time I check, the figure has gone up again. It is like standing in the checkout line at the grocery after selecting the family's food for the month...every

time I look up, the register has gone higher. But that analogy fails because at least as groceries in grocery basket remain constant in value and the food remains nutritious. With Black Rock, the value decreases every time I turn my head and the product seems more dubious than before, perhaps even unhealthy. In any event, the last figure I saw for Black Rock was \$6.7 billion. It will surely grow higher.

Regardless of the amount to be paid by this nation's taxpayers, the Alliance claims the gush of water is vitally needed for municipal growth, agriculture, sustain fish, recreation, resorts, and so forth.

Except for the fish component which I shall discuss later, **I submit that the very exact arguments for more water supplies made by the Alliance can be made by hundreds of communities in the American West. It is abundantly obvious that if the Yakima Valley can stage a coup and get \$6.7 billion for its growth and enrichment, all those other communities can make a strong case for billions of dollars for more water. That being the case, and if there is to be a policy by the federal government to created massive water enhancement projects similar those developed in the mid decades of the 20th Century, it needs to be articulated and approved by Congress. It should not be done on an ad hoc, leap-frog basis depending on who has the most political clout and best lobbying team. What, in the name of common sense and fairness, can be said to the folks in the Southwest facing a more severe water shortage with more certainty and sooner than those in the Yakima Valley can ever dream?**

That is not to say that there was not considerable "politicking" which brought about the great dam building projects built in the American West in the last century. There certainly were considerable politics. But that historic unseemly, power-grabbing process should not be replicated and be allowed to over ride orderly, scientific methodology if for no other reason that the best places to build dams have been taken and the best water has already been claimed. Perhaps the best advocate for dam building on the Columbia was the late Rufus Woods, the legendary publisher of the *Wenatchee Daily World*. His biography of Woods ("Rufus Wood, the Columbian River & the Building of Modern Washington"), author Robert E. Ficken notes that in Woods' long campaign to build the Grand Coulee Dam he centered his advocacy almost exclusively because of its huge capacity to generate hydroelectricity. It was the broad regional benefit of electrifying the rural farms and homes and to power industry in the cities that was the key selling point. This was the way Woods envisioned gathering good will and votes from the broadest base for Grand Coulee. Capturing the water for irrigation or municipal uses was downplayed simply because such benefits accrued only in the vicinity of the dam itself. As Woods reasoned it, how could one get the vote from a Congressman from, say, New York to vote to spend millions to provide water to produce crops more abundantly and cheaply than his own famers in New York who were competing

with Washington farmers? One could not, Woods concluded, so it was best to ignore or downplay the issue.

Woods met with great success by tailoring his pitch carefully. The Black Rock proposal, as political issue, turns tactics on its head and asked for vast water for consumption for the Yakima Valley as its nearly sole objective while claiming a small return on hydroelectricity and benefits for fish (more on those issues in a bit). What of preverbal the New York farmer of yesteryear? Yes, he is still there, but so are innumerable farmers and cities throughout the American West crying for more water and letting their representatives in Congress know. Black Rock does not even pretend to provide other regional benefits which made other dams attractive for federal funding, such as hydroelectric power, transportation and flood control which might be useful to those outside the Valley. If Black Rock is successful in getting funded and built, the political will, money and available water for any other irrigation projects along Columbia will disappear. Without a national policy, other communities will take note, and commence their own "me too" campaign for more water. It is just amazing to me that the Alliance and other advocates can put on the blinders and soldier on with this almost entirely self-possessed proposal without fairly considering the wide-range consequences.

I should hasten now to note the Alliance does claim broader benefits within the Yakima Basin beyond just the Yakima Valley itself. It even claims that 70 per cent of our water allocation here in the Kittitas Valley where I live will be guaranteed. How they can promise that, as a non-profit advocacy organization, I am unsure. It will be only when (and if) the proposal is approved and funded will the proper authorities are able to make such assurances. As proposed, the only thing which is certain about Black Rock is that it will put a gush of water into the Yakima Valley for growth and economic purposes.

Repeatedly, the Alliance says the best ancillary benefit for Black Rock is that it will make it possible to leave more water in the Yakima River for migrating fish. Again, nothing is certain in that regard until some authority beyond the promises of the Alliance agrees, but we all agree saving our beleaguered salmon and steelhead would be a profound benefit.

These dynamic fish going up stream—leaping, swimming—are symbols of the Pacific Northwest. Their fate evokes strong emotions. Their decline began almost at once with the arrival of the white settlers, and the blame for that is passed around almost universally. The dams blocked their path to their spawning grounds; the farms and ranchers ruined the spawning grounds; the fishermen took too many fish; fertilizers and pesticides ruined their waters; introduced species took their food. The list goes on. The tenuous fate of the Pacific Northwest salmon and steelhead is an American tragedy unfolding before our eyes.

That said, our efforts to reverse those factors have been weak at best. The dams, farmers, ranchers, fishermen, and competing fish species are still with us. Efforts to mitigate these effects are too often misguided, based on ignorance, often don't work, and sometimes were actually harmful. We should all be reminded that the proponents of The Dalles dam 50 years ago believed that the dam would actually help the migrating salmon because it would flood Celilo Falls and make it easier for the fish to swim up river!

We have been told fish hatcheries were the key to saving the fish only to learn that the hatcheries eventually produce an inferior type of fish compared the wild-run fish. The fish ladders haven't worked fully as we hoped. The evidence is clear that we know how to impede and destroy the migrating fish, and we get an F grade for that. But our efforts in correcting that failing mark might earn us a C for trying with some success, but probably an I for "incomplete" would be a better grade.

The lesson here to be very careful in evaluating the benefits of Black Rock with regard to fish. The law of unintended consequences pops up all too often as we struggle to save our fish. Would the water from Black Rock be too warm or trigger the wrong migrating instincts for the fish? Would the quality of the water be good enough? Would the water drained through cities and farms from Black Rock contain pesticides and fertilizers making it unfit for fish? More water in the Yakima River for migrating fish looks good at first glance, but a much-needed unbiased assessment should be conducted.

While still on the subject of fish, \$6.7 billion allocated for fish alone could go a very long way in funding their survival if we cared to spend that much and assuming we can ever get our science and effort going in the right direction. That amount could be paid to buy-out fishermen; buy spawning grounds, all sorts of things. Nobody is talking about \$6.7 billion solely for fish; only \$6.7 for Black Rock with fish tagging along (maybe) as a beneficiary. Which leads me to my own belief about the entire argument of tying the fish to Black Rock is a cynical Trojan Horse. The Black Rock issue seems to me to obviously unsalable on its face. Hence, that is the reason we hear the repeated arguments tying it to the survival of the iconic and beloved migrating salmon and steelhead. In fact, it is hard to believe most members of the Alliance believe helping fish is any where near central to their objective. Advocating for fish is simply verbal gift packaging to get the water they covet. I have never heard anyone from the Alliance note that the construction of dams have harmed the migrating fish and perhaps some of dams should be taken down. Instead, we hear the strange and seemingly counterintuitive argument that yet another dam must be constructed to save the fish whose migration has been damaged by dams. I would be astounded by all measure if the Black Rock issue fails to be realized if any of the Alliance key members continue working hard and providing funds for projects to save the fish. Once they lose their water, they will forget about the fish, I'm sure.

I would now like to comment on some of the so-called "studies" and assumptions put forth by the Alliance. The various "studies" commissioned by the Alliance invariably projects a rosy outcome if Black Rock becomes a reality. It is beyond my expertise to evaluate each one of them, but I must say the conclusions are so often fantastic and seemingly improbable, a **serious, third party and objective evaluation** needs to be applied to everything the Alliance has put forth.

I was amazed to read the Alliance's belief that billions of gallons could be pumped out of the Columbia River for Black Rock yet it would actually result in a net gain in power. This so-called "study" has been largely discredited, but we need to return to it for a minute because by seriously advancing this scheme, the Alliance has demonstrated it will go to desperate, even inaccurate, lengths to advance the cause of Black Rock. It sounds something like the old myth of a "perpetual motion" machine my high school physics teacher debunked so many years ago. Or, as my father admonished with the cliché "There ain't no such thing as a free lunch." Pumping billions of gallons of water uphill to will result in a net loss in energy regardless of clever arguments about associated wind power, recaptured hydro power as it the water flows out, and other shell-game analyses.

In previous communications, I have said I think the Black Rock area is so bleak it seems an unlikely candidate for conversion into a virtual Garden of Eden as the Alliance would have us believe the reservoir becomes a reality. I can think of quite a number of placid, warm pools of water behind dams in Eastern Washington which do not come any where close to the vision the Alliance sings for Black Rock. Most of them seem to bleak areas with waterlines with rise and fall on the whim of water needs, contrary to the wishes of those living on the shoreline or using the reservoir for recreation. Anyone can pull out a simple highway map and note the proposed Black Rock reservoir will be sandwiched between a site set aside for intensive military training and another site where nuclear waste is stored. There is some belief that the very creation of the Black Rock reservoir will cause the contaminated nuclear waste at the U.S. Department of Energy Hanford Site to slosh around where it is not wanted. Is this really a "destination" site for those looking for relaxation at a resort or to build an expensive home?

As the Alliance members wax on about the benefits of Black Rock, it just seems to me they lose sight of the fact all the nation's taxpayers asked to pay quite a lot of money for this project and, with amazing myopia, they fail to recognize that what is a benefit to the Alliance members, might be of no benefit to the general public. Is it really a national benefit that our tax dollars go build a resort and a place for big waterfront homes for the wealthy to play and live? The emergence of the wine industry in the Yakima Valley is a credit to those industrious people who planted the vineyards in the last decades, and I enjoy a glass of Yakima Valley wine as much as anyone. Quality hops have been grown in the Valley for decades to flavor beer, and I'm sure I've hoisted a mug of beer

kissed by Yakima Valley hops. However, millions of people are opposed to alcohol beverage for religious and/or health reasons. Why should these people be impressed crops grown exclusively to produce crops for alcohol consumption will be aided by the use of their tax dollars to build Black Rock? Also the Alliance fails utterly to understand that folks in Portland, Maine, or Key West, Florida, or any number of towns and cities across this great country couldn't care less that towns in the Yakima Valley cannot grow as they desire unless federal taxes are used to bring more water to them. Do those communities anxiously watching their source of water disappear as Lake Powell and Lake Mead dry up care much that Prosser or Sunnyside can't prosper to their hearts desire without a new water source? Hardly.

The advocates for Black Rock seem to be resorting to hyperbole, even hysterics, as a diversion to blunt their critics. The 2/3/2008 editorial in the *Herald-Republic* succinctly captures that turn of events. Many of the Alliance's "studies" depend on some amazing and clearly questionable assumptions, but the newspaper nonetheless has in the past relied on those results and assumed them as valid. Like the Alliance, the newspaper pooh-poohs the 16 cents benefit for \$1 earned ratio found in the draft EIS. "We're not sure what this cents-per-dollar benefit ratio has to do with anything anyway," the newspaper says. "If a badly needed, and long overdue, reservoir helps anchor the area's basic economy, that would seem its paramount benefit." The *Yakima-Herald*, like many members of the Alliance, are businesses and business people. These current business interests will benefit by the flood of new water coming into the Yakima Valley, either directly or indirectly, if Black Rock were to become a reality. Dare I ask: If they had before them a business plan which promised 16 per cent on each dollar they invested, and could only improve if some fairy-tale assumptions became a reality, would they put their money in it? No, of course not. But it is OK for the nation's taxpayers to buy into such a venture. As it has in the past, the newspaper moans that the last reservoir constructed to benefit the Yakima Basin was in 1933, during the hey-day years of dam construction in the last century, but which for all practical purposes stopped in 1966 with the completion of the Glen Canyon Dam. Was there ever a promise to continue with those water projects, especially after the best dam building sites had already been claimed and built and the water allocated? No, of course not. This claim that the Yakima Basin was somehow uniquely abandoned in creating new water supplies is just very odd and not substantiated.

Finally, asontinishingly, the newspaper creates a hysterical scenario occurs if Black Rock is not approved. Fruit trees would die, vineyards withered, buildings boarded up. The newspaper paints a disaster of Katrina proportions, compelling the nation to action at last.

Well, no. Folks would just have to continue to live with the water they have, or less if droughts and global warming mandate that. They will adjust; painfully and incrementally perhaps, but they will adjust. Yakima Valley may not

grow and may shrink. There will be no resorts, and those hoping to get rich won't have their dreams realized. But life will go on. Maybe, just maybe, they will look to some of the alternatives suggested, including more storage which is more modest and less costly. The Alliance could regain some credibility if it put as much effort and money into studying and advocating conservation as it has to push Black Rock. Black Rock has always been "Plan A" for the Alliance and its allies and have never seemed willing to compromise to a "Plan B." Maybe now is the time.

In conclusion, I acknowledge I may have overstated my concerns and I may have made some errors. Such is the case when issues such as these are reduced to political campaigns. If the Alliance will apologize for their overstatements and errors, I will apologize for mine.

Thank you for reading this. As imperfect as it may be, at least my presentation was prepared entirely with my own resources. If the Black Rock issue is shelved as I urge, perhaps the Alliance can scale back its activities to more reasonable efforts and cease holding out the tin cup to hard-pressed local governments for donations. Lowered expectations and compromise are now in order, I think, not any more questionable "studies" or political campaigns.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt Sharar". The signature is fluid and cursive, with the first name "Kurt" and last name "Sharar" clearly distinguishable.

Kurt Sharar
390 Cattail Road
Ellensburg, Wash. 98926

Phone/Fax: (509) 925-7216
Email: jkshar2@fairpoint.net



Received in Mailroom

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MAR 14 2008

Yakima, Washington

Tree Top, Inc.
220 East Second Avenue
P.O. Box 248
Selah, WA 98942-0248

T: 509.697.7251
F: 509.698.1460

www.treetop.com

March 10, 2008

Kim McCartney
Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901

Dear Mr. McCartney:

As you may know, Tree Top is the largest apple processor in the country. As a grower-owned cooperative, we are reliant on our growers' ability to grow an abundant supply of apples. Obviously, their ability to grow those apples depends on a number of factors, not the least of which is an adequate water supply.

I don't think there's any question about the need for a new water storage option for the region; the question is: What is the right solution?

Based on the available information, Tree Top supports the Black Rock Project.

While I understand the Bureau has well-defined criteria by which to judge the Black Rock project, I would encourage you to keep an open mind with respect to the potential benefits that lie outside your criteria, as well as the potential costs to our region if our current water issues persist long-term.

On behalf of our nearly 1,400 grower-owners, many of whom are very much dependent on the water supply in this Valley for their livelihood, I urge you to reserve your final recommendation until you've had the opportunity to complete a thorough, thoughtful investigation of *all* aspects of this project, including hearing from the citizens of our Valley through the public hearings process.

Sincerely,

Tom Stokes
President and CEO



From: David Grant <d2avid@charter.net>
To: <storagestudy@pn.usbr.gov>
Date: Sun, Mar 16, 2008 12:06 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 16, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

alternatives to new dams, including water conservation and efficiency, more robust water markets, aquifer recharge, or a combination thereof.

The State of Washington, on the other hand, does take a look at these non-structural water management alternatives. The final draft of the study should provide a full analysis of these alternatives to new dams, and they should be considered as joint federal-state alternatives rather than as state alternatives only. Anything less will delay and confuse implementation of smarter water management policies in the Yakima River basin.

One thing is clear from the draft study: the proposed Black Rock dam should be removed from further consideration. The \$6.7 billion proposed dam would drain resources from more sensible and efficient tools to improve water management and fish and wildlife habitat. On top of that, the leaky reservoir would likely cause radioactive groundwater underneath the Hanford nuclear reservation to reach the Columbia River, contaminating the river and the water supply for downstream communities. The Black Rock proposal should be abandoned now. There is no need to spend any additional taxpayer dollars studying this risky and expensive proposal.

Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Dr. David Grant
129 Oxford Pl
Medford, OR 97504-9333

From: <tajenkins@pol.net>
To: <storagestudy@pn.usbr.gov>
Date: Sun, Mar 16, 2008 2:13 PM
Subject: oppose new Columbia R dams

I am writing to oppose the construction of new dams on the Columbia River, for reasons of safety, financial viability, and environmental health. The Black Rock Dam is not a good investment for the public, with expenses far outweighing benefits. In addition it poses an unacceptable safety risk of flooding of unstable nuclear waste at Hanford. Finally we are moving towards reducing dam obstructions to our Northwest Rivers, to restore the health of salmon and river habitat. Please do not go forward with the Black Rock Dam, Wymer Dam, or the Wymer Dam Pump exchange. Thank you for your attention.
Tracy Ouellette,
MD 14078 MacTaggart Ave., Bow, WA 98232

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MAR 17 2008

Yakima, Wash

March 14, 2008

Dave Kaumhelmer
US Bureau of Reclamation
Pacific NW Region
1917 Marsn Road
Yakima, WA. 98901-20058

RE: No to Black Rock

Dear Mr. Kaumhelmer:

Black Rock Reservoir is a threat to the NW with Hanford only 5 miles away and contaminated ground water already leaking into the Columbia River. The DOE report on seepage impacts from pollution under Hanford must be included in any evaluation of Black Rock. The pressure to store water is reflected all over the Western United States and Canada, and the planning is rushed and inadequate. It is similar to the planning that left us without fish ladders along the Columbia at Grand Coulee.

Do not give in to immediate pressures at the expense of sound, long range planning. This planning needs to include Canadians, Oregonians and all stake holders. The pressure is only going to increase so saying No now to rushed planning and loud efforts to force things through is a good policy. Do not accept the Black Rock EIS. Thank you.

Sincerely,



Susan Evans
434 Orondo Avenue
Wenatchee, WA. 98801

From: "Rick Glenn" <RGlenn@awbank.net>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 17, 2008 4:25 PM
Subject: Question on Report

Does any storage system with usage above 1 million acre feet of water have a lower storage/usage ratio than the Yakima River Basin at 30%? What is the value of the irrigated acreage with senior rights? What is the value of the acreage with junior water rights? Will water rights that are ceded to the control of the Department of Ecology be considered junior to the existing rights holders? That could be a factor in drought years.

Thanks,

Rick Glenn

Commercial Loan Officer

AmericanWest Bank

127 W. Yakima Avenue

Yakima, Washington 98902

Fax: (509)-457-0756

Phone: (509)-494-1766

Oral agreements or oral commitments to loan money, extend credit, or to forebear from enforcing repayment of a debt are not enforceable under Washington Law.

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e-mail, delete this e-mail and destroy any copies. Any dissemination or use of this

information by a person other than the intended recipient is unauthorized and may be

illegal.

Re: Black Rock Dam
EVERETT WA 98201

It seems strange
that dammed
rivers elsewhere
are considering
removing the
dams & you're
planning one
which gains less
than the cost & build

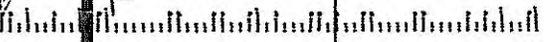
Mrs Jean R Strand
17543 102nd Ave NE # 237
Bothell, WA 98011-3790

J. Strand



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US Bureau of
Reclamation
Upper Columbia ACO
Yakima WA
98901-2058



March 17, 2008

Dave Kaumhelmer
U.S. Bureau of Reclamation
Pacific Northwest Region
Upper Columbia Area Office
1917 Marsh Road
Yakima, WA 98901-2058

We are commenting on the Draft Yakima River Basin Water Storage Feasibility Study and Environmental Impact. In particular we wish to comment on the Black Rock dam and reservoir. We do not think the study adequately addresses the danger of reservoir water flushing radioactive water in the nearby Hanford nuclear waste site into the Columbia River. The Bureau of Reclamation and the Department of Ecology has failed to include the Department of Energy's groundwater report on potential impacts of seepage from the Black Rock reservoir. This DOE study is critical for having a credible environmental impact statement. Also who will pay the electrical power cost for pumping Columbia River water into the new reservoir?

Mitigation for project does not adequately address wildlife migration corridor needs or adequate water rights for fish and wildlife dependent on the Yakima River. Mitigation should include consolidation of public lands and adding lands to create wildlife corridors as part of the Hanford National Monument. Project waters from the Columbia diverted to the Yakima, should be used to create a series of wetlands. Dikes and floodgates should be installed to maintain wetlands as reservoir waters are drawn down. Full mitigation should be made to protect fish, native plants, and the wildlife of the Hanford Reach from the effects of withdrawing 600,000-acre feet of water for the Black Rock Reservoir.

Sincerely,

Rosemary Sikes, president
Admiralty Audubon Society

Received in Mailroom
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A O
O Yakima, Washington

Alexandra Amonette
1939 Marshall Ave.
Richland, WA 99354

March 16, 2008

U.S. Bureau of Reclamation
Pacific Northwest Region
Upper Columbia Area Office, Attn: Dave Kaumheimer
1917 Marsh Road
Yakima, WA 98901-2058
(509) 575-5848 x370

RE: BLACK ROCK RESERVOIR PROPOSAL

Dear Mr. Kaumheimer:

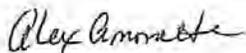
I oppose the Black Rock Reservoir Project.

As noted by regional geological experts, the proposed project lies atop faults. These faults have the potential to move and cause earthquakes, jeopardizing the stability of the dam. If the dam fails, the nuclear wastes from Hanford could go into the Columbia River. Also, water could drain away if the reservoir is in contact with the permeable zones (aquifers) that could provide a conduit for reservoir water to infiltrate the local rock. Both scenarios would have catastrophic and tragic consequences.

Your report leaves too many questions unanswered and provides insufficient factual information to meet the high standards of an Environmental Impact Statement and should be viewed as no more than a feasibility study. I strongly recommend that the Bureau of Reclamation and Department of Ecology drop Black Rock from further consideration and find another site for a reservoir that is not fraught with all these uncertainties.

Thank you.

Sincerely,



Alexandra Amonette
BA, Geology, MS Chemistry
Richland, WA

From: Harrison Grathwohl <hgrathwohl6448@msn.com>
To: <storagestudy@pn.usbr.gov>
Date: Thu, Mar 20, 2008 2:53 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 20, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

THIS IS BOILER PLATE, BUT IT EXPRESSES MY SENTIMENTS VERY WELL.

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study).

The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

alternatives to new dams, including water conservation and efficiency,

more robust water markets, aquifer recharge, or a combination thereof.

The State of Washington, on the other hand, does take a look at these non-structural water management alternatives. The final draft of the study should provide a full analysis of these alternatives to new dams, and they should be considered as joint federal-state alternatives rather than as state alternatives only. Anything less will delay and confuse implementation of smarter water management policies in the Yakima River basin.

One thing is clear from the draft study: the proposed Black Rock dam should be removed from further consideration. The \$6.7 billion proposed dam would drain resources from more sensible and efficient tools to improve water management and fish and wildlife habitat. On top of that, the leaky reservoir would likely cause radioactive groundwater underneath the Hanford nuclear reservation to reach the Columbia River, contaminating the river and the water supply for downstream communities. The Black Rock proposal should be abandoned now. There is no need to spend any additional taxpayer dollars studying this risky and expensive proposal.

Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Dr. Harrison Grathwohl
5507 258th Ave NE
Redmond, WA 98053-2515

Yakima County Auditor

Received in Mailroom

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Corky Mattingly, Auditor, Yakima, Washington
Diana Soules, Assistant Auditor

March 18, 2008

Att: David Kaumheimer
1917 Marsh Road
Yakima, WA 98901

Dear Mr. Kaumheimer:

As a native of the Yakima Valley and the granddaughter of pioneer farmers in this area, I have grave concerns about the future availability of water to this valley. We all know that over the years the snow pack (which serves as another storage for water) has fluctuated greatly and cannot be depended on from year to year.

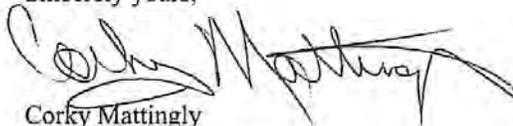
The Yakima Valley has the most diverse agricultural products grown anywhere in the world. The economy of this entire region is based on this production. Without a dependable water supply this area would be devastated. This devastation would not only affect this area but also national agricultural production and exportation.

The BOR has not taken into consideration the full economic and ecological impact that Black Rock would have on this area, Washington State and the United States. The presence of Black Rock would provide for dependable and abundant agricultural production and the expansion of tourism in the Yakima River Basin.

Being a YBSA board member, I have known the concerns that we have had about the study from the beginning. The Bureau's study has been going on far too long. The time for studying this issue is up. It is time for the BOR to take a stand and recognize that Black Rock meets all the goals stipulated in the study.

The Bureau of Reclamation does not have the option to choose "no action". BOR must take a stand to protect the viability of this area's economic well being and to protect its most valuable asset, water.

Sincerely yours,



Corky Mattingly
Yakima County Auditor

David Kaunheimer
Bureau of Reclamation
Upper Columbia Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

James Daniel Kinney Jr.
207 Santa Roza Dr
Yakima Wa.

March 21, 2008
**Draft Planning Report/Environmental Impact Statement
Yakima River Basin Water Storage Feasibility Study**

Dear Mr. Kaunheimer,

Thank you for allowing me to comment regarding the Yakima River Basin Water Storage Feasibility Study.

As a resident and businessman in Yakima for over 40 years, I have worked to provide a viable community, one that is both economically prosperous and offers the recreational opportunities of the Great Northwest. I believe that water is a very important ingredient in our lives here in Central Washington. Truly the water has turned the desert to into the Fruit Bowl of the Nation, and is the lifeblood of our valley.

As a member of the Yakima River Watershed Council's Storage Committee (Formed 1994), I studied and learned a great deal about the water needs and uses throughout the Yakima Valley. In June 1998 the Yakima River Watershed Council issued a Report with the following Recommendation:

Recommends pursuing the least cost, least ecologically damaging, surface water storage reservoirs as a potential way of making water available during the water short years for the recovery of the basin at risk fish species and the legitimate needs of the current agricultural and municipal base.

In reviewing the Black Rock Study plan with this recommendation in mind, the main problem I find with this Feasibility Study is that Black Rock is certainly NOT a least cost Proposal. With Total Project Cost of \$4.5 Billion, and Annual Operational costs of \$60 million this solution is too expensive for water users and taxpayers alike. I might add that it is also NOT very energy efficient – With annual pumping costs of \$50 million. That's enough energy for 54,000 homes, which would require the construction of another wind farm, the size of the Wild Horse Project above Ellensburg, to produce that much energy.

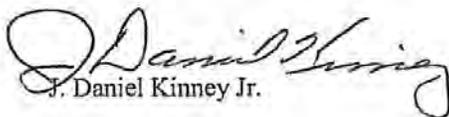
Black Rock looks to me like it's an overblown solution. Why is the Dam so large?

Black Rock would store 1.3 million acre-feet of water behind a 700-foot-high dam – A dam higher and longer than Grand Coulee that holds back the Mighty Columbia. The main driver of this Study has been the goal to provide 70-percent of proratable entitlements, but Black Rock would impound almost 3 ½ times the amount of water that would be needed to bring the Junior Water Districts to 70% of their entitlement in the worst year on record, 1994, when they received only 37% of their entitlement. [800,000 ac-ft May-Sept – 425,000 available (Proration of May-Sept) = 375,000 additional supply for proratable entitlement at 70% (717,000 needed for 100% entitlement)]

The National Economic Development Benefit Cost ratio of only 16 cents shows the true folly of this proposal. There has already been far too much spent on this unacceptable proposal. By contrast the more conservative Bumping Lake Enlargement could produce a 425,000 ac ft increase – Bureau of Reclamation study estimated the cost to build it in 1983 would have been \$151 million, and annual operating costs of \$100,000. I am sure that adjusting those figures to 2007 Cost estimates would fall far short of the Black Rock \$4.5 Billion price tag.

The Golf courses, Resorts, and the real estate boom, that proponents' talk about are pure speculation and definattly should not be used as justification for increased irrigation storage. Recreational Values, and Commercial ventures are truly pie in the sky. And, how can the operational objective to maintain Black Rock reservoir at full capacity be achieved, when the Columbia River Basin Management Water Management Program has already stated that withdrawals of water from the Columbia River in July and August would be prohibited. Are not July and August not only the prime Recreational months, as well as the months of highest irrigation demand? How could the Black Rock lake level be maintained with No water supply during the largest two months of demand?

I have one additional Concern, that of Groundwater movement to Hanford which could possibly wash contaminanents into the Columbia River. Proponents have offered the idea of sealing the reservoir bottom or construction of a collection system. Unfortunately the Dam is proposed to be built atop faults that are associated with the Yakima Fold Belt, in an area of relatively high earthquake potential. Surely the dam will be designed to withstand seismic activity, but what assurances will we have that an earthquake will not shift the rock structures under the earth and permit both leakage and increased seepage of groundwater.


J. Daniel Kinney Jr.

3-27-08

To: B. Reclamation EPM.

The Black Rock storage facility is a very good solution for water storage. I urge you support the promotion of this, and complete it.

Our vision in 50 years ahead cannot begin to focus on the benefit we create today. — Thank you

Columbia Basin Source of 25 years
Back to Backer, Lowell WA.

From: Joseph Caggiano <jacagg@verizon.net>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 24, 2008 1:40 PM
Subject: Black Rock Reservoir

To Whom It May Concern:

I oppose the construction of Black Rock Dam and Reservoir. While it might benefit a few farmers, on balance, it would be a negative for the area. I oppose the reservoir on several grounds:

1. Financial

A projected return of \$.16 per dollar invested is another way of saying that \$.84 of every dollar will be lost. The economics do not make sense under any circumstances. I do not want the U.S. Government borrowing more money from China or other foreign government to fund a project of dubious value. Even if there are offsetting cost factors, such as creating a recreational lake with attendant homes and development, this would be private money and not affect the taxpayers share of the costs of this facility. The only possible benefit would be increased taxes for the jurisdictions affected. Not worth the risk and the potential effects on the ecosystem of the area, including the potential effects on anadromous fish, notably salmon.

2. Geological

One abutment of the reservoir would be built above a fault with a significantly thick zone of fault gouge. Not only does this present challenges for foundation stability and stability of the resulting reservoir, but reservoir induced seismicity is well known from other areas of the world. Given that this structure would be built on a fault and leakage from the reservoir could reach the fault zone, thereby reducing shear stress along the fault plane, the potential for reservoir-induced seismicity is increased. Should any slippage occur along the fault, further instability is possible, both to the dam and the impounded water.

3. Hydrogeological

This is a leaky aquifer system, with estimates of thousands of gallons of potential water loss. Thus, the anticipated capacity of the reservoir might not be reached unless increased pumping from the Columbia River is allowed, and that is a matter of significance for river flow in the Columbia River from which the water to fill the reservoir would be extracted. Water flow in the Columbia River is regulated and extraction requires a permit. The leaky aquifer has the potential to raise the water table and hydrologic head beneath the 200 Areas of the Hanford Site where groundwater is contaminated from years of intentional and unintentional releases to the ground. Raising the water table would increase the hydrologic head and could accelerate the rate of contaminated groundwater toward the Columbia River--another potential negative consequence. Significant water losses from any reservoir from surface evaporation would accelerate the rate of potential water loss, leaving less water than currently anticipated that would be available for irrigation and other uses.

4. Modeling

Computer models of natural system processes are only as good as the assumptions, boundary conditions, and data that are used as input. The fact that very little characterization has been performed to accurately determine various geologic and hydrologic parameters indicates that the results of any modeling necessarily have high degrees of uncertainty because of the uncertainty that is inherent in the input data into the model. To rely on regional scale studies by the U.S.G.S. for input at the scale of this model is unacceptable, because the scale of the investigations and the scale of the model are entirely different.

For these reasons, I am opposed to further development of the Black Rock Dam and Reservoir. There has been sufficient study to indicate that Black Rock Dam and Reservoir would be a bad investment, so further taxpayer money should not be spent on gathering additional data.

Thank you for the opportunity to comment on this proposal.

Joseph A. Caggiano
WA State LHG #757
330 Snyder St.
Richland, WA 99354

From: Josh Norris <mr_garbonzo@yahoo.com>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 24, 2008 4:04 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 24, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

alternatives to new dams, including water conservation and efficiency, more robust water markets, aquifer recharge, or a combination thereof.

The State of Washington, on the other hand, does take a look at these non-structural water management alternatives. The final draft of the study should provide a full analysis of these alternatives to new dams, and they should be considered as joint federal-state alternatives rather than as state alternatives only. Anything less will delay and confuse implementation of smarter water management policies in the Yakima River basin.

One thing is clear from the draft study: the proposed Black Rock dam should be removed from further consideration. The \$6.7 billion proposed dam would drain resources from more sensible and efficient tools to improve water management and fish and wildlife habitat. On top of that, the leaky reservoir would likely cause radioactive groundwater underneath the Hanford nuclear reservation to reach the Columbia River, contaminating the river and the water supply for downstream communities. The Black Rock proposal should be abandoned now. There is no need to spend any additional taxpayer dollars studying this risky and expensive proposal. Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Mr. Josh Norris
834 NW 11th St
Corvallis, OR 97330-6000

From: DAVID E ORTMAN <deortman@msn.com>
To: <storagestudy@pn.usbr.gov>
Date: Tue, Mar 25, 2008 11:01 PM
Subject: RE: Yakima River Basin Storage Feasibility Study

Via Email to: <storagestudy@pn.usbr.gov>

March 24, 2008

TO: Bureau of Reclamation
Upper Columbia Area Office
Mr. David Kraumheimer, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058

RE: Yakima River Basin Storage Feasibility Study, Kittitas, Yakima and Benton Counties, Washington / Draft Planning Report and Environmental Impact Statement

Dear Bureau of Reclamation:

The following are comments on the above referenced feasibility study, draft planning report and environmental impact statement.

I join with others who are strongly opposed to Governor Gregoire=s efforts to construct massive new water storage dams for irrigators in eastern Washington.

One project alone, the Black Rock reservoir, would cost over \$6 billion dollars. Groundwater seepage from this project would threaten the already long overdue cleanup of the Hanford Nuclear Reservation. Other projects such as the Wymer site in the Yakima basin would likely cost over a half billion dollars if it were ever built. This project, and other sites in the Yakima Basin, has been studied and found to be perennial losers over the last thirty years at a time in which Yakima irrigation districts have yet to take water conservation seriously or pay off the existing Bureau of Reclamation=s Yakima River Basin Project. In addition, the feasibility study fails to analyze how the Wymer project could contribute to instream flows when the 1945 Consent Degree (see page 1-15) already allocates all existing water within the Yakima Basin. As the feasibility study states (page 1-17), the 1977 adjudication of the Yakima River system does not supersede the 1945 Consent Degree until a final judgment is entered.

The five page summary of anadromous fish on pages 4-94 to 4-98 of the feasibility study fails miserably in disclosing the status of anadromous fish in both the Columbia and Yakima Rivers. A thorough review of anadromous fish under the Endangered Species Act should be provided. A thorough review of fish hatcheries in the Columbia and Yakima Rivers should also be provided.

Congress passed the Yakima River Basin Enhancement Project in 1979. Since then, the Bureau of Reclamation has failed for nearly forty years to address issues of water-spreading, water-pricing, project repayment, surplus crops, or water conservation by senior irrigation districts in the Yakima Basin. The following information should be provided as part of any final planning

report/FEIS:

- What are the Yakima River Basin irrigation districts growing? Surplus crops? Is the Kittitas Irrigation District still growing hay for the Japanese race horse industry?

- What percentage of crops grown in the Yakima River Basin are exported out of state or out of country? What is the estimated carbon footprint for transporting such crops out of state or out of country?

- What have the irrigation districts actually done on the ground since 1980 on water conservation? - What are the current costs to the irrigators of water (per acre feet) and electricity for pumping (are they still subsidized by BPA?)

- What would be the true costs of irrigated crops if they had to pay market rates for water and power? - Where are the irrigators at in terms of repayment for the existing Bureau of Reclamation Yakima River Basin Project? - What is the water consumption from the Yakima River Basin wine industry? Are there any eastern Washington vineyards that do not rely on irrigation?

- What contribution could the Wenatchee National Forest and other state or private forest lands make to increasing Yakima River Basin water supply later in the year by managing such lands for snow pack retention instead of timber harvest?

- What is the estimated evaporation rate from the proposed water storage projects?

In summary, the Yakima River Basin Water Storage Feasibility Study is nothing more than an attempt by Governor Gregoire to buy off eastern Washington votes in exchange for environmentally damaging and wasteful mega water projects. The Black Rock and Wymer projects should not be constructed. The Bureau of Reclamation should pull the plug on any further dam project studies.
Sincerely,

David E. Ortman
Attorney-at-Law
7043 22nd Ave N.W.
Seattle, WA 98117

From: Barb Kruse <krusenketchum@netscape.net>
To: <storagestudy@pn.usbr.gov>
Date: Mon, Mar 24, 2008 10:35 PM
Subject: Please Abandon the Black Rock Dam Proposal

Mar 25, 2008

Gerald and Derek Kelso and Mr. Sandison

Dear Kelso and Mr. Sandison,

Thank you for the opportunity to comment on the Yakima River Basin Water Storage Feasibility Study/Draft Planning Report and Environmental Impact Statement (draft study). The joint federal-state portion of the study improperly assumes that the only way to meet future water needs for people and fish is to build a new surface storage dam. The joint federal-state alternatives fail to consider more environmentally and economically viable

alternatives to new dams, including water conservation and efficiency, more robust water markets, aquifer recharge, or a combination thereof.

The State of Washington, on the other hand, does take a look at these non-structural water management alternatives. The final draft of the study should provide a full analysis of these alternatives to new dams, and they should be considered as joint federal-state alternatives rather than as state alternatives only. Anything less will delay and confuse implementation of smarter water management policies in the Yakima River basin.

One thing is clear from the draft study: the proposed Black Rock dam should be removed from further consideration. The \$6.7 billion proposed dam would drain resources from more sensible and efficient tools to improve water management and fish and wildlife habitat. On top of that, the leaky reservoir would likely cause radioactive groundwater underneath the Hanford nuclear reservation to reach the Columbia River, contaminating the river and the water supply for downstream communities. The Black Rock proposal should be abandoned now. There is no need to spend any additional taxpayer dollars studying this risky and expensive proposal.

Again, thank you for this opportunity to comment on the draft study.

Sincerely,

Ms. Barb Kruse
PO Box 2011
Ketchum, ID 83340-2011

From: Susan McDonald <ssmcdon@msn.com>
To: <storagestudy@pn.usbr.gov>
Date: Tue, Mar 25, 2008 10:47 PM
Subject: BLACK ROCK DAM

WE ARE VERY MUCH IN FAVOR OF THIS BLACK ROCK DAM. WATER SHORTAGES WILL ONLY CONTINUE, LAND USE FOR AGRICULTURE NEEDS WILL CONTINUALLY INCREASE, AND INSTALLATION COSTS WILL ONLY SOAR, THE MORE TIME THAT PASSES.

THE ENVIRONMENTALISTS IF THEY HAD THEIR WAY, WE WOULD ALL BE LIVING BACK IN THE DARK AGES. PEOPLE AND THEIR SURVIVAL NEEDS HAVE PRIORITY. THIS WILL CREATE A RECREATIONAL ENVIRONMENT, AS WELL AS A COZY HABITAT FOR WILDLIFE OF ALL KINDS. IT WILL BENEFIT HUNDREDS OF THOUSANDS, ENHANCE MANY COMMUNITIES, AND AGRICULTURE ENDEAVORS. GREAT IDEA TO GET MOVING ON.

STEVE/SUSAN MCDONALD
RICHLAND, WA

From: <Skybradley10@aol.com>
To: <storagestudy@pn.usbr.gov>
Date: Wed, Mar 26, 2008 3:47 PM
Subject: Blackrock Dam

Dear Sirs:

I am opposed to the construction of the Blackrock Dam.

The proposed site is mostly undisturbed natural habitat.

The cost to the taxpayer would be huge and the limited benefit will be to large corporate and agricultural businesses.

We do not need any crops which might be grown using the water because we can import them at much lower cost - if we stop subsidising American agriculture directly and through tariffs.

Farming is the most destructive use of land since the natural habitat is destroyed. Additional water is bound to result in more large scale farming and loss of wildlife and native plants.

We who actually live on the east side of the State can no longer accept it being treated as a sacrifice zone by the west side politicians.

The claimed recreational benefits must be deleted from the draft EIS since there are already many large slack water recreational areas near this site which are very lightly used do to low population in the vicinity.

Sincerely,

Schuyler L. Bradley
2015 Riverside Dr.
W. Richland, WA
99353

From: "Mickie Chamness" <mickiec@charter.net>
To: <storagestudy@pn.usbr.gov>
Date: Wed, Mar 26, 2008 10:34 PM
Subject: comments on Black Rock Reservoir

Mickie Chamness

4255 Tami St.

Richland, WA 99352

509-628-0709

I learned a lot at the public meeting, and appreciate getting copies of the EIS and the supporting technical reports on CD's to read. Thanks. I also appreciate the opportunity to voice my concerns.

1. I started my professional career as a geologist mapping faults on Umtanum Ridge near Priest Rapids Dam for the Department of Energy. The Umtanum anticline in that area has a steeply dipping to overturned northern limb with a major south-dipping thrust fault that is exposed in the bedrock between the dam and the ridge front. Wells drilled for the Puget Power Sound and Light Skagit Hanford Nuclear Project encountered the fault. Each of the basalt layers in that steeply dipping northern limb slid past each other as the basalt folded, creating breccias that are often, but not always, cemented. These cemented breccias are actually more resistant to erosion, and form vertical walls parallel to the folded basalt layers. There is a secondary thrust fault (the Buck Thrust) 1/3 of the way up the north side of Umtanum Ridge just above Priest Rapids Dam that formed to accommodate deformation as the basalt layers not only tried to fold about a vertical plane along the folds axis, but also bend as that axis changed trend from east-west to slightly more northwest-southeast. My point is that the geology of Umtanum Ridge is complex, and drilling a tunnel through it will probably be more difficult than you anticipate. Drilling through both Umtanum and Yakima Ridges will probably be much more expensive than planned. I am concerned that any leakage of water through the lined tunnel could lubricate existing fault surfaces and allow them to reactivate. That could be minor faults that would disrupt the tunnel, or potentially larger faults such as the main Umtanum Thrust or possibly even the Buck Thrust where it extends back into the anticline core. There are springs on the ridge nearby, and you may encounter confined aquifers as well. And you'll definitely encounter Grande Ronde Basalt in the tunnels.

2. Seepage of water from the dam into the unconfined and confined (basalt) aquifers will move to the east, toward the Hanford Site. Increases in head based on the different model runs appears to range from 1 to 20 feet beneath the 200 West Area, that is the area of groundwater contamination on Hanford Site closest to the dam. Since discharges of water ceased on the Hanford

Site in the late 1980's, unconfined water levels have dropped as much as 20 feet. This has caused changes in the movement of contaminated groundwater, and may have left some contaminants "stranded" in the vadose zone. If head levels rise again, it will probably cause further changes in groundwater movement and may remobilize "stranded" contaminants.

3. It appears that water will also flow at the surface down Dry Creek and Cold Creek. There may also be the impacts to flows at Rattlesnake Springs on the Hanford Reach National Monument. Both cases will change the environment of the Hanford Reach National Monument. I wasn't able to find a discussion of this in any of the technical reports, and hope it has been evaluated.

4. The cost-benefit studies indicate that none of the joint alternatives are economically justified. I'm not sure I understand the mechanism for continuing with this proposal when the return on the dollar for the three alternatives are all below \$0.30 and none are deemed economically justified. Does that mean the dam could be built anyway? Recreational uses and resort homes should not be used as part of the justification for such a large expense.

5. The no-action alternative and the state alternatives for enhanced water conservation and market-based allocation of water resources all provide significant water savings. I would like to see the no-action joint alternative selected, and some combination of the 3 state alternatives tried. At some point, we will have to recognize that water will be a limiting resource, and we should start preparing for that now but starting major conservation education efforts instead of waiting another 20 years when there is no more "excess" water to utilize.

From: "deidre" <linkdal@televar.com>
To: <storagestudy@pn.usbr.gov>
Date: Wed, Mar 26, 2008 3:28 PM
Subject: Wind Farm Comments

Deidre Link
560 Hawk Haven Rd.
Cle Elum, WA 98922
509-674-2420

March 26, 2008

RE: Yakima River Basin Draft Planning Report/EIS Comments

David Kaumheimer, Environmental Programs Manager

To Whom It May Concern,

Thank you for the opportunity to comment on this water storage proposal. I am well aware of the water issues/situation in the Yakima Basin: WHAT ARE YOU THINKING? Blackrock has more problems than you can shake a stick at. The cost/benefit is amazing. I guess, in D.C. with the right kind of 'spin', anything is possible. Blackrock is priced out at over 6 billion dollars and is going to benefit a small percentage of people.

Most of Eastern Washington is a DESERT. The dams that have been built have damaged fisheries, helped farmers and created hydroelectric power. Humans being human have done little to conserve water or control population growth. Consequently we are running out of surface water rights - have run out I guess. The idea to build a big bathtub and allow more uncontrolled growth makes little or no sense.

The study does not take the fact of climate change into account. If we get less rain/snow fall, 20, 30 50 or more years down the road how can this project know or guarantee there will be enough water to support the growth developers and businessmen want to create?

Just say no to this project.

Regards,
Deidre Link

From: Mary Peters <marylynn888@msn.com>
To: <storagestudy@pn.usbr.gov>
Date: Wed, Mar 26, 2008 1:44 PM
Subject: Yakima River Storage Study, Draft Environmental Impact Statement

March 26, 2008

David Kaumheimer
Environmental Programs Manager
U.S. Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901-2058

Dear Mr. Kaumheimer:

As a 32 year resident of Richland, Washington and neighbor of the Hanford Reservation, I am concerned over the proposed Black Rock Dam and Reservoir/Yakima River Basin Water Storage Facility.

Having read a summary of the feasibility study, I would like you to consider it a study and not a final nor correct sets of facts. Some of the maps, the listing of Franklin County as part of the study and the evergreen trees that are pictured makes me question if anyone has visited this area. Yes, we are the evergreen state and at the very western edge of this project there are evergreens and mountains, however, the main part of the area impacted by the dam and reservoir is a shrub-steppe, treeless, high desert.

Some of the figures in the study don't add up. The amount of water that will be removed from the river at a critical spawning time for the salmon is a concern of mine. Also will the volume of the water after spawning be great enough to wash the silt out of the spawning redds?

Why was the Environmental Impact Study completed before the Department of Energy Study? How much electricity will be needed for this project? Where will it come from? Will I experience brown-outs? Who will pay for it?

What about the earthquake factor? There is a fault line near Rattlesnake Mountain. How big of an earthquake is 'too big'? What about slippage? Sand? Clay? We have them both and the size of this structure is huge even compared to Grand Coulee Dam (the "largest structure by the hand of man"..as the song says). Will the land stand up to the stresses?

As you, and others 'back East', read this study, there is a large emphasis on Recreational Benefits. There is a listing of annual visitors to some lakes, rivers and reservoirs in our state. Many of these are at the western end of the Yakima River Basin, with trees. The figure for visits to these areas is 108,000 visitors. The study projects year 1- 250,000 and after 20 years 700,000 visitors. Yike! Before I moved here Desertaire sold lots along the Columbia River and tauted it as the perfect vacation home area. In over 30 years it has never taken off or developed into anything large or well populated. A high-end resort at Black Rock? I don't think so. What about the lake itself? It will fluctuate and have the 'bathtub ring' scenario. That is not aesthetically pleasing. One map shows 4 miles of mud at some

times during the year. The drop off into the reservoir is very sheer. This is not conducive to swimming, boating, hiking or viewing.

As a Richland resident ,downstream from the Hanford Area, I am extremely concerned about ground water movement and contamination. This is a huge project. Large amounts of earth and then water will be moved. As water leaks out of the reservoir, it will move towards the contaminated area of the Hanford Reservation. What measures will be put in place so contaminants do not reach the Columbia River?

What is the rush with the project? Please take time to reevaluate this first study. Please allow for an Independent Review.

Thank you for considering my comments. Please add me to the list to receive USBR's final EIS and decision in this matter.

Sincerely,

Mary Peters

508 Fuller Street
Richland, WA 99354

Marylynne888@msn.com

From: Gayle Robinson <gayle.robinson@hotmail.com>
To: <storagestudy@pn.usbr.gov>
Date: Wed, Mar 26, 2008 12:20 PM
Subject: BLACK ROCK DAM

The Black Rock Dam should definitely be constructed. It would be a win-win situation. It would create a habitat for wildlife, a recreational area, and above all, it would help to insure water for agricultural use. As the demand for more food products increases, we will need such structures in place to keep up with the demand. Otherwise, if there are shortages of food, prices on food items will go up, and we will be in as bad a shape for food as we are for gasoline. We should not let environmentalists rule to the point that average people suffer. Also, if the building of the dam is put off, the construction prices will be much higher at a later date.

Gayle Robinson
West Richland, WA

To Area Manager

3-24-08

I would like to thank all of you who have worked on this proposal. This is the best project for the area I have seen presented in 30 years. The potential to improve fish habitat & water use in the Yakima to

Prosser area are unbeatable. Also the possible step in the Flip-Flop program makes a lot of sense

Sincerely
Neil Skelton
YTI Dgroun

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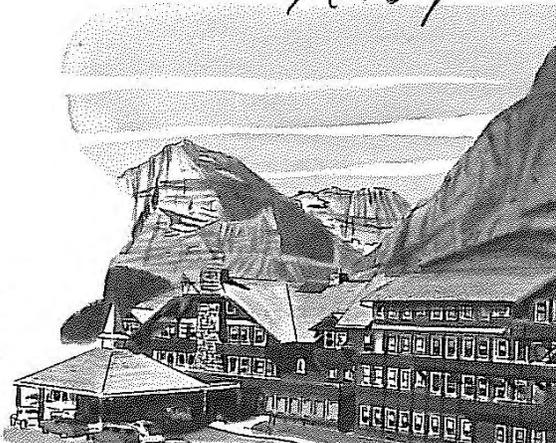
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Yakima, Washington

**MANY GLACIER HOTEL
GLACIER NATIONAL PARK
MONTANA**

Referred to as the "Showplace of the Rockies" opened on July 4, 1915. Local timber and native stone, taken from the Many Glacier valley, were used in its construction. Many Glacier boasts a true Swiss atmosphere - from the Alpine beauty that surrounds it to the decor within.



COMMENT FORM

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Yakima, Washington

Yakima River Basin Water Storage Feasibility Study Draft PR/EIS

Name (please print legibly): <u>Richard Vorenkamp M.D.</u>	
Organization: <u>Retired</u>	
Mailing Address: <u>836 N 4TH Ave</u>	
City, State, and Zip Code: <u>Yakima Wash 98908</u>	
Telephone: <u>509 966 1033</u>	E-mail: <u>vorenkamp@charter.net</u>

Request to be placed on the mailing list:

- I want my name put on the mailing list to receive information on the Yakima River Basin Storage Study.
 I want my name removed from this mailing list.

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

My comments on the Yakima River Basin Draft Planning Report/Environmental Impact Statement are:

Water storage options based on Yakima River flows are not feasible since we know that droughts can reduce their value significantly

Despite its cost a Black Rock reservoir could be extremely valuable for many reasons but only if it can be built without endangering down river communities
(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments before March 31, 2008, to: David Kaumheimer, Environmental Programs Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima, WA 98901-2058; fax (509) 454-5650; email storagestudy@pn.usbr.gov; phone 509-575-5848, ext. 612.



U.S. Department of the Interior
Bureau of Reclamation



Washington State
Department of Ecology

Comments (continued)

from radioactive plumes. Decisions to build should
be based on seepage studies being done by DOE.
The results of which are pending.

Why not enlarge the Bumping Lake reservoir?

Quentyn M.D.

You may leave your comments in the box provided or mail, fax, email, or call in your comments before March 31, 2008, to: David Kaumheimer, Environmental Programs Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima, WA 98901-2058; fax (509) 454-5650; email storagestudy@pn.usbr.gov; phone 509-575-5848, ext. 612.



IN REPLY REFER TO:
1795 (134)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Spokane District
Wenatchee Field Office
915 Walla Walla Avenue
Wenatchee, Washington 98801

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Yakima, Washington

March 26, 2008

Mr. David Kaumheimer
Bureau of Reclamation
1917 Marsh Road
Yakima, Washington 98901-2058

Dear Mr. Kaumheimer:

Thank you for the opportunity to respond to the Draft EIS on the Yakima River Basin Water Storage Study. Both Black Rock Reservoir and the Wymer Dam Reservoir are large and ambitious projects. While we have more questions than answers at this point, we have enclosed some initial comments compiled by our natural resource specialists and we would welcome an opportunity to meet with you and discuss these alternatives in more detail.

The proposed Black Rock Reservoir will have the largest impact upon Bureau of Land Management (BLM) lands, since several BLM parcels would potentially be inundated by or lie immediately adjacent to the water storage facility. If a determination is made to proceed with a reservoir project, please be aware that either a withdrawal or a BLM right-of-way would be needed. The Wymer Dam Reservoir proposed for the Lmuma Creek area would be located very close to some of our most heavily visited recreation sites located in the Yakima Canyon.

If you have any questions or you would like to discuss these matters in more detail, I can be reached at 509-665-2100. We look forward to participating in this process in the future.

Sincerely,

Donald Washco
Acting Field Manager

Enclosure

March 26, 2008

**Bureau of Land Management Wenatchee Field Office
Comments for Yakima River Basin Water Storage Feasibility Study Draft PR/EIS**

Fisheries: The major impact to fisheries resources in both the Yakima River and the Columbia River will be from the water intake pumping facilities in both rivers. The pumping facilities will not be on BLM and will be closely permitted and monitored by appropriate agencies ie. WDFW and NOAA Fisheries. Both reservoirs have the potential to increase the water temperatures by a large reservoir surface exposed to high ambient summer temperatures. This could result in releasing warmer water back into the systems. Both the Columbia and the Yakima have pretty consistently cool water temperatures. All alternatives propose changing the flow regime in the Yakima River. It's not clear how that might affect anadromous fisheries in the Yakima. Currently the flows are kept artificially high after spring runoff through the 5 impoundments in the headwaters of the Yakima and Cle Elum Rivers. It is not clear how the more natural flows without the input from the Yakima reservoirs will impact anadromous fish habitats. The study should consider the cost effectiveness of raising the pool height and volume impounded in the 5 headwater reservoirs of the Yakima River, as an alternative to building the two proposed dams and pumping stations.

Range: Based on a review of the draft Black Rock project map, public lands within two grazing allotments will be inundated and no longer available for grazing. In accordance with the 43 CFR 4110.4-2, the lessee will have to be given two years notice prior to loss of grazing use. Access to public lands will also be impacted.

Cultural Resources: The draft EIS/Yakima River Basin Water Storage Feasibility study includes a proposed reservoir east of Wymer, Washington and a second reservoir in Black Rock Valley, east of the Rattlesnake Hills. Another project proposed in the draft EIS is the Wymer Dam Plus Yakima River Pump Exchange Alternative; this project requires pipeline construction. There are no BLM-administered lands within the proposed Wymer Reservoir; however, the Black Rock Reservoir will inundate roughly 578 acres of BLM lands and the proposed pipeline corridors may also impact additional BLM lands in Yakima and Benton Counties (not 100% sure due to the scale of the EIS maps): T 9N R 27E Sections 8 & 10 (Sec. 10 is part of the Maughn land exchange), T 9N R 28E Sections 18, 26 & 28 (Secs. 18 & 26 are in the Maughn land exchange), T12N R 21E Sections 4 & 10, and T 12N R 22E Sec. 18. Until more explicit information is available regarding the pipelines, cultural resource comments only address the Black Rock APE.

Compliance with Section 106 would be required prior to the implementation of the water storage projects. The process is outlined in the draft EIS in Chapters 4 (4:253-261) and 5 (5:87-90). Properties having traditional, religious and cultural significance (Traditional Cultural Properties or TCPs) to members of the Tribes would also need to be identified and evaluated through consultations with the affected Tribes.

Black Rock Reservoir: A review of the BLM and DAHP databases and archival records indicates that some of the affected BLM parcels in T 12N R 23E Sections 2, 10, and 14

March 26, 2008

have been inventoried for cultural resources in the past. Lands in Sections 2 and 10 were selectively surveyed for a land exchange in 1977; in 2002, following wildfire suppression efforts, a portion of Section 14 was surveyed at BLM's Class III level. The 1977 surveys do not meet current survey standards and would require additional cultural inventories, this would apply to approximately 560 acres of BLM within the proposed Black Rock Reservoir. Thus far, no cultural properties have been identified in the Black Rock Area of Potential Effect (APE). The slopes above the proposed reservoir in the YTC contain many recorded sites, so the potential for sites on BLM is high. The 1881 cadastral survey map of T 12N R 23E shows one E-W trail paralleling a dry channel through the center of Black Rock Valley; no other cultural features were noted in the area at that time. TCPs in the Black Rock reservoir area have yet to be identified, but they potentially include traditional plant gathering areas in shrub-steppe communities; the draft EIS specifically notes that the proposed projects would result in a loss of shrub-steppe habitat. By extension, traditional native plant gathering locales may also be lost.

Wildlife: The analysis of impacts to wildlife populations and habitats is lacking in-depth discussion of State Threatened and Federal ESA Candidate greater sage-grouse.

Section 4.7.1.2—Movement Corridors

Little mention is made concerning movements of greater sage-grouse between known populations in Yakima Training Center (YTC) and Douglas County and to potential habitats on adjacent and nearby lands identified by the Washington State Greater Sage-grouse Recovery Plan (Stinson et al. 2004) as recovery units. Four paragraphs are dedicated to elk movements. A similar discussion would be appropriate for greater sage-grouse because of its State Threatened status and potential for federal listing.

Section 4.7.2—Environmental Consequences

Section 4.7.2.1—Methods and Assumptions—Shrub-Steppe Habitat

HEP analysis uses Brewer's sparrow to represent sagebrush obligate species. While this is reasonable, using greater sage-grouse as the representative species may have been more appropriate because it is the species of greatest concern in the area, and would also represent other sagebrush obligates well. Habitat requirements for both species are similar, but there are some differences. Altman and Holmes' Conservation Strategy for Landbirds in the Columbia Plateau of Eastern Oregon and Washington (2000) uses Brewer's sparrow as a focal species for "sagebrush cover," while using greater sage-grouse as a focal species for "expansive areas of high quality sagebrush habitat with a diverse understory of native grasses and forbs."

Section 4.7.2.1—Methods and Assumptions —Movement Corridors

The analysis focuses completely on movements of Rocky Mountain Elk. While elk are a major management issue in the area, greater sage-grouse is a Federal Candidate species of great concern and should also be analyzed for impacts to movements. Genetic exchange is essential to recovery of species with small populations, and impacts to movement and dispersal can have direct consequences to the species and recovery efforts.

March 26, 2008

Sections 4.7.2.3 and 4.7.2.4—Blackrock Alternative and Wymer Dam and Reservoir Alternative—Construction Impacts

Analysis should discuss potential for disturbance of greater sage-grouse, especially during the breeding season. The State Recovery Plan (Stinson et al. 2004) recommends preventing disturbance such as development, blasting and recreation in sage-grouse nesting and brood rearing habitat from March 1 to June 15. Discussion should include distances to known leks and subsequent potential for disturbance.

Sections 4.7.2.3 and 4.7.2.4—Blackrock Alternative and Wymer Dam and Reservoir Alternative—Long-Term Impacts—Shrub-Steppe Habitat

HEP analysis of the Blackrock Alternative first uses the entire site to estimate habitat units, including shrub-steppe, grassland, CRP land, agricultural croplands and developed lands, and then omits agricultural and developed lands. It does not indicate if CRP lands were considered agricultural, as they should be unless they are permanently protected. It then states that the analysis “indicates that the lands within the reservoir and dam footprint are of relatively low value for shrub-steppe species. This may be largely due to the fact that less than half of the site is actually in shrub-steppe.” The Wymer Dam and Reservoir Alternative first uses the entire site to estimate habitat units, including shrub-steppe, grassland, barren land, riparian, cliff/canyon, agricultural cropland, developed land, forest and wetlands, and then omits “lands not suitable for Brewer’s sparrow.” It does not indicate which lands were considered suitable for Brewer’s sparrow.

The analysis is of shrub-steppe habitat, and Brewer’s sparrow was chosen to represent sagebrush obligate species. Therefore, using lands that aren’t shrub-steppe while calculating the value of shrub-steppe is not appropriate because it “waters down” the analysis, giving the appearance of marginal shrub-steppe quality when in reality, the shrub-steppe habitat that is present may be of very high quality. Quality of other habitat types within the site footprint should be evaluated using different standards that are more appropriate for the species that use them.

Sections 4.7.2.3 and 4.7.2.4—Blackrock Alternative and Wymer Dam and Reservoir Alternative—Long-Term Impacts—Movement Corridors

There is no section for Movement Corridors for either alternative, only a paragraph dedicated to impacts to elk movements. To be consistent with the structure of the rest of the analysis, a separate section heading for Movement Corridors should be added. Within this section there should also be discussion of impacts to greater sage-grouse movements.

Section 4.7.2.6—Mitigation

Potential mitigation measures are very general, more specific measures should be identified. Concerning sage-grouse, the idea of “no net loss of sagebrush habitat” has been suggested by many agencies and groups, including BLM, the Western Association of Fish and Wildlife Agencies, and Partners in Flight Western Working Group for other areas in the west. A similar approach would be appropriate for this area.

March 26, 2008

Section 4.7.2.7—Cumulative Impacts—Shrub-Steppe Habitat and Wildlife Movement Corridors

The cumulative effects analysis for this section is brief and quite general. More specific, quantitative analysis of the rates and types of development and potential impacts would be appropriate.

Recreation: The Black Rock alternative would directly affect BLM-managed lands, due to some BLM lands being inundated with water, and other nearby BLM lands being adjacent to the new reservoir. The Feasibility Study and EIS assumes that there will be great public demand for recreation use of the reservoir and its shoreline, and that future shoreline improvements for recreation will occur (page 4-177 projects annual Black Rock visitation during the first 5 years after reservoir construction at 250-304,000 people). The proximity of BLM lands to the new reservoir and any recreation improvements which will occur indicates that visitor use will likely spill over onto BLM land. This could lead to management issues with litter, dispersed camping, weeds and possibly OHV use along the shoreline when the reservoir is drawn down. BLM might eventually need to monitor and provide staffing for site upkeep to areas where we currently have little on the ground presence. This could potentially lead to the need for site improvements on BLM land along or near the reservoir.

The Wymer reservoir and Wymer Reservoir/Pump Exchange alternatives would indirectly affect BLM due to the proximity of the Wymer reservoir to Spokane District's most heavily visited recreation sites in the Yakima Canyon. The reservoir pump station and head of the dam are adjacent to BLM's Lmuma Creek recreation site, which receives approximately 12,000 visitors each year (BLM use figures). Page 4-175 of the Feasibility Study/EIS lists "Estimated 2006 Annual Visitation to the Yakima River" as being 18,000 people. These figures are much too low, as BLM manages 4 river access sites along the Yakima Canyon, and estimates annual use at these sites at approximately 120,000 visitors.

The Feasibility Study and EIS notes that the Wymer reservoir would be popular with local residents. The reservoir would also draw in many visitors from out of town, as most of the high summer use in the Yakima Canyon is from outside the Kittitas County area. Increased visitor use of the Wymer Reservoir (Table 4.39 on page 4-180 projects annual Wymer reservoir visitation during the first five years after reservoir construction at 40,000-45,300 people) and any future recreation improvements along the shoreline which will occur, will likely result in increased use of the nearby BLM recreation sites. It will also increase traffic on busy Highway 821, as this highway will be the gateway to the reservoir. The fluctuating water line of the reservoir might make OHV access possible when the water levels are low. This OHV use could spill over onto private and nearby BLM land.

The pumping plant and switchyard which would be built where Lmuma Creek enters the Yakima, will greatly change the appearance of the area. Currently, views of the future pumping plant/switchyard area from the river, highway and adjacent BLM recreation site, are of irrigated fields, a farmhouse, and relatively low development. The switchyard with its' 80-ft towers, pumping plant building, transmission line and associated roads, will add

March 26, 2008

a much higher level of development and visual resource impacts to the area which will be difficult to mitigate.

The Black Rock reservoir, Wymer reservoir and Wymer reservoir/Pump Exchange alternatives all change river flows in the Yakima River. The alternatives estimate higher winter/spring flows and lower summer flows on the upper Yakima. Higher winter/spring flows could result in additional flooding and/or ice damage to nearby BLM recreation sites and other properties. Lower summer flows might result in more difficulty by recreationists in navigating the shallow places in the river and avoiding rock barb fisheries improvements along the shoreline.

From: <PLCRJC@aol.com>
To: <storagestudy@pn.usbr.gov>
Date: Thu, Mar 27, 2008 8:28 PM
Subject: Black Rock Reservoir

As this years' spring runoff begins, wouldn't it be great if that extra water was going into the Black Rock Reservoir instead of being flushed down the Columbia, with no benefit to man nor beast?

It is high time that we started actually doing something to address the water crisis that we are facing in our region. It is high time that we quit being tangled up in our underwear with more studies and what-ifs, and start helping ourselves. It is high time for Black Rock!

Bob Cummings
4321 Mt Challenger Ct
West Richland WA 99353
509-628-2878 home
509-551-7374 cell

Create a Home Theater Like the Pros. Watch the video on AOL Home.

(<http://home.aol.com/diy/home-improvement-eric-stromer?video=15&ncid=aolhom00030000000001>)

From: "riparian owners of ferryco."
<riparian_owners_of_ferryco@bossig.com>
To: "Black Rock Storage Study" <storagestudy@pn.usbr.gov>
Date: Thu, Mar 27, 2008 11:36 AM
Subject: Black Rock Dam Storage Study Public Comment

The Riparian Owners of Ferry County are a private property and water rights protection group of citizens of Ferry County, Washington..

We are also supportive of efforts to add to the long term water storage capacity of our state in other counties. Water accumulation facilities in one county help other counties by reducing cross-county demand for water transfers and the cost of litigation, facilities, continuing maintenance, and long term management of water transfer agreements. Seepage of large reservoirs also add to the aquifer recharge capabilities of a county.

Additionally, local reservoir facilities add esthetic and recreational facilities for the local community and are an economic attraction to the community for vacationers and new business and residents.

Yours truly,

Gary Howden for
Riparian Owners of Ferry County

From: Katie Fite <katie@westernwatersheds.org>
To: <storagestudy@pn.usbr.gov>
Date: Thu, Mar 27, 2008 6:40 AM
Subject: Black Rock and other New Dams

Dear Washington State Department of Ecology, BuRec, Governor's Office and others,

We are very much opposed to the proposal to construct the new Black Rock and other dams that Governor Gregoire has proposed.

This is the dead opposite path that any western state should be taking. Dams have already destroyed so much of the West's natural areas, and critical fish and wildlife habitats.

As an alternative, to conserve water and decrease global warming and desertification processes, we ask that Washington state fully evaluate alternatives to reduce domestic livestock grazing on public and private lands in all watersheds east of the Cascades. For a small fraction of the cost of new dam construction, permits on public land could be purchased and retired. The state should also immediately begin to phase out any grazing permits on DNL or WDFW lands.

The Governor, instead of encouraging more waste and abuse of Washington's resources through dam building and other current proposals, such as cattle grazing on WDFW and other state lands, should establish programs to diminish growing of water-wasteful livestock forage crops on irrigated lands. A shift to other higher value less wasteful crops should be state policy.

This, in fact, is the only path that will lead to sustainable and ecologically sound use and protection of waters and watersheds.

As part of this process, please provide a detailed analysis of the global warming costs of the production of all livestock, and livestock forage crops, in Washington state. Please also provide a complete analysis of how much water is currently be used (and natural stream flows diminished and wasted) in livestock production.

Sincerely,

Katie Fite
Biodiversity Director
Western Watersheds Project
PO Box 2863
Boise, ID 83701

Received in Mailroom

U Y
C MAR 27 2008 F
A
O Yakima, Washington

March 23, 2008

U. S. Bureau of Reclamation
Upper Columbia Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Re: **BLACK ROCK DAM**

Dear Sir or Madam:

We were shocked to learn that the State of Washington is proposing the building of a dam, the cost of which is approximately \$6.7 BILLION Dollars, which would be located just 5 miles above the Hanford Nuclear Reservation, which is an earthquake prone area. Surely, there is some mistake here.

All parties are aware, that should there be an earthquake, it could cause a washing of waters across the Hanford Nuclear Reservation releasing radioactive waste from the Quad Cities area to Portland, and beyond. As you are also aware, there are currently plumes of radioactive waste migrating from Hanford to the Columbia River. Any dam seepage from Black Rock would accelerate this tragedy.

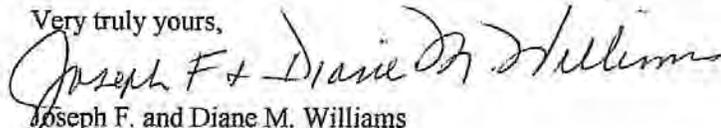
We have also learned that this dam would return 16 cents for every dollar spent to build and operate it. These facts come from the U. S. Bureau of Reclamation and the Washington Department of Ecology.

Is this an example of wise use of tax payer dollars? We do not think so.

We understand that there are two other dam items under consideration (Wymer Dam, and Wymer Dam pump exchange). These fall in the same category of money wasted.

We look forward to learning that this "folly", as well as the other two, has been removed from the taxpayers table, never to be heard of again. Thank you.

Very truly yours,



Joseph F. and Diane M. Williams
3880 Stikes Drive, S.E.
Lacey, WA 98503

Cc: Governor Chris Gregoire
Office of the Governor
P. O. Box 40002
Olympia, WA 98504-0002



YAKIMA BASIN
FISH AND WILDLIFE
RECOVERY BOARD

March 27th, 2008

Mr. David Kaunheimer
Bureau of Reclamation
1917 Marsh Rd.
Yakima, WA 98901-2058

Dear Mr. Kaunheimer,

On behalf of the Yakima Basin Fish & Wildlife Recovery Board, I would like to offer the following brief comments on the Yakima River Basin Water Storage Feasibility Study.

The flows of the Yakima River and its tributaries sustain one of the nation's most productive agricultural regions, growing communities with diverse economies, and a productive natural ecosystem that is home to multiple runs of salmon and steelhead. In drought years, the river's flows can not meet all of these needs. Anticipated reductions in summer water supply due to climate change are expected to further reduce our ability to meet these competing demands for water.

Balancing these competing demands for water requires forward thinking efforts to 1) make the most of existing water supplies and infrastructure, 2) increase storage capacity to better manage the seasonal distribution of river flows, and 3) evaluate the use, if necessary after other options are fully explored, of Columbia River water within the Yakima Basin. All of these options (which are the focus of the Storage Study) have real potential to increase our ability to better manage instream flows in the Yakima Basin for the benefit of salmon and steelhead and the broader ecological system that sustains them. Yet the Storage Study's assessment of the benefits of these options falls short by 1) failing to address the added stresses created by climate change, and 2) assessing changes in flow in isolation. These points are expanded below.

While climate change predictions are inherently uncertain, there is a growing consensus that the Yakima Basin will face reductions in snow pack and summer stream flow in the next 50 years; indeed there is considerable evidence showing that snow pack in the Pacific Northwest has been trending downward since the 1920's. The current analysis assumes that future conditions will be essentially identical to the period of record (1981 to 2006) used in the study's analyses. The Storage Study needs to do a better job of anticipating how different climate and precipitation scenarios would affect the ability of the proposed alternatives--including the no action alternative--to meet the basin's water needs. While we understand that we can not predict future climate in detail at this time, we can develop a

set of scenarios that allows us to model the types of impacts that would result from different--even contrasting--climate change hypotheses.

Improving flow conditions is a key component of fisheries recovery in the Yakima Basin, but truly restoring the basin's salmon and steelhead runs also requires significantly improving habitat conditions and continuing to use targeted hatchery programs to reintroduce extirpated salmon runs. When assessed in isolation, any one of these three components of recovery will appear to fall short; indeed, the Storage Study's assessed benefits of flow improvements to fisheries has been widely viewed as disappointing. Yet if these three key component- improvements in flow, habitat enhancement and hatchery programs- are implemented as a single unified fish recovery program, the benefits will be far more substantial. Two quick examples illustrate this point:

- 1) The Bureau's use of the 2-d models of floodplain habitat availability under different flow scenarios is commendable, and adds considerably to our understanding of the interaction between flows and habitat conditions. Yet the models are static and do not indicate how targeted projects to change the form of floodplain habitat can in turn improve the ability of improved flows to produce desired habitat conditions. Modeling that combines the Study's assessment of response to flow changes with assessments of our ability to reopen side-channel habitat and add complexity to the river channel would show significantly greater ability to improve habitat conditions, and correspondingly greater increases in fish production.
- 2) Re-opening fish passage to Cle Elum and Bumping Lakes and the watersheds above them is being actively pursued by the Bureau, WDFW and the Yakama Nation, yet is not addressed in the Storage Study. Assessing the benefits of providing fish passage at the storage dams in combination with the increase flexibility in managing flows from the Storage Study alternatives and new hatchery production initiatives will show benefits significantly greater than any action on its own (especially if a sockeye run can be re-established in the Yakima Basin).

The Storage Study provides a valuable beginning for ongoing discussion of ways to increase the flexibility of water management in the Yakima Basin. The Bureau is also closely assessing how it can optimize operations of the Yakima project as part of securing a Biological Opinion for Yakima Project Operations, and we are encouraged to see the Bureau's commitment to involving stakeholders and utilizing the DSS and other analytic tools from the Storage Study in their Biological Opinion discussions. The Yakima Basin Fish & Wildlife Recovery Board has developed the Yakima Subbasin Plan, the Yakima Subbasin Salmon Recovery Plan, and the Yakima Steelhead Recovery Plan. These plans give the best overview of what is required to maintain and restore anadromous fish habitat in the Yakima Basin. The Yakima/Klickitat Fisheries Project has or is developing detailed master plans for all anadromous species in the basin that evaluate hatchery supplementation options in great detail. These different elements--flows, habitat enhancement and hatchery supplementation--need to be analyzed together to get a full picture of the potential for anadromous fish restoration in the Yakima Basin.

We look forward to continuing to work with the Bureau, WDFW, the Yakama Nation, BPA, the Northwest Power & Conservation Council and other key stakeholders to define, promote and implement an integrated approach to salmon and steelhead recovery in the Yakima Basin.

Sincerely,



David Bowen
Chair

From: "Rick Leumont" <leumont@owt.com>
To: <storagestudy@pn.usbr.gov>
Date: Fri, Mar 28, 2008 10:10 PM

LOWER COLUMBIA BASIN AUDUBON SOCIETY
9016 Sunset Trail
Pasco, Washington 99301

March 28, 2008

David Kaumheimer
Bureau of Reclamation
Upper Columbia Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

Dear Mr. Kaumheimer:

Introduction:

Thank you for this opportunity to comment on the Draft Planning Report/
Environmental Impact Statement for the Yakima River Basin Water Storage
Feasibility Study issued in January 2008. We have many concerns with the report
and associated projects.

The report has been constructed as a draft plan, draft environmental impact
statement and a feasibility study reviewing two major dam and reservoir projects
and three state alternatives. The projects and alternatives have little in common
except being found in the Yakima River basin. The report does not name a
preferred alternative or indicate how a mix of the projects and alternatives will
provide sufficient water for fish and agriculture. The reader is left to ponder
whether the agency is considering going forward with all the projects and
alternatives or a mix. The report falls short on comparing and contrasting these
alternatives or how they would impact each other if a mix were selected.

The report attempts to do too much at one time and in the end, fails to adequately
address how these projects and alternatives could accomplish the mission of
providing water for fish, agriculture and urban areas in the right amount at the
right time. The report fails to adequately address the impacts of these projects and
alternatives on the environment and our cultural heritage. The report fails to
adequately address the impacts of the Black Rock project on Hanford ground
water. Serious geological questions remain unanswered. The Black Rock and

Wymer dam project's impact on regional electrical supplies has not been addressed. The Recreational report is flawed and grossly exaggerates the potential visitor usage.

We strongly recommend that the report be reclassified as a draft plan and feasibility study only. Additional information is needed on Hanford groundwater and geological concerns. More information is needed on the engineering details of the dams. On the ground surveys of wildlife, native plants and cultural resources need to be done. Simply stated the report does not meet the rigorous standards of the National Environmental Policy Act for Environmental Impact Statements. We realize this will be costly in terms of time, labor and printing but a comprehensive, in depth EIS utilizing all available data, subjected to intense peer and public review can save billions of dollars and avoid environmental catastrophes.

If you decide to continue viewing this report as a draft environmental impact statement, we insist that the report be submitted to a panel of independent experts in the various disciplines, such as the National Academy of Sciences, to review the report in detail and attempt to resolve these shortcomings, before writing the final report.

The remainder of my comments will focus on the Black Rock proposal.

Ground Water Impacts:

Large plumes of highly contaminated ground water lie beneath the Hanford Reservation, a constant unseen threat to the Columbia River.

For the most part, these contaminated ground waters are stable and contained deep underground. We must not allow highly toxic contaminants to be flushed into the Columbia River.

The Department of Energy is striving to monitor, remediate and shrink these plumes, but they need time. Our first line of defense is to reduce the natural and artificial recharge of Hanford ground water.

The proposed Black Rock dam would be within five miles of Hanford's western boundary. The dam would be 755 feet tall and well over a mile long in length, holding 1.3 million acre feet of water. The dam would overlook Dry and Cold creeks, intermittent stream courses that meander onto the Hanford Reservation.

The study predicts water would seep from the reservoir at the rate of 31 cfs and move onto the Hanford Reservation. The report indicates that this almost quadruples the ground water moving under Dry and Cold creeks. This does not sound like a lot of water, but it amounts to 30,000 acre feet per year - or the equivalent of an underground lake one foot deep covering almost 47 square miles

creeping under Hanford. Another underground lake of that dimension would be added every year, relentlessly building and pushing those contaminated pools closer and closer to the Columbia. The report also states in Table ES.6 that the total ground water seepage towards the Columbia River would be 57 cfs. The study does not indicate why only 31 cfs would flow under Hanford, I can only infer from this that there is the distinct possibility that the 31 cfs prediction could climb to 57 cfs or a 84% increase over the present prediction.

The study does not include detailed maps of the Black Rock project or Dry and Cold creek drainages. This is a serious deficiency which inhibits the public's ability to evaluate the proposal.

The increased ground water flows could easily mobilize the contaminated pools under Hanford and push them into the Columbia River initiating and environmental disaster that would be almost impossible to control or clean up. We can not allow this to happen.

The Department of Energy is currently studying the possible impacts of seepage from Black Rock on Hanford's ground water. The report will be completed sometime in 2008 and will be included in your Final Report. Your draft Environmental Impact Statement is fatally flawed by the failure to wait a few short months to include the Department of Energy's report in the draft EIS. The public must have the opportunity to make an informed review and comment on this vital issue. You are rushing to a decision without some of the most vital facts.

Seismicity / Geological Threat:

The Black Rock dam would lie in an area of high earthquake potential. The report is vague and difficult to understand as to the extent of the threat. The report states on page 2-9 "at a return period of 10,000 years, the estimated mean PHA is about 0.95g (acceleration of gravity), a level of ground shaking that might be associated with the occurrences of magnitude 6 to 7+ earthquakes..". I have no idea what that means. Is "6 to 7+" the Richter scale or some other form of measurement? How high is the potential frequency or magnitude of the earthquake threat? The report really does not give the reader any concrete idea of the threat from seismic activity. NEPA requires EIS's to be written in a manner understandable to the general public. Once again the report fails to meet the NEPA standards.

The dam would be constructed on the Black Rock fault and an additional thrust fault. The report provides only a very vague idea as to the exact location of these faults. I would hope this information is available and am disturbed that it has not been released to the public in this report.

The right abutment of the dam would rest on Horsethief Mountain. We are greatly concerned as to the fitness of Horsethief Mountain to function in this important role as the right hand foundation for a 755 foot high dam or its ability to safely hold back 1,300,000 acre feet of water.

The report states on page 4-37:

"Landslides are common in the Yakima Fold Belt and generally form on the over-steepened south limbs of the anticlines. Several ancient landslides have been identified on the Horsethief Mountain anticline, which comprises the right abutment of the proposed Black Rock dam (Columbia Geotechnical Associates, 2004). The steeply dipping orientation and layering of the low-strength sediments and the presence of the Horsethief Mountain Thrust Fault along the southern edge of the reservoir valley present a potentially hazardous combination. Though the slide areas are currently stable, seepage from the reservoir into the presently unsaturated basalts and interbedded sediments would increase pore pressures within those materials and would likely reactivate some of those slides as well as initiate new landslides along the reservoir rim and dam abutments."

The Bureau of Reclamation's Appraisal Assessment of Geology at Black Rock Damsite, Technical Series No. TS-YSS-5 (December 2004) states on page 32:

"This high level of shaking leads to the potential of causing lower density embankment or foundation saturated soils to experience liquefaction, which is essentially a loss of strength that can result in large slope failures."

This statement should have been included in the EIS and been easily available to the public and not lost in a supporting document.

The above cited report provides photographs of Horsethief Mountain which indicate the location of some of the landslides, but the photos only vaguely indicate where the dam would abut the mountain. These photographs should have been included in the feasibility study report. The report does not provide a detailed diagram of the proposed dam. We are provided with a very small diagram of the intake structure at Priest Rapids Dam but no drawings of the dam are offered for our review. The report again is severely deficient in this respect. The report should provide detailed diagrams of the dam, and its relationship to Horsethief Mountain and the faults. These diagrams should provide views across the face of the dam, a cross section of the dam and an aerial view of the dam and Horsethief Mountain.

The above cited geology report also states on page 35 concerning the design of the dam:

"Large site investigation and materials testing programs will be needed to ensure the site conditions are well understood. Detailed analyses will be critical to

ensure a safe design is developed. In addition to these measures, such a design would need to be independently reviewed by an expert board of consultants."

The EIS does not indicate if the dam design was ever reviewed by an "expert board of consultants". We feel it is absolutely essential that this independent expert review be completed and included in a new draft EIS. Once again the draft EIS fails to include critical information. The EIS should be revised, expanded and reissued as a draft.

Columbia River Water Withdrawal:

The report is confusing and inconsistent as to the volume of water to be withdrawn from the Columbia River.

The draft EIS states on page 2-40:

"In years when the maximum water exchange occurs, Black Rock reservoir would release a total of about 600,000 acre feet annually."

Table 2.19 indicates the average water pumped into Black Rock at 640,693 acre feet annually, with a maximum of 1,077,510 acre feet. The table predicts the annual amounts that would be pumped over a 25 year period. Two of those years would pump over 1,000,000 acre feet, five of those years would pump between 730,000 and 1,000,000 acre feet and nine years the total would be between 18,000 and 730,000 acre feet annually.

The Bureau of Reclamation's Appraisal assessment of the Black Rock Alternative Facilities and Field Cost Estimates, Technical Series No. TS-YSS-2 states in Table 1, the water exchange in wet and average years at 810,400 acre feet and 662,000 acre feet in dry years.

Clearly, the maximum water exchange exceeds 600,000 acre feet. The report must be consistent in this vital respect. Once again the report does not meet the NEPA standard for an EIS.

Columbia River / Hanford Reach Impacts:

The report only vaguely alludes to the impacts of withdrawing water from the Columbia River above Priest Rapids dam. The Columbia's Hanford Reach lies just below Priest Rapids dam and above the confluence of the Yakima and Columbia Rivers. The Hanford Reach contains the very best spawning grounds on the main stem of the Columbia River and adequate water flows are absolutely critical to the successful spawning, rearing and passage of these fish.

The Black Rock project would withdraw, on average 396,847 acre feet of water from the Columbia at Priest Rapids dam in September and October. This is 62%

of the average annual withdrawal according to Table 2.19. The project would divert this water from the Hanford Reach at the most critical time for spawning and exactly when flows are significantly declining. The report must provide detailed information as to the anticipated impact these withdrawals will have on the Reach.

The report should also acknowledge that three additional off channel storage reservoirs for Columbia River water above Priest Rapids are in the planning stage. What would the cumulative impact to the Hanford Reach be from all these projects?

Fish - False Attraction:

We have great concerns over the mixing of Columbia and Yakima River waters and the confusion it could cause migrating fish.

The report states Columbia River water entering the Yakima River from the project would range from .34% to 1.62% which is well under the 10% threshold laboratory experiments have indicated sockeye salmon can tolerate before discriminating between water sources. This is encouraging but we feel more testing should be done using Columbia and Yakima water on migrating fish native to these streams.

We recommend that feasibility studies be conducted to determine if Black Rock project waters from the Columbia Rivers could be diverted to create wetlands and completely avoid entering the Yakima River. These wetlands could be very beneficial to fish and wildlife and provide recreational opportunities.

Wildlife:

The wildlife section of the report quotes numerous studies but does not indicate if any on the ground wildlife and native plant surveys were done specifically for this project by Interior Department biologists. The report should be clear on this point and if these surveys were not done, they should be and the results published in a new revised draft EIS.

The project would disrupt wildlife migration between the Hanford Reach National Monument and Yakima Firing Center and extending on to the Cascades. Land should be acquired linking the Yakima Firing Center to the Hanford Reach National Monument along the Columbia River. These lands should be added to the Hanford Reach National Monument. A second wildlife corridor should be established along the Rattlesnake Hills to assist wildlife in their movement.

The reservoir as designed would be of minimal value to fish and wildlife. The Black Rock reservoir should be redesigned to include a number of dikes, gates and pumps to maintain shallow wetlands as the reservoir is drawn down during

the irrigation season. These wetlands would be beneficial to fish, wildlife and migratory birds. Maintaining these wetlands would enhance the scenic view as well as fishing and hunting opportunities.

Recreation:

The report foresees Black Rock Reservoir as a sportsman's paradise and outdoor recreation Mecca. The 8,640 acre lake and narrow band of shoreline that would be acquired are expected to attract boat and shore fishing, swimming, picnicking, water skiing, jet skiing, hiking, wildlife viewing, horseback riding and off road vehicles. The report estimates annual visitor days starting at 200,000 and quickly climbing to 700,000. We believe these projections are grossly exaggerated.

The report includes a recreational survey of existing lake and river recreational opportunities in the Yakima basin. These recreational opportunities are concentrated in the Cascade Mountains and have little in common with Black Reservoir which would be located in a treeless semi-arid area. The recreation report indicates the annual visitor count for the seven lakes and five rivers in the Yakima basin survey at only 108,012. It is hard to conceive how the construction of an 8,640 acre lake in an area with summer temperatures climbing to 110 degrees would attract seven times the current number of visitors in the study area.

The report foresees 245,000 annual fishing days per year. Black Rock, as designed, would be deep and have steep slopes and virtually no shallow wetlands so critical to fish. We believe the potential for developing an attractive fishery in the reservoir are very small.

The report forecasts 175,000 boat fishing visitor days and 175,000 water skiing and jet skiing visitor days. We believe the lake is far too small to support this number of boats, particularly when we take into consideration that the lake surface will shrink as the irrigation season progresses. The shrinking lake surface and steep slopes will also leave boat launches and docks high and dry.

The report and survey ignores other recreational facilities virtually on the doorstep of Black Rock such as the Hanford Reach, Lake Wallula, Priest Rapids Lake, Moses Lake, the Columbia National Wildlife Refuge, Scootene Lake, Potholes reservoir and the many parks along the Lower Snake River. We already have an abundance of slake water reservoirs which are far from being over crowded. Desert Aire, a small vacation community located at Priest Rapids dam has struggled to survive for many years and has never attracted the visitors predicted for Black Rock.

Electrical Supply Impacts:

The draft EIS's Table 4.12 portrays the costs and volume of electrical power required to pump water into Black Rock reservoir. The electrical costs are

estimated to range from \$33 to \$93 million per year with an average of \$50 million. The report does not indicate what price rate these estimates are based on. We requested this information and were unable to secure an answer. We fear the rate is a highly discounted bulk rate fare below that paid by residents, businesses and irrigators. Rate information is a critical component in determining the true costs of the pumping operation and must be available for public comment.

The majority of the annual pumping will be done in September and October, when Columbia and Yakima River flows are declining. The table shows that on average 511 MW and 430 MW will be required in September and October respectively. How will this impact the supply of electricity available to other consumers? We must remember that the 396,847 acre feet of water pumped out of the Columbia during September and October to begin refilling Black Rock will not be available to generate electricity at Priest Rapids dam or the four other dams downriver. The market value of this foregone power generation should be computed in the actual cost of the project as well as the cost benefit ratio.

How will the large consumption of power in September and October for pumping coupled with the associated lost power generation impact the supply of electricity? Will this require BPA to buy expensive power out of the area, driving up the rates paid by local consumers.

Table 4.12 shows the average annual power required to supply Black Rock at 132 MW. The table also gives the average monthly power required for each of the twelve months. The total average MW for the twelve months listed on the table is 1649 MW's. How can the sum of the monthly averages be so many times higher than the annual average? It is hard to understand how the table could list the annual average at 132 MW when the monthly average for September is 511 MW and 430 for October. Obviously the table is in error. The table provides critical information and should be corrected and included in a new draft EIS and submitted to public review.

Cultural Impacts:

We are concerned that sufficient research and field study has not been done on historic properties and Native American sacred sites. Table ES.6 in the draft EIS states under Historic Properties and Indian Sacred Sites indicates that the number of properties and sites is "unknown". This is unacceptable. The presence of Sacred Sites can and rightly should bring a multi billion dollar project to a screaming stop. The question of impacts to historic and sacred sites must be answered and provided in the draft EIS. Once again critical information is missing and a new draft EIS must be done and submitted for public review.

Inadequacy of EIS:

It should be noted that the Bureau of Reclamation's Yakima River Basin

Reservoir and River Recreation Survey Report of Findings, Technical Series No TS-YSS-15 describes the Yakima River basin as encompassing Benton, Franklin, Yakima and Kittitas counties. It should be noted that Franklin County is east of the Columbia River and not in the Yakima Basin. Figure 4.11 on page 4-60 of the draft EIS portrays a map of the Yakima basin. The Figure erroneously places the Horn Rapids Irrigation Pump on the Columbia River and not its true location on the Yakima River. These are insignificant errors but they dampen our faith in the accuracy of the reports.

In view of the lack of information, pending reports and conflicting information contained in the study, we strongly recommend that the report be reviewed by an independent body of experts such as the National Academy of Science and a new draft EIS be developed and submitted for public review.

Conclusion:

We recommend that the Black Rock project be dropped from further consideration.

The cost / benefit ratio of .16 to 1 is totally unacceptable and renders the project financially unsound. We believe that when costs of foregone power generation due to water diversions, scaling back recreational benefits projections to a reasonable level and the costs of attempting to prevent ground water incursion onto the Hanford Reservation are figured into the equation the cost / benefit ratio will drop far below the present .16 to 1.

We believe the impacts to migratory fish using the Hanford Reach alone make this project unacceptable.

Most importantly we believe the geological conditions at Black Rock coupled with the problem of ground water incursion on Hanford render the project unsafe. We do not believe these conditions can be fixed or mitigated. You can not fix a fault line and we are dealing with two fault lines on this project. The threat of major earthquakes is high. Horsethief Mountain, the critical right abutment of the dam is very unstable and prone to liquefaction which means we could completely lose Horsethief Mountain during an earthquake releasing the entire reservoir in a massive wave across Hanford. The threat of 30,000 or more acre feet of ground water per year pushing, building and forcing contaminated ground water under Hanford into the Columbia River is also unacceptable.

In spite of all this, if the decision is made to pursue the Black Rock project we recommend the following:

1. The current draft EIS is unacceptable, it must be redone and reissued to the public for comment.

2. Convene a group of third party, disinterested experts, such as the National Academy of Science to thoroughly peer review the draft EIS.
3. State and federal legislation must be passed granting a water right to fish for the 440,000 acre feet of water the project supposedly will leave in the Yakima River for fish. The water right should be held in trust by the US Fish & Wildlife Service, US Marine Fisheries Service and Washington Department of Fish & Wildlife.
4. Establish wetlands to prevent the mixture of Columbia & Yakima River waters entering the Yakima River.
5. Establish dikes, flood gates and pumps to maintain shallow wetlands in the reservoir as irrigation draws down the reservoir water level.
6. Fully mitigate impacts to the Hanford Reach by increasing Columbia River flows to compensate for water diverted to Black Rock.

Alternatives:

What would we propose doing to manage water in the Yakima basin if the Black Rock project were dropped?

First of all the objective of Black Rock is not to expand irrigation in the lower Yakima valley but to increase Yakima River flows and provide a minimum of 70% of the water commitments in dry years - which have been found to be around 6 out of every 25 years.

We recommend studying the possibility of diverting water out of the Yakima River during the high spring runoff into artificially constructed wetlands along the Yakima River. Allow these waters to gradually seep into the aquifer, storing them as ground water, far from Hanford. These waters could then be tapped in dry years by pumps managed by the Bureau of Reclamation. Based on past history we would have 19 out of every 25 years to build up our ground water supply and then only tap it in dry years by carefully managed wells.

The wetlands created by these diversions would be extremely valuable to fish and wildlife and provide recreational opportunities far superior to those envisioned at Black Rock.

This alternative would be far cheaper to construct and use only a fraction of the electrical power Black Rock would require.

We also believe an insurance or subsidy system should be in place to compensate Yakima valley farmers growing annual crops thus enabling them to let their fields lay fallow during drought years while concentrating the available water on

permanent crops such as orchards and vineyards.

We also recommend pursuing water conservation and refitting irrigation systems to use the available water as effectively as possible.

We believe these measures could provide the water needed by fish, wildlife, agriculture and urban communities in the right amount at the right time.

Thank you for this opportunity to comment on these reports. We appreciate the hard work you and your staff have done over many months to produce the report.

Sincerely,

Richard J. Leumont
Chair
Conservation Committee

CC: jtrumbo@tricityherald.com

VANCOUVER AUDUBON SOCIETY

P.O. Box 1966 Vancouver, WA 98668-1966
www.vancouveraudubon.org



308 NE 124th Avenue
Vancouver, WA 98684
March 28, 2008

David Kaumhelmer
U.S. Bureau of Reclamation
Pacific Northwest Region
Upper Columbia Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Dear Mr. Kaumhelmer:

The Vancouver Audubon Society, along with our sister Audubon chapters in Washington, are concerned about the proposed Black Rock Reservoir. Our concern is for the wildlife and the fish in the area.

The Black Rock Reservoir would block movement of wildlife between the National Hanford Monument and the Yakima Firing Range. Providing migrating corridors for wildlife is greatly important to allow for genetic mixing and keeping wildlife populations strong. Cutting off a migration corridor is likely to lead to the eventual decline of wildlife populations.

The salmon may be at greater risk. Additional water should not be pumped from the Columbia in dry years. The Hanford Reach fall Chinook salmon is a valuable stock as it represents the only mainstem spawning Chinook left in the Columbia Basin. Any possibility of dewatering the redds of the fall Chinook would jeopardize that population. In addition, salmon migration depends on chemical cues in the water from their natal streams. If water from one river is transferred to another, it could confuse the returning adults, causing them to migrate up the wrong stream.

Additional water cannot be produced. It can only be shoved from area to another. Or prevented from flowing downstream in one season (winter and spring) to be released to flow downstream in another season (summer and fall).

There is only so much water available in the Columbia. A lot of demands are placed on the Columbia and its tributaries: hydropower, transportation, irrigation, and providing for fish. We may be at the point that the Columbia cannot provide for any more water use without jeopardizing another use. Fish are likely to be the greatest loser if the Columbia becomes over-allocated. If we are facing greater droughts as a result of global warming, we must encourage conservation, not encourage greater use. The question of whether or not the farmers in the Yakima Basin are using water in the most efficient manner must be addressed before even considering using more Columbia River water, either directly or indirectly. The Vancouver Audubon Society opposes the building of the Black Water Reservoir.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Gretchen Starke
Conservation Chair,
Vancouver Audubon Society

David Kaumheimer
Environmental Programs Manager
U.S. Bureau of Reclamation
1917 Marsh Road
Yakima, Washington 98901-2058

SUBJECT: YAKIMA STORAGE STUDY, DRAFT ENVIRONMENTAL IMPACT
STATEMENT

Dear Mr. Kaumheimer:

I have the following comments concerning the Draft EIS for the Yakima Storage Study

First of all, this "study" does not meet the standards of a true Environmental Impact Study. It does not address concerns regarding affects on migrating salmon. It appears that you are mixing Yakima and Columbia River waters, which will confuse the fish. Your greatest drawdown of Columbia River water is in September and October, during the major migration of salmon. This will be disastrous to our fish.

In the paragraph "Large Dam Height," it states that the "design would need to be independently reviewed by an expert board of consultants." Why has this not been done and included in the study? Why have you not waited until the Department of Energy completes their study on the effects of increased ground water seepage which would move contamination to the Columbia River? This would be a catastrophic event that could not be cured. It must be prevented!

I also have concerns about the geology of the dam placement. You are planning to build on a trust fault in an earthquake zone and against a landslide prone Horse thief Mountain. It may be stable now, but what happens when a great deal of water of applied?

This project will consume vast amounts of electricity and produce none. Who pays for this? We taxpayers? As for "recreational" aspects, what mountain lake, with forests on the banks, did you use as your picture for the "...River Recreation Survey Report of Findings?" Most of the summer, there will be only mudflats shown on the banks. That is not very appealing. If this is a real estate developers dream, they should pay to build and operate it. I certainly don't want my taxes creating profits for the real estate industry!

Finally, I am appalled that you spent 18 million dollars to prepare and produce this Feasibility document (IT IS NOT AN EIS) that does not justify the \$4 billion cost to benefit very few. Wise management of water supplies will provide for the farmers to produce needed crops.

Thank you for considering my comments. Please add me to the list to receive USBR's final EIS and decision in this matter.

Sincerely,

Charlotte Reep
8205 Sunset Lane; Pasco, WA 99301

March 28, 2008

From: Nancy and Richard Rust <ndrust@comcast.net>
To: <storagestudy@pn.usbr.gov>
Date: Fri, Mar 28, 2008 9:10 PM
Subject: Black Rock Dam

There are lots of reasons why the Black Rock Dam should not be built. I thought we had decided against it years ago.

The facts are there:

It would be built on unstable geology, on a fault and subject to earthquake damage.

There would be a threat to the nuclear reservation if it should fail.

There would be a drain on energy needed elsewhere as water is pumped from the Columbia.

Water in the Columbia is already spoken for.

It would be a bad use of taxpayers dollars. Studies have shown it would yield \$0.16 on the dollar.

Why are we still talking about it? Because someone ones to build a resort? It that supposed to pay for it? If so that's voodoo economics.

Please stop subsidizing water. Conserve instead!

Nancy Rust
18747 Ridgefield Rd NW
Shoreline WA 98177