RECLAMATION
Managing Water in the West

Scoping Summary Report – Keechelus-to-Kachess Conveyance and Kachess Drought Relief Pumping Plant

Environmental Impact Statement

A component of Yakima River Basin Integrated Water Resource Management Plan

Yakima Project, Washington
Pacific Northwest Region

U.S. Department of the Interior
Bureau of Reclamation
Pacific Northwest Region
Columbia-Cascades Area Office

Washington State
Department of Ecology
Office of Columbia River

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Mission Statements

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

The mission of the Department of Ecology is to protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations.

Scoping Summary

The Proposed Project

The Bureau of Reclamation and the Washington State Department of Ecology are joint leads in preparing an environmental impact statement (EIS) for the proposed Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus-to-Kachess Conveyance (KKC) that meets the requirements of both the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). Both projects are components of the Yakima River Basin Water Enhancement Project (YRBWEP) Integrated Water Resource Management Plan (Integrated Plan).

The KDRPP is included in the Surface Water Storage element of the Integrated Plan and the KKC is included in the Structural and Operational Changes element of the Integrated Plan. The project-level EIS for KDRPP and KKC will tier to the March 2012, *Yakima River Basin Integrated Water Resource Management Plan Final Programmatic EIS*. Tiering refers to using the coverage of general matters in a broader NEPA document in a subsequent, narrower NEPA document (40 Code of Federal Regulations [CFR] 1508.28, 40 CFR 1502.20). This allows the tiered NEPA document to focus on a site-specific or project-specific proposal and its alternatives, and to concentrate solely on the issues not already addressed in the broad programmatic NEPA document. Tiering is appropriate when the analysis for the proposed action will be a specific refinement or project implementing the programmatic NEPA action. The tiered document focuses only on those issues and mitigation measures specifically relevant to the project-specific proposal but not analyzed in sufficient detail in the program-level EIS.

Two separate, yet related, projects are being proposed by Reclamation and Ecology in the upcoming environmental impact statement.

The proposed action for the **Kachess Drought Relief Pumping Plant** would provide additional water supply for municipal, domestic, and agricultural uses during drought years. The current reservoir outlet for Kachess Reservoir does not provide access to water below elevation 2,192 feet; therefore, water stored in the reservoir below that elevation is currently designated as unusable, or “inactive,” storage. Reclamation and Ecology propose to install a pumping plant at the Kachess Reservoir to allow additional water (up to 200,000 acre-feet) to be withdrawn from the reservoir below the current outlet during drought years.

The proposed action for the **Keechelus-to-Kachess Conveyance** would involve a tunnel through which water would be moved from the Keechelus Reservoir to Kachess Reservoir in order to reduce flows in the upper Yakima River to improve ecological conditions for fish and enable the storage of more runoff from the Keechelus Reservoir drainage to provide additional water supply for municipal and domestic uses, and agriculture. This project could also potentially augment flows to refill Kachess Reservoir.

In addition, an alternative combining both the KDRPP and KKC will be evaluated in the EIS, as well as the No Action Alternative.

Scoping Process

The process of seeking comments and public information on the proposed action, alternatives, and potential issues to be considered in the EIS is called "scoping." This report summarizes the comments received during four public scoping meetings held jointly by Reclamation and Ecology for the KKC/KDRPP EIS. In addition, both Reclamation and Ecology received comments from the interested public, including individuals, organizations, and government agencies via mail, email, telephone, and facsimile, and those comments are captured here as well. The comments received will assist in:

- Identifying the significant issues relevant to these proposals,
- Identifying those elements of the environment that could be affected by the proposal,
- Formulating alternatives and mitigation for the proposals, and
- Determining the appropriate environmental documents to be prepared.

On October 30, 2013, Reclamation published a Notice of Intent to prepare an EIS in the *Federal Register*. Both Reclamation and Ecology issued a joint press release to Washington State media on November 6, 2013, announcing the dates and locations of scoping meetings. Meeting notices were emailed to interested individuals, Tribes, interest groups, and government agencies. Notice was also posted on Reclamation's Integrated Plan website and associated pages describing the project, requesting comments, and providing information about the public scoping meeting.

On November 4, 2013, Ecology published its Determination of Significance and public notices in area newspapers requesting comments on the scope of the EIS. Ecology also notified by email all those registered on their Yakima Basin Plan list-serve, and notice was posted on Ecology's Office of Columbia River website.

On November 20, 2013, Reclamation and Ecology held two public open houses/scoping meetings at the Yakima Arboretum in Yakima, Washington—one in the afternoon and one in the evening. Twenty-three individuals attended the two meetings. At the meetings, the KKC and KDRPP proposals were described and attendees were given the opportunity to discuss the proposal with Reclamation and Ecology staff as well as comment on the scope of the NEPA/SEPA EIS, the EIS process, and resources to be evaluated in the EIS.

On November 21, 2013, Reclamation and Ecology held two public open houses/scoping meetings at the U.S. Forest Service Cle Elum Ranger District Office in Cle Elum, Washington—one in the afternoon and one in the evening. Thirty-three persons attended the two meetings. The same meeting format was followed as those in Yakima.

The period for comments to be included in this document was from October 30, 2013, through December 16, 2013, during which 39 comment letters were received. Reclamation and Ecology have considered the comments received to assist in the following:

- Identify the significant issues relevant to the proposed action
- Identify those elements of the environment that could be affected by the proposed action
- Formulate alternatives to the proposed action and potential mitigation.

Summary of Scoping Comments

The following is a summary of comments received during the scoping period for consideration by Reclamation and Ecology during preparation of the Draft EIS:

Surface Water Resources

- The EIS should clarify how the KDRPP would operate.
- The EIS should describe all waters of the U.S., including wetlands, that could be affected by the projects alternatives, and include maps that clearly identify all waters within the planning area, as well as the pathways of alternative routes through the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters.
- What time of the year can the water be transferred from Lake Keechelus to Lake Kachess?
- What will be the volume of the new stored water that will be available as opposed to the volume rerouted from Keechelus Reservoir for downstream

irrigation use for the purpose of bypassing the Keechelus-to-Easton reach of the Yakima River?

- What will be the impact on the Kachess Reservoir refill of the 239,000 acre-feet of current active storage capacity when the inactive storage is accessed in drought years?
- Has a right to the use of the inactive storage water been issued?
- During a drought year, would all 200,000 acre-feet be supplied directly to the Kittitas Reclamation District?
- How many seasons since 1979 has the Kachess Reservoir completely refilled?
- How many seasons since 1979 has the Keechelus Reservoir completely refilled?
- What are the estimated refill times for the existing Keechelus and Kachess reservoirs and with the proposed KKC and KDRPP, assuming complete drawdown during a drought year?
- The EIS should address impacts to streams.
- What is the transevaporation rate for Keechelus and Kachess reservoirs?
- Would the proposed project supply all proratable irrigation districts with water during drought years?
- Would the proposed project supply any non-proratable irrigation districts?
- Can Yakima irrigation districts expand their irrigation acreage or convert to more water-intensive crops to claim access to the Kachess inactive storage during non-drought years?
- The EIS should explicitly state whether any additional volumes of water rights will be granted, or whether other uses of the Kachess Reservoir Inactive Storage such as water supply to new municipalities will be allowed in non-drought years.
- Would the KKC Alternative T3 option require diversion of the Yakima River? What stream alterations would be required?
- What wetland impacts would occur? What mitigation is proposed?
- If the pumping plant had been installed during the last 20 years, how many times would Lake Kachess have been drawn down an additional 80 feet below its natural level?
- How often is it projected that the KRDPP will be used to draw down Lake Kachess below its current outflow level of 2192 feet?
- What effects would the KKC have on the KDRPP operation?
- Surface water from springs will be impacted due to the Kachess drawdown.

- Streamflows and timing of changes beyond baseline conditions should be modeled and described in detail. Washington Department of Fish and Wildlife (WDFW) is concerned that streamflows within Keechelus reach of the upper Yakima River will become more regulated and suffer a less normative hydrograph and that the frequency and duration of channel-forming flows, important to channel and habitat maintenance, will be reduced.
- The benefits or risks to various life history stages of fish life associated with altering winter and summer instream flow within the upper Yakima River should be determined and mitigated through modeling exercises.
- A review of how "flip-flop" operations in the Tieton and Naches Rivers might be affected by storage and flow alterations in the upper Yakima River resulting from these project proposals should be examined.
- Additional explanation needs to be provided in the EIS to justify the fishery benefits for the diversion dam downstream option. With regard to the option of a new outlet works at Keechelus Dam, we request an analysis of an appropriately-sized tunnel that will meet the flow targets for all water year types. Specifically, we request that a study determine whether the 10-to-12-foot-diameter tunnel as considered in the scoping notice will be adequate to meet the instream flow targets. If it is not, then a larger tunnel diameter should also be evaluated.
- How will the proposed increased water be distributed (water rights)?
- Will the EIS provide an analysis on how water stored or pumped in a new or expanded reservoir and already allocated under the 1945 Consent Decree may be reallocated to instream flows?
- Who will benefit (a water right) from water drawn from below the natural lake level?
- The Washington State Department of Transportation (WSDOT) would like more information on how changes to existing drainage flows within the Upper Yakima River Watershed may affect downstream WSDOT infrastructure.
- Please describe in detail the effect of instream flow changes from the proposed projects over drought, average, and above-average water years, under both current and proposed operations, over short- and long-term temporal scales.
- Why aren't optimum instream flows being considered for the Kachess River?
- Would any of the inactive storage be used for instream flows during non-drought years?
- During a drought year, how many acre-feet (af) or cubic feet per second (cfs) would be provided to the Kachess River to maintain minimum flows?

- What specific instream flow benefits in the Kachess River and Yakima River would result from the proposed Kachess Alternative 2 - Pump Station?
- What Yakima River instream flow benefits would result from the KKC project during drought years? During non-drought years?
- What consideration has been given to residents who currently pump water from the lake? Would these residents be compensated for needed extensions to existing waterlines and possible upgrades to household pump systems?
- Have considerations been made to ensure no undertow would exist, presenting a potential danger to residents and tourists partaking in Lake Kachess recreational activities?
- Please clarify the relationship between the water conservation program and the opportunity to provide access to an additional 200,000 acre-feet of water and how it varies by water-year type.
- The EIS should list all Reclamation-approved water conservation plans for the Yakima River Basin.
- In compliance with Section 404 of the Clean Water Act, the EIS should include information regarding alternatives to avoid discharges into waters of the U.S., or, if not practicable, measures to minimize and ultimately to mitigate their impacts.

Earth

- Where would disposal sites be and what would be the impacts from tunnel construction, transportation and disposal of the muck, rock-spoil, from the tunnel excavation?
- How will the increased shoreline be managed to prevent erosion?
- The EIS should discuss the potential for seismic risk and approaches to evaluate, monitor, and manage the risk. The document should include a seismic map or a reference to it. The proposed projects should use appropriate seismic design and construction standards and practices to minimize impacts. One strategy would be to assess geologic faults in the analysis area because fault areas are vulnerable to movement, which makes them potential areas of risk for pipeline rupture. Along with that, geologic resources within the area should be evaluated; and the nature of the subsurface soil and bedrock materials within the Horizontal Directional Drilling (HDD) path should be determined.
- What plans are in place to prevent or lessen erosion and landslides due to changes in tidal tables and continuously shifting water levels?
- What is the proposed method to remove the waste and excess material from the tunnel drilling?

- What plans, if any, are in place to protect the lakebed and surrounding environment from destruction such by off-road vehicle use and "mudders?"
- How will the EIS evaluate the project's potential construction impacts and identify potential mitigation measures for those impacts such as impacts of upland discharge, including soil contamination and erosion; impacts of surface water discharge, and potential impacts resulting from earthquakes?
- The EIS should identify potentially affected groundwater aquifers, any potential for subsidence, as well as impacts to seeps and springs.
- Have geotechnical studies been done for any proposed project site?

Surface Water Quality

- When exposed, the reservoir bottom has a sulfurous smell (presumably anaerobic). The EIS should address what the effect the reservoir bottom silt outflow—which has been collecting in the natural lakebed since time immemorial—will be on the Yakima River and fish redds when the Kachess Inactive Storage is being used.
- What will be the likely effect to agriculture of the sulfurous sediments after drawdown?
- The EIS should describe the effect on Yakima River water quality as a result of sediments stirred up by "mudders" in years when the Kachess Inactive Storage is being used.
- The EIS should disclose waters in the analysis area and vicinity that the proposed projects may impact, nature of the potential impacts, and pollutants likely to affect those waters.
- Surface water from springs will be impacted due to the Kachess drawdown.
- The EIS should report waters on the State's and Tribe's most current EPA-approved 303(d) list and describe any existing restoration and enhancement efforts for those waters, how the projects would coordinate with ongoing protection efforts, and any mitigation measures to implement to avoid further degradation of water quality within impaired waters. Please also note that non-degradation provisions of the Clean Water Act prohibit degrading water quality standards within water bodies that are currently meeting water quality standards. Because of that, the EIS document should indicate how the projects would meet those provisions during and after construction.
- Since construction and operation of the projects may impact sources of drinking water, the EIS should include the following information:
    - Source water protection areas within the analysis area.
    - Activities that could potentially affect source water areas.
    - Potential contaminants that may result from the proposed projects.

- Measures that would be taken to protect the source water protection areas.

- The EIS should include data about existing and new roads and evaluate the change in road miles and density that will occur because of the projects and predicted impacts to water quality by roads.
- The EIS should document the projects' consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality.
- A deep drawdown in the lower lake may also start a significant head cut within the accumulated fine sediments within the reservoir bed, which may result in water quality and sedimentation concerns within spring Chinook spawning and rearing habitat below the point of discharge. The potential adverse impacts should be studied and avoided.
- For the EIS, consider also the impacts of merging one water source, Keechelus Lake, with another.
- The EIS should study the transfer of toxins or pollutants that may be present in Keechelus Lake (because of clear-cut logging, development near ski areas, and oils and other pollutants from I-90) and how these pollutants or invasive species might impact Kachess Lake. A full catalog of pollutants in both lakes should be compiled, along with study of invasive species.
- What plans are in place to limit and control the wash and buildup of silt and bedrock materials from both drilling and exposure?
- How would the pipeline water flow be regulated to prevent this silt from washing to the shores and waterfront lands of residents?
- Will the EIS include a description of the potential for spills of contaminants into waters of the United States and the measures such as an emergency response plan to mitigate impacts?

Groundwater

- During drought years, it seems the water table will be dramatically impacted by the additional drawdown. This would require the expense of re-drilling wells; will compensation be provided to well owners?
- Ecology recently entered into a Senior Water Rights agreement with 19 residents of the East Kachess Homeowner's Association. This agreement provides these residents Senior Water Rights, with their rights to this water supply "banked" in Lake Kachess. During drought periods when the lake is drawn down, will homeowners be required to reduce their water use?

- What provision exists to acknowledge and protect the water rights of those who have already obtained or purchased rights to these waters, including the Senior Water Rights agreement?
- Construction and maintenance of linear features, including IP projects, have the potential to disrupt the continuity of ecological processes such as the flow of shallow groundwater and the movements of wildlife species. Because of their location in the I-90 corridor, the Service recommends that the design of the proposed projects incorporate maintenance of ecological connectivity as a primary objective (i.e., it should be a part of the purpose and need for these projects).
- WSDOT will be installing a series of culverts in an identified hydrologic connectivity zone at the location of the KKC tunnel crossing of I-90. The EIS should clarify how this project would be coordinated with ongoing construction of I-90, including an analysis of potential impairment of any I-90 ecological connectivity structures.
- Water from springs will be impacted due to the Kachess drawdown.

Fish

- A deep drawdown in the lower lake may also start a significant head cut within the accumulated fine sediments within the reservoir bed, which may result in water quality and sedimentation concerns within spring Chinook spawning and rearing habitat below the point of discharge. The potential adverse impacts should be studied and avoided.
- The benefits or risks to various life history stages of fish life associated with altering winter and summer instream flow within the upper Yakima River should be determined and mitigated through modeling exercises.
- Explanation needs to be provided in the EIS to justify the fishery benefits for the Yakima diversion dam option. With regard to the option of a new outlet works at Keechelus Dam, we request an analysis of an appropriately-sized tunnel that will meet the flow targets for all water year types. Specifically, we request that a study determine whether the 10-to-12-foot-diameter tunnel as considered in the scoping notice will be adequate to meet the instream flow targets. If it is not, then a larger tunnel diameter should also be evaluated.
- The EIS should address what the effect the reservoir bottom silt outflow—which has been collecting in the natural lakebed since time immemorial—will be on the Yakima River and fish redds when the Kachess Inactive Storage is being used.
- When the drawdown of the lake occurs, will there be fish passage between upper and lower Lake Kachess?
- How will a fish ladder built at Lake Kachess Dam be operational when the drawdown of the lake occurs?

- What will happen to the existing fish: trout, Kokanee, and Dolly Varden, in the lake after drawdown?
- What is the viability of fish passage at Keechelus and Kachess Reservoirs with these two projects online?
- Such a drawdown can also be expected to have a severe negative effect on the health of fisheries stocks in Kachess Lake, which will be concentrated in a much smaller lake volume and area.
- The EIS should quantify fishery impacts and benefits for both KKC Alternative T1 and T3 options.
- The EIS should include a quantitative analysis of the flow targets and corresponding fishery benefits for the upper Yakima River.
- Kachess Reservoir has a slow refill rate, and has documented issues with the stranding of fish and inadequate spawning tributary access under current operations. The USFWS is concerned that access to spawning habitats may be further compromised with a more extreme drawdown of Kachess Reservoir. The potential and magnitude of effect of the proposed action to the lake's limnology, productivity, predatory/prey interactions, entrainment rates, and impacts to fish communities are other key concerns. The Service would like to better understand these impacts and recommends a full analysis of these issues.
- Young fish eat at the mouths of the several creeks presently emptying into Lake Kachess. After the lake is lowered, will the new mouth(s) accommodate their feeding habitat? Today the mouths are delta like and once the lake is lowered, there will be a near vertical drop into the lake.
- Please describe in detail the effect of instream flow changes from the proposed projects over drought, average, and above-average water years, under both current and proposed operations, over short- and long-term temporal scales.
- What are the adverse impacts of the additional drawdown to Box Canyon Creek on the late-season spawning of bull trout, and what mitigation is proposed?
- What specific steps would be taken to ensure effective passage at Box Canyon Creek?
- Why aren't optimum instream flows being considered for the Kachess River?
- Would any of the inactive storage be used for instream flows during non-drought years?
- During a drought year, how many acre-feet (af) or cubic feet per second (cfs) would be provided to the Kachess River to maintain minimum flows?

- Would the gravity tunnel alternative provide better opportunities to increase instream flows for fish and wildlife?
- What specific instream flow benefits in the Kachess River and Yakima River would result from the proposed Kachess Alternative 2 - Pump Station?
- What Yakima River instream flow benefits would result from the KKC project during drought years? During non-drought years?
- How does accessing this inactive storage conflict with fish passage/habitat enhancement proposed for Lake Kachess?
- The EIS should include an analysis of potential impairment of riparian and aquatic processes at each end of the conveyance.
- Executive Order 13112, Invasive Species, mandates that Federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species may cause.
- What fish species and life-stages are being targeted for improved ecological conditions? Which conditions of the ecosystem are currently in need of improvement? How does this project improve those conditions?
- The potential risks and benefits of the KKC and associated pumping station to resident fish and sport fisheries should be assessed and described. It is uncertain how significant drawdowns during drought years might impact existing resident trout and future anadromous fish due to entrainment through new outlet structures.
- Reservoir drawdowns reduce fish habitat availability, strand benthic organisms, adversely impact water quality and congregate predators with their prey. Faster turnover of lake input/output (i.e. decreased water retention time) can cause increased entrainment of both fish and their prey and loss of nutrients.
- Cutthroat trout, rainbow trout and kokanee, and future anadromous stocks, may not be able to access spawning tributaries, or current spawning and incubation areas may be inundated under the new management scenarios. The project should assess how spawning resident fish, and future anadromous fish, would be adversely impacted and how to preserve tributary access.
- Pre- and post-project monitoring efforts should be directed at determining the best strategies for long-term adaptive management of upper Yakima River Reservoir fish and fisheries. These include:
    - Develop a zooplankton and water quality sampling protocol during Kachess and Keechelus reservoir drawdown and subsequent refill of the reservoirs to assess impacts on primary productivity and fish production.

- Shoreline observations as lake levels drop in Kachess and Keechelus Reservoirs, to identify index sites for potential kokanee and sockeye spawning locations.
- Study and implement ways to minimize entrainment of fish and zooplankton from reservoirs. Consider hydroacoustic studies to assess fish concentrations in the lower reaches of the reservoirs, particularly near the proposed pumping station in Kachess Reservoir to determine which actions will help reduce entrainment into the new outlet and how to avoid trapping bull trout in lower Kachess Lake.
- Provide resources so that WDFW can adaptively manage these fisheries to maintain or enhance fisheries value. For example, increased plants of artificially propagated fish, or enhanced public fishing access facilities might be necessary in order to maintain fisheries. Adaptations can include:
  - Changing fishing regulations;
  - Altering fish stocking species mix, numbers, timing, or sizes;
  - Providing facilities or resources that increase fish stocks' self- sustainability;
  - Enhancing fisher's access to the fishery.

- The potential for transfer of existing and future transmission of diseases between fish populations in Kachess and Keechelus should be assessed. Keechelus Reservoir should be inventoried for potential aquatic/invasive species now and in the future. Its proximity to I-90 could result in higher risk of infestation. The potential effects and risks of aquatic species such as quagga and zebra mussels into Kachess and Keechelus should be discussed and a response action identified.
- How will the quantity of water improve conditions for fish during drought years?
- Will the EIS address impacts to fishery habitat from vibration, sound, shading, wave disturbance, alterations to currents and circulation, water quality, scouring, sediment transport, shoreline erosion (landfall) and structural habitat alteration?
- Will studies for all final sites include an assessment of: (1) species type, life stage, and abundance; based upon existing, publicly available information; (2) potential changes to habitat types and sizes; and (3) the potential for fishery population reductions?
- Will the EIS assess potential indirect impacts to fish, mammals, and turtles that may result from changes in water movement, sediment transport, and shoreline erosion?

- The EIS should identify all potential conflicts with existing fishery use patterns and the potential for fishery elimination due to the consequences of the construction of the proposed projects.
- Will the EISs comprehensively address the interconnections between the benthic and fisheries and avian resources?
- What impacts would the proposed projects, including construction and operation have on the Pacific Lamprey and its recovery?
- Reservoir drawdowns reduce fish habitat availability, strand benthic organisms, adversely impact water quality, and congregate predators with their prey.
- Faster turnover of lake input/output (i.e. decreased water retention time) can cause increased entrainment of both fish and their prey and loss of nutrients.
- Provide resources so that WDFW can adaptively manage these fisheries to maintain or enhance fisheries value. For example, increased plants of artificially propagated fish, or enhanced public fishing access facilities might be necessary in order to maintain fisheries. Adaptations can include changing fishing regulations; altering fish stocking species mix, numbers, timing, or sizes; providing facilities or resources that increase fish stocks' self-sustainability; and enhancing fisher's access to the fishery.

Vegetation and Wetlands

- What wetland impacts would occur? What mitigation is proposed?
- The EIS should include an analysis of potential impairment of riparian processes at each end of the conveyance.
- Executive Order 13112, Invasive Species, mandates that Federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species may cause.
- Site-specific vegetation studies should be conducted for Keechelus and Kachess Reservoirs and included in the EIS along with descriptions of the current quality and capacity of habitat and its use by wildlife in the analysis area, especially avian populations and fish. The EIS should also describe these habitats in more detail, species that use them, impacts of the projects on the habitats and species, as well as mitigation measures for the impacts. If there would be marine habitat impacts due to the proposed projects, the EIS would need to disclose those impacts and measures to reduce them.
- The EIS should describe the critical habitat for species; identify impacts on species and their critical habitats. The EIS should include a mitigation plan with detailed steps to take to reduce or eliminate adverse impacts. In

particular, the EIS analysis should include the following information and effects of the projects, individually or together, on:

  - Construction and normal and maintenance operations of the I-90 Snoqualmie Pass East project.
  - Key habitats and related corridors associated with crossings identified for this project.
  - Species that use the habitats, particularly fish and ESA species.
  - Habitat loss, including types and function.
  - Measures to take to minimize impacts.
  - Coordination efforts with WSDOT and other agencies with ongoing projects to reduce the effects and protect resources, such as wetlands mitigation, maintenance of habitat connectivity, and fish passage restoration.

- The projects may also have impacts on native and rare plants and the EIS should include information about these plants, if any, related impacts and measures to take to mitigate potential impacts on the plants. The timing of projects' activities, should be planned so that there would be little to no impacts to plants and animals during crucial seasons in their life cycle. The EIS should specify Best Management Practices to protect resources in the analysis area.
- Can you estimate the amount of habitat area that will be created or improved relative to current conditions if the project is in place?
- Shoreline observations should be made in Kachess and Keechelus reservoirs as pool levels drop, to identify index sites for vegetation monitoring.
- What major plant communities are present and affected? Will the EIS consider impacts on sensitive plant species, particularly those endemic to the Yakima River Basin? How will sensitive plant species in the vicinity be protected?
- The EIS must address the consistency of the project with the I-90 Snoqualmie Pass East Project in regard to ecological connectivity. It must also address not only the direct species and watershed impacts of all associated infrastructure (i.e. maintenance roads, clearings, etc.) but the impacts of those on ecological connectivity in the I-90 corridor where land management policy directs that we are to be improving that value on the landscape. Construction and maintenance of linear features, including IP projects, have the potential to disrupt the continuity of ecological processes such as the flow of shallow groundwater.
- WDFW has significant concerns with regard to maintaining north-south ecological connectivity for wildlife in the eastern Cascades. The same overhead clearance standards used for I-90 should apply to the Kachess to

Keechelus pipeline project proposal. The pipeline alignment should complement existing I-90 corridors.

- The EIS discussion on wetlands and floodplains should cover the following aspects:
    - Develop mitigation plans that include acreage, geomorphic setting and habitat type of waters of the U.S. that would be created or restored to mitigate for unavoidable impacts.
    - Identification of how mitigation would compensate functionally for all unavoidable losses from the projects.
    - Existing water budget and water sources to maintain the mitigation area.
    - Grading plan, based on a natural wetland reference.
    - Revegetation plans, including the numbers, density and age of each species to be planted, as well as special techniques that may be necessary for planting.
    - Maintenance and monitoring plans, including performance standards to determine mitigation success.
    - Size and location of mitigation zones.
    - Parties that would be ultimately responsible for the mitigation plan success.
    - Contingency plans that would be enacted if the original plan fails.
    - Long-term maintenance plan.
- Mitigation implementation should be in advance of or concurrent with impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation.

Wildlife

- Will the EIS assess potential indirect impacts to fish, mammals, and turtles that may result from changes in water movement, sediment transport, and shoreline erosion?
- Will the EISs comprehensively address the interconnections between the benthic and fisheries and avian resources?
- The south end of the lake has been used by 4x4 vehicles and target practice, which makes ruts and possibly disturbs nesting sites for local birds. When the lake is drawn down, there will be much more land for these groups to abuse.
- What will be the likely effect on wildlife of the sulfurous sediments after drawdown?

- Deer, elk, cougars and other wildlife and fowl depend upon the lake for water—how will their access be affected by finding the lake 80 feet lower? Will they still have access?
- Will the EIS describe the current quality and potential capacity of habitat, its use by fish and wildlife in the Yakima River Basin, and identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation?
- Will the EIS evaluate effects on fish and wildlife from habitat removal and alteration, aquatic and terrestrial habitat fragmentation caused by roads, land use, and management activities, and human activity?
- How will the EIS describe the impacts to migratory birds? Species, number, type of use, and spatial and temporal patterns of use should be described.
- EIS should address bird migration, bird flight during storms, foul weather, and/or fog conditions, food availability, predation, and benthic habitat and benthic food sources.
- The EIS should be thorough not only in documenting the footprint of the project, but the full extent of its impact on terrestrial and aquatic habitats at a site scale and landscape scale.
- Altered reservoir elevations, and the timing and rate of filling and drafting reservoirs have potential to adversely affect shorebird and waterfowl populations in the project area. There is need to assess habitat with respect to timing and rate of pool elevation changes within the reservoirs and their shorelines. Include an assessment of how riverine wetlands and associated waterfowl and shorebirds will be affected by changes in flow quantity and timing of flow releases with a focus on nesting impacts.
- The EIS should assess how changes in water supply will affect wildlife.
- IP actions, which occur within and adjacent to NWFP lands, needs to be consistent with the conservation objectives of the NWFP. The U.S. Fish and Wildlife Service recommends that the development of action alternatives in the EIS be coordinated with the OWNF to ensure these NWFP-based conservation strategies remain intact. The Service has devoted significant resources toward the successful implementation of the NWFP, as well as land exchanges, land purchases, habitat conservation plans, and other conservation agreements in Kittitas County. The Service wants to ensure our investments are complemented by IP actions. Please assess in your EIS, and associated biological assessments, how these existing conservation efforts will be affected by IP actions.
- WSDOT requests more detailed information on the location and depth of the tunnel crossing. It is imperative that the conveyance projects be coordinated with Phase 2B of the highway project for construction timing and sequencing in relation to any wildlife crossings.

- Need to ensure that Connectivity Emphasis Areas (CEAs) and other existing highway structures, including bridges and drainage features, are protected. CEAs are areas within the I-90 corridor that WSDOT has invested public funds into bridges, habitat restoration, fish and wildlife connectivity, and hydraulic connectivity within the highway footprint.
- Would the gravity tunnel alternative provide better opportunities to increase instream flows for fish and wildlife?

Threatened and Endangered Species

- Will an assessment of fisheries and benthic impacts specifically address the requirements for an Essential Fish Habitat Assessment per the Magnuson Stevens Act?
- The EIS should describe the critical habitat for species; identify impacts on species and their critical habitats; and show how the projects will meet all requirements under the ESA. The EIS should include a mitigation plan with detailed steps to take to reduce or eliminate adverse impacts.
- Describe in the EIS how the KKC and KDRPP would modify the operations and maintenance (O&M) of the storage and release of water, including changes in bull trout access from the reservoir into and out of spawning tributaries such as Box Canyon, Kachess River, and Gold Creek.
- Assess the potential for bull trout passage though both reservoir pools and into spawning tributaries (and back) by developing a reservoir elevation frequency analysis over drought, average, and above average water years, under both current and proposed operations.
- The EIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the analysis area. The EIS should describe the critical habitat for the species and identify any impacts the projects would have on the species and their critical habitats.
- There is concern that the new outlet works may increase the incidence of entrainment and diversion of bull trout from Keechelus Reservoir, into Kachess Reservoir. It is not indicated if fish screens will be installed to preclude diversion of bull trout from Keechelus Reservoir into Kachess Reservoir and what screening methods are to be used. Diverting bull trout between reservoirs should be avoided or mitigated.
- The potential adverse impacts to juvenile and adult bull trout passage to and from the Kachess and Keechelus under different water-year scenarios should be examined to assess potential adverse impacts on all life histories of bull trout, including migration to and from tributaries utilized for spawning and rearing. There is need to investigate how bull trout use and access to Gold Creek, Cold Creek, in Keechelus Reservoir and Box Canyon Creek, Mineral Creek, and Kachess River and other tributaries might be affected, and how access can be maintained.

- Ramping criteria must also be established to avoid increased incidence of stranding of fish and wildlife along the margins of the pool during pool drawdown in lower Kachess Reservoir.
- There should be a discussion of alternatives to improve bull trout access into tributaries from both the Keechelus Reservoir and Kachess Reservoir, which might involve structural channel modifications or supplementing streamflows via pumping, or using pressurized pipe from the Kachess and Keechelus pipeline via multiple discharge points. Bull trout access must be maintained at equal or better efficiency.
- The full reservoir drawdown associated with accessing the currently inactive storage could impact connectivity between Box Canyon and Kachess Reservoir. Box Canyon Creek is important for bull trout. The EIS should provide a quantitative analysis of the seasonal impacts of reservoir drawdown under different water year types on bull trout.
- Will the EIS identify the endangered, threatened, and candidate species under the ESA, describe critical habitat for these species, and identify impacts from construction?
- Will the EIS address whether northern spotted owls are present on nearby National Forest lands, State Department of Natural Resources lands, or private forestry lands and whether the species or individuals of the species may be affected by construction and operational activities?
- What impacts would the proposed projects, including construction and operation have on the Pacific Lamprey and its recovery?
- IP actions, which occur within and adjacent to NWFP lands, needs to be consistent with the conservation objectives of the NWFP. The U.S. Fish and Wildlife Service recommends that the development of action alternatives in the EIS be coordinated with the OWNF to ensure these NWFP-based conservation strategies remain intact. The Service has devoted significant resources toward the successful implementation of the NWFP, as well as land exchanges, land purchases, habitat conservation plans, and other conservation agreements in Kittitas County. The Service wants to ensure our investments are complemented by IP actions. Please assess in your EIS, and associated biological assessments, how these existing conservation efforts will be affected by IP actions.
- Pipeline excavation materials could potentially be used for environmental benefits—nearby habitat restoration projects that could use fill materials are currently in the assessment phase. Project mitigation measures could be enhanced by integrating disposition of earthen materials for the benefit of an endangered species habitat restoration project.
- Without consultation first occurring on the IP O&M, the USFWS will be unable to develop a credible or defensible environmental baseline or assess ongoing activities as part of its jeopardy analysis.

Visual Quality

- The EIS should explicitly describe how lowering Lake Kachess another 80 feet and exposing the sulfurous sediments does not alter the "intact appearance" of the lake.
- The lake is at the base of the Alpine Lakes area and needs to be protected as part of the intention to preserve the natural landscape insofar as possible for posterity.
- The EIS should explicitly describe the expected visual disturbances associated with the proposed pumping station on the East shore of Lake Kachess, including the building facilities, effects of artificial lighting, and frequency of O&M activities.
- How will the EIS address visibility of any proposed project and need for landscaping or buffers? How will the EIS assess effects of light and glare from construction on adjacent properties and communities?

Air Quality

- How would dust abatement be handled?
- The protection of air quality should be addressed in the EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related VOC and NOx emissions, should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities and ongoing operation of the roadways are important concerns. The EIS should detail mitigation steps to take to reduce associated impacts and address and disclose the projects' potential effects on all criteria pollutants under the National Ambient Air Quality Standards, including ozone; visibility impairment, and air quality related values in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.
- How will the EIS evaluate the project's potential impacts on existing air quality during construction?
- How will the EIS evaluate the project's compliance with the Clean Air Act requirements for construction and operation phases?
- How would construction of the project contribute to carbon footprint?

Climate Change

- Exactly what process will Ecology follow in making the determination of a drought?
- How would construction of the project contribute to climate change gases?

- The NEPA analysis should consider how resources affected by climate change could potentially influence the proposed projects and vice versa, especially within sensitive areas.
- The EIS should discuss climate change effects in the context of water supply and availability to meet demands within the analysis area and vicinity. Climate change impacts on runoff, snowpack, recharge and discharge, as well as reliability may influence the projects. At a minimum, the EIS should include a qualitative discussion of impacts of climate change to water supply in the local area, implications of the proposed projects, and water conservation measures to implement to reduce water demands.
- What plans and proposals are in place for the occurrence of drought conditions throughout the Yakima Valley, including the upper basin?
- What studies and research has been done to provide an expected impact on the upper basin should drought conditions or lesser snow pack become more frequent due to global warming and its effects?
- What provisions, if any, are provided to protect the upper basin residents from the possibility of drought due to the reallocation of more water through this proposed plan?
- How will climate change affect the project during drought years?
- The EIS should consider how resources affected by climate change could potentially influence the proposed project and vice versa, especially within sensitive areas.

Noise

- Blasting may be required in some areas, resulting in increased noise and related effects to local residents and wildlife, including disruption, displacement, and possible death of some wildlife species. The ElS should discuss where blasting would be needed, blasting methods that will be used, and how the adverse effects of blasting will be controlled and mitigated.
- The EIS should address the noise levels from the pumping plant.
- What plans are in place to minimize construction impacts of the project such as pollution, road maintenance, increased traffic volume and resulting noise?
- How will the EIS address the potential for underwater noise and vibrations associated with construction and operation of the facilities, and the potential for adversely affecting fish and mammal habitats and migration?
- Will the EIS evaluate noise-generating activities associated with construction and ongoing operations, including traffic to and from any project site?

Recreation

- The south end of the lake has been used by 4x4 vehicles and target practice, which makes ruts and possibly disturbs nesting sites for local birds. When the lake is drawn down, there will be much more land for these groups to abuse.
- How will the drawdown affect the public campground and private property on the shores of Lake Kachess?
- Such a drawdown would have significant negative effects on property owners who use their beachfront recreationally as well as the large numbers of members of the public who use the Kachess Campground to the north.
- A much smaller lake will certainly adversely impact the users of the State Park on the west side of the lake.
- How will the early summer drawdown impact lake access?
- Will the boat launch at the state park be extended to allow use of the boat launch when the water level has dropped?
- The area around the makeshift boat launch at the south end of the lake has been used by campers with no respect to private property. They have destroyed trees, left trash, built illegal campfires, have drinking parties, and shoot guns. There should be more protection at the reservoir. Campers should have a permit for a short period, 5 days, but not allowed to stay for months at a time.
- Will the EIS address the potential for increased litter?
- Will the EIS address the disposal of solid waste?
- These projects would result in the complete devastation of fishing, boating, and recreation on the lake due to mud flats and lack of lake access.
- Except in times of a significant and sustained drought emergency, enough water should be left in the lake for recreational use.
- All three upper Yakima River reservoirs host popular recreational fisheries. Kokanee, rainbow trout, cutthroat trout, mackinaw, and burbot are all popular fishing targets in these waters. The overall level and success of recreational fishing needs to be maintained or improved. Access to the lake at various pool levels must be maintained to the extent possible.
- Would this pipeline further restrict public access to recreational areas of the reservoirs and their surrounding environs?
- Have considerations been made to ensure no undertow would exist, presenting a potential danger to residents and tourists partaking in Lake Kachess recreational activities?

- The full reservoir drawdown associated with accessing the currently inactive storage could impact connectivity between Box Canyon and Kachess Reservoir. Box Canyon Creek is utilized by whitewater paddlers. The EIS should provide a quantitative analysis of the seasonal impacts of reservoir drawdown under different water year types on this resource.
- How will the EIS address the proposed project's impacts on recreational use of the Yakima River, its tributaries, and the Keechelus, Kachess, and Cle Elum reservoirs?
- The overall level and success of recreational fishing needs to be maintained or improved.
- Access to the lake at various pool levels must be maintained to the extent possible.
- Tourism in these areas feeds and sustains the local economy and residents of these rural communities rely on the income it provides.

Land and Shoreline Use

- The Teanaway acquisition should be included in the plan area.
- The EIS should assess how changes in water supply will affect residential and agricultural development throughout the Yakima basin.
- Wilderness or other appropriate designation should also be sought for USFS roadless areas in the Teanaway, in the area between Kachess and Cle Elum Lakes, and in the upper reaches of Manastash and Tanuem Creeks in order to protect headwaters streams, snow pack, and forests.
- The EIS should include information explaining anticipated activities in floodplains, alternatives considered, and steps taken to reduce impacts to floodplains.
- The EIS should document all land cover and uses within the analysis area, potential impacts due to the projects, and mitigation measures to reduce impacts.
- The EIS should discuss impacts to farmlands and include acres affected and crops that could be lost.
- The EIS should describe the impacts to open land use types, indicate if the impacts would be permanent or temporary, and list measures to mitigate impacts.
- The EIS should include data on the properties that would be involved (type of ownership, acreage, current and anticipated use), nature and extent of impacts to the properties (e.g., land use changes), and measures to minimize impacts.
- The EIS should discuss the acquisition process, including compensation and methods to address the extent of necessary participation.

- The conceptual pipeline alignment would cross parcels owned by the Kittitas Conservation Trust (KCT) that were acquired with “Section 6” Federal funds and would require coordination with KCT, WA State Department of Natural Resources, and the National Park Service before crossing the lands.
- Could a project such as this set precedence for future development and growth in these protected areas?
- How will the EIS address compliance with land-use laws, plans and policies?
- How will the EISs address compliance with the State Shoreline Management Act?
- What is the State Shoreline Management Act (SMA) environmental designation for the Kachess Reservoir shoreline? For the Keechelus Reservoir shoreline?
- What are the policies and goals for the SMA environmental designations? What substantial development permits would be required?
- The EIS should discuss how the proposed actions would support or conflict with the objectives of Federal, State, Tribal or local land use plans, policies and controls in the analysis area and vicinity. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. If an appropriate government body has proposed plans in writing, but the plans are not yet fully developed, address them. The EIS should also address existing constraints in the analysis area and how the land uses will impact the proposed projects.
- The EIS must document and detail the land allocations covered by actions, consistent with existing national forest policy (including Northwest Forest Plan (NWFP), Snoqualmie Pass Adaptive Management Area Plan, Land Management Plan, Aquatic Conservation Strategy, Roadless Rule, and all species recovery plans). The Aquatic Conservation Strategy states that all actions must “maintain or enhance” watershed health with court-tested reference to the need to do so in both the short- and long-term. Therefore, actions must include mitigation in both the immediate and long-term to temporally offset impacts to the watershed health (i.e. sedimentation from roads and construction). The EIS should also seek consistency towards objectives as being proposed in the Okanogan-Wenatchee National Forest (OWNF) Plan under revision now. The EIS should also ensure close coordination with the analysis and proposed actions of the Upper Yakima Restoration Project. The Snoqualmie Pass Adaptive Management Area is already in exceedance of its stated road density standards, and this project must detail any contribution (negative and positive) it makes to meet the standards set for this landscape in the short- and long-term.

- The EIS should address potential direct, indirect and cumulative impacts of hazardous materials from construction and operation of the projects, as well as mitigation measures.
- The EIS should address issues related to prevention of potential spills and leaks, and their cleanup.
- Will the EIS include a description of the potential for spills of contaminants into waters of the United States and the measures such as an emergency response plan to mitigate impacts?
- If the proposed projects would use pesticides and herbicides to control vegetation where needed, the EIS should address any potential toxic hazards related to the application of the chemicals, and describe actions to take to assure that impacts by toxic substances released to the environment will be reduced.

Utilities

- Since construction and operation of the projects may impact sources of drinking water, the EIS should include the following information:
    - Source water protection areas within the analysis area.
    - Activities that could potentially affect source water areas.
    - Potential contaminants that may result from the proposed projects.
    - Measures that would be taken to protect the source water protection areas.
- What consideration has been given to residents who currently pump water from the lake? Would these residents be compensated for needed extensions to existing waterlines and possible upgrades to household pump systems?
- Where will the pumping plant be located and who will manage and maintain it?
- The EIS should include a full discussion of the means and methods of construction of the Pump Station intake for the KDRPP, addressing all the potential impacts and proposed means to reduce and/or mitigate those impacts.
- In order to regulate the KKC tunnel, will electricity and computers be required at all times to avert flooding or other issues?
- Who will supply the power for the pumping units and who will pay for the power?
- Water running by gravity through a pipe creates the opportunity for hydropower at the outlet. This should be addressed in the EIS, as well as at other locations where there is a head of water to offset energy requirements of the pump station for the KDRPP.

- What will be the need for additional public services, including public safety and emergency services, during the proposed construction of the project?
- What impacts to local school systems in the Yakima River basin can be expected?
- How will housing needs for construction crews and employees be addressed? Where will employee construction housing be developed?
- The EIS should describe measures to take to reduce chances of such accidents occurring, and respond to an emergency resulting from potential occurrence of any accident.
- Will the EIS address the potential for increased litter?
- Will the EIS address the disposal of solid waste?
- Water running by gravity through a pipe creates the opportunity for small hydropower at the outlet. This should be addressed in the EIS, as well as at other locations where there is a head of water to offset energy requirements of the pump station for the KDRPP.

Transportation

- The T1 Alternative option would disturb residents along Lake Kachess Road and those trying to access properties adjacent to Kachess Reservoir during construction and should be addressed.
- The EIS should include data about existing and new roads and evaluate the change in road miles and density that will occur because of the projects.
- What plans are in place to minimize construction impacts of the project such as pollution, road maintenance, increased traffic volume and resulting noise?
- WSDOT requires that the construction technique planned for the highway crossing of the tunnel be identified and that the details of this technique and alternative techniques being considered are reviewed by WSDOT.
- No direct access to I-90 will be allowed. Access to either side of the highway shall be via the Stampede Pass Interchange. WSDOT has construction activities planned for the segment of I-90 between Keechelus Lake and the Cabin Creek Interchange well into 2020. These activities will include traffic control. To minimize construction activity conflicts between the highway projects and the conveyance project, we highly discourage using the existing US Forest Service/Bureau of Reclamation access connection at Highway Engineer's Station 1507+00 for construction access. WSDOT requests that the anticipated construction site access locations for both sides of the highway be identified.

- The EIS should include an analysis of potential changes in road access along the conveyance route.
- Traffic issues and controls need to be addressed.
- Road 4818 is designated as a passenger car road; will the road be maintained for passenger car use in the future? This road is also the only access for fire-fighting personnel to reach the east side of the lake.
- How long will this project take to complete?
- What steps will be taken to allow residents access to their property 24 hours a day/7 days a week (i.e. during construction and once new drainage system is in place). If access to private property will not be allowed, what compensation for loss of use will be provided?
- Will the EIS identify existing traffic levels and transportation infrastructure, impacts of the proposed projects on potential increases in traffic accidents, additional maintenance, and minimization of traffic impacts?
- How many vehicle trips would be generated, including trips by employees and service and delivery vehicles, from the proposed projects?
- Will the EIS evaluate the level of service and overall traffic generation from various activities at the proposed project sites?
- Will there be congestion at the interchanges serving the proposed project?
- Where would borrow and disposal sites be and what would be the impacts from transportation of borrow and spoil materials?

Cultural Resources

- The EIS should describe the process and outcome of Government-to-Government consultation between Reclamation and each Tribe potentially affected by the projects, issues that were raised, if any, and how those issues were addressed.
- Will the scope of the cultural resources analysis include identifying all historic properties or cultural resources potentially impacted by the projects or associated offsite development, including traditional cultural properties, other native cultural resources, and nonnative historic properties? What are the impacts of the project and associated offsite development (e.g., housing, amenities) to cultural resources?
- How will historical Tribal uses of this area be factored in, including impacts to sacred sites and fishing grounds?
- How will the project affect the cultural heritage of the area?

Socioeconomics

- Executive Order 13112, Invasive Species, mandates that Federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species may cause.
- Exactly what process will Ecology follow in making the determination of a drought?
- The EIS should assess how changes in water supply will affect residential and agricultural development throughout the Yakima basin.
- How will the quantity of water improve conditions for agriculture during drought years?
- How long will this project take to complete?
- What will be the total cost of the project?
- Who will pay for the project?
- Who will pay for operation and maintenance of the system when the proposed program to use the water is not possible?
- Has the cost of the mitigation for the loss of resident fishery been determined?
- What is the repayment obligation for the drought year water supply?
- Private property devaluation would be substantial.
- If the Kittitas Reclamation District (KRD) is the principle beneficiary of this project, would the KRD be required to pay the full cost of the project? Would they be required to pay the O&M?
- The EIS should include a cost/benefit analysis comparing agricultural water conservation vs. the KDRPP proposal.
- Water supply benefits and their economic repercussions, should be individually identified to evaluate how much of the programmatic objectives will be accomplished with this project.
- What additional crop production will result from keeping prorated water availability > 70%, and how many years of such additional crop production would be required to pay off the $4 billion investment?
- It is helpful to have a neutral measure to evaluate projects on a cost-benefit basis.
- The EIS should represent a balance of public interests between the needs of users and the needs of fish and wildlife and the local economic activity they generate.

- What research and studies have been done to consider how each EIS would be altered when compared to its counterparts and, when standing alone, should certain components fail to be completed as proposed?
- Tourism in these areas feeds and sustains the local economy and residents of these rural communities rely on the income it provides.
- The individual benefit and cost analysis for this specific project should be shown.
- Will a comprehensive economic analysis be undertaken to identify potential effects of the proposed project on the Yakima River basin?
- Will the demand for hotel rooms in the Yakima River basin be calculated?
- How many jobs will be created; at what wage levels? What percentage of work would be reserved for local contractors?
- What will be the consequences on property values and property taxes in the Yakima River Basin?
- How will the project impact existing restaurants, hotels, motels, RV facilities, and other overnight tourism lodging facilities?
- Will the EIS assess the current social and economic impacts of not having adequate public and essential commercial services (e.g., housing, medical, emergency) for current and future workers?
- How will effects on quality of life, including community character, demographics, and small-town atmosphere, be assessed?
- Will the potential dislocation of current residents due to an increased cost of living be considered?
- The impacts analysis should including construction, operation, and maintenance costs.
- The proposed EISs must provide information and analysis that would allow decisionmakers and the public to determine whether there are other less environmentally damaging alternatives with lower financial costs.

Environmental Justice

- The EIS should include an evaluation of environmental justice populations within the geographic scope of the projects.
- Will the EIS assess whether low income or people of color communities will be impacted by the proposed project and disclose what efforts were taken to meet environmental justice requirements consistent with Executive Order (EO) 12898?

Cumulative Effects

- In the Final Programmatic EIS for the Integrated Plan, the impacts of many basinwide issues are glossed over to be "dealt with later in project specific EISs." Therefore, the scope of this EIS must be broad enough to address these basinwide impacts and not be limited to only local site-specific impacts.
- Executive Order 13112, Invasive Species, mandates that Federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species may cause.
- The EIS analysis should include the following information and effects of the projects, individually or together, on:
    - Construction and normal and maintenance operations of the I-90 Snoqualmie Pass East project.
    - Key habitats and related corridors associated with crossings identified for this project.
    - Species that use the habitats, particularly fish and ESA species.
    - Habitat loss, including types and function.
    - Measures to take to minimize impacts.
- Coordinate efforts with Washington State Department of Transportation (WSDOT) and other agencies with ongoing projects to reduce the effects and protect resources, such as wetlands mitigation, maintenance of habitat connectivity, and fish passage restoration.
- WSDOT has construction activities planned for the segment of I-90 between Keechelus Lake and the Cabin Creek Interchange well into 2020. These activities will include traffic control. To minimize construction activity conflicts between the highway projects and the conveyance project, we highly discourage using the existing US Forest Service/Bureau of Reclamation access connection at Highway Engineer's Station 1507+00 for construction access. WSDOT requests that the anticipated construction site access locations for both sides of the highway be identified.
- The EIS should assess impacts over the entire area potentially affected by similar impacts (e.g., hydrology, wetlands, and habitat), and to consider the effects of other past, present and future projects together with the proposed action, including those outside the jurisdiction of the lead agency. Where adverse cumulative impacts may exist, the EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
- The EIS should clearly identify the resources that may be cumulatively impacted, the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed project.

- For each resource analyzed for cumulative impacts, the EIS should identity the current condition of the resource as a measure of past impacts.
- Identify the trend in the condition of the resource as a measure of present impacts.
- Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends.
- Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives.
- Identify opportunities to avoid and minimize impacts, including working with other entities. Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
- The EIS should address potential cumulative impacts of hazardous materials from construction and operation of the projects.
- This EIS must deal with all impacts as part of the Integrated Plan and fully consider the cumulative effects on the entire Yakima River Basin by the Integrated Plan.
- The EIS should include a detailed discussion of the cumulative effects from road construction and other projects on the hydrologic conditions of the analysis area and vicinity. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to groundwater and surface water resources. The EIS should identify potentially affected groundwater aquifers, any potential for subsidence, as well as impacts to seeps and springs or other open water bodies and biological resources.
- The EIS should assess impacts over the entire area potentially affected by similar impacts (e.g., hydrology, wetlands, and habitat), and to consider the effects of other past, present, and future projects together with the proposed action, including those outside the jurisdiction of the lead agency. Where adverse cumulative impacts may exist, the EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
- The EIS should clearly identify the resources that may be cumulatively impacted, the time over which impacts are going to occur, and the geographic area that will be impacted by the projects.

Process/Scope

- In the Final Programmatic EIS for the Integrated Plan, the impacts of many basinwide issues are glossed over to be "dealt with later in project specific EISs." Therefore, the scope of this EIS must be broad enough to address these basinwide impacts and not be limited to only local site-specific impacts.

- The Yakima Integrated Plan Final Programmatic EIS failed to provide specific responses to scoping comments on the Integrated Plan.
- The purpose and need should adopt a recognition that all actions should contribute to or neutrally effect ecological connectivity (aquatic and terrestrial).
- The scope of the EIS must be broad enough to address basinwide impacts; not be limited to site-specific impacts.
- The purpose and need statement for each project should explain the role of each within the Yakima Basin Integrated Plan.
- The EIS should discuss the means by which the IP will be managed to ensure that all of the elements of the IP will be developed.
- Will the EIS disclose the relationship of the Citizens Advisory Group to the establishment of the Yakima Workgroup?
- The EIS should include a discussion of the role of the IP Workgroup and IP Implementation Committee. The membership of these two groups should be listed and identified by affiliation.
- A listing and summary of all Workgroup Implementation Committee meetings should be included in the EIS.
- Will the EIS disclose all meetings of the Yakima Workgroup Executive Committee, the minutes from those meetings, and how public notice was given?
- The proposed EIS must provide information and analysis that would allow decisionmakers or the public to determine whether there are other less environmentally damaging alternatives with lower financial costs.
- Evaluate how much of the programmatic objectives will be accomplished with this segment of the overall Integrated Plan.

Other Impacts/Issues

- The EIS should include a full discussion of the means and methods of construction of the outfall, discharge feature of the KKC, addressing all the potential impacts and proposed means to reduce and/or mitigate those impacts.
- What impacts would occur due to locating a new discharge structure on the left bank of the Kachess River?
- A comment submitted in 2012 to the Final Programmatic EIS noted, "The 1998 DEIS on the YRBWEP stated a goal of '165,000 acre-feet of water savings in 8 years' under the Basin Conservation Program. This EIS should address whether this goal has been achieved, and if it has not been demonstrably achieved, the EIS should justify creation of additional water resources in the absence of conservation efforts.

- What will be the future maintenance requirements to coming generations? In order to regulate the KKC tunnel, will electricity and computers be required at all times to avert flooding or other issues and what burden does that place on future generations?
- Access to additional storage in Kachess Reservoir should be conditioned based on implementation of performance-based conservation measures. Please provide an overview of any legal or policy barriers to this approach in the EIS.
- The EIS should list all Reclamation-approved water conservation plans for the Yakima River Basin.
- Each EIS should include the likely O&M activities associated with the constructed projects.

Recommended Alternatives

- The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process. This will ensure that the EIS provides the public and the decisionmaker with information that sharply defines the issues and identifies a clear basis for choice among alternatives as required by NEPA. This applies even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS for the proposed actions. The Environmental Protection Agency (EPA) encourages selection of alternative(s) that will minimize environmental degradation.
- The project design should include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The EIS document should describe the monitoring program and its use as an effective feedback mechanism so that adjustments can be made to meet environmental objectives throughout the life of the project.
- Water running by gravity through a pipe creates the opportunity for small hydropower at the outlet. This should be addressed in the EIS, as well as at other locations where there is a head of water to offset energy requirements of the pump station for the KDRPP.
- A comprehensive and mandatory conservation program in the Yakima River basin should be fully presented that provides the same amount, 200,000 acre-feet, of water as the proposed construction projects, without either the environmental impacts or financial cost.
- The EIS should evaluate potential conservation efforts for agricultural water users.
- Canals and ditches should be lined to conserve water.

- A gravity tunnel should be presented for the KDRPP.
- For the KKC Project, all three pipeline and all three tunnel alternatives must be full described and all impacts enumerated.
- The EIS should examine an alternative that ensures the ability to meet Yakima basin IP flow targets of 450-500 cfs in the upper Yakima in dry, normal, and wet years. It is not clear whether the alternative proposed in the scoping documents can be relied on to accomplish this goal in wet years.
- Regarding a combined alternative where both KKC and KDRPP are in operation—the EIS should examine the ability of the KKC to help refill Kachess Reservoir after it is drawn down, and ensure that it is sized to maximize its reservoir refill benefits as well as its instream flow benefits. This could involve examining an additional alternative that conveys more than 500 cfs during spring runoff while also accounting for the need for channel maintenance flows in the upper Yakima River.
- The EIS should determine if the KKC could be used in non-drought years to help meet downstream flow targets during any season in which it might help.
- The EPA recommends that the EIS include evaluation of HDD as one of the potential methods to install the pipeline. This method can help avoid impacts to aquatic resources. HDD entry and exit points should be located outside sensitive areas e.g., wetlands; installation of the pipe should be at an appropriate depth belowground; and work areas should be located outside of the 100-year floodplain areas. In addition, installing a casing near surface formations susceptible to fracturing during drilling would seal off permeable formations and reduce impacts in highly permeable unconsolidated materials.
- The EIS should consider alternatives that would reduce impacts to the lake and reservoir, such as locating the pipeline away from these waterways.
- The EIS should consider alternatives that use different existing technologies, such as HDD to avoid impacts to affected waterways.
- How could smaller-scale agriculture projects and smaller-scale dam improvements that help fish habitat and instream flow compare with the large-scale tunnel approach?
- A siphon should be considered as an alternative.
- Enhanced Water Conservation alternative—the EIS should include an alternative of maximum water conservation efforts, in addition to the 170,000 acre-feet proposed under the Integrated Plan.
- Municipal and Domestic Conservation alternative—how much water could be conserved by ending the exempt well provisions under Washington water law?

- Would not a Market-Based Reallocation of Water Resources alternative alone have the capacity to meet the irrigation "goals" of the Yakima Plan?
- Crop Selection alternative—which Yakima basin crops are most drought-resistant? Which are least drought-resistant?
- Market-Value Water Pricing—what would be the true costs of irrigated crops if farmers had to pay market rates for water and power delivery?
- Crop Insurance alternative—what is the status of crop insurance availability to address crop losses during a drought?
- Aquifer Storage alternative—what is the status of aquifer storage in the Yakima basin?
- Forest Practices alternative—will the EIS look at halting timber harvesting in the Yakima basin to retain more snowpack and improve instream flows throughout the summer above the reservoirs?
- Any EIS must include a nonstructural alternative including both water conservation and water marketing to provide the public and Congress with a fair comparison and range of choices.

Anticipated Scope of the EIS

Except as noted here, the EIS will evaluate the concerns and issues identified in the scoping comments summarized above for each of the listed resources. The level of analysis and documentation in the EIS will be based on the alternatives and potential for significant impacts. The following resources will be evaluated in the EIS:

- Surface Water Resources

  Note: The EIS will not list all approved water conservation plans because these details are not sufficiently related to the alternatives and the potential for significant impacts.
- Earth
- Surface Water Quality
- Groundwater
- Fish
- Vegetation and Wetlands

  Note: The EIS is not expected to contain detailed mitigation plans that include elements such as water budget, water sources, grading plans, planting plans, and/or revegetation plans.
- Wildlife
- Threatened and Endangered Species
- Visual Quality

- Air Quality

  Note: The EIS will not conduct an analysis of the carbon footprint of the proposal because these details are not sufficiently related to the potential for significant impacts.
- Climate Change
- Noise
- Recreation
- Land and Shoreline Use
- Utilities
- Transportation
- Cultural Resources
- Indian Sacred Sites
- Indian Trust Assets
- Socioeconomics

  Note: The EIS will not include a detailed economic cost/benefit analysis; nor will it attempt to weigh water conservation measures versus the proposed projects. Substantial water conservation initiatives are already proposed as part of the Integrated Plan. Water conservation is understood to be part of the comprehensive solution for the Yakima Basin; conservation is not an alternative to the proposed projects.
- Environmental Justice
- Cumulative Effects

  Note: The EIS will not reevaluate cumulative effects of the overall Integrated Plan that have been evaluated previously at a planning level in the March 2012, Yakima River Basin Integrated Water Resource Management Plan Final Programmatic EIS. The cumulative effects evaluation will instead focus on effects of the proposed projects in combination with other consequential federal, state, local, and private actions.

The Kachess Drought Relief Pumping Plant and Keechelus-to-Kachess Conveyance are intended to:

- Reduce high flows from Keechelus Dam into the Yakima River during the irrigation season to improve rearing habitat for steelhead and spring Chinook upstream of Lake Easton;
- Increase stored TWSA available for agricultural, municipal and domestic, and instream uses;
- Improve capabilities for refilling Kachess Reservoir in dry years; and
- Access previously unavailable stored water in Kachess Reservoir for use during drought periods.

The EIS will not advance alternatives for detailed analysis in the EIS that do not satisfy or approximate these adopted purposes of the proposed action. Substantial initiatives to promote water conservation, water marketing, aquifer storage, improved land management, and terrestrial and aquatic habitat improvements are already proposed for implementation as part of the Integrated Plan. Because these are understood to be part of the comprehensive solution for the Yakima Basin alongside the proposed projects, they are not considered alternatives to the proposed projects. Thus, water conservation, water marketing, alternative agriculture and cropping, aquifer storage, new forest designations and practices, and related suggestions likely will not receive detailed assessment in the EIS.

The NEPA *Notice of Intent*, SEPA *Determination of Significance*, press release, and comment letters are attached to this report, along with handouts from the meetings.

Attachments

- **Notice of Intent**
- **Determination of Significance**
- **News Release**
- **Scoping Meeting Handouts**
- **Comment Letters**

DEPARTMENT OF THE INTERIOR

Bureau of Reclamation

[XXXR0680R1 RR.R0336A1R5WRMP01.03 RR01113000]

Notice of Intent To Prepare an Environmental Impact Statement and Public Scoping Meetings for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage, Yakima River Basin Water Enhancement Project, Integrated Water Resource Management Plan, Kittitas County, Washington

AGENCY: Bureau of Reclamation, Interior.

ACTION: Notice.

SUMMARY: The Bureau of Reclamation intends to prepare an Environmental Impact Statement (EIS) for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and the Kachess Reservoir Inactive Storage projects. The Washington State Department of Ecology will be a joint lead agency with the Bureau of Reclamation in the preparation of this EIS. The Bureau of Reclamation is requesting public comment and agency input to identify significant issues or other alternatives to be addressed in the EIS.

DATES: Submit written comments on the scope of the EIS on or before December 16, 2013.

Two scoping meetings, combined with open houses each day, will be held on the following dates and times:

- November 20, 2013, 1:30 p.m. to 3:30 p.m., and 5:00 p.m. to 7:00 p.m., Yakima, WA.
- November 21, 2013, 1:30 p.m. to 3:30 p.m., and 5:00 p.m. to 7:00 p.m., Cle Elum, WA.

ADDRESSES: Send written scoping comments, requests to be added to the mailing list, or requests for sign language interpretation for the hearing impaired or other special assistance needs to Ms. Candace McKinley, Environmental Program Manager, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901; or email *yrbwep@usbr.gov.*

The scoping meetings and open houses will be located at:

- Yakima—Yakima Area Arboretum, 1401 Arboretum Way, Yakima, WA 98901.
- Cle Elum—U.S. Forest Service (Cle Elum Ranger District Conference Room), 803 W 2nd Street, Cle Elum, WA 98922.

FOR FURTHER INFORMATION CONTACT: Ms. Candace McKinley, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901; telephone (509) 575–5848, ext. 232; facsimile (509) 454–5650; email *yrbwep@usbr.gov.* Persons who use a telecommunications device for the deaf may call the Federal Relay Service (FedRelay) at 1–800–877–8339 TTY/ASCII to contact the above individual during normal business hours. The FedRelay is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours. Information on this project may also be found at: *http://www.usbr.gov/pn/programs/yrbwep/index.html.*

SUPPLEMENTARY INFORMATION: The Bureau of Reclamation (Reclamation) is issuing this notice pursuant to the National Environmental Policy Act of 1969, as amended (NEPA), 42 U.S.C. 4321 *et seq.;* the Council on Environmental Quality's (CEQ) regulations for implementing NEPA, 43 CFR Parts 1500 through 1508; the Department of the Interior's NEPA regulations, 43 CFR Part 46, and the Washington State Environmental Policy Act.

Background

On July 9, 2013, the Record of Decision (ROD) for the Final Programmatic EIS (PEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) was signed. In the ROD, the Reclamation selected the Integrated Plan Alternative for implementation. The Integrated Plan Alternative is comprised of seven elements which were considered in the PEIS:

1. Reservoir Fish Passage;
2. Structural and Operational Changes;
3. Surface Water Storage;
4. Groundwater Storage;
5. Habitat/Watershed Protection and Enhancement;
6. Enhanced Water Conservation; and
7. Market Reallocation of Water Resources.

As described in the PEIS, Reclamation and the Washington State Department of Ecology (Ecology) will complete project-level, site-specific environmental review for actions within the Integrated Plan once the agencies are ready to move forward each action or groups of actions. For instance, with regard to the present NOI, Reclamation and Ecology have determined that it is appropriate to initiate the environmental review process with regard to the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Reservoir Inactive Storage projects.

These actions were previously evaluated at a programmatic level of analysis in the Integrated Plan PEIS (see chapters 2 through 5 of the PEIS available at: *http://www.usbr.gov/pn/programs/yrbwep/reports/FPEIS/fpeis.pdf*). That PEIS examined the effects of the overall Integrated Plan Alternative, which included the Keechelus Reservoir-to-Kachess Reservoir Conveyance and the Kachess Reservoir Inactive Storage projects. Now the agencies will prepare a project-level EIS for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and the Kachess Reservoir Interactive Storage projects and will tier to the Integrated Plan PEIS as provided for in the Council on Environmental Quality Regulations (40 CFR 1502.20, Tiering). The project-level environmental analysis to be conducted in this EIS will expand upon and add detail to those analyses already completed in the Integrated Plan PEIS.

The proposed, site specific actions to be evaluated in the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Reservoir Inactive Storage EIS are:

1. Transfer water through a tunnel from the Keechelus watershed to Kachess Reservoir. Two alternatives have been identified for a tunnel to convey water from Keechelus watershed to Kachess Reservoir. One would include construction of a new outlet works at the north end of Keechelus Dam connecting to a 10–12 foot-diameter, 3.7-mile-long, gravity flow tunnel. The other would include construction of a diversion structure on the Yakima River about 8,000 feet downstream of Keechelus Dam, connecting to a 10–12 foot-diameter, 3.2-mile-long, gravity flow tunnel. Both tunnel alternatives would discharge into Kachess Reservoir through a new structure located on the west shore; and

2. Release an additional 200,000 acre-feet of water from Kachess Reservoir during severe droughts by accessing inactive storage through additional outlet facilities. A substantial volume of water stored in Kachess Reservoir is currently inaccessible because it is below the elevation of the outlet works. This is referred to as inactive storage. An alternative being considered to access the inactive storage in Kachess Reservoir includes a new outlet works at a lower elevation in the reservoir connected by a tunnel to a pump station that would discharge to the Kachess River.

The objectives of these proposed actions are to increase the total water supply available from the Keechelus watershed for irrigation and instream flow, provide additional water for

proratable irrigation districts during severe drought conditions, and create more normal flows in the upper Yakima River between Keechelus Dam and Lake Easton to improve fish habitat.

At this time, there are no known Indian Trust Assets or environmental justice issues associated with the Proposed Actions.

Special Assistance for Public Scoping and Open House Meetings

If special assistance is required to participate in the public scoping and open house meetings, please contact Ms. Candace McKinley, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901; telephone (509) 575–5848, ext. 232; facsimile (509) 454–5650; email *yrbwep@usbr.gov.* Persons who use a telecommunications device for the deaf may call the Federal Relay Service (FedRelay) at 1–800–877–8339 TTY/ASCII to contact the above individual during normal business hours. The FedRelay is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours. All meeting facilities are physically accessible to people with disabilities.

Public Disclosure

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Dated: October 24, 2013.

Lorri J. Lee,

Regional Director, Pacific Northwest Region.

[FR Doc. 2013–25689 Filed 10–29–13; 8:45 am]

BILLING CODE 4310–MN–P

DEPARTMENT OF THE INTERIOR

Bureau of Reclamation

[XXXR0680R1 RR.R0336A1R5WRMP01.03 RR01113000]

Notice of Intent To Prepare an Environmental Impact Statement and Public Scoping Meetings for the Cle Elum Reservoir Pool Raise, Yakima River Basin Water Enhancement Project, Integrated Water Resource Management Plan, Kittitas County, Washington

AGENCY: Bureau of Reclamation, Interior.

ACTION: Notice.

SUMMARY: The Bureau of Reclamation intends to prepare an Environmental Impact Statement (EIS) on the Cle Elum Reservoir Pool Raise project. The Washington State Department of Ecology will be a joint lead agency with the Bureau of Reclamation in the preparation of this EIS, which also will be used to comply with requirements of the Washington State Environmental Policy Act (SEPA). The Bureau of Reclamation is requesting public comment and agency input to identify significant issues or other alternatives to be addressed in the EIS.

DATES: Submit written comments on the scope of the environmental impact statement on or before December 16, 2013.

Two scoping meetings, combined with open houses each day, will be held on the following dates and times:

- November 20, 2013, 1:30 p.m. to 3:30 p.m., and 5:00 p.m. to 7:00 p.m., Yakima, WA.
- November 21, 2013, 1:30 p.m. to 3:30 p.m., and 5:00 p.m. to 7:00 p.m., Cle Elum, WA.

ADDRESSES: Send written scoping comments, requests to be added to the mailing list, or requests for sign language interpretation for the hearing impaired or other special assistance needs to Ms. Candace McKinley, Environmental Program Manager, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901; or email *yrbwep@usbr.gov.*

The scoping meetings and open houses will be located at:

- Yakima—Yakima Area Arboretum, 1401 Arboretum Way, Yakima, WA 98901.
- Cle Elum—U.S. Forest Service (Cle Elum Ranger District Conference Room), 803 W 2nd Street, Cle Elum, WA 98922.

FOR FURTHER INFORMATION CONTACT: Ms. Candace McKinley, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901; telephone (509) 575–5848, ext. 232; facsimile (509) 454–5650; email *yrbwep@usbr.gov.* Persons who use a telecommunications device for the deaf may call the Federal Relay Service (FedRelay) at 1–800–877–8339 TTY/ASCII to contact the above individual during normal business hours. The FedRelay is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours. Information on this project may also be found at *http://www.usbr.gov/pn/programs/yrbwep/index.html.*

SUPPLEMENTARY INFORMATION: The Bureau of Reclamation (Reclamation) is issuing this notice pursuant to the National Environmental Policy Act of 1969, as amended (NEPA), 42 U.S.C. 4321 *et seq.;* the Council on Environmental Quality's (CEQ) regulations for implementing NEPA, 43 CFR parts 1500 through 1508; the Department of the Interior's NEPA regulations, 43 CFR part 46, and the Washington State Environmental Policy Act.

Background

On July 9, 2013, the Record of Decision (ROD) for the Final Programmatic EIS (PEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) was signed. In the ROD, the Reclamation selected the Integrated Plan Alternative for implementation. The Integrated Plan Alternative is comprised of seven elements which were considered in the PEIS:

1. Reservoir Fish Passage;
2. Structural and Operational Changes;
3. Surface Water Storage;
4. Groundwater Storage;
5. Habitat/Watershed Protection and Enhancement;
6. Enhanced Water Conservation; and
7. Water Market Reallocation of Water Resources.

As described in the PEIS, the Reclamation and the Washington State Department of Ecology (Ecology) will complete project-level, site-specific environmental review for actions within the Integrated Plan once the agencies are ready to move forward each action or groups of actions. Reclamation and Ecology have determined that it is appropriate to initiate the environmental review process with regard to the Cle Elum Reservoir Pool Raise.

This action was previously evaluated at a programmatic level of analysis in

DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE KEECHELUS RESERVOIR-TO-KACHESS RESERVOIR CONVEYANCE AND KACHESS INACTIVE STORAGE PROJECTS

The Department of Interior, Bureau of Reclamation (Reclamation) and the Washington State Department of Ecology (Ecology) Office of Columbia River are beginning preparation of an Environmental Impact Statement (EIS) for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage Project. The EIS will be a joint National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) EIS. Reclamation and Ecology are requesting comments regarding the scope.

Lead Agency: Reclamation and Ecology are joint lead agencies for the combined NEPA and SEPA process

SEPA Responsible Official: Derek I. Sandison, Director Office of Columbia River, Washington State Department of Ecology

EIS Required: Pursuant to section 102(2)(C) of the National Environmental Policy Act of 1969, as amended, Reclamation proposes to prepare an EIS for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage, Yakima River Basin Water Enhancement Project, Integrated Water Resource Management Plan. Ecology has determined that an EIS is required under SEPA (Chapter 43.21C RCW).

Location: Kittitas County, Washington

Description of Proposal:

The Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage Projects are proposed as part of the Yakima River Basin Water Enhancement Project, Integrated Water Resource Management Plan (Integrated Plan). The Integrated Plan is comprised of seven elements which were evaluated in a Programmatic EIS issued March 2, 2012:

1. Reservoir Fish Passage;
2. Structural and Operational Changes;
3. Surface Water Storage;
4. Groundwater Storage;
5. Habitat/Watershed Protection and Enhancement;
6. Enhanced Water Conservation; and
7. Water Market Reallocation of Water Resources.

As described in the Programmatic EIS, Reclamation and the Ecology will complete project-level, site-specific environmental review for individual actions and projects within the Integrated Plan

once the agencies are ready to move forward each action or groups of actions. Reclamation and Ecology have determined that it is appropriate to initiate the environmental review process with regard to the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage Projects.

The proposed, site specific actions to be evaluated in the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Reservoir Inactive Storage EIS are:

1. Transfer water through a tunnel from the Keechelus watershed to Kachess Reservoir. Two alternatives have been identified for a tunnel to convey water from Keechelus watershed to Kachess Reservoir. One would include construction of a new outlet works at the north end of Keechelus Dam connecting to a 10-12 foot-diameter, 3.7 mile-long, gravity flow tunnel. The other would include construction of a diversion structure on the Yakima River about 8,000 feet downstream of Keechelus Dam, connecting to a 10-12 foot-diameter, 3.2-mile-long, gravity flow tunnel. Both tunnel alternatives would discharge into Kachess Reservoir through a new structure located on the west shore; and

2. Release an additional 200,000 acre-feet of water from Kachess Reservoir during severe droughts by accessing inactive storage through additional outlet facilities. A substantial volume of water stored in Kachess Reservoir is currently inaccessible because it is below the elevation of the outlet works. This is referred to as inactive storage. An alternative being considered to access the inactive storage in Kachess Reservoir includes a new outlet works at a lower elevation in the reservoir connected by a tunnel to a pump station that would discharge to the Kachess River.

The objectives of these proposed actions are to increase the total water supply available from the Keechelus watershed for irrigation and instream flow, provide additional water for proratable irrigation districts during severe drought conditions, and create more normal flows in the upper Yakima River between Keechelus Dam and Lake Easton to improve fish habitat.

Scoping Meeting Dates: Two scoping meetings, combined with open houses each day, will be held on the following dates and times:

- November 20, 2013, 1:30pm to 3:30pm, and 5:00pm to 7:00pm, Yakima Area Arboretum, 1401 Arboretum Way, Yakima, WA.

- November 21, 2013, 1:30pm to 3:30pm, and 5:00pm to 7:00pm, U.S. Forest Service (Cle Elum Ranger District Conference Room), 803 W 2nd Street, Cle Elum, WA.

Comments: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Comments on the scope of the EIS must be received by December 16, 2013, at the address listed below.

You may submit comments by any of the following methods:

Email: *yrbwep@usbr.gov*

Mail: Ms. Candace McKinley, Environmental Program Manager, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901

For further information contact: Ms. Candace McKinley, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901; telephone (509) 575-5848, ext. 232; facsimile (509) 454-5650; email *yrbwep@usbr.gov*.

News Release

RECLAMATION
Managing Water in the West

Pacific Northwest Region
Boise, Idaho

Media Contact:

Annette Ross (208) 378-5322
aross@usbr.gov

Candace McKinley (509) 575-5848 ext. 232
cmckinley@usbr.gov
TTY/TDD: 711

Derek Sandison (509) 457-7120

For Release: November 6, 2013

Reclamation and Ecology Host Scoping Meetings for Proposed Cle Elum, Kachess, and Keechelus Projects

YAKIMA, Wash. - The Bureau of Reclamation and Washington State Department of Ecology's Office of Columbia River will conduct joint public scoping meetings this month for two environmental impact statements (EIS) — one for the proposed Cle Elum Pool Raise, and one for the Kachess Reservoir Inactive Storage and Keechelus-to-Kachess Conveyance Projects — three components of the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) under the Yakima River Basin Water Enhancement Project (YRBWEP).

The combined open houses/scoping meetings will be held from 1:30-3:30 p.m., and from 5-7 p.m. on the following dates and locations:

- November 20, 2013 - Yakima Area Arboretum, 1401 Arboretum Way, Yakima, WA
- November 21, 2013 - U.S. Forest Service Cle Elum Ranger District, 803 W. 2nd Street, Cle Elum, WA

Ecology is joint lead with Reclamation in the preparation of the EISs, and they will satisfy the requirements of both the National Environmental Policy Act and the Washington State Environmental Policy Act.

The scoping meetings will give the public and agencies the opportunity to identify issues and concerns associated with the proposed projects and to identify other potential alternatives that could be considered in the EISs.

Reclamation and Ecology have led the basinwide YRBWEP Workgroup since 2009 to develop a well-defined set of strategies for resolving water supply and streamflow imbalances, as well as ecosystem restoration enhancements. This effort resulted in a final programmatic EIS for the Integrated Plan for the Yakima basin in 2012, and Reclamation issued a Record of Decision in 2013.

The Integrated Plan includes seven elements:

> Fish passage at existing reservoirs; structural and operational changes to existing facilities; new or expanded storage reservoirs; groundwater storage; habitat/watershed protection and enhancement; enhanced water conservation; and market-based reallocation of water resources. Additional information about these efforts can be found at: http://www.usbr.gov/pn/programs/yrbwep/index.html.

The draft EISs are expected to be issued in the summer of 2014, followed by an opportunity for public and agency review and comment. The final EISs are anticipated to be completed in the spring of 2015.

The meeting facilities are physically accessible to people with disabilities. Requests for sign language interpretation for the hearing impaired or other special assistance should be mailed to the Bureau of Reclamation, Ms. Candace McKinley, Environmental Program Manager, 1917 Marsh Road, Yakima, WA 98901-2058; (509)-575-5848, ext. 232 or by email to yrbwep@usbr.gov, by November 12, 2013.

Reclamation published a Notice of Intent to prepare the EISs in the Federal Register, and Ecology published a Determination of Significance in local newspapers concurrent with the release of the Notice of Intent.

In addition to comments received at the scoping meetings, written comments will also be accepted through December 16, 2013. Comments should be submitted to Ms. McKinley using the contact information above. For additional information or questions, please call (509) 575-5848, ext. 613.

# # #

Reclamation is the largest wholesale water supplier and the second largest producer of hydroelectric power in the United States, with operations and facilities in the 17 Western States. Its facilities also provide substantial flood control, recreation, and fish and wildlife benefits. Visit our website at www.usbr.gov.

RECLAMATION
Managing Water in the West

DEPARTMENT OF ECOLOGY
State of Washington

Contact: Candace McKinley, (509) 575-5848, ext. 613

Derek Sandison, 509-457-7120

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance

Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan)

November 2013

What is proposed for the Kachess Drought Relief Pumping Plant?

The current reservoir outlet for Kachess Reservoir does not provide access to water below elevation 2,192 feet; therefore, water stored in the reservoir below that elevation is currently designated as unusable, or "inactive," storage. Reclamation and Ecology propose to install a pumping plant at the Kachess Reservoir to allow additional water to be withdrawn from the reservoir.

The purpose of the Kachess Drought Relief Pumping Plant (KDRPP) (Kachess Reservoir Inactive Storage) is to:

- Provide additional water supply for municipal, domestic, and agricultural uses during drought years.

These goals would be accomplished by:

- Constructing a pumping plant, which would allow the reservoir to be drawn down approximately 80 feet lower than the current outlet, and
- Allowing up to 200,000 acre-feet of water to be withdrawn from the reservoir during drought years.

What is proposed for the Keechelus-to-Kachess Conveyance?

Reclamation and Ecology propose the Keechelus-to-Kachess Conveyance (KKC) to convey water from the Keechelus Reservoir to Kachess Reservoir in order to:

- Reduce flows in the upper Yakima River to improve ecological conditions for fish,
- Enable the storage of more runoff from the Keechelus Reservoir drainage to provide additional water supply for municipal and domestic uses, agriculture, and
- Potentially augment flows to refill Kachess Reservoir.

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

These goals would be accomplished by constructing a tunnel that would convey an average of 400 cubic feet per second (cfs) (maximum 500 cfs) from the Keechelus Reservoir to the Kachess Reservoir.

How do the KDRPP and KKC relate to the Integrated Plan?

The KDRPP is included in the Surface Water Storage element of the Integrated Plan and the KKC is included in the Structural and Operational Changes element of the Integrated Plan. The project-level environmental impact statement (EIS) for KDRPP and KKC will tier off the March 2012, *Yakima River Basin Integrated Water Resource Management Plan Final Programmatic EIS*.

What alternatives are being considered for the KDRPP and KKC EIS?

Only one action alternative is being considered for the KDRPP—a pumping plant at Kachess Reservoir to withdraw the additional water. The alternative includes the following components:

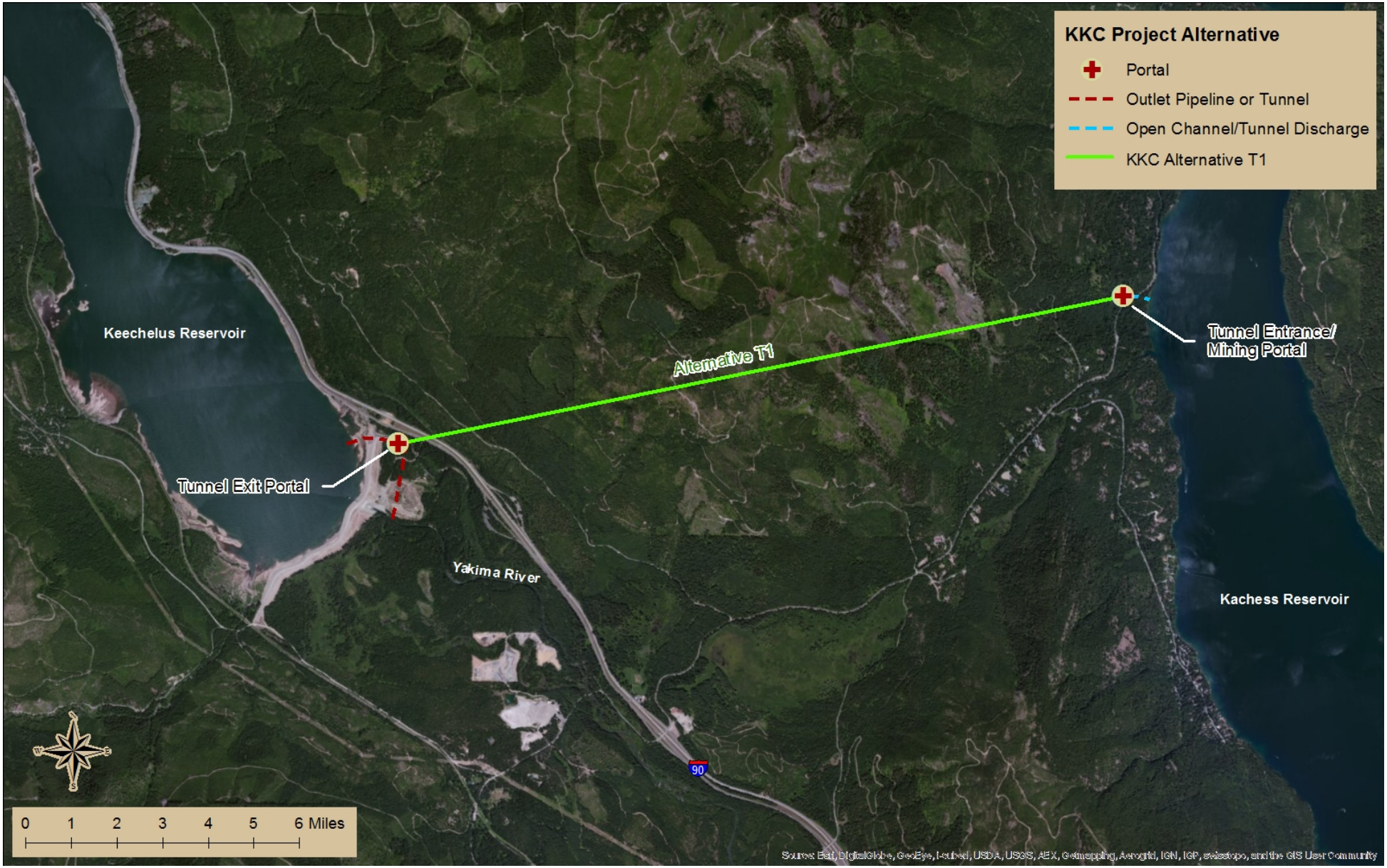
- Intake tunnel from the reservoir to a pump station;
- Pump Station (1,000 cubic feet per second [cfs]) located on the downstream side of the Kachess Reservoir Dam;
- Pipeline (12-foot-diameter) conveying flow from the pump station to a discharge structure;
- Discharge structure (1,000 cfs) to the Kachess River, located just downstream of the existing Kachess outlet channel; and
- Access roads to the pump station and discharge structure.

One action alternative is being considered for KKC for conveying water between the two drainages—Alternative T1. Alternative T1 was designed to cross the shortest distance between Keechelus Reservoir and Kachess Reservoir. The gravity tunnel would be approximately 19,700 feet (3.7 miles) long and extend from the existing outlet or from a new outlet of Keechelus Reservoir near the north end of the dam, to an exit portal near the west shore of Kachess Reservoir.

An alternative combining both the KDRPP and KKC will also be evaluated.

In addition, the No Action Alternative is evaluated to form the baseline for evaluating the potential impacts of all the action alternatives.

Kachess Drought Relief Pumping Plant Alternative



Keechelus-to-Kachess Conveyance Alternative T1

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

October 30 – December 16, 2013

Name (please print legibly):	
Organization:	
Mailing Address:	
City, State, and Zip Code:	
Telephone:	**E-mail:**

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

___ I would like to receive a copy of the Scoping Document.

___ I want to receive email updates and information on the Environmental Impact Statement (EIS).

___ I want my name included on the mailing list to receive information on the EIS.

___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

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 Kachess Drought Relief Pumping Plant are:

My comments on the Keechelus-to-Kachess Conveyance are:

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

Comments (continued)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

RECLAMATION
Managing Water in the West

DEPARTMENT OF ECOLOGY
State of Washington

Contact: Candace McKinley, (509) 575-5848, ext. 613

Derek Sandison, 509-457-7120

What Is the Integrated Plan?

Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan)

November 2013

In 2009, Reclamation and the Washington State Department of Ecology's Office of Columbia River convened the Yakima River Basin Water Enhancement Project Workgroup (Workgroup) to provide a collaborative forum for evaluation of the usefulness of an integrated water resource management approach to addressing water and aquatic resource needs in the Yakima River basin in Washington. The Workgroup is comprised of representatives of the Yakama Nation, irrigation districts, environmental organizations, and federal, state, and local governments. In 2010, under the WaterSMART Basin Study Program, Reclamation and Ecology jointly conducted the Yakima River Basin Study with the Workgroup to better define options for future water management of the basin.

The Integrated Plan is a comprehensive approach to address a variety of water resource and ecosystem needs in the Yakima River Basin. The Integrated Plan includes seven elements: (1) reservoir fish passage; (2) structural and operational changes; (3) surface water storage; (4) groundwater storage; (5) habitat/watershed protection and enhancement; (6) enhanced water conservation, and (7) market reallocation.

In March 2012, Reclamation and Ecology released the Final Programmatic Environmental Impact Statement (PEIS) for the Integrated Plan. The Integrated Plan was selected as the Preferred Alternative in the PEIS. Reclamation signed a Record of Decision in 2013, which selected the Integrated Plan for implementation. The total cost of all the elements of the Integrated Plan is approximately $4.2 billion, with estimated annual operation and maintenance costs of $10 million. Implementation is expected to take place over a 15- to 20-year period.

In the first legislative action of his administration, Governor Inslee focused on Washington's water resources and, specifically, the Integrated Plan to support food and agriculture industry jobs, salmon recovery, and a growing population in Central Washington. The 2013-2015 Washington State Budget includes $132 million for Integrated Plan projects.

Yakima River Basin Integrated Water Resource Management Plan

Structural & Operational Changes

1. Raise the Cle Elum Pool by three feet to add 14,600 ac-ft in storage capacity.
2. Modify Kittitas Reclamation District canals to provide efficiency savings.
3. Construct a pipeline from Lake Keechelus to Lake Kachess to reduce flows and improve habitat conditions during high flow releases below Keechelus and to provide more water storage in Lake Kachess for downstream needs.
4. Decrease power generation at Roza Dam and Chandler power plant to support outmigration of juvenile fish.
5. Make efficiency improvements to the Wapatox Canal.

Enhanced Water Conservation

1. Implement an agricultural water conservation program designed to conserve up to 170,000 acre-feet of water in good water years.
2. Create a fund to promote water use efficiency basin-wide using voluntary, incentive-based programs. Focus on outdoor uses as top priority.

Habitat/Watershed Protection & Enhancement

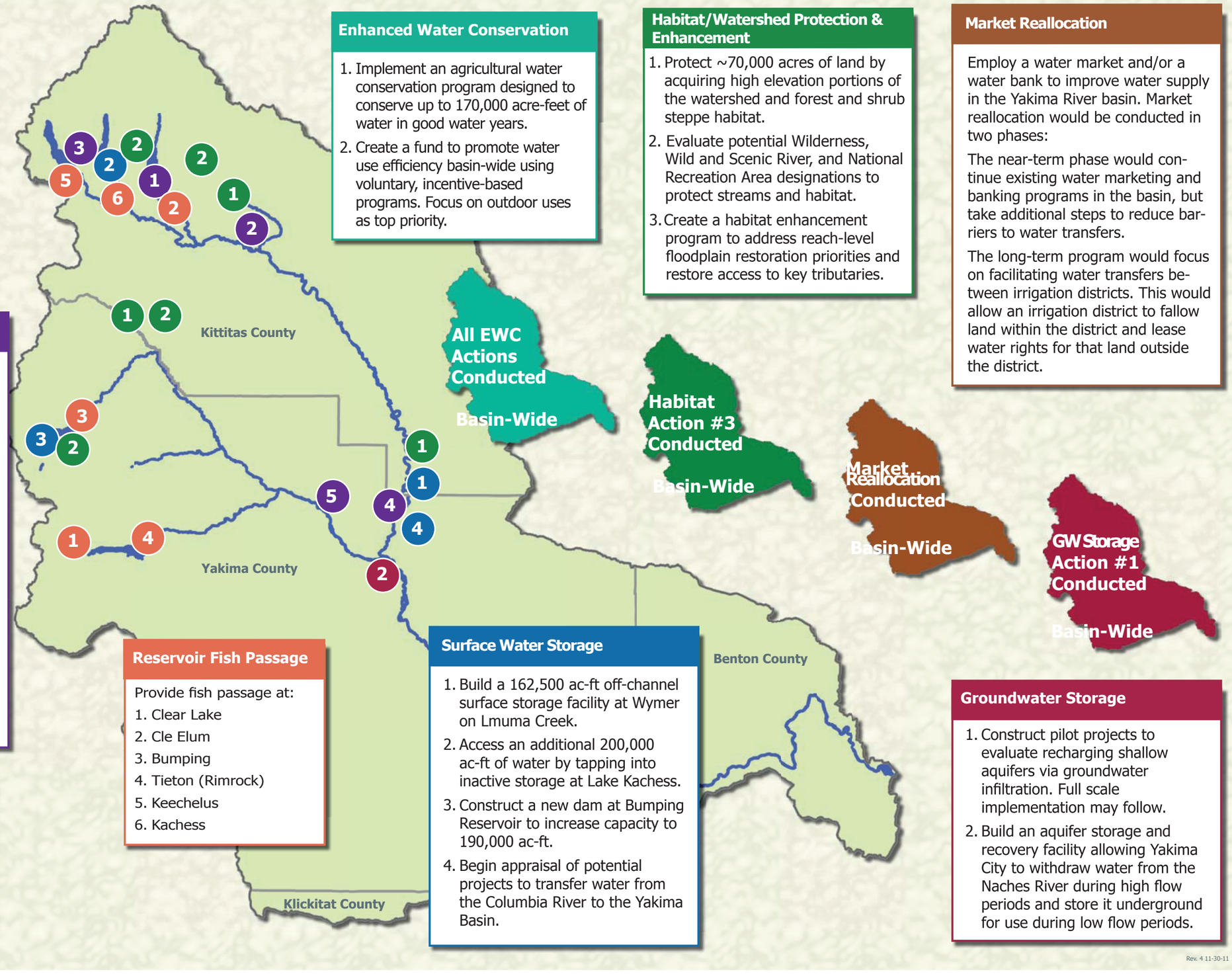
1. Protect ~70,000 acres of land by acquiring high elevation portions of the watershed and forest and shrub steppe habitat.
2. Evaluate potential Wilderness, Wild and Scenic River, and National Recreation Area designations to protect streams and habitat.
3. Create a habitat enhancement program to address reach-level floodplain restoration priorities and restore access to key tributaries.

Market Reallocation

Employ a water market and/or a water bank to improve water supply in the Yakima River basin. Market reallocation would be conducted in two phases:

The near-term phase would continue existing water marketing and banking programs in the basin, but take additional steps to reduce barriers to water transfers.

The long-term program would focus on facilitating water transfers between irrigation districts. This would allow an irrigation district to fallow land within the district and lease water rights for that land outside the district.



Reservoir Fish Passage

Provide fish passage at:

1. Clear Lake
2. Cle Elum
3. Bumping
4. Tieton (Rimrock)
5. Keechelus
6. Kachess

Surface Water Storage

1. Build a 162,500 ac-ft off-channel surface storage facility at Wymer on Lmuma Creek.
2. Access an additional 200,000 ac-ft of water by tapping into inactive storage at Lake Kachess.
3. Construct a new dam at Bumping Reservoir to increase capacity to 190,000 ac-ft.
4. Begin appraisal of potential projects to transfer water from the Columbia River to the Yakima Basin.

Groundwater Storage

1. Construct pilot projects to evaluate recharging shallow aquifers via groundwater infiltration. Full scale implementation may follow.
2. Build an aquifer storage and recovery facility allowing Yakima City to withdraw water from the Naches River during high flow periods and store it underground for use during low flow periods.

Rev. 4 11-30-11

RECLAMATION
Managing Water in the West

DEPARTMENT OF ECOLOGY
State of Washington

Contact: Candace McKinley, (509) 575-5848, ext. 613

Derek Sandison, 509-457-7120

How Can I Provide Input?

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance, and Cle Elum Pool Raise Environmental Impact Statements (EIS)

November 2013

Reclamation and Ecology are conducting scoping for the Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance, and the Cle Elum Pool Raise EISs. The scoping period began on October 30, 2013, and will continue through December 16, 2013. As part of the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA), scoping is conducted to receive public and agency comments on the scope of an upcoming EIS, and may include comments on:

- ✓ **Purpose of and Need for** a proposed project;
- ✓ Recommendations concerning the **proposed project**, and **alternatives;**
- ✓ **Substantial issues and concerns** that should be addressed in the EIS;
- ✓ **Potential impacts** (beneficial and adverse, direct, indirect, and cumulative) and **mitigation;**
- ✓ **Other major actions** in the Yakima basin and **regulatory requirements** of Federal, State, and local agencies;
- ✓ Scope of **project-level environmental studies** to be conducted.

We are seeking comments on these documents and we would like your help! There are a variety of ways for you to participate in this process:

- ✓ **Attend** one of four public scoping meetings:
  - **Yakima – November 20, 2013; 1:30 p.m. to 3:30 p.m.; and 5 p.m. to 7 p.m. at the Yakima Arboretum**
  - **Cle Elum – November 21, 2013; 1:30 p.m. to 3:30 p.m.; and 5 p.m. to 7 p.m. at the U.S. Forest Service Cle Elum Ranger District Office**

- ✓ **Mail** written scoping comments, requests to be added to the mailing list, and/or requests for a scoping document to:

Bureau of Reclamation, Columbia-Cascades Area Office
Attention: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima WA 98901-2058

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/eis/cleelumraise/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

- ✓ **E-mail** comments to ***yrbwep@usbr.gov***

- ✓ **Fax** comments to 509-454-5650

- ✓ **Telephone** comments may be recorded at (509) 575-5848, ext. 613.

Then What Happens?

- ✓ A **Scoping Summary Document** of comments submitted through December 16, 2013, for each EIS will be made available in January 2014.

- ✓ Two **Draft EISs will be released—one for Kachess Drought Relief Pumping Plant and Keechelus-to-Kachess Conveyance, and one for the Cle Elum Pool Raise--followed by a 45-day public and agency review and comment period.** Notice of the availability of the Draft EISs and the public and agency comment period will be published in the Federal Register and local newspapers prior to release of the documents, which is anticipated for the summer of 2014.

RECLAMATION
Managing Water in the West

DEPARTMENT OF ECOLOGY
State of Washington

Contact: Candace McKinley, (509) 575-5848, ext. 613

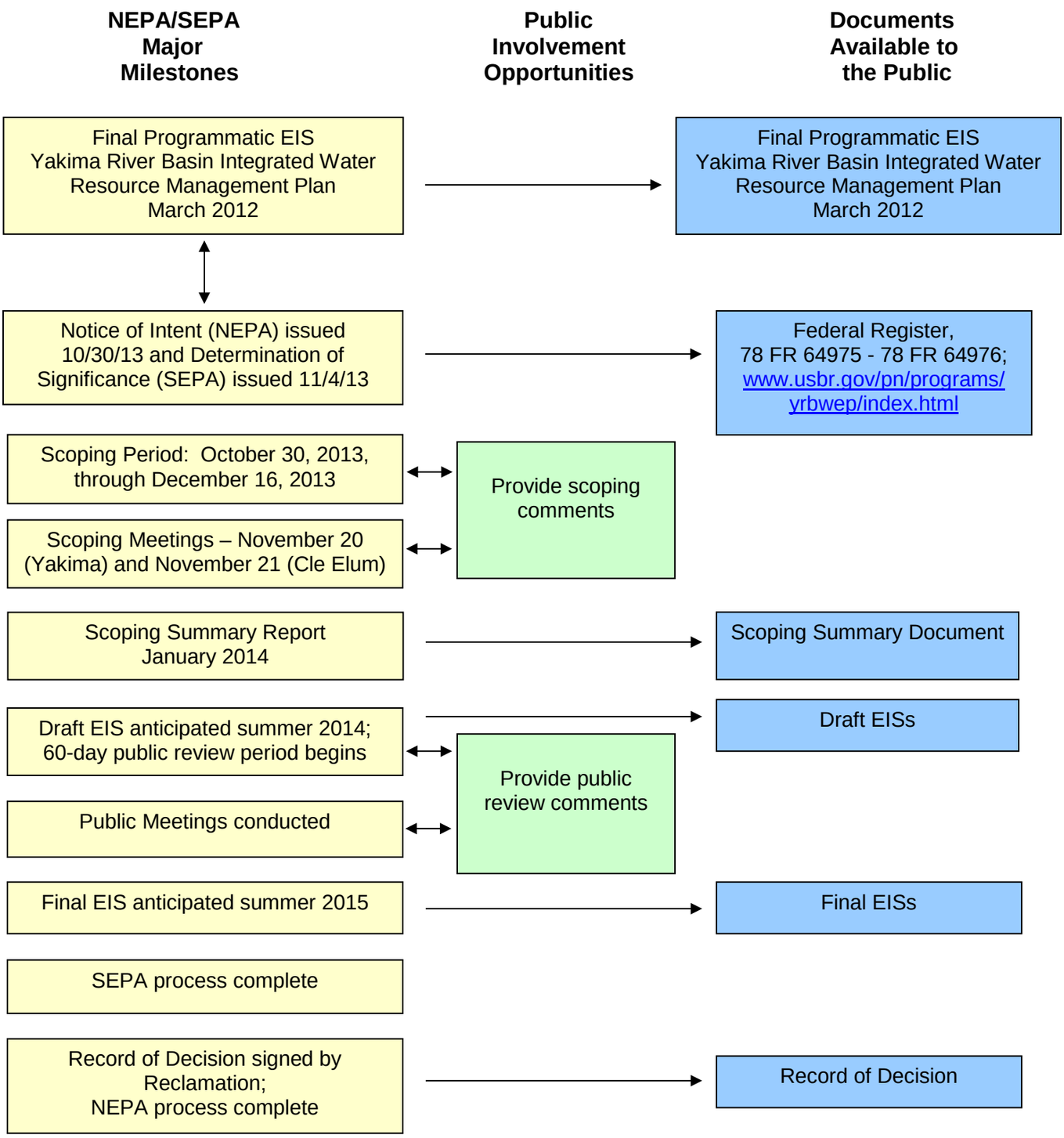
Derek Sandison, 509-457-7120

Yakima River Basin Integrated Water Resource Management Plan

NEPA/SEPA Process for:

Kachess Drought Relief Pumping Plant and Keechelus-to-Kachess Conveyance EIS and Cle Elum Pool Raise EIS

November 2013



http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/eis/cleelumraise/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

RECLAMATION
Managing Water in the West

DEPARTMENT OF ECOLOGY
State of Washington

Contact: Candace McKinley, (509) 575-5848, ext. 613

Derek Sandison, 509-457-7120

What Is the Difference Between a Programmatic and a Project-Level Environmental Impact Statement?

Yakima River Basin Integrated Water Resource Management Plan

November 2013

There are two types of environmental impact statements—"programmatic" and "project-level." These are also sometimes referred to as "planning-level" and "site-specific" based on differences in their focus and level of detail.

In March 2012, a Final Programmatic Environmental Impact Statement (PEIS) was released for the entire Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan).

A *programmatic* environmental impact statement (PEIS) evaluates the effects of broad proposals or planning-level decisions that may include any or all of the following:

- A wide range of individual projects;
- Implementation over a long timeframe; and/or
- Implementation across a large geographic area.

The level of detail in a PEIS is sufficient to allow informed choice among planning-level alternatives and to develop broad mitigation strategies. Collaboration among Federal, State, and local agencies and Tribes is especially important in a PEIS process.

The PEIS does not evaluate project-level issues such as precise project footprints or specific design details that are not yet ready for decision at the planning level. Instead, a PEIS is an excellent means for examining the interaction among proposed projects or plan elements, and for assessing cumulative effects. Like a project-level EIS, a PEIS also includes a "no action alternative."

Typically, a PEIS is followed by subsequent project-level environmental reviews in the form of an EIS, Environmental Assessment, or Categorical Exclusion Checklist, for specific components of the proposal. When a project-level environmental review is undertaken for a specific component, the stepwise approach to analyses and decisionmaking is called "tiering."

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/eis/cleelumraise/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

The EISs being prepared for the Cle Elum Pool Raise and Keechelus-to-Kachess Conveyance and Kachess Drought Relief Pumping Plant (Kachess Inactive Storage) are *project-level*, and will *tier* off the Integrated Plan PEIS. These project-level EISs will analyze a narrower proposal related to the initial broad (*programmatic*) proposal identified in the Integrated Plan PEIS.

The intent of the tiering concept is to encourage elimination of repetitive discussions and to focus on the actual issues ready for decisions at each level of environmental review. Tiering expedites the resolution of big-picture issues so that subsequent studies can focus on project-specific impacts and issues. Those big-picture issues and analyses do not have to be repeated in subsequent tiered environmental reviews, but can simply be referenced from the programmatic document. Tiering also allows environmental analyses for each Tier 2 project to be conducted closer in time to the actual construction phase, or as funds become available for construction.

Tiering expands the opportunities for public and agency input by breaking the environmental analyses into two levels. Individuals with an interest in the overarching big-picture questions have had an opportunity to participate at the programmatic level (Tier 1), and those who are interested in localized impact and mitigation issues can focus their efforts on the current specific project-level (Tier 2) project or projects.

Cle Elum-DS and K2KKIS DS comments

Mike Hoban <mkhoban@hotmail.com> Wed, Nov 6, 2013 at 6:07 PM
To: yrbwep@usbr.gov

Hello,

I would like to show my Positive position on the three proposals to increase water storage in Upper Kittitas County; as noted in the two subject DS and as summarized below:

> The Cle Elum Pool Raise Project would raise Cle Elum Reservoir by three feet, providing an additional 14,600 ac-ft of storage capacity. The water would be put to both instream and out of stream use.
>
> The Kachess Drought Relief Pumping Plant Project would provide an additional 200,000 ac-ft of water available for drought relief by tapping into the reservoir's inactive storage (water that is store below the current outlet structure).
>
> The K to K Conveyance Project allows for additional storage by moving water from Keechelus Reservoir, which lies in a basin that catches more water than can be stored in the reservoir, to Kachess Reservoir, which has additional storage capacity.

Regardless of any possible climate change – population locally, across the country and around the world are only growing and thus, the need for additional waters for fish & farming will only be more critical in the years to come. Our leaders & government agencies need to lead the way and be ahead of any major "needs" – and water is certainly an major need.

Thanks,

Mike Hoban

2351 Pasco Road

Cle Elum, WA 98922

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

November 20, 2013 – Yakima Arboretum, Yakima, Washington

Name (please print legibly): Brian & Margaret Cole	
Organization: Private	
Mailing Address: 2907 W. Yakima Ave	
City, State, and Zip Code: Yakima. Wash 98902	
Telephone: 509 453-1498	**E-mail:** mbcole101@centurylink.net

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

✓ I would like to receive a copy of the Scoping Document.

✓ I want to receive email updates and information on the Environmental Impact Statement (EIS).

✓ I want my name included on the mailing list to receive information on the EIS.

___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

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 Kachess Drought Relief Pumping Plant are:

Be aware of the sound level of the Kachess pumps.

My comments on the Keechelus-to-Kachess Conveyance are:

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

Scoping comments--Integrated Plan's Cle Elum Pool Raise, Keechelus-to-Kachess Conveyance and Kachess Drought Relief Pumping Plant Projects

November 20, 2013

The purpose and need statement for each of the projects should explain the role of each within the Yakima Basin Integrated Management Plan. A map/drawing of the entire Integrated Plan planning area should be set forth, and a discussion should be written that explains how each of these particular project fits within that plan. The Teanaway acquisition should be included in the plan area.

In the environmental analysis for each of the projects, the general benefit and cost analysis in the YBIP Programmatic EIS should be broken out so that the individual benefit and cost analysis for these portions of the Programmatic action can be seen. This information should be updated, taking passage of time into account. In particular, the water supply benefits, and their economic repercussions, should be individually identified as part of the Integrated Plan, so as to be able to evaluate how much of the Programmatic objectives will be accomplished with this segment of the overall Integrated Plan.

The EIS should also discuss the means by which the YBIP will be managed to ensure that all of the elements of the Integrated Plan will be developed, notwithstanding that these early project elements are under development while others have not yet be developed to the same stage. This should include a discussion of the role of the YBIP work group and YBIP Implementation Committee. The membership of these two groups should be listed and identified by affiliation.

Jim Davenport
509 969-2191

November 20, 2013

Bureau of Reclamation, Columbia-Cascade Area Office
Attn: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058

There are major issues and concerns that need to be addressed when reviewing both proposed projects. The main issue is how climate change will effect both projects during drought years. Other concerns are how will the proposed increase water distributed (water rights) and who will pay for each project. When the two proposed projects are completed how will the quantity of water improve conditions for fish and agriculture during drought years? Is it prudent to spend hundreds of millions of dollars on the Kachess and Cle Elum Projects before a determination can be made that Bumping and Wymer can be built? Without all the new storage projects available water needed for the Yakima Basin will continue to be significantly short of water.

The potential impacts of the Lake Cle Elum Rise Project that needs to be answered are:

1. What happens to the Dike constructed on the south east bank of the existing lake that protects the road and private property?
2. How much of the Salmon-La-Sac Road will have to be moved or improved due to potential flooding?
3. How will the boat launches be affected?
4. What type of mitigation measures will be taken to compensate for the forest and picnic area on the shores of the upper end of Lake Cle Elum?
5. How will property owners be compensated for loss of property including sewer and water?
6. Who will benefit from the potential increase in water and who will pay for the water?
7. How will the elevation of the water in the lake affect the non-populated shoreline and the fish population?

The potential impacts of the Kachess Reservoir inactive storage project that needs to be answered are:

1. If a pipeline or tunnel is used to transfer water from Lake Keechelus to Lake Kachess what time of the year can the water be transferred?
2. When the drawdown of the lake occurs will there be fish passage between upper and lower Lake Kachess?
3. How will the increased shoreline be managed to prevent erosion?
4. Where will the pumping plant be located and who will manage and maintain it?
5. Who will benefit (a water right) from water drawn from below the natural lake level?
6. Who will pay for the Keechelus conveyance, the pumping plant, and the pipeline to move water drawn from Lake Kachess to be placed in the Yakima River?
7. How will a fish ladder built at Lake Kachess Dam be operational when the drawdown of the lake occurs?

8. What will happen to the existing fish: trout, Kokanee, and Dolly Varden that exits in the lake after drawdown?
9. Who will pay for operation and maintenance of the system when the proposed program to use the water is not possible?
10. How will the drawdown effect the public campground and private property on the shores of Lake Kachess?

Charles J Klarich

Charles Klarich

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

November 20, 2013 – Yakima Arboretum, Yakima, Washington

Name (please print legibly): Mark Norman	
Organization: WSDOT	
Mailing Address: 2809 Rudkin Rd	
City, State, and Zip Code: ~~Yakima~~ Union Gap	
Telephone: 573-8324	**E-mail:** normannm@wsdot.wa.gov

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

___ I would like to receive a copy of the Scoping Document.

___ I want to receive email updates and information on the Environmental Impact Statement (EIS).

X I want my name included on the mailing list to receive information on the EIS. ✓

___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

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 Kachess Drought Relief Pumping Plant are:

—

My comments on the Keechelus-to-Kachess Conveyance are:

WSDOT will be installing a series of culverts in an identified hydrologic connectivity zone (HCZ) @ the location of the ~~k~~tok & tunnel crossing of I-90. If ~~the~~ the tunnel is deep enough, this should not be an issue.

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

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SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

November 21, 2013 – USFS Cle Elum Ranger District, Cle Elum, Washington

Name (please print legibly):	
Organization:	
Mailing Address:	
City, State, and Zip Code:	
Telephone:	**E-mail:**

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

___ I would like to receive a copy of the Scoping Document.

___ I want to receive email updates and information on the Environmental Impact Statement (EIS).

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My comments on the Kachess Drought Relief Pumping Plant are:

My comments on the Keechelus-to-Kachess Conveyance are:

It is logical too me that water running by gravity thru a pipe creates the opportunity for small hydro peaks at the outlet. I think this should be addressed in the EIS as

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

Comments (continued)

well as at other locations where there is a head of water -

You may leave your comments in the box provided or mail, fax, email, or call in your comments by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

Robert Angrisano <rangrisano@gmail.com>

Nov 28 (6 days ago)

to me, gcbrandt, jerrygwatts, paul.jewell, gary.berndt, obie.obrien, maib461

I am the President of the Kachess Community Association, representing 167 homeowners. I've also copied Jerry Watts, Kachess Ridge Homeowners Association Board member, and Gordon Brandt, President of East Kachess Homeowner's Association on this email as well. Between the three of us, we represent the bulk of all property owners around Lake Kachess.

While in Cle Elum this week, I picked up a copy of the Northern Kittitas Country Tribune. I read the article about the public meeting held in Cle Elum and was shocked to read about the closing date for comment on December 16, 2013. I say "shocked" in that no one has contacted any of the property owners who live on Lake Kachess and are directly affected by what is being proposed in the Yakima Integrated Plan. No one from your office has requested a public meeting in our area, has sent us information about the project, or reached out to the Board members of the communities on the lake and requested a meeting with us.

How can you possibly create an Environmental Impact Statement without soliciting the input of those directly affected by the proposal? Our members property ownership is public record and the existence of the Homeowner Associations can be easily discovered with a simple Google search. Why are those directly affected by the plan being excluded from the comment process?

I would like to suggest two solutions to correct this oversight. First, I would like to host a public meeting at the Kachess Community Clubhouse on January 4, 2014 at 10:00am, at which time, all property owners from the three HOA's would be invited to attend. Second, postpone the closing of the public comment period for 30 days, to allow proper comment from those directly affected by the proposal.

I look forward to your immediate response.

Best regards,

Robert Angrisano, President
Kachess Community Association
Email: rangrisano@gmail.com
Phone: 425-443-5421

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KID
KENNEWICK IRRIGATION DISTRICT

December 3, 2013

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Candace McKinley, Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

RE: Scoping Comments, Kachess Drought Relief Pumping Plant and Keechelus –to-Kachess Conveyance Environmental Impact Statement

Dear Ms. McKinley,

Staff from the Kennewick Irrigation District attended the open house/scoping meeting held on November 20, 2013 at 1:30 p.m. at the Yakima Arboretum in Yakima, Washington. After considering information obtained at this meeting, the Kennewick Irrigation District has the following comments:

1. The EIS scope should include an analysis of the impacts of the projects on downstream agricultural water users, especially those below the Parker gage. Specifically, quantify the impact that these projects would have on the water supply of the Kennewick Irrigation District, which has historically depended on return flows.
2. What impact would these projects have on the target flows at Prosser Dam, as described in the Yakima Basin Water Enhancement Project, Title XII (October 31, 1994)?
3. What will be the total cost of these projects? Any analysis of the impacts should include the cost to build, maintain, and operate these projects.

Thank you for the opportunity to comment on the scope of the upcoming environmental impact statement.

Sincerely,

Gene Huffman, Board President
Kennewick Irrigation District

cc: Charles Freeman
Seth Defoe

December 11, 2013

Bureau of Reclamation, Columbia-Cascade Area Office
Attn: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058

There are major issues and concerns that need to be addressed when reviewing both proposed projects. The main issue is how climate change will effect both projects during drought years. Other concerns are how will the proposed increase water distributed (water rights) and who will pay for each project. When the two proposed projects are completed how will the quantity of water improve conditions for fish and agriculture during drought years? Is it prudent to spend hundreds of millions of dollars on the Kachess and Cle Elum Projects before a determination can be made that Bumping and Wymer can be built? Without all the new storage projects available water needed for the Yakima Basin will continue to be significantly short of water.

The potential impacts of the Lake Cle Elum Rise Project that needs to be answered are:

1. What happens to the Dike constructed on the south east bank of the existing lake that protects the road and private property?
2. How much of the Salmon-La-Sac Road will have to be moved or improved due to potential flooding?
3. How will the boat launches be affected?
4. What type of mitigation measures will be taken to compensate for the forest and picnic area on the shores of the upper end of Lake Cle Elum?
5. How will property owners be compensated for loss of property including sewer and water?
6. Who will benefit from the potential increase in water and who will pay for the water?
7. How will the elevation of the water in the lake affect the non-populated shoreline and the fish population?

The potential impacts of the Kachess Reservoir inactive storage project that needs to be answered are:

1. If a pipeline or tunnel is used to transfer water from Lake Keechelus to Lake Kachess what time of the year can the water be transferred?
2. When the drawdown of the lake occurs will there be fish passage between upper and lower Lake Kachess?
3. How will the increased shoreline be managed to prevent erosion?
4. Where will the pumping plan be located and who will manage and maintain it?
5. Who will benefit (a water right) from water drawn from below the natural lake level?
6. Who will pay for the Keechelus conveyance, the pumping plant, and the pipeline to move water drawn from Lake Kachess to be placed in the Yakima River?
7. How will a fish ladder built at Lake Kachess Dam be operational when the drawdown of the lake occurs?

8. What will happen to the existing fish: trout, Kokanee, and Dolly Varden that exits in the lake after drawdown?
9. Who will pay for operation and maintenance of the system when the proposed program to use the water is not possible?
10. How will the drawdown effect the public campground and private property on the shores of Lake Kachess?

Charles J Klarich

Charles Klarich

December 11, 2013

The Keechelus to Kachess conveyance and the pumping of the inactive water from the preexisting Lake Kachess to the Yakima River creates many environmental and ecological problems along with a high cost of the per acre foot of the water.

What Do These Projects Do?

The purpose of the Keechelus to Kachess Conveyance project is to move water from Keechelus Reservoir (157,000 acre-foot capacity) to Kachess Reservoir (239,000 acre-foot capacity) to (1) improve the stored water supply in Kachess Reservoir by transferring runoff that would otherwise be spilled from Keechelus Reservoir and (2) rerouting water through Kachess Reservoir for downstream irrigation use that would otherwise be released from Keechelus Reservoir into the upper Yakima River impacting anadromous fish production in this 12-mile Keechelus Dam to Easton Diversion Dam reach of the river.

The Kachess Inactive Storage project will provide access to an additional 200,000 acre-feet of water from a pre-existing natural lake below the current reservoirs outlet works. The water in this inactive storage supply will be withdrawn by installing a pump station and pumping in drought years discharging into the Kachess River below the dam for downstream irrigation use primarily by the Kittitas Reclamation District and the Roza Irrigation District.

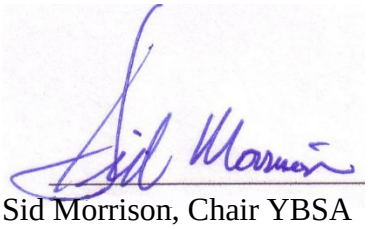
What is the Volume of Water Transferred?

The annual volume of water transferred by the Keechelus to Kachess Conveyance for the 25-year historical period of record (1981-2005) ranges from a minimum of 12,000 acre-feet (1994) to a maximum of 135,000 acre-feet (1997) with a median volume of 97,000 acre-feet. This represents the total volume moved through the Keechelus to Kachess Conveyance for the purposes of bypassing excessive releases into the Keechelus to Easton Reach and for improving the stored water supply of Kachess Reservoir.

What We Do Not Know

- The volume of the new stored water which will be available as opposed to the volume rerouted from Keechelus Reservoir for downstream irrigation use for the purpose of bypassing the Keechelus to Easton reach of the Yakima River.
- The impact on Kachess Reservoir refill of the 239,000 acre-feet of current active storage capacity when the inactive storage is accessed in drought years.
- The economic justification (benefit to cost analysis) of these projects; a requirement of the 2013 State Legislature.
- Who pays for the construction and annual operation and maintenance costs of these projects and what is the repayment obligation for the drought year water supply?

- The viability of fish passage at Keechelus and Kachess Reservoirs with these two projects online.
- Dead Storage Water.
    - Has a right to the use of this water been issued?
    - Has the cost of the mitigation for the loss of resident fishery been determined?
    - How are the costs for the development and use of the water been assigned?



Sid Morrison, Chair YBSA

Comments Regarding Kachess Drought Relief Pumping Project

1 message

Baldwin, Keith <keithbaldwin@dwt.com> Thu, Dec 12, 2013 at 1:54 PM
To: "yrbwep@usbr.gov" <yrbwep@usbr.gov>

- To: Ms. Candace McKinley, Environmental Program Manager, Bureau of Reclamation, Columbia-Cascades Area Office, 1917 Marsh Road, Yakima, WA 98901

Dear Ms. McKInley,

I am directing my comments to you regarding the proposed Kachess Drought Relief Pumping Project. These comments reflect the personal views of my wife and me and are not necessarily those of Davis Wright Tremaine, LLP, the law firm of which I am a partner.

My wife and I are owners of 15 acres of waterfront land on Kachess Lake near Lodge Creek. Our property and the surrounding acreage of Kachess Ridge and Kachess Village are used for year-round recreational and residential purposes, including use of Lake Kachess beachfront during the warm months. Many property owners, including us, have beachfront property lines that directly adjoin the lakebed owned by the Bureau of Reclamation. We have owned our property for over 20 years.

We are writing to express our concerns with regard to the proposed plan by which the water level of Kachess Lake could be drawn down 85 feet below its current lowest level. Such a drawdown would have significant negative effects on property owners who use their beach front recreationally as well as the large numbers of members of the public who use the Kachess Campground to the north of us. It can also be expected to have a severe negative effect on the health of fisheries stocks in Kachess Lake, which will be concentrated in a much smaller lake volume and area.

The current lowest level of Kachess Lake has existed over the course of recorded history, inasmuch as the Kachess Dam was built at approximately the original lake level. The proposal would result in the lake level being reduced to well below its historic levels. Is this not an environmental change of the magnitude of sluicing Denny Hill in Seattle, or digging the Lake Washington Ship Canal? How can such a severe environmental change be permitted with so many stakeholders adversely affected?

We are aware that this proposal is for "drought relief." We are not so naïve as to believe that "drought relief" would not become a standard operating condition every summer as the needs for water in the lower Yakima Basin continue to grow.

Finally, there is the potential impact of the increased drawdown on the performance of water wells in the Kachess Lake area, including some (ours included) with water rights superior to most of the downstream users.

We oppose any plan or proposal by which the minimum level of Kachess Lake would be lowered from its historical levels.

Thank you for considering our perspectives. I would welcome the opportunity to discuss these issues further with you.

Very truly yours,

Keith G. Baldwin

Keith G. Baldwin | Davis Wright Tremaine LLP
777 - 108th Avenue NE, Suite 2300 | Bellevue, WA 98004
Tel: (425) 646-6133 | Fax: (425) 709-6033 | Mobile: (206) 617-6932
Email: keithbaldwin@dwt.com | Website: www.dwt.com
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(206) 283-6497

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Yakima, Washington

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December 12, 2013

Bureau of Reclamation
Columbia-Cascades Area Office
Attention: Candace McKinley
Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901
Via Email to: yrbwep@usbr.gov

RE: Keechelus to Kachess Conveyance, Kachess Inactive Storage, SEPA/NEPA Scoping Comments

Dear Ms. McKinley:

I am familiar with the FPEIS for the Yakima River Basin Integrated Water Resource Management Plan (The Integrated Plan). I attended the public meeting in Cle Elum on November 21st, and I have studied the Technical Memoranda for the Keechelas to Kachess Conveyance Project and the Kachess Reservoir Inactive Storage Project. As these projects are a subset of the Integrated Plan, I assume the Purpose and Need remains the same. i.e. to insure a level of confidence in the water management in the Yakima River Basin to provide water for municipal, agricultural and in-stream flows for fish.

I am surprised that the Bureau of Reclamation and the Department of Ecology have progressed so far in the preliminary design of these projects as to be confident enough to eliminate all but your preferred alternative along with the required no action alternative. I find it condescending on your part to reach this important decision without first submitting all reasonable alternatives to public scrutiny and constructive comment.

In the Final Programmatic Environmental Impact Statement for the Integrated Plan, the impact of many basin wide issues are glossed over to be "dealt with later in project specific EIS's." Therefore the scope of this Environmental Impact Statement (EIS) must be broad enough to address these basin wide impacts and not be limited to only local site-specific impacts. This EIS must deal with all impacts as part of the Yakima River Basin Integrated Plan and fully consider the cumulative effects on the entire Yakima River Basin by the Integrated Plan.

In preparing the EIS for these projects the following alternatives should be fully presented for public examination and comment:

- A comprehensive and mandatory conservation program in the Yakima River Basin that provides the same amount, 200,000 acre-feet, of water as the proposed construction projects without either the environmental impacts or financial cost.

- For the Kachess Reservoir Inactive Storage; the Gravity Tunnel.

- For the Keechelas-to-Kachess Conveyance Project, all three pipeline and all three tunnel alternatives must be full described and all impacts enumerated.

As a retired professional civil engineer I am particularly concerned with the following impacts during construction of these projects.

- Noise and dust abatement;
- Traffic increases and control;
- For tunnel construction, transportation and disposal of the muck, rock-spoil, from the tunnel excavation;
- A full discussion of the means and methods of construction of the Pump Station intake for the Kachess Reservoir Inactive Storage Project, addressing all the potential impacts and proposed means to reduce and/or mitigate those impacts;
- A full discussion of the means and methods of construction of the outfall, discharge feature of the K to K Conveyance Project, addressing all the potential impacts and proposed means to reduce and/or mitigate those impacts.

Thank you for the opportunity to study the proposed scope of the EIS for these projects and to make recommendations for issues to be addressed. Please notify me when the draft EIS is published. I look forward to reviewing and commenting on it.

Sincerely,

Edward M. Henderson

Edward M. Henderson, Jr., P.E.

Fwd: Kechess Drought Relief Pumping Plant

harlarpete@comcast.net

Dec 13 (3 days ago)

Name: Larry Wilson
Mailing Address: 11707 145st Kirkland,WA 98034
Telephone: 425 488 8855

Comments regarding Drought Relief Pumping Plant, Lake Kachess

Appears no consideration was made for "built environment". Property owners have expended substantial funds to achieve a lakefront residence. The lakefront aspect will vanish once the lake is lowered.

It has been my experience the young fish eat at the mouths of the several creeks presently emptying into Lake Kachess. Once a new mouth, after the lake is lowered, exists will this accommodate their feeding habitat? Today the mouths are delta like and once the lake is lowered there will be a near vertical drop into the lake.

For several years the elk have been wintering on my property. Once their access to water is greatly changed will they endure the winter?

It seems to me, rather intuitively, that the quoted price is excessively tilted in favor of downstream irrigators. What this really is is a humongous subsidy masked as something else.

I am a recreational cabin owner on east shore of Lake Kachess. I bought the property about 20 years ago, acknowledging the annual surface lowering approximately each Sept with maximum lowering of 65 feet.

This plan, Drought Relief Pumping Plan, was done without formal notice to me or any other property owners on Lake Kachess that I can find. I only found out about the plan by a 2 Dec 2013 Seattle Times article. It appears to me the rules dictated by SEPA and NEPA were not followed. From information I can gather it seems the plan if for total benefit of those downstream and ignores the impact on upstream property owners. The plan even smacks of inverse condemnation because of restricted property values.

In my case, I bought the property by investing a life savings to have a recreational site, on a lake, for my family and future generations. Once the beach is moved several hundred feet laterally and yo ti 140 feet vertically I will no longer have lakefront property. Instead I will be looking at moonscape. The exposed lake bed is nothing but rocks; some large boulders but generally ranging

up to basketball sizes, extremely difficult to traverse without twisting an ankle. The lake bed in vicinity of my cabin drops sharply so any access to water would be a trek of considerable vertical elevation.

The intangible aspects of the property which were attractive when purchased were the view of water and mountains, close proximity for walking shorelines, boating, fishing, the total relaxation without noise of the city, watching azure sunsets, and viewing the lake from dining room table.

Recently, we property owners on the east side obtained water rights and several wells were drilled. Coincidentally, the depth of wells fairly well matched the present lake level. Once the lake is lowered it seems reasonable to expect the water table will be affected. This will require the expense of re-drilling wells, not an inexpensive proposition.

Property devaluation would be substantial. There are no other comparable lakefront properties within 100 miles of Seattle so my option of attempting to sell and repurchase is non-existent without an infusion of far more funds than I possess.

A much smaller lake will certainly adversely impact the users of the State Park on the west side of the lake.

Kachess Scoping Comments

alan <flyfreebird@comcast.net> Dec 14 (2 days ago)

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901

I have several items that I would like to address in the Kachess Scoping Comments submission.

1. For years, the south end of the lake has been used by 4 x 4 vehicles, which are making ruts and possible disturbing nesting sites for local birds.
and in addition the last few years there has been groups of campers that use the south end of the lake for target practice. But they are using very large caliber guns, and set up targets across the open grounds several thousand feet away. The sheriff has chased them out several times.
So, what will be done to protect these exposed lands to abuse? When the lake is drawn down there will be much more land for these groups to use their 4 x4 vehicles.

2. In 2004 the road 4818 was designated as a passenger car road, but after that the county refused to put any money into keeping the road maintained.
Will the road be maintained for passenger car use in the future?

3. We monitor the level of the lake on the internet and for the last 5 years the level has been maintained "full" until later in the summer.
Will this change. I am worried that the level will drop early in the summer making access to the lake more difficult.

4. Will the boat launch at the state park be extended to allow use of the boat launch when the water level has dropped?

5. Last question, for years and years the area around the makeshift boat launch at the south end of the lake has been used by campers with no respect to private property and have destroyed trees and leave trash. Also they build illegal camp fires, shoot guns and have drinking parties.
This is a reservoir and there should be more protection. Campers should at least have a permit for a short period, 5 days but not allowed to stay for months at a time.

December 14. 2013

These are my comments on the Lake Kachess drought relief pumping plant as well as the Keechelus to Lake Kachess conveyance.

While I feel that my comments will bring about no change in the intended plans, I must voice my Strong opposition and make clear my reasons against the plans for additional water in the Yakima basin.

I am a resident and property owner on the Eastern shores of Lake Kachess. We have owned the property for approximately 43 years. Two years ago we purchased senior water rights and installed a well that should be completed in 2014. The property owners on the Eastern side of Lake Kachess spent a great deal of time, money and effort to negotiate and establish our water source with the Department of Ecology only to presumably see it drained away. With the impending drainage of eighty feet of lake water on top of the current drainage of sixty five vertical feet, the lake would be a sight of mud and rocks as far as the eye can see.

Why must taxpayers help subsidize the holders of junior water rights in the Yakima basin when there are rational alternatives that could come into play prior to this extremely expensive plan to assist property owners and farmers in the Yakima valley. Conservation should be the first step and it should be mandatory. Canals and ditches should be and could be lined at a far less cost than the estimated "4 Billion Dollars" of taxpayer dollars.

Property values at Lake Kachess would plummet, making the land virtually unsalable and untaxable.

The preponderance of agricultural commodities grown in the Yakima Valley are exports to Foreign countries. Hay for Japanese race horses, apples and cherries for Brazil, Argentina, Chile, Japan and China. Exports of Yakima wines as well as hops for making foreign beer.

There must be an alternative to this money washed down the drain proposal. Please consider other means to retain what the Yakima Basin already receives in water and improve the conservation efforts to retain it prior to spending money devastating such a beautiful area such as Lake Kachess. Finally, it would result in the complete devastation of fishing, boating and recreation on the lake.

I respectfully ask for your reversal of this extremely expensive and what I consider poorly conceived plan.

Respectfully: Ron and Robin Morissey
7224 N. Fotheringham St.
Spokane, WA, 99208
(509) 324 2087

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Alpine Lakes Protection Society * Center for Biological Diversity
El Sendero Backcountry Ski and Snowshoe Club
Federation of Western Outdoor Clubs * Friends of Bumping Lake
Friends of the Earth * Friends of Wild Sky * Kittitas Audubon Society
Middle Fork Outdoor Recreation Coalition
North Cascades Conservation Council * Olympic Forest Coalition
Sierra Club * Western Lands Project

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December 15, 2013

Bureau of Reclamation
Columbia-Cascades Area Office
Attention: Candace McKinley
Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901

RE: Keechelus to Kachess Conveyance, Kachess Inactive Storage, and Cle Elum Reservoir Pool Raise SEPA/NEPA Scoping Comments
Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley:

We have reviewed the scoping notices for the preparation of SEPA/NEPA EISs for the Keechelus to Kachess (K-K) Conveyance, Kachess Inactive Storage, and Cle Elum Reservoir Pool Raise.

GENERAL COMMENTS

Since the 1979 passage by Congress of the Yakima River Basin Water Enhancement Project (YRBWEP), the Bureau of Reclamation (BuRec) and Washington Department of Ecology (Ecology) have failed for over thirty years to seriously address issues of water-spreading, water-pricing, water metering, project repayment, surplus crops, and water conservation in irrigation districts in the Yakima Basin. During this same time period, Yakima irrigation districts have only been asked to undertake voluntary water conservation and have yet to pay off the existing BuRec's Yakima Basin Project. The BuRec and Ecology Yakima River Basin Integrated Water Resource Management Plan (Yakima Plan) includes the K-K Conveyance and Kachess Inactive Storage projects, which are proposed to further benefit Yakima Basin irrigators. Although the Cle Elum Reservoir Pool Raise was authorized by Congress to improve flows for fish, the Yakima Plan proposes to change this authorization to allow Yakima irrigators to also claim this water.

The Yakima River Basin Integrated Water Resources Management Plan FEIS (March 2012) failed to provide any alternatives, other than the required no-action alternative. The proposed EISs for the K-K, Kachess, and Cle Elum projects must provide information and analysis that would allow decisionmakers or the public to determine whether there are other less environmentally damaging alternatives with lower financial cost as detailed below.

PROJECT WIDE SCOPING COMMENTS

The Yakima Plan FEIS also failed to provide specific responses to scoping comments on the Yakima Plan. Because the proposed EISs are now project specific, these EISs should address the following:

1. Earth Resources

* How will the EISs evaluate the construction of the prosed projects' potential impacts and identify potential mitigation measures for those impacts such as impacts of upland discharge, including soil contamination and erosion; impacts of surface water discharge, and potential impacts resulting from earthquakes?

2. Air Resources

* How will the EISs evaluate the construction of the proposed projects' potential impacts on existing air quality?
* How will the EISs evaluate the construction of the proposed projects' compliance with the requirements of the Clean Air Act for construction and operation phases?
* What would be the construction of the projects' contribution to climate change gases?
* What would be the construction of the projects' carbon footprint?
* How extensive will the assessment of air quality and visibility impacts be? Will emission sources to be studied include emergency generators and other secondary sources? Will the EISs evaluate the impacts on air quality and visibility caused by fugitive and exhaust emissions from construction, traffic, and all point source emissions?

3. Water Resources

* Will the EISs include a description of the potential for spills of contaminants into waters of the United States and the measures such as an emergency response plan to mitigate impacts?
* What is the scope of the water quality analysis? Will the EISs disclose which water bodies may be impacted by the construction of the proposed projects, the nature of the potential impacts, and the specific pollutants likely to impact those waters? Will it also report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether the Washington Department of Ecology has developed a water quality restoration plan (Total Maximum Daily Load) for the water bodies and the pollutants of concern? If a Total Maximum Daily Load (TMDL) has not been established for those water bodies on the 303(d) list, in the interim will the EISs demonstrate that there will be no net degradation of water quality to these listed waters?
* Will the EISs explain how anti-degradation provisions of the Clean Water Act would be met for the construction of the proposed projects?
* Will any damage to the shoreline or other waterfront impacts result from the construction of new storage reservoirs and associated uses in the area?

* Will the EISs discuss how Clean Water Act (CWA) Section 404 requirements for wetlands would be met and evaluate potential impacts to adjacent wetlands or indirect impacts to wetlands such as hydrologic changes due to increases in impervious surface? Will the EISs disclose where there are known waters or wetlands that would be directly or indirectly affected by the proposed construction?
* Will the EISs address compliance with Executive Order (E.O.) 11990, Protection of Wetlands?

4. Fishery Impacts
* Will the EISs address impacts to fishery habitat from vibration, sound, shading, wave disturbance, alterations to currents and circulation, water quality, scouring, sediment transport, shoreline erosion (landfall) and structural habitat alteration?
* Will the EISs address physical and acoustical impacts during construction and operation?
* Will the Biological Assessment required for compliance with Section 7 of the Endangered Species Act (ESA) be a clearly identifiable section?
* Will an assessment of fisheries and benthic impacts specifically address the requirements for an Essential Fish Habitat Assessment per the Magnuson Stevens Act?
* Will studies for all final sites include an assessment of: 1) species type, life stage, and abundance; based upon existing, publicly available information, 2) potential changes to habitat types and sizes; and 3) the potential for fishery population reductions.
* Will the EISs assess potential indirect impacts to fish, mammals, and turtles that may result from changes in water movement, sediment transport, and shoreline erosion?
* Will the EISs include an assessment of potential impacts to fishing techniques and gear types used by commercial and recreational fishermen? The EISs should identify all potential conflicts with existing fishery use patterns and the potential for fishery elimination due to the consequences of the construction of the proposed projects. The EISs should include a review of existing literature and databases to identify and evaluate commercial and recreational fish data and abundance data in the Yakima River Basin. Data to be reviewed should include: National Marine Fisheries Service (NMFS) Commercial Data, NMFS Recreational Data, Washington Department of Fish and Wildlife Commercial Data, and supplemented with intercept surveys.
* Will the EISs comprehensively address the interconnections between the benthic, fisheries and avian resources? The predator-prey interactions are important considerations in fully understanding the potential impacts of these projects within the Yakima River Basin.

5. Biological Resources
* Will the EISs analyze potential impacts on fish, wildlife and their habitats from every element of the construction of new storage reservoirs, along with identification of mitigation measures?
* How will the EISs consider ecological objectives? Will ecological objectives be designed to protect water quality and to maintain and/or enhance the natural habitats in the Yakima River Basin for the benefit of fish and wildlife resources and the public?
* Will the EISs address measures that compensate for the loss of habitats of value to fish and wildlife?
* Will the EISs identify the endangered, threatened, and candidate species under the ESA, and other sensitive species within the Yakima River Basin? In addition, will the EISs describe the critical habitat for these species and identify any impacts the construction of the proposed projects would have on these species and their critical habitat?

* Will the EISs describe the current quality and potential capacity of habitat, its use by fish and wildlife in the Yakima River Basin and identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation?
* Will the EISs evaluate effects on fish and wildlife from habitat removal and alteration, aquatic and terrestrial habitat fragmentation caused by roads, land use, and management activities, and human activity? How will endangered species and habitat, including steelhead, salmon, and bull trout in the Yakima River Basin, be protected and enhanced?
* Will the EISs address whether northern spotted owls are present on nearby National Forest lands, State Department of Natural Resources lands, or private forestry lands and whether the species or individuals of the species may be affected by construction and operational activities?
* What major plant communities are present and affected? Will the EISs consider impacts on sensitive plant species, particularly those endemic to the Yakima River Basin? How will sensitive plant species in the vicinity be protected?
* What impacts would the proposed projects, including construction and operation have on the Pacific Lamprey? Will the EISs discuss how the proposed projects contribute to the recovery of the Pacific Lamprey?

6. Avian Impacts
* How will the EISs describe the impacts to the Yakima River Basin, particularly on migratory birds? How will the EISS establish a baseline data set? The species, number, type of use, and spatial and temporal patterns of use should be described. Information derived from other studies, which provides a three-year baseline data set, should be included if available. Information should be based on (1) existing, published and unpublished research results, especially research that describes long-term patterns in use, and (2) new field studies undertaken for this EISS. Data on use throughout the year, especially in spring for migratory species, and under a range of conditions should be collected. Data collection should allow a statistically rigorous analysis of results. Issues needing to be addressed include: (1) bird migration, (2) bird flight during storms, foul weather, and/or fog conditions, (3) food availability, (4) predation, and (5) benthic habitat and benthic food sources.
* Will the Biological Assessment required for compliance with Section 7 of the ESA be a clearly identifiable section?

7. Noise and vibrations
* How will the EISs address the potential for underwater noise and vibrations associated with construction and operation of the facilities?
* The EISs should include an assessment of the magnitude and frequency of underwater noise and vibrations, and the potential for adversely affecting fish and mammal habitats and migration. It should also include an assessment of fish and mammal tolerance to noise and vibrations, with particular emphasis on noise and vibration thresholds that may exist for each of the species. The EISs should also include the potential of noise impacts to human activity at any of the proposed dam construction sites.
* How will the EISs address identification of existing noise levels and evaluation of the construction of new storage reservoirs' potential short-term and long-term noise impacts along with potential mitigation measures?

* Have noise contour maps been developed for construction of new storage reservoirs and does it show day-night average sound level (DNL)? How will any DNL's that are in excess of local ordinance requirements be mitigated?
* Will the EISs evaluate noise generating activities associated with construction and on-going operations, including traffic to and from any project site?

8. Environmental Health
* How will the EISs address impacts of hazardous materials and identification of mitigation measures?

9. Land and Shoreline Use
* How will the EISs address compliance with land-use laws, plans and policies?
* How will the EISs address compliance with the State Shoreline Management Act?

10. Aesthetics
* How will the EISs address visibility of any proposed project and need for landscaping or buffers? How will the EISs assess effects of light and glare from construction on adjacent properties and communities?

11. Recreation
* How will the EISs address the proposed projects' impacts on recreational use of the Yakima River, its tributaries, and the Keechelus, Kachess, and Cle Elum reservoirs?

12. Transportation
* How will the EISs address the proposed projects' potential transportation impacts and identification of mitigation measures?
* Will the EISs identify existing traffic levels and transportation infrastructure, impacts of the proposed projects on potential increases in traffic accidents, additional maintenance, and minimization of traffic impacts?
* How many vehicle trips would be generated, including trips by employees and service and delivery vehicles from the proposed projects?
* Will the EISs evaluate the level of service and overall traffic generation from various activities at the proposed project sites including: construction traffic and the level of service and overall traffic generation reasonably expected from project-associated growth in the surrounding communities? Will this evaluation be made on a daily, weekend, and seasonal basis?
* Will the traffic study calculate road maintenance costs attributable to the proposed projects?
* What is the scope of mitigation of traffic impacts that will be considered in the EISs?
* What is the capacity of local roads to accommodate additional traffic associated with the construction of the proposed projects? Will there be congestion at the interchanges serving the proposed projects?

13. Public Services and Utilities
* What will be the need for additional public services, including public safety and emergency services during the proposed construction of the projects?
* What impacts to local school systems in the Yakima River Basin can be expected?

* How will housing needs for employees be addressed? Where will employee construction housing be developed?

14. Cultural Resources

* How will the EISs address requirements to comply with federal and state laws concerning cultural resources?
* Will the scope of the cultural resources analysis include identifying all historic properties or cultural resources potentially impacted by the projects or associated offsite development, including traditional cultural properties, other Native cultural resources, and non-Native historic properties? Will the EISs evaluate the impacts to any identified historic properties and cultural resources, i.e., what are the impacts of the projects and associated off-site development (e.g., housing, amenities)?
* How will historical Tribal uses of this area be factored in, including effects on sacred sites and fishing grounds?
* How will the projects affect the cultural heritage of the area?
* Will the EISs consider Tribal fishery impacts?
* How will the EISs fulfill the requirements of Section 106 of National Historic Preservation Act including coordination with the State Historic Preservation Officer?

15. Environmental Justice

* Will the EISs consider, based on the experience of such projects elsewhere, effects on levels of poverty?
* Will the EISs assess whether low income or people of color communities will be impacted by the proposed projects and disclose what efforts were taken to meet environmental justice requirements consistent with Executive Order (EO) 12898?

16. Socio-Economics

* Will a comprehensive economic analysis be undertaken to identify potential effects of the proposed projects on the Yakima River Basin?
* What will be the time frame for the assessment of economic and social impacts; 10, 20, 50 years?
* For comparison purposes, will the socioeconomic effects of other similar projects on other communities in the state be examined?
* Will the demand for hotel rooms in the Yakima River Basin be calculated?
* How many jobs will be created; at what wage levels? What percentage of work would be reserved for local contractors?
* What will be the consequences on property values and property taxes in the Yakima River Basin?
* How will impacts from any project impact existing restaurants, hotels, motels, RV facilities, and other overnight tourism lodging facilities? Will the EISs assess whether there will be a loss of workers from existing businesses? What nationally accepted professional or scholarly data will be used to evaluate the potential impacts over the next ten years?
* Will the EISs assess the current social and economic impacts of not having adequate public and essential commercial services (e.g., housing, medical, emergency) for current and future workers?

* How will effects on quality of life, including community character, demographics, and small-town atmosphere, be assessed?
* Will the potential dislocation of current residents due to an increased cost of living be considered?
* How will the EISs address safety considerations during construction of the projects?

17. Other Issues
* Will Tribal consultation occur with nearby Indian tribes in a manner consistent with Section 20(b)(1)(A) of IGRA, the Department's trust responsibilities to tribes, and the 1994 Executive Memorandum entitled Government-to-Government IGRA Section 20?
* How will local communities be consulted with and involved in the NEPA and SEPA processes?
* What consultation with school districts and other service providers will occur?
* What other permits and approvals are required?
* Have geo-tech studies been done for any proposed project site?
* Would any proposed project be affected by seismic faults or fractures?
* Will the EISs address the potential for increased litter?
* Will the EISs address the disposal of solid waste?
* Wilderness or other appropriate designation should also be sought for USFS roadless areas in the Teanaway, in the area between Kachess and Cle Elum Lakes, and in the upper reaches of Manastash and Tanuem Creeks in order to protect headwaters streams, snow pack, and forests.
* Will USFS roadless acreage in the Keechelus, Kachess, and Cle Elum watersheds be identified?
* Without significant improvements to in-stream flows in the lower Yakima River, how will in-stream flow improvements for fishery benefits in the upper Yakima River Basin be ensured?
* The EISs should evaluate impacts of climate change on these projects under a range of conditions: continuation of current climate conditions; more rain – less snow; and less rain – less snow.

ALTERNATIVES

The EISs for the proposed projects should address the following alternatives:

Alternatives - Enhanced Water Conservation

The proposed agricultural water conservation program under the Yakima Plan proposes to conserve up to 170,000 acre-feet of water in good water years. However, the Yakima Plan does not identify specific projects for implementation. As a result of this decision, water conservation is put at a significant disadvantage as the BuRec and Ecology are eager and willing to identify the Cle Elum, K-K, and Kachess Inactive Storage projects they intend to build to benefit Yakima irrigators, while disdaining to even hint at what or where water conservation projects would take place. In addition it is apparent that unlike the above projects, which BuRec and Ecology would like to have authorized and constructed, water conservation projects would remain voluntary.

The Yakima Plan identifies only a single goal of conserving up to 170,000 acre-feet in good water years. The Yakima Work Group prepared a Summary Results – Water Needs Assessment Yakima River Basin Study (Task 2), date July 20, 2010. Table 2 lists 213,595 acre-feet of water conservation savings from projects recommended for inclusion. What accounts for these

discrepancies in water conservation? The EISs should set out an alternative of maximum water conservation efforts, in addition to the 170,000 acre-feet proposed under the Yakima Plan.

* Assuming that the proposed water conservation program would conserve up to 170,000 acre-feet of water in good water years, how many acre-feet of water would be conserved during drought years?

* Identify all water conservation projects undertaken in the Yakima River Basin since 1979.

* Under the Central Valley Project Improvement Act of 1992 (CVPIA) and the Reclamation Reform Act of 1982 established Criteria for Evaluating Water Management Plans. These plans must contain the following information:

1. Description of the District
2. Inventory of Water Resources
3. Best Management Practices (BMPs) for Agricultural Contractors
4. BMPs for Urban Contractors
5. Plan Implementation
6. Exemption Process
7. Regional Criteria
8. Five-Year Revisions.

Has the BuRec applied the CVP Criteria to any of the past or proposed Yakima River Basin irrigation district water conservation plans? The EISs should list all BuRec approved water conservation plans for the Yakima River Basin.

* According to the BuRec Draft Programmatic EIS on the Yakima River Basin Water Enhancement Project, dated April 1998, page 33, "Under the Basin Conservation Program, a goal of the legislation is to achieve 165,000 acre-feet of water savings in 8 years." Has this level of acre-feet of water savings been achieved? If so, in which irrigation districts?

* The Department of Ecology FEIS on the Yakima River Basin Integrated Water Resource Management Alternative (dated June 2009, #09-11-012) Tables 2-3 and 2-4 display 223,596 acre-feet of potential conserved water savings from Yakima River water users and an additional 20,003 acre-feet of potential conserved water savings from Naches River Water Users. Why does the Yakima Plan propose less than half of the water conservation potential proposed just four years ago?

* These Tables disclose 84,700 acre-feet of water conservation potential on the Wapato Irrigation Project (WIP). Why does the Yakima Plan fail to identify any specific water conservation improvements for the WIP?

<u>Alternatives- Municipal and Domestic Conservation program</u>

* How much water could be conserved by ending the exempt well provisions under Washington Water Law?

<u>Alternatives - Market Reallocation</u>

* Will the EISs provide a list of all legal and institutional barriers to market reallocation?
* Will the EISs provide an estimate of the current water savings that could occur under existing Washington Water Law?
* Will the EISs evaluate the results of the Market-Based Reallocation of Water Resources (Yakima River Basin Study Task 4.12, November 19, 2010, Power Point page 14)? Do BuRec and Ecology agree that up to 110,000 acre-feet of water may be available for inter-district water trades and up to 230,000 acre-feet of water may be available for intra-district trades? Doesn't this alternative alone have the capacity to meet the irrigation "goals" of the Yakima Plan? Will the EISs evaluate this alternative?
* What is the status of water banking in the Yakima Basin?
* What is potential for water banking, both intra-and inter irrigation district?

Alternatives - Crop selection
* What are the Yakima irrigation districts growing?
* How much acreage is devoted to surplus crops? Is the Kittitas Reclamation District still growing hay for the Japanese race horse industry?
* How many acres of vineyards in the Yakima River Basin are sustainable and do not rely on irrigation or groundwater?
* What Yakima Basin crops are most drought-resistant? What crops are least drought-resistant?

Alternatives - Water pricing
* What are the current costs to the irrigators of water (per acre-feet) and electricity (are irrigation rates still subsidized by the BPA)?
* Have the Yakima River Basin irrigation districts repaid the costs of the existing Yakima Basin Irrigation Project?
* If not, what is the amount left to be repaid?
* What would be the true costs of irrigated crops if they had to pay market rates for water and power delivery?

Alternatives – Crop Insurance
* What is the status of crop insurance availability to address crop losses during a drought?

Alternatives – Aquifer Storage
* What is the status of aquifer storage in the Yakima Basin?

Alternatives - Forest Practices
* What is the current contribution to early spring runoff from clearcuts on the Okanogan-Wenatchee National Forest, DNR land and private forestry land in the Yakima River Basin?
* Will the proposed EISs look at the alternative of halting timber harvesting in the Yakima River Basin to retain more snow pack and improve in-stream flows throughout the summer, particularly above the Keechelus, Kachess, and Cle Elum Reservoirs.

We request that each of the above alternatives be addressed in the EISs.

MORE SPECIFIC PROJECT COMMENTS

As set out in 40 C.F.R. Section 1501.7(2) and WAC 197-11-408(1), we have identified significant issues to be analyzed in depth in the EISs. The following are specific comments on Cle Elum Dam (Pool Raise), the Kachess Reservoir Inactive Storage Project, and Keechelus to Kachess Conveyance elements as proposed in the Yakima River Basin Study Integrated Water Resource Management Plan Final Programmatic EIS (dated March 2012):

Cle Elum Dam (Pool Raise)

Phase 2 of the YRBWEP, Public Law 103-434, was passed on October 31, 1994. Section 1206 of Title Xll of this act authorized the appropriation of $2,934,000, cost indexed to September 1990 prices to (1) modify the radial gates at Cle Elum Dam to provide an additional14,600 acre-feet of storage capacity in Lake Cle Elum, (2) provide for shoreline protection of Lake Cle Elum, and (3) construct juvenile fish passage facilities at Cle Elum Dam, plus such additional amounts as may be necessary which may be required for environmental mitigation.

* If this project is a priority, why have none of these projects been carried out over the past nearly 20 years?
* Why was this proposed project not evaluated as part of Ecology's 2009 Yakima River Basin Integrated Water Resource Management Alternative Final EIS?

In the Yakima River Basin Integrated Water Resources Management Plan FEIS (March 2012), the BuRec claims that the proposed 3-foot rise would be used to improve streamflows for fish and increase water supply for out-of-stream needs.

* How can this increased water storage do both?
* Why are irrigators seeking to claim the pool raise water for themselves?
* Would this require a change in legislation?
* How can additional stored water be used to improve streamflows if the stored water must be dedicated to irrigators during drought years as part of the Total Available Water Supply under the 1945 Consent Decree?
* Can Congress override the 1945 Consent Decree by allocating a portion of the Yakima Basin, Total Available Water Supply (TAWS) from irrigation to instream flows?
* What amount does the BuRec intend to divert to out-of-stream needs?
* How would instream flow released from the pool raise enhance fishery resources in the Yakima Basin?
* The EIS should disclose any adverse impacts from release of pool raise water for irrigation drought relief on downstream fishery species.
* Where would irrigators divert the pool raise water for irrigation use?
* Has the BurRec determined what portion of the operation and maintenance costs of Cle Elum pool raise would be the responsibility of local irrigation districts?
* Would this alternative supply all pro-ratable irrigators with water during drought year?
* If so, list the acre-feet that each pro-ratable irrigation district would receive from this project.
* How many seasons since 1979 has the Cle Elum reservoir completely refilled?
* Which years, if any, has the Cle Elum reservoir not refilled?

Raising the reservoir pool elevation by three feet would worsen existing shoreline erosion problems around Cle Elum Lake. A 2000 Reclamation report proposed the following shoreline protection to extend to 2250' at areas of erosion concern:

- 50,000 CY riprap placement
- 38,000 CY bedding placement
-143,000 CY shoreline excavation

An Anchor QEA Cle Elum Pool Raise Technical Memorandum (March 2011) provided the following estimates:
- 24,500 CY riprap
- 13,900 CY bedding placement
- 80,500 CY shoreline excavation

and an additional estimate of 24,700 CY of slope toe backfill and 104,000 CY of in-reservoir disposal.
* Have these estimates changed since 2011?
* Where would the in-reservoir disposal take place?
* How would in-reservoir disposal take place? By barge?
* What benthic and water quality impacts would be caused by in-reservoir disposal?
* The Kittitas County Shoreline Management Program (SMP) (1975) has not been updated for nearly 40 years. It designates the Cle Elum shoreline as a Conservancy Environment. Section 28 of the SMP provides that landfills in the Conservancy environment shall be a conditional use and allowed only for water-dependent uses, for public uses, and for the purpose of elevating a structure to meet flood proofing requirements as required by the flood control zone permit.

Sec. 35 of the SMP provides that shoreline works and structures shall be permitted in the Conservancy environment only where they do not substantially change the character of that environment, where they are a necessary part of a project clearly dependent on a nearby location and where necessary to protect or facilitate irrigation structures. Any project will be denied if the possibility that downstream properties and natural river systems will be adversely affected by any such development.
* Would the drilling and blasting, as well as pit excavation, create solid waste as defined by Sec. 36 of the SMP. Would solid waste disposal be allowed in the Cle Elum reservoir?

It appears that the proposed landfilling and riprapping may not comply with the 1975 SMP. The Kittitas County SMP is undergoing review with proposed changes scheduled to be sent to the Department of Ecology in summer of 2014.
* Would these projects be vested to the 1975 SMP?
* How would any changes to the SMP adopted by Ecology in the future impact this project?

New environmental protection standards for updated shoreline master programs include "no-net-loss of shoreline ecological functions."
* How would the extensive shoreline landfilling and riprapping comply with this standard?
* Will the Cle Elum EIS identify the adverse environmental impacts to the Cle Elum Reservoir shoreline, vegetation, fish forage habitat, and wildlife?
* How long would the three-foot elevation rise inundate previously unflooded shoreline areas during a normal water year? A drought water year?
* How many acres of forest would be inundated by a three-foot rise?

* Identify the acreage of National Forest roadless area that would be inundated by an expanded reservoir around the Cle Elum Reservoir.
* Identify any previous BuRec reservoir project that has inundated National Forest areas and what mitigation was proposed or carried out.
* What decrease in shading and insect production would occur as a result of this project?

The Anchor QEA Cle Elum Pool Raise Technical Memorandum states that the Cle Elum fish passage project is now considered a separate project from the Pool Raise.
* The EIS should describe the relationship between the proposed fish passage project with and without the pool raise.

The proposed Yakima River Basin Study Integrated Water Resource Management Plan (PIWRMP) (Vol. 1), dated February 2011, Figure 4-1, Improvements in Instream Flows under Yakima Plan (page 47) shows that with the Yakima Plan, only minor in-stream flow reach results from FWIP (<5%) would occur in the lower reach of the Yakima River from the Roza Diversion Dam down to Richland, WA.
* With only minor in-stream flow improvements in the lower Yakima how would Cle Elum pool raise enhance fishery resources in the Yakima River?
* The PIWRMP (page 24) states, "Providing unimpeded fish migration past the existing storage dams in the Yakima Basin would increase species distribution. . ." The Cle Elum EIS should clarify how this goal of providing unimpeded fish migration is consistent with raising the pool of an existing storage dam.
* The EIS should describe and evaluate all impacts to state or Federal listed endangered or threatened species.
* What are the estimated evaporation rates for the existing Cle Elum reservoir and proposed rise?
* What are the estimated refill times for both the existing Cle Elum reservoir and proposed rise?

Kachess Reservoir Inactive Storage Project

According to the HDR Engineering, Inc., Yakima River Basin Integrated Water Resource Management Plan Technical Memorandum: Kachess Reservoir Inactive Storage Project Alternatives Comparison and Recommendation for Advancement, October 2013 (Kachess Tech Memo), this project would allow an additional 200,000 acre-feet of water stored in Kachess Reservoir to be released for water supply purposes during drought years, anticipated to be approximately three years out of every 10 years. The Kachess Tech Memo recommends a single alternative (Alternative 2- Pump Station) as the preferred alternative.

* Just as in the Programmatic Yakima Plan FEIS, other than the required no-action alternative, the BuRec and Ecology is presenting only a preferred alternative. NEPA regulations require that agencies rigorously explore and objectively evaluate all reasonable alternatives. *40 CFR 1502.14(a).*

The Kachess Tech Memo states that Alternative 2 – Pump Station would provide supply water directly to the Kittitas Reclamation District (KRD) division. The EIS should clarify how the Kachess Reservoir Inactive Storage Project would operate.

* During a drought year, would all 200,000 acre-feet be supplied directly to the KRD?

The Kachess Tech Memo also states that Alternative 2 – Pump Station would provide water to the Kachess River to maintain minimum flows for fish and wildlife, which are not currently available.
* Why aren't optimum instream flows being considered?
* Would any of the inactive storage be used for instream flows during non-drought years?
* During a drought year, how many acre-feet (or c.f.s.) would be provided to the Kachess River to maintain minimum flows?
* How many seasons since 1979 has the Kachess reservoir completely refilled?
* Which years, if any, has the Kachess reservoir not refilled?
* What are the estimated refill times for the existing Keechelus and Kachess reservoirs, and with the proposed K-K and Inactive storage projects assuming complete draw down during a drought year?
* What is the trans-evaporation rate for Keechelus and Kachess reservoirs?

The BuRec has apparently dropped consideration of a gravity tunnel alternative.
* Would the gravity tunnel alternative provide better opportunities to increase instream flows for fish and wildlife?

According to the Kachess Tech Memo, for the pump station alternative, the base-flow pumping system would operate continuously whenever all of the six (6) large pumps were not operating and the water surface elevation in the reservoir had dropped below the level of the existing outlet works to meet demand for fish flows.
* What specific instream flow benefits in the Kachess River and Yakima River would result from the proposed Kachess Alternative 2 – Pump Station?
* Where would the disposal site be for any intake tunnel and shaft muck?
* What impacts would occur due to locating a new discharge structure on the left bank of the Kachess River?
* Capital costs for this alternative are projected at $205,000,000 and O/M costs at $970,000/yr. If the KRD is the principle beneficiary of this project, would the KRD be required to pay the full cost? Would they be required to pay the O/M?

The Pump Station Alternative would require about 8,000 kilowatts of power for the six large pumping units. Redundancy for the small, base-flow pumps would be provided by an on-site, back-up power source so Reclamation can deliver base flow to the river if the primary power supply system fails.
* Who would supply this power?
* Power costs are projected at $600,000 per year. Who would pay for this power?

The Kachess Tech Memo states that the proposed project would provide the ability to supply water directly to the KRD diversion and other water right holders without needing to use the Keechelus Reservoir and upper reach of the Yakima River (from Keechelus Reservoir to the KRD diversion).
* Would this alternative supply all pro-ratable irrigation districts with water during drought year?
* Would this alternative supply any non-pro-ratable irrigation districts?

* List the acre-feet that each Yakima irrigation district would receive from this project in a drought year.
* Can Yakima irrigation districts expand their irrigation acreage or convert to more water intensive crops to claim access to the Kachess inactive storage during non-drought years?

The YRBWEP Workgroup Integrated Water Resource Management Plan Summary Support Document (YRBSSD) (March 23, 2011) page 3, states: "At Box Canyon Creek (Kachess Lake tributary), ensure effective passage for pre-spawn adult bull trout."
* What specific steps would be taken to "ensure effective passage"?

The Yakima River Basin Study Integrated Water Resource Management Plan (PIWRMP) (Vol. 1, page 58), dated February 2011 states that for Box Canyon Creek the Yakima Plan would result in adverse impacts.
* What are these adverse impacts and what mitigation is proposed?
* How does accessing this inactive storage conflict with fish passage/habitat enhancement proposed for Lake Kachess?
* The EIS should describe and evaluate all impacts to state or Federal listed endangered or threatened species.
* What is the State Shoreline Management Act environmental designation for the Kachess reservoir shoreline?
* What are the polices and goals for this environmental designation?
* What substantial development permits would be required?

Keechelus to Kachess (K to K) Conveyance

According to HRD Engineering, Technical Memorandum: Screening of Alternatives for the Keechelus-to-Kachess Conveyance Project (September 2013) (page 2) (K-K Tech Memo), the K-to-K Conveyance project has two purposes: 1) to improve fish habitat conditions by reducing flows in the upper 10.3 miles of the Yakima River below Keechelus Dam during periods of high reservoir releases; and 2) to enable the storage of more runoff from Keechelus Reservoir drainage to provide additional water supply for agricultural irrigation and other uses. The K-K Tech Memo goes on to state there are .artificial summer high flows in the Yakima River between Keechelus dam and the mouth of the Kachess River. Currently the flows are higher than natural conditions during summer months when water is released from the reservoir for irrigation. The project would also increase water levels in Kachess Reservoir most years. The increased reservoir levels are expected to improve bull trout passage to tributary streams which is currently impaired by low reservoir levels. The K-K Tech memo states that increased flow releases from Kachess Reservoir would improve instream flow and habitat quality for salmonids in areas downstream of the reservoir. Modeling of the Yakima River system using BuRec's RiverWare model indicates a median quantity of 97,000 acre-feet of water can be transferred from Keechelus Reservoir to Kachess Reservoir annually. The quantities would vary considerably from year to year and range from approximately 10,000 acre-feet in years with low runoff to as high as 130,000 acre-feet in years with high runoff. An average capacity of 400 cubic feet per second (cfs) and a maximum of 500 cfs flow rate is intended to enable BuRec to reduce flows in the upper Yakima River to 500 cfs beginning in July each year between Keechelus Dam and Lake Easton (approximately 10.3 river miles). Flow in this reach is controlled primarily by releases from Keechelus Reservoir. The flow rate in this reach of the Yakima River would then be ramped down from 500 cfs in early August to 120 cfs by early September. To

improve the fish habitat conditions for fish in this reach of the Yakima River, the year-round base flow in that reach of the river would be increased to 120 cfs.

It appears that the BuRec and Ecology have already eliminated all pipeline alternatives (P1, P2 and P3), as well as tunnel alternative T2. Just as in the Programmatic Yakima Plan FEIS, other than the required no-action alternative, the BuRec and Ecology is presenting only a preferred tunnel alternative with two options T1 (from Keechelus to Kachess), and T3 (from Crystal Springs Campground below Keechelus Reservoir to Kachess). NEPA regulations require that agencies rigorously explore and objectively evaluate all reasonable alternatives. *40 CFR 1502.14(a).*

The T3 option would result in 8.8 miles of improved flows in the Yakima River compared to 10.3 with T1.

* The K-K EIS should quantify fishery benefits between these two options.
* What Yakima River instream flow benefits would results from the K-K project during drought years? During non-drought years?
* How many seasons since 1979 has the Keechelus reservoir completely refilled?
* Which years, if any, has the Keecheulus reservoir not refilled?
* The EIS should clarify how this project would be coordinated with on-going construction of I-90.

* Fish screening was one of the original programs to be carried out by the YRBWEP authorized in 1979. Are there currently fish screens on the existing Keechelus Reservoir tower outlet? If not, why not?
* Will the K-K EIS address impacts to streams, wetlands, wildlife and fisheries?
* The EIS should describe and evaluate all impacts to state or Federal listed endangered or threatened species.

T1 Option
* The T1 option would disturb residents along Lake Kachess Road and those trying to access properties adjacent to Kachess Reservoir during construction and should be addressed.
* What wetland impacts would be caused by the T1 option? What mitigation is proposed?
* What is the State Shoreline Management Act environmental designation for the Keechelus reservoir shoreline?
* What are the goals and polices for this environmental designation? What substantial development permits would be required for the T1 option?
* Field studies for wetland and stream delineations, and fish, wildlife, vegetation, and cultural resource surveys should be carried out.

T3 Option
The T3 option would involve releases flowing downstream for 1.5 miles from the Keechelus Dam outlet to the campground site, where it would be diverted from the river into the tunnel.
* What environmental impacts would occur from installing a new Yakima River diversion and leaving the K-to-K diversion flow in the first 8,000 feet of the Yakima River, particularly to fish species?
* The T3 option would disturb residents along Lake Kachess Road and those trying to access properties adjacent to Kachess Reservoir during construction and should be addressed.

* Would the T3 option require diversion of the Yakima River? What stream alterations would be required? What wetland impacts would occur? What mitigation is proposed?
* Would this alternative reduce the length of the Yakima River reach that would achieve improved flows for fish habitat as a result of the K-to-K Conveyance project? What benefits would accrue to the remaining 8.8 miles of Yakima River between the Crystal Springs Campground and Lake Easton? Is this river diversion is hydraulically feasible or would it lead to potentially unacceptable operational restrictions to protect fish habitat in this reach of the Yakima River?
* Would the T3 alternative decrease the length of the Yakima River that would benefit from reducing the artificially high summer flows?
* Field studies for wetland and stream delineations, and fish, wildlife, vegetation, and cultural resource surveys should be carried out.

Rolling Review and Future Plan Adjustments

* The Department of Ecology has created a Yakima Work Group "Implementation Subcommittee" with meetings that are closed to the public and not subject to public notice. A listing and summary of all Work Group "Implementation Committee" meetings should be included in the EISs.

Potential Barriers to Plan Implementation and Mitigation Strategies

* A Conservation Advisory Group (CAG) was appointed by the Secretary of Interior under Title XII on July 13, 1995 (membership includes two Yakima River Basin irrigators, one from the Yakama Indian Nation, one from environmental interests, one from Washington State University Ag Extension Service, and WDFW). Will the EISs disclose the relationship of the CAG to the establishment of the Yakima Work Group?
* Will the EISs provide an analysis on how water stored or pumped in a new or expanded reservoir and already allocated under the 1945 Consent Decree may be reallocated to in-stream flows?
* Failure to comply with the Federal Advisory Committee Act (FACA) is a potential barrier to plan implementation. The Federal Advisory Committee Act (Pub. L. 92-463, 6 October 1972) seeks to curtail the rampant "locker-room discussion" that had become prevalent in administrative decisions. These "locker-room discussion" are masked under titles like "task force," "subcommittee," and "working group" meetings, which are less than full FACA meetings so they do not have to be open to the public. Will the EISs disclose whether the Yakima Work Group was established under FACA? Will the EISs disclose all meetings of the Yakima Work Group Executive Committee, the minutes from those meetings and how public notice was given? Will the EISs disclose all meetings of the Yakima Work Group Implementation Subcommittee, the minutes of those meetings and how public notice was given?
* Will the EISs evaluate the U.S. Supreme Court's May 2, 2011, decision in *Montana v. Wyoming* (563 U.S. ____(2011)) and possible legal effects on water rights in the Yakima River Basin?

Finally, as set out in 40 C.F.R. Sec. 1502.14, alternatives are the heart of the environmental impact statement. The BuRec has an affirmative obligation to "[R]igorously explore and objectively evaluate all reasonable alternatives, including those that may require changes to existing law or not within the jurisdiction of the lead agency. *40 C.F.R Sec. 1502.14(a)-f).* Any EIS must include a non-structural alternative including both water conservation and water

marketing to provide the public and Congress with a fair comparison and range of choices and not just an *ad hoc* justification of a limited work group hand selected by the BuRec and Ecology.

Please send us a copy of the draft EISs when they become available.

Sincerely,

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Candace McKinley
Environmental Program Manager
Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901
Via email to: yrbwep@usbr.gov

December 15, 2013

☒ Yes, I would like to receive a copy of the scoping document

☒ Yes, I want to receive email updates and information on the EIS

☒ Yes, I want my name included on the mailing list to receive information on the EIS

Dear Ms. McKinley: Please find attached my Scoping Comments on the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus to Kachess Conveyance EISs. While I am the President of the East Kachess Homeowner's Association, these are my personal comments, and not those of the Association. For your convenience, the comments below are organized using the headings from the Programmatic Final EIS (FPEIS) Scoping Summary.

Elements / Alternatives / Projects

- A critical element of the project has so far been undefined: how often is it projected that the KRDPP will be used to draw down Lake Kachess below its current outflow level of 2192 feet? Washington state RCW 43.83B.400 defines "drought" as "when water supply conditions are expected to be 75 percent or less of the normal supply and will cause undue hardship to water users." The EIS should explicitly address the following: Exactly what process will Ecology follow in making the determination of a drought? Looking back at historical data, Ecology has declared a drought five times in the last 21 years (FPEIS p 3-21): 1992, 1993, 1994, 2001, and 2005 when water supplies were estimated at 37-67% of normal. Using whatever methodology will be used in the future, if that method were retroactively applied, would these five years be the only times when the Kachess Reservoir Inactive Storage would have been used? In other words, can the residents of Lake Kachess expect that approximately one year in four the lake will be drawn down below its historical level?
- A second critical element of the project remains undefined: Given the availability of additional surface water from Lake Kachess, there may be a temptation to use that water in non-drought years. For example, the "Yakima RiverWare Model" described in Section 5.3

(p5-5 ff) of the FPEIS does not state what percentage of years the Kachess Reservoir Inactive Storage was accessed in the model for its drought year calculations. The EIS should explicitly state whether any additional volumes of water rights will be granted, or whether other uses of the Kachess Reservoir Inactive Storage such as water supply to new municipalities will be allowed in non-drought years.

- In general, the Keechelus to Kachess pipeline is supported; any means which increases water levels in Lake Kachess is welcome to residents of Lake Kachess.

Water Resources / Water Quality

- When Kachess was drawn down to the natural lake level a few years back to work on the outflow structure of the existing dam, the bottom was revealed to be sulfurous smelling (presumably anaerobic) silt. The EIS should address what the effect of this silt outflow, which has been collecting in the natural lake bed since time immemorial, will be on the Yakima river and fish redds when the Kachess Inactive Storage is being used.
- When Lake Cle Elum is drawn down, a group of 4x4 truck owners who call themselves "mudders" drive around on the mud seeing who can get their truck dirtiest. This practice is illegal, but continues throughout Washington as noted by a recent forest service posting http://www.fs.usda.gov/detail/okawen/news-events/?cid=STELPRDB5423426 The EIS should describe the effect on Yakima river water quality as a result of sediments stirred up by "mudders" in years when the Kachess Inactive Storage is being used.

Water Conservation

- The FPEIS (p. 2-36) notes that "Agricultural water conservation…modeling estimated that the agricultural water conservation program would conserve approximately 170,000 acre-feet of water in good water years." This is approximately equal to the additional surface storage capacity offered by the proposed Kachess Reservoir Inactive Storage. The EIS should evaluate potential conservation efforts for agricultural water users, and should include a cost / benefit analysis comparing agricultural water conservation vs the Kachess Drought Relief Pumping Plant proposal.
- A comment submitted in 2012 to the FPEIS noted "The 1998 DEIS on the YRBWEP stated a goal of "165,000 acre-feet of water savings in 8 years" under the Basin Conservation Program. Has this goal been achieved? By which irrigation districts?" The EIS should address whether this goal has been achieved, and if it has not been demonstrably achieved, the EIS should justify creation of additional water resources in the absence of conservation efforts.

Economics

- This $4 Billion project is designed to take water from the upper reaches of the Yakima basin primarily for the benefit of prorated agriculture users in the lower Yakima basin. The EIS should specifically note exactly what contribution those prorated agriculture users are making to the program, and should provide a cost / benefit analysis for their contribution. Specifically what additional crop production will result from keeping prorated water availability > 70%, and how many years of such additional crop production would be required to pay off the $4 Billion investment?
- While the benefit of an integrated water plan is apparent, it is not realistic to think that all its components have equal priority or can be conducted simultaneously. The individual Project EISs should include a cost benefit calculation in each EIS, which can then be compared to sequence the projects.

- Property values for homeowners on Lake Kachess will be decreased as a result of the lowering of the lake level. Figure 3 of the Lake Kachess Inactive Storage Technical Memorandum (http://www.usbr.gov/pn/programs/yrbwep/reports/tm/4-9kachinacstore.pdf) indicates that with the additional 80 foot drop proposed for drought years, the shoreline will recede from 200 to 450 feet, depending on location of the shoreline. So property owners who now have lakefront property will no longer be lakefront. They may be "able to see the lake" but accessing the water through the rock and silt shoreline which will result will be a challenge. The EIS should address reduction in property values for all residents of Lake Kachess.

Recreation and Tourism

- The FPEIS notes on page 5-91 "The Kachess Reservoir inactive storage project would allow lower drawdown of Kachess Reservoir in drought years. …However, the reservoir is currently drawn down annually, and the additional drawdown would have little additional impact on recreation." This conclusion appears incorrect. Lake Kachess is actively used by boaters. If the lake is drawn down by another 80 feet during drought years, the EIS should describe what provisions are to be made for boat launching facilities. Will there be money available to extend the single public boat launch at the campground through the several hundred feet of exposed silt which will be required to reach lake level? Otherwise recreational boating at the lake will be impossible.

Groundwater

- All residents of Lake Kachess rely on well water or surface water for their homes. Well levels in this area a known to seasonally fluctuate, approximately following the lake level. As an example, here is a five year graphic of my well water levels, which were part of the recently completed USGS Kittitas Aquifer study.
http://groundwaterwatch.usgs.gov/AWLSites.asp?S=471803121125101
The EIS should state the expected impact on local well users when the lake is drawn down an additional 80 feet. Will compensation be made to well owners which need to redrill their wells?

Crops

- As noted above, the benefit of the Yakima Basin Integrated Plan appears primarily for the prorated agriculture users in the lower valley. The EIS should describe what efforts those users are taking to plant less water intensive or more drought tolerant crops.

Fish/Wildlife

- Box Creek Canyon bull trout stocks on Kachess Reservoir are characterized as "critical" (FPEIS p 3-57) and a "high priority action population" in the Yakima Bull Trout Action Plan (YBTAP p. 126). The report notes that for Box Creek Canyon on Lake Kachess, "With the reservoir level significantly lowered from irrigation water withdrawal, the mouth is located on the lakebed." The YBTAP also notes that "The highest severity threats to this population are passage barriers in the form of Kachess Dam at the outlet of the lake and from low water conditions at the mouth of the spawning tributary during the migratory period. This population also has a low population abundance, which increases the risk of extirpation." (emphasis added) If the current lake drawdown level represents "the highest severity threat" to this "high priority action population," the EIS should specify what additional effect drawing down Lake Kachess by another 80 feet will have on the late-season spawning of bull trout.

Visual and Noise

- The FPEIS p3-66 notes the "Visual Quality Objective" (VQO) for Lake Kachess is "Scenic Travel 1 (ST-1) – Retention." The document goes on to note that "Under Retention VQO…Changes in their qualities of size, amount, intensity, direction, pattern, etc., should not be evident." The EIS should explicitly describe how lowering Lake Kachess another 80 feet, and exposing the sulfurous sediments which have been covered since time immemorial, does not constitute visual "changes in size, amount, intensity, direction, or pattern."
- The FPEIS p 3-66 notes that for Lake Kachess, the "Scenic Integrity Level" for Lake Kachess is "high, meaning the landscape appears intact." The EIS should explicitly describe how lowering Lake Kachess another 80 feet does not alter the "intact appearance" of the lake.
- The EIS should explicitly describe the expected visual and noise disturbances associated with the proposed pumping station on the East shore of Lake Kachess. This is currently pristine forest.

Transportation

- On the map on p3 of the "KDRPP Fact Sheet" released in November 2013, the proposed 12 foot diameter pipeline conveying water from the Kachess pump station to the discharge structure is shown to be located under Forest Service Road 4818 for approximately 1.5 miles. The FPEIS notes (p4-60) "Construction associated with the inactive storage project would have minor, short-term impacts on local roads in the vicinity of Kachess Reservoir. It would temporarily increase traffic on roadways with worker traffic, equipment, and deliveries." This characterization appears to ignore a critical point: FS-4818 is the only access road to the homes, National Forest Service campground, and recreational areas on the east side of Lake Kachess, and for most of its length this dirt road is about 12 feet wide and is bordered on both sides by forest. Therefore the suggestion that burying a 12 foot diameter pipeline under a 12 foot width road will result in "minor" impacts seems difficult to justify. Rather it would appear that vehicle access to all of the east side of Lake Kachess will be completely blocked for the duration of the construction, unless a parallel road is constructed through the bordering forest. The EIS should specifically describe how vehicle access will be preserved to homes, property, Forest Service campground and recreation uses during the construction of this pipeline.

Process / Scope

- While it is not a specific component of the EIS, I must add my voice to those who point out that property owners who will be directly affected by the Yakima River Basin Integrated Plan have <u>never</u> been contacted by Ecology or Reclamation. Not the cabin owners in Bumping Lake whose properties would be inundated, nor the property owners on Lake Cle Elum who will lose "an approximately 300 foot strip of land surrounding the entire reservoir" (FPEIS p5-95), nor the property owners on Lake Kachess who find that a pumping plant or pipeline is now proposed for their private property. All property owners on Lake Kachess receive periodic newsletters from the State of Washington Shoreline Management Program and even from the Kittitas County Weed Control Board. When the total lack of communication was brought up to Reclamation, the verbatim response received was "It was published in the Federal Register." Sorry, that's not a publication ordinary citizens commonly read, though I'm sure it fulfills Reclamation's legal obligation. I would have expected a project as important to the property owners on Lakes Kachess, Cle Elem and Bumping could at least have received the same level of outreach as we get from the local Weed Control Board. Please consider making periodic mailings to property owners.

I look forward to seeing the above issues explicitly detailed in the EIS. Thank you for allowing the public opportunity to comment.

With best regards,

Gordon Brandt
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gcbrandt@comcast.net

cc:
Congressman Dave Reichert
22605 SE 56th Street Suite 130
Issaquah, WA 98029

Comments on the lake Keechelus to lake Kachees conveyance project.

Inbox x

Ray prentice <rprentice402@gmail.com> 3:41 PM (20 hours ago)

Candace,

I am a Lake Kachees property owner and member of the Lake Kachees Cabin owners association

I am very concerned about this project, with what appears to be little or no feedback from individuals who own property on Lake Kachees or enjoy it for recreational purposes in the summer.

Additionally a group of property owners, inc,iding myself have just completed a multi-year negotiation with the state re installing a group water well and acquiring water rights.
We are unclear what this proposed project has on our efforts.

My ask is that you reconsider your timeline to allow the opportunity for Lake Kachees area Property owners, including waterfront owners, to be apprised, ask questions, and express our concerns.

Sincerely,

Ray Prentice
Lake Kachees Property owner (lot 71- East side of the lake).

(206) 979-1959
rprentice402@gmail.com

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
Central Washington Field Office
215 Melody Lane, Suite 103
Wenatchee, Washington 98801-8122

December 16, 2013

MEMORANDUM

To: Candace McKinley, Environmental Program Manager
Columbia-Cascades Area Office
Bureau of Reclamation
Yakima, Washington

From: Ken S. Berg, Manager
Central Washington Field Office
Washington Fish and Wildlife Office
Lacey, Washington

Jeffrey M Krupka for

Subject: Scoping Comments on the Cle Elum Pool Raise, Keechelus Reservoir-to-Kachess Reservoir Conveyance, and Kachess Inactive Storage
USFWS Reference Number: 01EWFW00-2014-TA-0059

This responds to your request for scoping comments on the scope of the associated Environmental Impact Statements (EIS) for the subject projects, located in Kittitas County, Washington. Your letter requesting scoping comments was received in the U.S. Fish and Wildlife Service's (Service) Central Washington Field Office (CWFO) on November 14, 2013.

The Service (primarily the Mid-Columbia Fisheries Resource Office, with periodic CWFO involvement) has been a partner in the development of the Yakima River Basin Water Enhancement Plan, Integrated Water Resource Management Plan (IP), with the CWFO focused on implementation, consultation, and recovery planning issues surrounding the IP. In a project as complex as the IP, with dual objectives of providing a more secure water supply (for agriculture, municipal, and other uses) and advancing the conservation of species, trade-offs are inevitable. These proposed EISs support projects that are the first major actions of the IP. The Service desires an efficient and timely environmental analysis process which yields projects that are consistent with the conservation objectives of the Service and our partners. The CWFO provides these comments for your consideration in the development of these EISs, and to develop a framework for successful consultations in accordance with section 7(a)(2) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

General Comments

1. The Service's view is that the IP represents a substantial change and a potential improvement of the current Yakima Irrigation Project's (YIP) on-going operations and maintenance (O&M) with respect to fisheries resources. However, the YIP has never completed consultation on the current O&M, and as we have discussed in multiple venues, this must occur prior to consultation of major IP actions. Without consultation first occurring on the YIP O&M, we will be unable to develop a credible or defensible environmental baseline or assess on-going activities as part of our jeopardy analysis. We strongly encourage the Bureau of Reclamation (BOR) to submit a biological assessment on the YIP O&M as soon as possible, to avoid delays on early IP actions.

2. Close coordination with the Okanogan and Wenatchee National Forest (OWNF) is vital regarding the design and implementation of the proposed projects. Among the policy and guidance that directs the OWNF's land management actions is the Northwest Forest Plan (NWFP). The NWFP is the underpinning of the conservation strategy for both the northern spotted owl (*Strix occidentalis caurina*) and the bull trout (*Salvelinus confluentus*), and also provides for the conservation of other species. IP actions, which occur within and adjacent to NWFP lands, needs to be consistent with the conservation objectives of the NWFP. The Service recommends that the development of action alternatives in the EIS be coordinated with the OWNF to ensure these NWFP-based conservation strategies remain intact. The Service has devoted significant resources toward the successful implementation of the NWFP, as well as land exchanges, land purchases, habitat conservation plans, and other conservation agreements in Kittitas County. The Service wants to ensure our investments are complemented by IP actions. Please assess in your EIS, and associated biological assessments, how these existing conservation efforts will be affected by IP actions. In addition, the OWNF may require a special use permit for some aspects of your proposed action, and their early involvement would streamline the NEPA and consultation process.

3. The Service has invested heavily in conservation efforts in Kittitas County and the I-90 corridor because numerous assessments have identified this area as critical to the ecological connectivity in the Cascades. The Service is part of a diverse array of partners that has focused on maintaining, restoring, and enhancing ecological connectivity in this area. Construction and maintenance of linear features, including IP projects, have the potential to disrupt the continuity of ecological processes such as the flow of shallow groundwater and the movements of wildlife species. Because of their location in the I-90 corridor, the Service recommends that the design of the proposed projects incorporate maintenance of ecological connectivity as a primary objective (i.e., it should be a part of the purpose and need for these projects). The Service recommends close coordination with I-90 workgroups and the Washington State Department of Transportation to ensure the proposed actions are consistent with on-going efforts.

4. We recommend that each EIS also include the likely O&M activities associated with the constructed projects. The proposed projects will involve long construction periods but

even longer periods of O&M. The Service needs to understand the full spectrum of effects that may occur over the life of these structures.

5. For all projects, assess how changes in water supply will affect residential and agricultural development throughout the Yakima basin. How will these changes affect listed species, and other fish, wildlife, and plants?

Cle Elum Pool Raise

1. Please describe in the EIS how the Cle Elum Pool Raise would modify the O&M of the storage and release of water, highlighting the changes in bull trout access from the reservoir into and out of spawning tributaries such as the Cle Elum River. In addition, address the potential effects within the littoral zone and at the mouths of tributaries, which may impact foraging or rearing habitats. The potential and magnitude of effect of the proposed action to the lake's limnology, productivity, and fish communities are among key concerns. Assess these effects over drought, average, and above average water years, over short- and long-term temporal scales.

2. Assess any potential effects of the Cle Elum pool raise on non-native species in the reservoir, including lake trout (*Salvelinus namaycush*), brook trout (*S. fontinalis*), and brown trout (*Salmo trutta*). Non-native species interactions (i.e., competition and predation) are likely suppressing the native fish assemblage.

3. Describe the new area to be inundated with the Cle Elum pool raise. Include the effects to habitat for the spotted owl, designated critical habitat for the spotted owl, riparian habitat, and any infrastructure that would be impacted, such as roads, culverts, campgrounds, boat launches, and other structures. Even if the impacted infrastructure appears to be minor, the pool raise may result in the relocation of these features, which may also have effects to listed species and their habitats (e.g., road relocation may remove spotted owl habitat). There may also be shoreline areas that may experience erosion or need future erosion control. Please include these analyses in the EIS.

Keechelus Reservoir-to-Kachess Reservoir Conveyance, and Kachess Inactive Storage

1. Describe in the EIS how the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage would modify the O&M of the storage and release of water, including changes in bull trout access from the reservoir into and out of spawning tributaries such as Box Canyon, Kachess River, and Gold Creek. When Kachess Reservoir is drawn down, it essentially forms an upper and lower pool, with conveyance between them. Assess the potential for bull trout passage though both reservoir pools and into spawning tributaries (and back) by developing a reservoir elevation frequency analysis over drought, average, and above average water years, under both current and proposed operations. Of particular interest is the potential for, and frequency of, the use of the inactive storage. Kachess reservoir has a slow refill rate, and has documented issues with the stranding of fish and inadequate spawning tributary access under current operations. The Service is concerned that access to spawning habitats may be further

compromised with a more extreme draw-down of Kachess Reservoir. The potential and magnitude of effect of the proposed action to the lake's limnology, productivity, predatory/prey interactions, entrainment rates, and impacts to fish communities are other key concerns. The Service would like to better understand these impacts and recommends a full analysis of these issues.

2. The Keechelus Reservoir-to-Kachess Reservoir Conveyance, and Kachess Inactive Storage would also change streamflow conditions in the Upper Yakima and Kachess Rivers. Please describe in detail the effects of these flow changes in both reaches over drought, average, and above average water years, over short- and long-term temporal scales.

3. The Service has been introduced to some of the aspects of the proposed Keechelus Reservoir-to-Kachess Reservoir Conveyance by BOR. Our key concerns include the potential for (1) habitat removal or degradation, (2) interruption of groundwater flow, (3) impairment of any I-90 connectivity structures, (4) road access along the conveyance route, and (5) impairment of riparian and aquatic processes at each end of the conveyance. These concerns span not just the construction of these projects, but the long-term O&M. Other potential effects may include the frequency and magnitude of maintenance activities, artificial lighting, noise, buildings or other structure required in support of the project, etc. Please include these analyses in the EISs.

Thank you for your assistance in the conservation of listed species. If you have any questions or comments regarding this letter, please contact Jeff Krupka at the Central Washington Field Office in Wenatchee at (509)665-3508, extension 2008, or via e-mail at jeff_krupka@fws.gov.

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AMERICAN WHITEWATER

Thomas O'Keefe, PhD
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December 16th, 2013

Ms. Candace McKinley, Environmental Program Manager
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yrbwep@usbr.gov

RE: REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE CLE ELUM RESERVIOR POOL RAISE and REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE KEECHELUS RESERVOIR-TO-KACHESS RESERVOIR CONVEYANCE AND KACHESS INACTIVE STORAGE PROJECTS

Dear Ms. McKinley:

We have reviewed the scoping notices for the preparation of an Environmental Impact Statement (EIS) to satisfy requirements under the National Environmental Policy Act and State Environmental Policy Act for the Keechelus to Kachess Conveyance, Kachess Inactive Storage, and Cle Elum Reservoir Pool Raise. We are providing a statement of interest and our preliminary scoping comments on these two projects.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5800 members and 100 local-based affiliate clubs, representing thousands of whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the Yakima River and tributaries that support whitewater recreation including Box Canyon Creek, Cle Elum River, Cooper River, Waptus River, and Yakima River. A significant percentage of American Whitewater members reside in Washington State—a short driving distance from these rivers for recreation.

Cle Elum Pool Raise Project

The scoping notice states that the proposed action would modify the radial gates at Cle Elum Dam to provide an additional 14,600 acre-feet capacity and raise the pool elevation by approximately 3 feet, to "provide increased seasonal releases from Cle Elum Reservoir to improve streamflows for fish." A description of this project provided in the Final Programmatic Environmental Impact Statement for the Yakima River Basin Integrated Water Resource Management Plan states that "the increased storage would be used to improve streamflows for fish and increase water supply

for out-of-stream needs."[1] We request that the EIS provide additional clarification on the purpose of the additional storage and how it will be used. Will the additional storage be used to improve streamflows for fish as implied in the scoping notice, or will it also serve additional out-of-stream needs? We request a complete description of any out-of-stream needs this pool raise will serve and the relationship between this objective and the benefits for fish.

The Cle Elum River was evaluated from the headwaters to the Cle Elum Reservoir for eligibility under the Wild and Scenic Rivers Act and recommended to Congress for designation as suitable for addition to the Wild and Scenic Rivers system due to the great deal of public support for designation".[2] In addition to the free-flowing nature of the river upstream of the reservoir, the river's outstandingly remarkable values of regional and national significance include scenery, recreation, and cultural/historical values. As noted in the Forest Service Manual, "a river found to be eligible and suitable must be protected as far as possible to the same extent as a designated study river."[3] We request that the EIS for this project include a clear description of how the pool raise will impact the currently free-flowing reach of the Cle Elum River upstream of the current reservoir. How far upstream will impacts occur and how will this impact the free-flowing nature of the river? We request an analysis of how the project will comply with agency requirements for management of a river identified as suitable for Wild and Scenic designation. Specific mitigation measures to the project may include permanent protection of the Cle Elum River and its tributaries including the Cooper and Waptus through Wild and Scenic River designation. This protection could be included in Congressional authorization for this project.

With respect to specific values, recreational river runners currently end their run on the Cle Elum River at the Forest Road 4308 Bridge.[4] The EIS needs to document any impacts associated with the access at this site that might result from a reservoir pool raise. River runners use watercraft that are designed for use in flowing current that are not efficient for flatwater paddling. If the access site at the FR 4308 Bridge will be change from a river setting to a reservoir setting, or if the bridge itself will be modified, alternatives for take-out access need to be evaluated.

Thorp Mountain Inventoried Roadless Area is adjacent to Cle Elum Reservoir, and the proposed pool raise would presumably inundate areas protected under the Roadless Area Conservation Rule.[5] We request an analysis of how the pool raise would impact the Thorp Mountain Inventoried Roadless Area, including impacts to vegetation and any need for timber cutting or removal. A discussion of how the project would comply with the provisions of the Roadless Area Conservation Rule should be provided. How long would the pool raise result in previously unflooded shoreline

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[1] At Page 2-17, Yakima River Basin Integrated Water Resource Management Plan, Final Programmatic Environmental Impact Statement, March 2012

[2] See eligibility assessment (Page E5-E7) and suitability assessment (Page E48-E53) for the Cle Elum River in Appendix E, Assessment of Rivers as to Their Eligibility and Suitability for Designation Under the Wild and Scenic Rivers Act, Land and Resource Management Plan, Wenatchee National Forest, 1990.

[3] Forest Service Manual 2354.62

[4] See American Whitewater Rivers Inventory, Cle Elum River description at http://www.americanwhitewater.org/content/River/detail/id/2094/

[5] 66 FR 3244

being inundated, would this change in different water years and would it necessitate the removal of timber?

On September 28, 2010, Free Flow Power filed an application for a preliminary permit, pursuant to section 4(f) of the Federal Power Act, proposing to study the feasibility of the Cle Elum Dam Hydroelectric Project.[6] The Federal Energy Regulatory Commission issued a Preliminary Permit and granted priority to file a license on July 29, 2011.[7] On June 4th, 2012, Free Flow Power surrendered their preliminary permit, noting the uncertainty associated with potential changes to the flow regime associated with elements of the Yakima Basin Integrated Plan.[8] We believe it would be appropriate to further consider opportunities for hydropower at Cle Elum Dam and appropriate analysis of this opportunity should be considered in the development of the EIS for the Cle Elum Pool Raise Project. At a minimum, modifications to the dam should not preclude future opportunities for hydropower development given progress towards collaborative approaches to encourage hydropower development at federally-owned facilities.[9]

Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage Project

The scoping notice identifies two alternatives for a tunnel to convey water from Keechelus watershed to Kachess Reservoir: a new outlet works at Keechelus Dam and a 3.7 mile-long gravity flow tunnel or a new diversion dam downstream of Keechelus Dam and a 3.2 mile-long gravity flow tunnel. The scoping notice also states that the objectives of this project are to increase water supply for irrigation and instream flow and to create more normal flows in the Upper Yakima River between Keechelus Dam and Easton. We understand this goal to correspond to a flow target of 450-500 cfs through different water year types, but request that the EIS include a quantitative analysis of the flow targets and corresponding fishery benefits. We question whether the option of building a new diversion dam downstream of Keechelus Dam would adequately address the issue of creating a more normal flow regime between Keechelus Dam and Easton. Approximately 1.5 miles of river habit between Keechelus Dam and the new diversion dam would continue to be impacted. Additional explanation needs to be provided in the EIS to justify the fishery benefits for this option. With regard to the option of a new outlet works at Keechelus Dam, we request an analysis of an appropriately-sized tunnel that will meet the flow targets for all water year types. Specifically, we request that a study determine whether the 10-12 foot-diameter tunnel as considered in the scoping notice will be adequate to meet the instream flow targets. If it is not, then a larger tunnel diameter should also be evaluated. All alternatives need to include an analysis of fish and wildlife habitat connectivity, and project infrastructure should be compatible with the goals and objectives of the I-90 Snoqualmie East Project to improve aquatic and terrestrial connectivity along the highway.[10]

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[6] FERC eLibrary Submittal 20100928-5277
[7] 136 FERC ¶ 62,089, FERC eLibrary, Issuance 20110729-3032
[8] FERC eLibrary, Submittal 20120604-5073
[9] Memorandum of Understanding for Hydropower Among The Department of Energy, The Department of the Interior, and The Department of The Army. March 24, 2010. <http://www.usbr.gov/power/SignedHydropowerMOU.pdf>
[10] http://www.wsdot.wa.gov/projects/i90/snoqualmiepasseast/

Opportunities for hydropower on the gravity flow tunnel should be evaluated, particularly if power generation can be used to offset energy requirements of the pump station proposed for the Kachess Inactive Storage Project.

This project also proposes to release an additional 200,000 acre-feet of water from Kahcess Reservoir by accessing the current inactive storage (i.e. below the elevation of the current outlet works). The scoping notice states that a pump station would be used. We request an annual estimate of energy requirements for pumping. We request that a siphon also be considered as an alternative.

With regard to opportunities for water conservation, "the modeling estimated that the agricultural water conservation program would conserve approximately 170,000 acre-feet of water in good water years and substantially less in drought years."[11] Please clarify the relationship between the water conservation program and the opportunity to provide access to an additional 200,000 acre-feet of water and how it varies by water year type. We also request additional explanation on whether these actions are directly linked—i.e. if funds for implementation of the Kachess Inactive Storage Project are appropriated, will similar investments be made in implementing the conservation program? We believe access to additional storage should be conditioned based on implementation of performance-based conservation measures. Please provide an overview of any legal or policy barriers to this approach in the EIS.

The full reservoir drawdown associated with accessing the currently inactive storage could impact connectivity between Box Canyon and Kachess Reservior. Box Canyon Creek is utilized by whitewater paddlers[12] and is also important for bull trout, and we request that the EIS provide a quantitative analysis of the seasonal impacts of reservoir drawdown under different water year types on these resources.

Conclusion

Thank you for the opportunity to provide scoping comments on the Keechelus to Kachess Conveyance, Kachess Inactive Storage, and Cle Elum Reservoir Pool Raise Projects in advance of the preparation of an EIS. Please include us on the mailing list for future correspondence related to this project and do not hesitate to contact us if you have any questions regarding the preliminary issues we have identified.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

[11] At page 2-36, Yakima River Basin Integrated Water Resource Management Plan, Final Programmatic Environmental Impact Statement, March 2012

[12] See American Whitewater Rivers Inventory, Cle Elum River description at http://www.americanwhitewater.org/content/River/detail/id/3818/

December 16, 2013

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima WA 98901

Derek Sandison
Director, Office of Columbia River
Department of Ecology
15 W. Yakima Ave., Ste 200
Yakima, WA 98902

Delivered via email to: yrbwep@usbr.gov

Re: NEPA scoping comments on Kachess Drought Relief Pumping Plant/Keechelus-to-Kachess Conveyance and Cle Elum Pool Raise

Dear Ms. McKinley and Mr. Sandison:

Please accept this letter as the comments of American Rivers, Forterra, Trout Unlimited, and the Wilderness Society on the National and State Environmental Policy Act scoping of the Kachess Drought Relief Pumping Plant (Kachess Pumping) and Keechelus-to-Kachess (K-K) Conveyance project, as well as the separate scoping concerning the Cle Elum Pool Raise. The NEPA and SEPA Determinations of Significance were warranted for these projects due to their complexity, cost, and potential impacts and we are pleased that the Environmental Impact Statements will be prepared.

Our organizations are proud to support the Yakima Basin Integrated Plan (YBIP), which thanks to early implementation actions such as the state acquisition of 50,000 acres in the Teanaway River watershed, Manastash Creek water conservation, and Cle Elum fish passage design, has already begun to demonstrate its ability to improve the environmental function of the Yakima Basin while improving out-of-stream water reliability. The Kachess Pumping Plant, K-K Conveyance, and Cle Elum Pool Raise are all appropriate to include as the central water supply elements of the first, approximately decade-long phase of the YBIP, subject to the outcome of this NEPA and SEPA analysis and compliance with the Endangered Species Act. These projects must also be accompanied by other YBIP first phase projects such as fish passage at Cle Elum Dam and another dam/reservoir to be determined, water conservation, enhanced water markets, habitat restoration, land and river protection actions, and aquifer/groundwater storage and recharge projects. Below we outline what our organizations will be looking at most closely as these projects move to the draft Environmental Impact Statements phase of analysis.

I. Kachess Drought Relief Pumping Plant/Keechelus-to-Kachess Conveyance

a. Kachess Drought Relief Pumping Plant

Our primary concern with the Kachess Drought Relief Pumping Plant is habitat connectivity for bull trout when the lake is drawn down after pumping. Specifically, the EIS should determine if it will be feasible for Endangered Species Act-threatened bull trout to access habitat in Box Canyon Creek and other Kachess Reservoir tributaries when the reservoir is drawn down. This project requires consultation with the U.S. Fish and Wildlife Service to determine whether it is compatible with bull trout survival and recovery.

b. Keechelus-to-Kachess Conveyance

The Keechelus-to-Kachess Conveyance is an important opportunity – if designed and sited correctly – to begin restoring a more natural hydrograph in the Yakima Basin, beginning with restoring a more natural flow regime in the upper 11 miles of the Yakima River. This action can benefit salmon and steelhead while also allowing more rapid refill of Kachess Reservoir after a drought. We have a strong preference for the alternative that diverts the flow directly from Keechelus Dam rather than 8,000 feet downstream. The latter alternative, which would require a new diversion dam, should be set aside, as it involves higher environmental costs and fewer benefits.

The EIS should examine an alternative that ensures the ability to meet YBIP flow targets of 450-500 cfs in the upper Yakima in dry, normal, and wet years. It is not clear to us whether the alternative proposed in the scoping documents can be relied on to accomplish this goal in wet years. If meeting that goal in wet years requires designing a conveyance system that moves more than an average of 400 cfs, that alternative should be presented given the broad environmental restoration goals of the YBIP.

We encourage your agencies to examine whether in-conduit hydropower can be part of the K-K project, perhaps to help offset reduced hydropower generation downstream from power subordination at the Roza and Chandler dams, which are YBIP actions as well. Hydro generation in the K-K Conveyance could also help power the Kachess Pumping Plant in drought years.

Finally, we encourage you to quantify the native fish production benefits of meeting flow targets in the upper 11 miles of the Yakima.

c. Combined operation of K-K Conveyance and Kachess Pumping

It is essential that K-K Conveyance is in place at or before the time that Kachess Pumping becomes operational, as the environmental and aesthetic impacts of pumping should be greatly mitigated by having the conveyance in place to speed reservoir refill. The EIS should examine the ability of the K-K Conveyance to help refill Kachess Reservoir after it is drawn down, and ensure that it is sized to maximize its reservoir refill benefits as well as its instream flow benefits. This could involve examining an additional alternative that conveys more than 500 cfs during spring run-off while also accounting for the need for channel maintenance flows in the upper Yakima River.

The EIS should also examine the instream and out-of-stream benefits of K-K conveyance in all years – wet, normal, and dry – and determine if the conveyance can be used in non-drought years to help meet downstream flow targets during any season in which it might help.

II. Cle Elum Pool Raise

We urge a full analysis of the effects of the pool raise on fish and wildlife habitat, including benefits from increased ability to meet instream flow targets and any impacts of the pool raise on fish and wildlife and their habitat. This includes salmon and steelhead species that will make greater use of the Cle Elum Reservoir and the Cle Elum River once permanent fish passage is completed through a separate but presumably concurrent YBIP project.

Thank you for considering our comments.

Sincerely,

Michael Garrity
Washington State Conservation Director
American Rivers

Lisa Pelly
Director, Washington Water Project
Trout Unlimited

Kitty Craig
North Cascades Program Manager
The Wilderness Society

Gene Duvernoy
President
Forterra

Bret Arsenal – bretonly@hotmail.com

425-985-0709

I'd like to be added to the mailing list for both the Kachess Drought Relief Pumping Plant and the Keechelus-to-Kachess Conveyance.

I have no understanding why we would be doing this and spending money building a dam or a tunnel, in particular, a 3-mile tunnel from Keechelus to Kachess for a river flow that's been there for 8 years when we didn't fund the fish ladder when we rebuilt the Keechelus Dam in the first place. This is an extreme waste of taxpayer's money—absolutely useless effort in terms of what you're trying to accomplish.

I don't also agree with the comments on the relief pumping station, although it has a little bit more resemblance, I'd love to understand why we wouldn't do the pumping station at Keechelus vs. Kachess or Cle Elum vs. Kachess, in particular Keechelus, in which there is no other uses of that lake other than a reservoir and it serves a higher elevation. So, given those facts, I'm extremely disappointed in the State and the Government, for even considering spending resources on these sorts of things.

I look forward to being in the continued loop of information.

From: Lynn and Tom Benediktsson
Homeowners, East Lake Kachess
44 Wildwood Terrace, Glen Ridge, NJ 07028
benediktl@aol.com

To: Candace McKinley Environmental Program Manager
Bureau of Reclamation
1917 Marsh Road Yakima, WA 98901
Via email to: yrbwep@usbr.gov

December 16, 2013

X Yes, I would like to receive a copy of the scoping document

X Yes, I want to receive email updates and information on the EIS

X Yes, I want my name included on the mailing list to receive information on the EIS

Dear Ms. McKinley:

Here are our comments in response to the proposals for the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus to Kachess Conveyance.

Elements / Alternatives / Projects

- How will the Department of Ecology determine which years are "drought" years? How often does the department project that additional water will be drawn from Lake Kachess? How will additional demand for water impact uses of the Kachess Reservoir Inactive Storage and what restrictions and incentives will ensure that water users conserve rather than expend the (expanded) resource?

Water Resources / Water Quality

- When Lake Kachess is drawn down, the lakebed is heavily eroded, steep and liable to further erosion. It slips down as you walk. I would anticipate further erosion and silting. The material of the lakebed is also silty and smelly. What effect will this newly revealed lakebed have on water quality in the lake as the effect of minerals is concentrated by reduced water levels? What will the likely effect on wildlife and agriculture?

Water Conservation

- If water conservation efforts are successful and Lake Kachess can store additional water from Lake Keechelus via a pipeline, would an additional pumping station (which would be enormously expensive) be necessary? Why not try just the one project and see whether that is sufficient?

Economics

- This $4 Billion project should require agricultural users to show that they are conserving water. They should also demonstrate that that additional water will improve crop production. Users should also be required to enact water-saving techniques and pay for additional costs.

- The impact on property values for homeowners on Lake Kachess will be enormous. Boating access to the lake (which is already difficult at the two launching point), aesthetic considerations such as view plus access to lake for fishing, swimming and boating (which are the primary elements of Lake Kachess property evaluation) will plummet. In fact, the area will be ugly and unusable, not just slightly less appealing; therefore, the economic value of property on the lake will surely suffer.

Recreation and Tourism

- Claiming that an additional draw down of 80 feet will have only a little impact on recreation is simply false. No boat launching and a ¼ mile walk down a steep, nearly impossible decline to gain access to the lake will eliminate tourism both on Big Kachess and Little Kachess. Access to Little Kachess from Lake Kachess will essentially end, cutting off the smaller lake.

Groundwater

- Years of experience as a Lake Kachess resident tells me that the level of the Lake does affect available water for houses, whether water is drawn from wells or the surface. Local users will experience reduced drinking water access.

Crops

- What efforts will ensure that agricultural users do their part - act responsibly to conserve water when it will be evident that additional resources will be available?

Fish/Wildlife

- The Dolly Varden in Box Creek Canyon are already endangered. How will the additional 80 feet of small stream to reach the Lake impact the species? Additionally, what will be the effect on silvers and trout in the lake with reduced water and longer, less reliable access to streams? Deer, cougars and other wildlife and fowl depend upon the lake for water. How will their access be affected by finding the lake 80 feet lower? Will they still have access?

Visual and Noise

- How is it possible that drawing down the lake by 80 feet could not be visually "evident?" Instead of a verdant edge and a large clean surface of water, there will be endless dead verge and a small blue

spot (which is inaccessible) at the bottom. This isn't keeping the appearance of the lake "intact." At present, Lake Kachess is the only lake where people can see the beauty of a big alpine lake. Keechelus and Cle Elum have long been drawn down, but Lake Kachess has retained its beauty and reminded us that not all public works projects must trade natural beauty for economic pressures. The lake is at the base of the Alpine Lakes area and needs to be protected as part of the intention to preserve the natural landscape in so far as possible for posterity.

Transportation

- Service Road 4818 is the only road on the east side of Lake Kachess. It provides access to homeowners, campers, boaters, fishermen and hunters. It is also the only way fire fighting personnel (who have used this road in the past fews years to put out fires) can reach this side of the lake. How would building a pipeline under this road cause "minor, short-term impacts?" What are the specifics? Would a temporary road provide access? And how would the impact on the surrounding forest be measured? How long would the project take?

Process / Scope

- The process needs to be transparent and provide sufficient information and time so that those who are affected have an opportunity to have their voices heard.

Sincerely,

Lynn and Tom Benediktsson

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

October 30 – December 16, 2013

Name (please print legibly):	RONALD L. COHEN
Organization:	LAW OFFICES OF RONALD L. COHEN
Mailing Address:	5317 HARBOUR VIEW
City, State, and Zip Code:	MERCER ISLAND WA 98040
Telephone:	425.454.0915(W) 206.714.8706(CELL)
E-mail:	RON@RLCOHEN.COM

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

X I would like to receive a copy of the Scoping Document.

X I want to receive email updates and information on the Environmental Impact Statement (EIS).

X I want my name included on the mailing list to receive information on the EIS.

___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

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 Kachess Drought Relief Pumping Plant are:

I SUPPORT COMMENTS MADE BY GORDON BRANDT, PRESIDENT OF EAST KACHESS HOMEOWNERS ASSOCIATION

My comments on the Keechelus-to-Kachess Conveyance are:

DITTO - FROM ABOVE

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

LAW OFFICES OF
RONALD L. COHEN
2155 – 112TH AVENUE N.E.
BELLEVUE, WASHINGTON 98004
(425) 454-0915
FAX: (425) 637-1740

DATE: December 16, 2013

TO: Ms. CANDACE McKINLEY
Environmental Program Manager
Bureau of Reclamation

FAX#: (509) 454-5650

FROM: Ronald L. Cohen

RE: Scoping Comment Form:
Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

ITEM SENT: SEE BELOW

NUMBER OF PAGES SENT: 2 (INCLUDING THIS COVER SHEET)

IF ALL PAGES ARE NOT RECEIVED, PLEASE CALL (425) 454-0915

MESSAGE: Dear Ms. McKinley: Please find attached my Scoping Comment Form which memorializes my agreement with the comments made by Gordon Brandt, President of East Kachess Homeowner Association. I have been an owner of recreational property on the east side of Lake Kachess since 1990 and I am opposed to the proposal to drop the Lake Kachess lake level.

Thank you. Ronald L. Cohen

Conservation Northwest
Keeping the Northwest Wild
3600 15th Ave W #101
Seattle WA 98119
www.conservationnw.org

December 16, 2013

Ms. Candace McKinley, Environmental Program Manager
Bureau of Reclamation, Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901
yrbwep@usbr.gov

Subject: Scoping comments on scope of EIS for the Cle Elum Reservoir Pool Raise and Request for Commets on scope of EIS for the Keechelus Resevoir to Kachess Resevoir Conveyance and Kachess Inactive Storage Projects

Dear Ms. McKinley,

I am writing to provide comments on the scope of issues to be considered and analyzed in the environmental review for several projects within the Yakima Integrated Plan. Our organization's mission is to protect and connect the wildlife and wild places from the Washington Coast to the BC Rockies. We recognize that the primary purpose of these two proposed projects and the Yakima Integrated Plan is to improve water storage and availability in the Yakima basin, but we also note that the proposals pose a direct impact to the fish and wildlife habitat in this landscape. Therefore, our comments will focus on the need to document, complete consultation on, and analyze those impacts for each proposal.

Since our organization's inception in 1989, we have recognized the vital importance of the Upper Yakima watershed also known as the "I-90 corridor" for its contribution to landscape scale habitat connectivity. It is the connective tissue of habitat for wildlife between the north and south Cascades. From 2000-2004, we administered a historic campaign to purchase and protect 40,000 acres of private land that was donated to the US Forest Service for maintaining habitat connectivity and public access. In 2004, we launched with partners the I-90 Wildlife Bridges Coalition that has worked closely with the Washington Department of Transportation on the design and implementation of the I-90 Snoqualmie Pass East Project which includes improving ecological connectivity in its purpose and need. In 2007, we launched with partners

the Upper Yakima Watershed Action Group who coordinates on ecological restoration throughout the watershed to ensure we leverage off of one another to have the greatest positive impact on the landscape from Snoqualmie Pass to the Manastash as possible. This watershed group is also the official collaborator on a 60,000 acre restoration project under development called the Upper Yakima Restoration Project. We signed an MOU with the Okanogan-Wenatchee National Forest allowing us to partner on restoration in our shared priorities, and have invested not only time but financial resources to see restoration occur on the landscape from native plantings to road and floodplain restoration. We therefore have a strong interest in any project that proposes a new footprint of disturbance on this valuable landscape.

In scoping the extent for analysis, we submit the following general comments for consideration:

- **Coordination and integration with ongoing efforts in the I-90 corridor including a commitment to maintaining or improving ecological connectivity in the project's purpose and need due to the location.** As stated in the introduction the proposed activities are occurring on a unique landscape with limited public lands that plays a role in regional wildlife issues. This landscape is managed for improvement of late successional habitat and habitat connectivity by policy, and significant public and private investments have occurred (and are occurring) to improve ecological connectivity. By adopting a recognition in the purpose and need that all actions should contribute to or neutrally effect ecological connectivity (aquatic and terrestrial), you ensure that all proposed designs that are analyzed will meet this vital standard. This includes impacts to both the habitat, and consistency in design features of the pipeline and infrastructure associated with the I-90 Snoqualmie Pass East Project's crossing structures over and under the highway.
- **The projects must be consistent with the management goals and policies of the national forest where they occur on that land, and close coordination with Okanogan-Wenatchee National Forest is vital.** We work closely with the national forest through their Forest Restoration Strategy to improve terrestrial and aquatic conditions on the forest with specific investments in this landscape including financial. This landscape is governed by the Northwest Forest Plan that amended their existing forest plan. The EIS must document and detail the land allocations covered by actions, consistency with existing national forest policy (including NW Forest Plan, Snoqualmie Pass Adapative Management Area Plan, Land Management Plan, Aquatic Conservation Strategy, Roadless Rule, and all species recovery plans). The Aquatic Conservation Strategy states that all actions must "maintain or enhance" watershed health with court tested reference to the need to do so in both the short and long term. Therefore, actions must include mitigation in both the immediate and long term to temporally offset impacts to the watershed health (i.e. sedimentation from roads and construction). The EIS should also seek

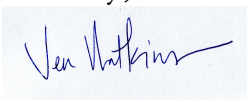
consistency towards objectives as being proposed in the Okanogan-Wenatchee National Forest Plan under revision now, as the construction will have impacts throughout the life of this plan. The EIS should also ensure close coordination with the analysis and proposed actions of the Upper Yakima Restoration Project. The Snoqualmie Pass Adaptive Management Area is already in exceedance of its stated road density standards, and this project must detail any contribution (negative and positive) it makes to meeting the standards of set for this landscape in the short and long term.

- **The Yakima Irrigation Project must complete consultation with relevant agencies including US Fish and Wildlife Service and National Marine Fisheries on the current Operations and Maintenance Plan before consultation begins on the integrated plan.** This provides them an environmental baseline to assume alterations from for actions within the integrated plan. Due to the impacts the proposals in this plan are likely to have (both positive and negative) to listed species, this is a vital step that must occur and be documented.
- **Specific to the Cle Elum Pool Raise, the analysis should document and detail the impacts of the new area to be inundated and all associated infrastructure** (i.e. roads, clearings, equipment storage,etc) including a list of all Survey and Manage species in the area to be affected, listed aquatic and terrestrial species presence or habitat impacted (i.e. spotted owl) with impacts documented for each species, and impacts to the adjacent Thorp Mountain Inventoried Roadless Area. Documentation of completed surveys for all Survey and Manage species should be included in the EIS for review or available upon request.
- **Specific to the K to K line proposal, the EIS must address the consistency of the project with the I-90 Snoqualmie Pass East Project as we have raised concerns with past conceptual designs that the appeared to interrupt the purpose of these public investments in ecological connectivity.** It must also address not only the direct species and watershed impacts of all associated infrastructure (i.e. maintenance roads, clearings, etc) but the impacts of those on ecological connectivity in the I-90 corridor where land management policy directs that we are to be improving that value on the landscape.

Informed public comments and decisions can only be made with a complete set of well-developed information. Therefore, we expect the EIS's for both of these proposals to be thorough in not only documenting their footprint but the full extent of their impact on terrestrial and aquatic habitats at a site scale and landscape scale. Strong coordination with all federal and state agencies that have policy mandates and ongoing investments in this landscape to improve its ecological function is critical, as well as partners within the landscape that invest time and resources into its conservation from NGO's to the Yakima Nation.

We look forward to a review of the EIS for these proposals and ongoing opportunity to provide public comment.

Sincerely,



Jen Watkins
Conservation Associate
206.940.7914
jwatkins@conservationnw.org

Kachess drought relief program

Andy Dulin <andy.dulin.b7wc@statefarm.com> 9:31 AM (47 minutes ago)

Images are not displayed. Display images below - Always display images from andy.dulin.b7wc@statefarm.com

I oppose both of these proposals in their entirety.

I understand that irrigation to central Washington is important to the state's economy, and for the governor's political power base, however the cost to the taxpayer, the impact on the property owners in the area, is unacceptable. If new drains need to be installed, pipes should be installed at Lake Keechelus, not lake Kachess or lake Cle Elum….both of which would be profoundly impacted if lake levels were droppe3d by 80 feet.

The argument that this would help the salmon run, is disingenuous.

Andrew L Dulin, CLU

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

December 16, 2013

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901

Re: Scoping Comments on the Kachess Drought Relief Pumping Plant and Keechelus to Kachess Conveyance Projects (EPA Project Number: 13-0036-BOR).

Dear Ms. McKinley:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the US Environmental Protection Agency has reviewed the Bureau of Reclamation Notice of Intent to prepare an Environmental Impact Statement for the proposed **Kachess Drought Relief Pumping Plant and Keechelus to Kachess Conveyance Projects** in Kittitas County, Washington.

According to the Notice, the Bureau of Reclamation, in conjunction with Washington State Department of Ecology, proposes to evaluate potential environmental impacts associated with activities to construct an 80-foot outlet on Lake Keechelus and transfer water to Kachess Reservoir for storage. Together, the projects would generate nearly 200,000 acre-feet of additional water supply for municipal, domestic, and agricultural uses during drought years. Activities would include construction of a tunnel to convey water from the Keechelus watershed to Kachess Reservoir or a diversion structure on the Yakima River that would also discharge into Kachess Reservoir. The project would also include installation of a pumping plant to discharge water into the Kachess River. Analysis of these projects tiers to the Yakima River Basin Integrated Water Resource Management Plan/EIS.

The EPA is supportive of the proposed NEPA process, including plans to involve other resource agencies and the public. Since the Notice of Intent does not identify issues and resources to evaluate in the proposed EIS analysis, we offer the attached scoping comments to highlight issues the EPA believes are important to address in the NEPA analysis. Thank you for the opportunity to provide comments at this stage of the EIS development process. If you have questions about our comments, please contact me at (206) 553-6322, or by electronically at mbabaliye.theogene@epa.gov.

Sincerely,

Theogene Mbabaliye
Environmental Review and Sediment Management Unit

EPA Detailed Scoping Comments on the proposed
Kachess Drought Relief Pumping Plant and
Keechelus to Kachess Conveyance Projects

Range of Alternatives
The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process. This will ensure that the EIS provides the public and the decision-maker with information that sharply defines the issues and identifies a clear basis for choice among alternatives as required by NEPA. The Council on Environmental Quality recommends consideration of all reasonable alternatives, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS for the proposed actions. The EPA encourages selection of alternative(s) that will minimize environmental degradation.

Environmental Effects
The EIS should include analysis of environmental effects and measures to mitigate impacts. This would involve delineation and description of the affected environment, indication of impacted resources and nature of impacts, and a listing of mitigation measures for the impacts. The following topics would be of particular interest to the EPA.

Water Resources
Water quality degradation is one of the EPA's primary concerns. Section 303(d) of the Clean Water Act requires the State of Washington and Tribes with the EPA-approved water quality standards to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet the state and tribal water quality criteria and associated beneficial uses. Therefore, the EIS should disclose waters in the analysis area and vicinity that the proposed projects may impact, nature of the potential impacts, and pollutants likely to affect those waters. It should also report waters on the State's and Tribe's most current EPA-approved 303(d) list and describe any existing restoration and enhancement efforts for those waters, how the projects would coordinate with on-going protection efforts, and any mitigation measures to implement to avoid further degradation of water quality within impaired waters. Please also note that anti-degradation provisions of the CWA prohibit degrading water quality standards within water bodies that are currently meeting water quality standards. Because of that, the EIS document should indicate how the projects would meet those provisions.

Public drinking water supplies and their source areas often exist in many watersheds. Source water areas might exist within watersheds in which the proposed projects and associated facilities would be located. Source water is water from streams, rivers, lakes, springs, and aquifers used as a supply of drinking water. The 1996 amendments to the Safe Drinking Water Act require federal agencies to protect sources of drinking water for communities. Since construction and operation of the projects may impact sources of drinking water, the EIS should include the following information.

a) Source water protection areas within the analysis area.
b) Activities that could potentially affect source water areas.
c) Potential contaminants that may result from the proposed projects.
d) Measures that would be taken to protect the source water protection areas.

Road Construction and Use

Construction of a pipeline or tunnels requires infrastructure that may include heavy machinery to transport materials, existing and new access roads, and other facilities. Use of equipment and construction of facilities may compact soils and change hydrology, runoff characteristics, and ecological function of sites, affecting flows and delivery of pollutants to water bodies. The EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions of the analysis area and vicinity. The document should clearly depict reasonably foreseeable direct, indirect and cumulative impacts to groundwater and surface water resources. The EIS should identify potentially affected groundwater aquifers, any potential for subsidence, as well as impacts to seeps and springs or other open water bodies and biological resources. This is especially important for the proposed projects due to boring and tunneling, and excavation activities that would be necessary.

Roads and their use also facilitate sediment transport to streams, increase habitat fragmentation and wildlife disturbance, as well as invasive plant infestations. Roads interrupt the subsurface flow of water. Therefore, the EIS should include data about existing and new roads and evaluate the change in road miles and density that will occur because of the projects and predicted impacts to water quality by roads. Under the CWA, any project construction that would disturb one or more acres of land also requires a National Pollutant Discharge Elimination System permit for discharges to waters of the U.S. The EIS should document the projects' consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality.

Aquatic Resources

The EIS should describe all waters of the U.S., including wetlands, that could be affected by the projects alternatives, and include maps that clearly identify all waters within the planning area, as well as the pathways of alternative routes through the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters. If the project would result in impacts to aquatic resources, then the Bureau would need to work with the U.S. Army Corps of Engineers to determine if the project needs a CWA §404 permit.

The substantive criteria which must be satisfied in order to comply with §404 of the CWA are found in Section 404(b)(1) Guidelines under which no discharge of fill material shall be permitted if there is a practicable alternative to the proposed discharge with less adverse impact on the aquatic ecosystem. The Guidelines require the least environmentally damaging practicable alternative. With this in mind, we recommend that the EIS document include information regarding alternatives to avoid discharges into waters of the U.S., or, if not practicable, measures to minimize and ultimately to mitigate their impacts. The EPA recommends that the EIS include evaluation of Horizontal Directional Drilling as one of the potential methods to install the pipeline. This method can help avoid impacts to aquatic resources. HDD entry and exit points should be located outside sensitive areas e.g., wetlands; installation of the pipe should be at an appropriate depth belowground; and work areas should be located outside of the 100-year floodplain areas. In addition, installing a casing near surface formations susceptible to fracturing during drilling would seal off permeable formations and reduce impacts in highly permeable unconsolidated materials. The EIS discussion on wetlands and floodplains should cover the following aspects:

(a) Alternatives that would reduce impacts to the lake and reservoir, such as locating the pipeline away from these waterways.
(b) Alternatives that use different existing technologies, such as HDD to avoid impacts to affected waterways.
(c) Develop mitigation plans that include acreage, geomorphic setting and habitat type of waters of the U.S. that would be created or restored to mitigate for unavoidable impacts.
(d) Identification of how mitigation would compensate functionally for all unavoidable losses from the projects.
(e) Existing water budget and water sources to maintain the mitigation area.
(f) Grading plan, based on a natural wetland reference.
(g) Re-vegetation plans, including the numbers, density and age of each species to be planted, as well as special techniques that may be necessary for planting.
(h) Maintenance and monitoring plans, including performance standards to determine mitigation success.
(i) Size and location of mitigation zones.
(j) Parties that would be ultimately responsible for the mitigation plan success.
(k) Contingency plans that would be enacted if the original plan fails.
(l) Long-term maintenance plan.

Mitigation implementation should be in advance of or concurrent with impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation.

Please also note that activities affecting floodplains are also regulated under the CWA §404 and Executive Order 11988, *Floodplain Management*. Therefore, the EIS should include information explaining anticipated activities in floodplains, alternatives considered, and steps taken to reduce impacts to floodplains. Floodplains perform a vital function of conveying and dissipating the volume and energy of peak surface runoff flows downstream. Thus, periodic flood flows form and sustain specific habitat types such as wetland and riparian areas within floodplains. As such, it is important to preserve unimpaired flood flows and prevent flood-related damage to resources. It should also be noted that any floodplain mitigation requirements that are identified by the Flood Emergency Management Agency may in themselves impact waters of the US, and these impacts should be included in the overall §404 analysis of alternatives, if any are identified.

Hazardous Materials

The EIS should address potential direct, indirect and cumulative impacts of hazardous materials from construction and operation of the projects. During construction of the projects, it is possible that activities will require use of chemicals, particularly during boring, tunneling and machinery use. Although spills are usually kept to a minimum, concerns remain about the possibility of accidents resulting in the release of toxic substances and other pollutants to the environment. For that reason, the EIS should describe measures to take to reduce chances of such accidents occurring, and respond to an emergency resulting from potential occurrence of any accident. The EIS should also address issues related to prevention of potential spills and leaks, and their cleanup.

If the proposed projects would use pesticides and herbicides to control vegetation where needed, the EIS should address any potential toxic hazards related to the application of the chemicals, and describe actions to take to assure that impacts by toxic substances released to the environment will be reduced.

Executive Order 13112, *Invasive Species*, mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species may cause.

Air Quality Impacts

The protection of air quality should be addressed in the EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related VOC and NOx emissions, should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities and ongoing operation of the roadways are important concerns, as discussed previously. The EIS should evaluate air quality impacts, and detail mitigation steps to take to reduce associated impacts. This analysis should also address and disclose the projects' potential effects on all criteria pollutants under the National Ambient Air Quality Standards, including ozone; visibility impairment, and air quality related values in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.

Seismic and Other Risks

Construction and operation of the proposed projects may cause or be affected by increased earthquake activity in tectonically active zones. Because of that, it will be important to discuss the potential for seismic risk and approaches to evaluate, monitor, and manage the risk. The document should include a seismic map or a reference to it. Construction of the proposed projects should use appropriate seismic design and construction standards and practices to minimize impacts. One strategy would be to assess geologic faults in the analysis area because fault areas are vulnerable to movement, which makes them potential areas of risk for pipeline rupture. Along with that, geologic resources within the area should be evaluated; and the nature of the subsurface soil and bedrock materials within the HDD path should be determined.

During the pipeline construction, blasting may be required in some areas, resulting in increased noise and related effects to local residents and wildlife, including disruption, displacement, and possible death of some wildlife species. The EIS should discuss where blasting would be needed, blasting methods that will be used, and how the adverse effects of blasting will be controlled and mitigated.

Land Use Impacts

Land use impacts would include, but not be limited to, disturbance of existing land uses within construction work areas during construction and creation of rights-of way for construction, operation, and maintenance of the pipeline and above ground facilities. The EIS should document all land cover and uses within the analysis area, potential impacts due to the projects, and mitigation measures to reduce impacts.

The Farmland Protection Policy Act was enacted to minimize the unnecessary conversion of farmland to nonagricultural uses because of federal actions. The Act also seeks to assure that federal programs are administered in a manner that will be compatible with state and local policies and programs that have been developed to protect farmland. Because of construction and operation of the projects, it is possible that some prime and/or environmentally significant farmlands could be taken out of production, which would result in loss of crops, disruption of irrigation systems and drainages, and loss of wildlife habitats often associated with farmlands. Farmlands that are contiguous to environmentally sensitive areas

(floodplains, wetlands, and aquifer recharge zones, etc...) should be protected because they play important roles in buffering these sensitive areas from development.

The EIS should discuss impacts to farmlands and include acres affected and crops that could be lost. If applicable, the EIS should discuss measures to restore farmlands and compensate landowners for losses incurred because of proposed actions. The policy of the Natural Resources Conservation Service is to protect significant agricultural lands from conversions that are irreversible and result in the loss of essential food and environmental resources.

The primary impact of construction on open land use types, such as rangelands and forests, would be the removal of trees, shrubs, and other vegetation. Although these can be regenerated/replanted, their re-establishment can take up to 20 years or more, making construction impacts to these resources long term and in some cases permanent. The EIS should describe the impacts to open land use types, indicate if the impacts would be permanent or temporary, and list measures to mitigate impacts.

If the projects would impact special areas such as Wildlife Refuges, the EIS should specify the areas, and discuss any easement conditions for use of those areas.

Habitat, Vegetation, and Wildlife

As proposed, the projects may impact shoreline vegetation near Lake Keechelus and Kachess reservoir, and their tributaries. We understand that no site-specific studies of vegetation have yet been conducted for Keechelus or Kachess Reservoirs. Therefore, we recommend that such studies be done and included in the EIS along with descriptions of the current quality and capacity of habitat, its use by wildlife in the analysis area, especially avian populations and fish. The EIS should also describe these habitats in more detail, species that use them, impacts of the projects on the habitats and species, as well as mitigation measures for the impacts. If there would be marine habitat impacts due to the proposed projects, the EIS would need to disclose those impacts and measures to reduce them.

The projects also have the potential to disrupt important wildlife species habitat due to habitat disturbance, fragmentation and loss that may favor some species over the others. The EIS should describe the critical habitat for species; identify impacts on species and their critical habitats; and how the projects will meet all requirements under the Endangered Species Act. The EIS should include a mitigation plan with detailed steps to take to reduce or eliminate adverse impacts. In particular, the EIS analysis should include the following information and effects of the projects, individually or together, on:

a) Construction and normal and maintenance operations of the I-90 Snoqualmie Pass East project.
b) Key habitats and related corridors associated with crossings identified for this project.
c) Species that use the habitats, particularly fish and ESA species.
d) Habitat loss, including types and function.
e) Measures to take to minimize impacts.
f) Coordination efforts with Washington State Department of Transpiration and other agencies with ongoing projects to reduce the effects and protect resources, such as wetlands mitigation, maintenance of habitat connectivity, and fish passage restoration. The pipeline will cross I-90 highway.

The projects may also have impacts on native and rare plants and the EIS should include information about these plants, if any, related impacts and measures to take to mitigate potential impacts on the plants. The timing of projects' activities, for example, should be planned so that there would be little to no impacts to plants and animals during crucial seasons in their life cycle. The EIS should specify Best Management Practices to protect resources in the analysis area.

Cumulative Effects

The EIS should assess impacts over the entire area potentially affected by similar impacts (e.g., hydrology, wetlands, and habitat), and to consider the effects of other past, present and future projects together with the proposed action, including those outside the jurisdiction of the lead agency. Where adverse cumulative impacts may exist, the EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.

In determining cumulative effects, the EIS should clearly identify the resources that may be cumulatively impacted, the time over which impacts are going to occur, and the geographic area that will be impacted by the projects. The focus should be on resources of concern - those resources that are at risk and/or are significantly impacted by the projects before mitigation. In the introduction to the Cumulative Impacts Section, identify resources analyzed, which ones are not, and why. For each resource analyzed, the EIS should:

a. Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date.
b. Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis.
c. Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example, what will the future condition of the watershed be?
d. Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives.
e. Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
f. Identify opportunities to avoid and minimize impacts, including working with other entities.

Endangered Species Act

The EIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the analysis area. The EIS should describe the critical habitat for the species; identify any impacts the projects would have on the species and their critical habitats; and how the projects will meet all requirements under ESA, including consultations with the US Fish and Wildlife Service and National Oceanographic Atmospheric Administration.

Easements

The proposed project would require acquisition of land or easements from property owners. For example, the description of the projects indicates that construction of the pipeline would require the acquisition of temporary and permanent easements for the pipeline corridor. Therefore, the EIS should include data on the properties that would be involved (type of ownership, acreage, current and

anticipated use), nature and extent of impacts to the properties (e.g., land use changes), and measures to minimize impacts. In cases of acquisition, the EIS should discuss the acquisition process, including compensation and methods to address the extent of necessary participation.

Climate Change Effects

Scientific evidence shows that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. Therefore, the proposed NEPA analysis should consider how resources affected by climate change could potentially influence the proposed projects and vice versa, especially within sensitive areas.

Specifically, the EIS should discuss climate change effects in the context of water supply and availability to meet demands within the analysis area and vicinity. This evaluation is particularly important for these projects, which are focused on water storage and release when needed. Thus, climate change impacts on runoff, snowpack, recharge and discharge, as well as reliability may influence the projects. At a minimum, the EIS should include a qualitative discussion of impacts of climate change to water supply in the local area, implications of the proposed projects, and water conservation measures to implement to reduce water demands.

Coordination with Other Land Use Planning Activities

The EIS should discuss how the proposed actions would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the analysis area and vicinity. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. If an appropriate government body has proposed plans in writing, but the plans are not yet fully developed, address them. The EIS should also address existing constraints in the analysis area and how the land uses will impact the proposed projects.

Coordination with Tribes

The NEPA document should describe the process and outcome of government-to-government consultation between the Bureau and each Tribe potentially affected by the projects, issues that were raised, if any, and how those issues were addressed. Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the U.S. government-to-government relationships with Indian tribes.

Environmental Justice

The EIS should include an evaluation of environmental justice populations within the geographic scope of the projects. If the analysis area includes such populations, the EIS would need to address the potential for disproportionate adverse impacts to minority and low-income populations, and approaches used to foster public participation by these populations. Assessment of the projects' impacts on minority and low-income populations should reflect coordination with affected populations. One tool available to locate Environmental Justice populations is the EJView, which is online at http://epamap14.epa.gov/ejmap/entry.html.

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994), directs federal agencies to identify and address

disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity to participate in the decision-making process.

Monitoring

The proposed projects have the potential to affect a variety of resources for an extended period. Because of that, we recommend that the projects' design include an environmental inspection and mitigation-monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The EIS document should describe the monitoring program and its use as an effective feedback mechanism so that adjustments can be made to meet environmental objectives throughout the life of the projects.

SCOPING COMMENTS

Kachess Drought Relief Pumping Plant and Keechelus-to-Kachess Conveyance EIS

December 16, 2013

Attn: Candace McKinley, Bureau of Reclamation, Columbia-Cascades Area Office
yrbwep@usbr.gov

From: David Gerth, Kittitas Conservation Trust
PO Box 428, Roslyn WA, 98941
509-649-2951 kct@inlandnet.com

1) The Technical Memorandum for the Keechelus to Kachess Pipeline prepared by HDR Engineering (Feb. 2011) describes the proposed alignment of the 96 inch diameter pipeline along its 25,000 foot path from the Lake Keechelus intake to the Lake Kachess outfall. The conceptual pipeline alignment would require easements for a total of 64 parcels, including 8 owned by the Kittitas Conservation Trust (KCT). The parcels owned by KCT were acquired in 2009 for the purposes of perpetual habitat protection for endangered species and preservation of forests that contribute to wildlife migration corridors. "Section-6" federal funds were invested in the properties' acquisition so there are many associated restrictions on the use of these forestlands. The WA State Department of Natural Resources has been granted a conservation easement over these properties for additional protection of habitat values. The process for granting an access and construction easement to Reclamation across those 8 parcels for the K to K pipeline would be complicated at best. Mitigation measures would need to be carefully and thoroughly negotiated.

2) Using the dimensions found in the Technical Memorandum, the volume of the pipeline would be approximately 463,000 cubic yards. If the project is constructed as described in the Memorandum, this order of magnitude of excavated materials may be generated. KCT has a keen interest in maintaining a dialogue with Reclamation about where project materials could be used for environmental benefits. Nearby habitat restoration projects that could use fill materials are currently in the assessment phase. Project mitigation measures could be enhanced by integrating disposition of earthen materials for the benefit of an endangered species habitat restoration project.

Thank you for the opportunity to submit scoping comments for the Kachess Drought Relief Pumping Plant and Keechelus-to-Kachess Conveyance Environmental Impact Statement.

December 16, 2013

James and Judith Mallon
East Kachess Property Owner of 161 Kachess Lane
801 E 1st Street Suite B102
Cle Elum, Wa 98922,
James.Mallon@yahoo.com

Candace McKinley
Environmental Program Manager Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901
Via email to: yrbwep@usbr.gov

Subject: Yakima Basin Water Resource Management Plan, Kachess Drought Relief Pumping Plat (Kachess Reservoir Inactive Storage Project)

Dear Ms. McKinley,

As we have not been receiving any information to date as to the above referenced project, we are requesting at this time a copy of the scoping document and would also like to receive email updates and any additional information in the future concerning said project.

Enclosed in this email are our comments concerning the Kachess Drought Relief plan and Keechelus to Kachess Conveyance EIS. Let me say at the outset, we understand the need for both short and long-term contingency plans regarding future droughts that may affect the Yakima Valley as well as local and regional water users. The plans as we understand them will have a dramatic impact on Lake Kachess residents during construction and in years of drought will turn the pristine lake we have enjoyed over the decades into essentially mud flats.

Our major concerns are as follows and we look forward to them being addressed in the Final EIS Statement:

Impact due to construction – We currently live full time on the Eastside of Lake Kachess from June through September (161 Kachess Lane, accessed via FS RD 4818).

What steps will be taken to allow residents access to their property 24 hrs a day 7 days a week (ie during construction and once new drainage system is in place). If access to our property will not be allowed, what compensation for loss of use will be provided?

If the road will be blocked during construction what access will fire crews have to fight forest wild fires?

Impacts to our water well (currently drilled to approximately 110 feet)
What steps are being taken to ensure that there will be no impact to our access to clean water? We are very concerned during drought years that the water table will be dramatically impacted by the additional draw down, and will render our well useless at the current 110 feet. Furthermore the use of surface water from a spring will also be impacted due to the lower water table (at considerable expense we have just completed acquiring senior water rights for our use of surface water) and could result in our loss of fresh water from this source.

We are a retired couple on a fixed-income; loss of fresh water for our home will result in the loss of use of our property.

Impact to use of the lake and property during drought years
Drawing down the lake an additional 80 feet, and causing the shoreline to recede 200 to 450 feet from the current shoreline will result in sizable mud flats (and associated smells) in front of our lake front property. Furthermore, access to the shoreline will be nearly impossible given the distance we will have to travel (i.e. launching a kayak from our shore given the additional 400 feet we would have to walk across mudflats to the shoreline).
As a result of reduced access to the shoreline and ultimately reduced property value, what compensation considerations would be proposed?

I look forward to understanding how these issues will be addressed and receiving future information.

Sincerely,

James and Judith Mallon

Kachess Drought Relief Pumping Plant - comment

Dan Menser <dan@menserfamily.com> 9:30 PM (13 hours ago)

Candace, please consider my comment as follows:

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

October 30 – December 16, 2013

Name (please print legibly): Dan Menser
Organization: [N/A – I am an individual landowner in the area]
Mailing Address: 2405 Squak Mountain Loop SW
City, State, and Zip Code: Issaquah, WA 98027
Telephone: 4259610475 E-mail:dan@menserfamily.com

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:
___ I would like to receive a copy of the Scoping Document.
_X_ I want to receive email updates and information on the Environmental Impact Statement (EIS).
___ I want my name included on the mailing list to receive information on the EIS.
___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

My comments on the Kachess Drought Relief Pumping Plant are:

_While it appears to me that a the Kachess lake level could be drawn down significantly more than is currently possible, I urge consideration of recreational uses: except in times of a significant and sustained drought emergency, enough water should be left in the lake for recreational use.

My comments on the Keechelus-to-Kachess Conveyance are:

_Construction of the conveyance appears to me to have a cost far exceeding the benefit. I urge consideration of a net-present-value type of business analysis to ensure that the significant cost of construction is truly worth the direct benefit to farming. Moreover, use of public funds for private benefit should be factored in, with a variable cost of water usage component worth considering.

You may leave your comments in the box provided or mail, fax, email, or call in your comments by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

Comments on Cle Elum Raise, Kachess Inactive Storage, and Keechelus to Kachess Pipeline

Monk, Patrick <patrick_monk@fws.gov> 3:03 PM (19 hours ago)

Please address the following issues in the Environmental Impact Statements being prepared for these project proposals:

Cle Elum Pool Raise: Water stored from the Lake Cle Elum pool raise is to be used for instream flow purposes. How does raising the pool affect the interim fish passage facility? Will the interim fish passage facility need to be modified to accommodate the pool raise? How often (annually), and when (seasonally) will the additional water actually be available to use for instream flows?

In order to compare the costs and benefits of the Cle Elum pool raise with other projects that yield water for instream flows, such as water conservation, it would be helpful to know the total project costs and the amount of acre-feet that will be dedicated to fishery enhancement, so that a cost per acre-foot comparison can be made.

Kacheelus to Kachess Conveyance: One of the primary project purposes is to "improve ecological conditions for fish." What fish species and life-stages are being targeted for improved ecological conditions? Which conditions of the ecosystem are currently in need of improvement? How does this project improve those conditions? Again, it's helpful to have a neutral measure to evaluate projects on a cost-benefit basis. Can you estimate the amount of habitat area that will be created or improved relative to current conditions if the project is in place?

Thanks for the opportunity to comment.

Patrick A. Monk
Fish Biologist
U.S. Fish and Wildlife Service
Yakima River Basin Water Enhancement Project
1917 Marsh Road
Yakima, WA 98901
509.575.5848 xt. 325
509.421.1096 cell

Comments on scoping for Keechelus Reservoir to Kachess Reservoir Conveyance

Susan Parr <sparr@drizzle.com> 9:40 PM (12 hours ago)

To: Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation

Columbia-Cascades Area Office

1917 Marsh Rd.

Yakima, WA 98901

Dear Ms. McKinley and the Bureau of Reclamation:

Thank you for requesting comments regarding the K-to-K Conveyance proposed project. I am writing to offer my input on the scope of the EIS for this project.

I am a writer and photographer living in the Seattle area. I frequent, as many people do, the Snoqualmie Pass area for outdoor recreation. I volunteer to lead hikes, and have also volunteered with the U.S. Forest Service, North Bend Ranger District, on restoration issues. I have an interest in natural history, social history of mountain areas like Snoqualmie Pass, climate change, and water use issues in general. I also have family members who have lived in eastern Washington who are actively write about local agriculture, especially newer industries such a wine, cider, and cheese-making.

In general, information about the Yakima Basin Integrated Plan has been elusive and hard for the general public (people like me, as opposed to organized entities and agriculture-related groups) to access. I am a thorough and frequent reader of local and national media, yet I only heard of the overall plan *after* the final PEIS had been completed for the overall package. I was not able to comment on any aspect of the plan because I didn't know of the plan's existence. This is no lapse of attention on my part; I have heard similar complaints from equally well educated and active, community-minded people. Therefore, for the EIS for the K-to-K project, please consider how the Bureau of Reclamation and the Dept. of Ecology plan on effectively publicizing the EIS. Public meetings should have been offered for the recent scoping sessions in the Seattle area, and should be offered for the EIS as well.

The approach of the project is extremely heavy on engineering solutions and extremely light on conservation solutions. While I applaud the efforts to increase instream flow for salmon and other fish species, I question the engineered approach. It is, in essence, geoengineering: expensive, elaborate control mechanisms which only bluntly imitate the finessed self-regulation of natural forces. These engineered solutions can do marvelous things, but always involve unintended consequences, just as the original dams offered efficient irrigation but decimated fish runs. Therefore, for the EIS, consider the effects of over-engineering river systems. For example, what will the future maintenance requirements be to coming generations? In order to regulate the K-to-K conveyance tunnel, will electricity and computers be required at all times to avert flooding or other issues and what burden does that place on future generations? How does increasing the

engineered aspects of the river system become sustainable in the long-term? Could farm-management projects use similar engineering skills but on a smaller, more sustainable scale to achieve similar results for some issues, eliminating the need for expensive water engineering projects?

For the EIS, consider also the impacts of merging one water source, Keechelus Lake, with another. Seattle's biggest water tunneling project was the connection between lake Washington, Lake Union, and Puget Sound. This had drastic negative consequences for Lake Washington including changes to the salinity and water chemistry, loss of shoreline habitat, temperature changes, and other effects. If a tunnel connects Keechelus Lake to Kachess Lake, what will be the effects? The EIS should study the transfer of invasive species from one reservoir to another. It should also study the transfer of toxins or pollutants that may be present in Keechelus Lake (because of clear-cut logging, development near ski areas, and oils and other pollutants from I-90) and how these pollutants or invasive species might impact Kachess Lake. A full catalog of pollutants in both lakes should be compiled, along with study of invasive species.

The study should also consider impacts to forests, wetlands, and the vestiges of shoreline habitat that surround both reservoirs and the species that use these areas, along with any other species that use or rely on the water in its current configuration.

Finally, a project that purports to be designed to mitigate the problems of climate change should address its own contributions to climate change. What is the carbon footprint of the project? What kinds of energy needs will the project demand from future generations? What kinds of energy might the project produce? How could smaller-scale agriculture projects and smaller-scale dam improvements that help fish habitat and instream flow compare with the large-scale tunnel approach? How might the project potentially accelerate the very same climate impacts it attempts to mitigate?

Thank you for accepting my comments about the cope of the EIS.

Best regards,

Susan Parr

Seattle, WA

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

October 30 – December 16, 2013

Name (please print legibly): Linda Pistorese / Erin Anderson

Organization: Homeowner

Mailing Address: 65 Commons Way

City, State, and Zip Code: Kalispell MT 59901

Telephone: 406-249-3445 **E-mail:** lindap@lindapRealEstate.com

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

X I would like to receive a copy of the Scoping Document.

X I want to receive email updates and information on the Environmental Impact Statement (EIS).

X I want my name included on the mailing list to receive information on the EIS.

___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

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 Kachess Drought Relief Pumping Plant are:

See attached comment addendum.

My comments on the Keechelus-to-Kachess Conveyance are:

See attached comment addendum.

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
1917 Marsh Road
Yakima WA 98901-2058
fax (509) 454-5650
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Comment addendum for:

SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

- **Elements / Alternatives / Projects**
  - Washington State RCW 43.83B.400 defines "drought as when water supply conditions are expected to be 75 percent or less of the normal supply and will cause undue hardship to water users." Historical data shows that emergency drought status has been declared one in every three to five years, on average (FPEIS pp. 1.83). Based on the current proposal, following emergency drought periods the Kachess reservoir would be refilled to its current level by the K-to-K Conveyance tunnel project.
    - Is this data what should be considered precedence to provide a realistic expectation for upper basin residents?
    - How long would the refill of water take and how frequent are these periods of low levels expected to be?
    - What plans and proposals are in place for the occurrence of drought conditions throughout the Yakima valley, upper basin included?
    - What assurances do the upper basin residents have that they will not incur their own drought conditions through this proposed plan?
    - What plans are in place to prevent or lessen erosion and landslides due to changes in tidal tables and continuously shifting water levels?
    - How has this impact to the surrounding shores and land been evaluated and what preventative measures, if any, are proposed?
- **Water Resources / Water Quality**
  - Previous experience, when Lake Kachess was drawn down to work on the outflow structure of the existing dam, revealed the bottom lake water to be sulfurous smelling (presumably anaerobic) silt. Further, it must be considered that construction of the pumping plant and underwater tunneling/mining could cause more buildup and excess material to be washed into all surrounding water beds, impacting water quality during and after construction.
    - What plans are in place to limit and control the wash and buildup of silt and bedrock materials from both drilling and exposure?

- What will the effect of this silt outflow have on the Yakima river and fish redds when the additional 80 feet drawdown is in effect?
- What effect will this have on the water quality for residents of Lake Kachess, who rely on this water supply for their own use?
- How would the pipeline water flow be regulated to prevent this silt from washing to the shores and waterfront lands of residents?

❖ **Water Conservation**

- The proposal to lower Lake Kachess by an additional eighty feet would roughly equate to the same surface storage capacity outlined for agricultural water conservation in the FPEIS, which states: "the agricultural water conservation program would conserve approximately 170,000 acre-feet of water in good water years" (pp. 144).
  - What current requirements or restrictions, such as water detainment or retention regulations and efforts, are currently in place to ensure responsible use and prevent waste or misuse of the already provided water resources?
  - What mandates for conservation and lower basin reclamation have been considered to offset the need for this pipeline?
  - How does the cost / benefit analysis compare agricultural water conservation to the Kachess Drought Relief Pumping Plant proposal?
  - What conservation procedures would be enacted in conjunction with the proposed plan and how would they be enforced?

❖ **Habitat Protection and Enhancement Program**

- Much of the surrounding land of both reservoirs is considered the property of the forest service or national parks. Provided plan maps indicate that the pumping plant and new outlet would both be built on these lands. As the many residents who reside on leased or purchased lands within these boundaries know, these lands are heavily protected and controlled to minimize growth impact and decimation. Drilling, mechanization, and engineered changes to these lands could cause drastic effects on the wildlife population of this region.
  - What impact could the plant and outlet have on the habitats and well-being of the many protected species currently in residence?
  - Are the same guidelines set forth to residents being used to minimize the impact of this proposed pipeline and plant?
  - If so, how does this plan follow these same guidelines governing current residents and homeowners?
  - Could a project such as this set precedence for future development and growth in these protected areas?

❖ **Cultural Resources**

❖ **Water Marketing, Power, and Economics**

- According to the "Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan)" outline, this project is designed to take water from the upper basin of the Yakima valley for the primary benefit of prorated agriculture users in the lower Yakima basin. The resulting benefits of an integrated water plan such as this are apparent and duly noted. However, based on the great scope and intricacy

of this proposal, its individual components are not equal in priority and therefore unlikely to be conducted simultaneously.

- What is the cost / benefit analysis for the prorated agriculture of the lower basin in comparison to the effected residents of the upper basin?
- What contributions and concessions are being made by the lower basin residents and farmers to offset the need and cost of this project?
- What cost / benefit analyses have been done to compare and sequence these projects?
- What research and studies have been done to consider how each EIS would be altered when compared to its counterparts and when standing alone, should certain components fail to be completed as proposed?

❖ **Recreation and Tourism**

- The popular use of these areas as recreational destinations is widely regarded. Much of this tourism feeds and sustains the local economy and residents of these rural communities rely on the income it provides. However, illegal and destructive use has become more frequent with the area's rise in popularity. The negative impact of recreational off-terrain vehicle use in the area surrounding Lake Kachess is already evident. Increased illegal and destructive activity are a very real concern if the lake bed is exposed, illegal "mudders" being one example recently posted by the forest service <http://www.fs.usda.gov/detail/okawen/news-events/?cid=STELPRDB5423426>.
  - What impact on water quality and usable resource can be expected if these sediments are stirred up by this and other off-terrain recreation?
  - What plans, if any, are in place to protect the lake bed and surrounding environment from destruction such as this?
  - Would this pipeline further restrict public access to recreational areas of the reservoirs and their surrounding environs?
  - Have considerations been made to ensure no undertow would exist, presenting a potential danger to residents and tourists partaking in Lake Kachess recreational activities?

❖ **Groundwater**

- Residents of Lake Kachess rely on well water or surface water for their homes and cabins. U.S. Geological Survey studies found at <http://groundwaterwatch.usgs.gov/>, show that well water levels of Lake Kachess residents fluctuate seasonally. When comparing these well levels to the lake's level, a correlation must be noted. Additionally, the Department of Ecology recently entered into a Senior Water Rights agreement with 19 residents of the East Kachess Homeowner's Association. This agreement provides these residents Senior Water Rights, with their rights to this water supply "banked" in Lake Kachess.
  - What impact will this plan have on existing homeowner's water rights?
  - During drought periods when the lake is drawn down will homeowner's be required to reduce their water use?

- What provisions exist to acknowledge and protect the water rights of those who've already obtained or purchased rights to these waters, including the Senior Water Rights agreement?
- What is the expected impact on residents relying on well water systems if the water level in the reservoir were to drop to the proposed maximum of an additional 80 feet?
- Would compensation be provided for resulting necessary upgrades on existing wells in order to adjust to the lowered water depth?
- What consideration has been given to residents who currently pump water from the lake?
- Would these residents be compensated for needed extensions to existing water lines and possible upgrades to household pump systems?

❖ **Crops**

- The Yakima Basin Integrated Plan appears to primarily benefit the lower basin agricultural businesses. Precedence for reasonable obligation by agricultural businesses to plan and enact new methods for environmental conservation can be found throughout the country and the world. Planting less water intensive or more drought tolerant crops and building individual irrigation and storm water retention systems are both becoming widely used and viable solutions to drought.
  - What efforts would be required by the recipients of this proposed plan's drought relief?
  - What efforts are currently being made to minimize the need for such a plan to be enacted?
  - What assurances are provided that the reallocated water would not be wasted or misused?

❖ **Climate Change**

- The proposed plan is outlined to specifically benefit the farming and agricultural lands in the lower Yakima basin by reducing the drought effects of limited snow pack, due to global warming. It is imperative to note that the proposed water supply of the Kachess and Keechelus reservoirs are equally impacted by the effects of a reduced snow pack. Receiving less water in the snow melt while draining more to the lower basin would doubly affect this upper basin water supply, without the option for relief from neighboring water supplies.
  - What studies and research has been done to provide an expected impact on the upper basin should drought conditions or lesser snow pack become more frequent due to global warming and its effects?
  - What assurances are provided that the upper basin residents won't find themselves the victims of this same drought, without additional water resources to draw upon?
  - What provisions, if any, are provided to protect the upper basin residents from the possibility of drought due to the reallocation of more water through this proposed plan?

❖ **Fish/Wildlife**

- The current Yakima Bull Trout Action Plan notes that the mouth of Lake Kachess' Box Creek Canyon is located on the lakebed due to the severity of the lowered reservoir level from irrigation water withdrawal. Due to this fact, trout stock are characterized as "critical" and a "high priority action population" (FPEIS pp. 219; YBTAP pp. 133). This action plan further states that low water levels during the bull trout migratory period and the Kachess Dam pose the greatest threats to the survival of this bull trout population.
  - If the current lowered levels are threatening this population of Yakima bull trout, how would the additional drain affect their habitats and spawning ability?
  - What preventative measures are being considered to protect these vital spawning grounds and migratory routes, to ensure the survival of this population?
  - What other habitat impact studies have been conducted and considered to prevent inadvertent dislocation or extinction of the many dwindling alpine species?

❖ ***Visual and Noise***

- *Many aspects of the proposed project make this a very challenging objective to meet successfully. Specifically, drilling and waste removal to create the pipeline, construction and operation of a new pumping station, as well as resulting changes in tidal and shore conditions.*
  - *What plans are in place to minimize the visual and physical impact to the environmental surroundings, including pollution, road maintenance, increased traffic volume, and resulting noise?*
  - *What studies document the effect of the pipeline's pull on the tidal flow and its resulting environmental impact, including possible habitat destruction and remodeling of the shoreline?*
  - *What proposals would ensure exposed silt and sediment would not line the shores of the lake, creating a noxious odor and visually unappealing surroundings?*

❖ *Geology*

- *The proposed plan requires extensive tunneling and mining through the surrounding hillsides of these two reservoirs. Recent experience in the city of Seattle has shown that this type of drilling results in great volumes of excess material that must be disposed of. Moving such material by vehicle would put excessive weight on many roads already in need of repair. These roads are vital to resident mobility and many are currently maintained at resident expense.*
  - *What methods are proposed to prevent this excess material from filtering*

... is proposed to prevent this excess material from flowing into the reservoir beds, contaminating the water and ultimately reducing the depth of the lake?

- What is the proposed method to remove the waste and excess material resulting from this drilling?

- What documentation, such as impact studies and geological surveys, can provide assurance to residents of structural integrity and safety of both the roads and surrounding hillsides?
- How does this plan account for keeping roads operational and functional for residents?
- What assurances are provided so that residents are not forced to incur additional expense to keep these roads operational?

❖ **Transportation and System Operations**

- A project such as this will require many laborers and extensive construction to complete. Further, more employment would be required for the operation and maintenance of the plant and pipeline. The areas surrounding the basins are rural communities with camping as their primary tourist accommodation. Lengthened travel on I-90 to neighboring communities would be necessary or dwellings would have to be constructed for this increased labor force population. The materials needed to complete the project would further increase the heavy vehicle traffic on I-90, surrounding highways, and the many narrow and winding local roads that provide the only current access to the proposed construction sites.
  - How would the hiring and staffing of these proposed projects be handled?
  - What consideration has been given to provisions for utilizing the local population, providing much needed industry and economic stability?
  - What operations would be in place to maintain and improve the road conditions due to increased use?

❖ **Process / Scope**

- Due diligence should require the government and its respective agencies to put forth a reasonable effort to notify landowners and residents affected by such enormous proposals such as the KDRPP and the KKC. It can be generally agreed upon that few people are in the habit of reading through every minute change in governmental plan, policy, and procedure. Therefore, the current policy to make documents public without specifically notifying the property owners who are directly affected shows itself to be underhanded and suspect. Transparency and informative dialogue to encourage local consideration and participation is essential to create a truly equitable and sustainable solution for all parties involved.

I appreciate the opportunity to respond to these issues and look forward to the EIS response.

Erin Anderson
Easton Edwards LLC

cc: Congressman Dave Reichert
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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE
Region 3 South Central Washington
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December 16, 2013

Candace McKinley
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1917 Marsh Road
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Derek I. Sandison
Director, Office of Columbia River
Washington State Department of Ecology
303 S. Mission Street
Wenatchee, WA 98801

RE: Determination of Significance and Request for Comments on Scope of Environmental Impact Statements for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage Pumping, and the Cle Elum Pool Raise

Dear Ms. McKinely and Mr. Sandison,

The Washington Department of Fish and Wildlife (WDFW) appreciates the U.S. Bureau of Reclamation (Reclamation) and the Washington State Department of Ecology (Ecology) Office of Columbia River request for comments regarding the scope of Environmental Impact Statements (EIS) for the Keechelus Reservoir-to-Kachess Reservoir Conveyance and Kachess Inactive Storage and the Cle Elum Pool Raise in accordance with the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA).

The U.S. Bureau of Reclamation and the Washington State Department of Ecology Office of Columbia River are beginning preparation of Environmental Impact

Statements for the Cle Elum Pool Raise, Keechelus-to-Kachess Conveyance (K to K) and Kachess Inactive Storage (aka Kachess Drought Relief Pumping Plant) Projects. The documents will be joint National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) Environmental Impact Statements.

WDFW has been and will continue to be an active participant in implementing the Yakima River Basin Water Enhancement Project, Integrated Water Resource Water Management Plan (Integrated Plan). The Integrated Plan is comprised of seven, nondiscretionary elements that WDFW presumes will occur in a balanced manner and include (1) Reservoir fish passage, (2) Structural and operational changes, (3) Surface storage, (4) Groundwater storage, (5) Habitat/watershed protection and enhancement, (6) Enhanced water conservation, and (7) Water market reallocation of water resources. WDFW continues to support Reclamation and Ecology's approach Integrated Plan implementation and WDFW will continue to support efforts that support WDFWs is mandated to

> *"… preserve, protect, perpetuate, and manage the wildlife and food fish, game fish, and shellfish in state waters and offshore waters … in a manner that does not impair the resource. … consistent with this goal, the department shall seek to maintain the economic well-being and stability of the fishing industry in the state. The department shall promote orderly fisheries and shall enhance and improve recreational and commercial fishing in this state."*[1]

WDFW remains committed to coordinating with Reclamation and Ecology to identify information needs for EIS development and to address ecological uncertainties to avoid or mitigate significant project impacts on fish, wildlife, habitats, and the public benefits they provide. The enclosed comments provided by WDFW have been formulated with the understanding that it is a priority for the State of Washington to solve complex water issues within the Yakima River Basin and within the context of the Integrated Plan. WDFW suggests the following information be provided in and or assessed in both EISs:

Resident Fish and Fisheries

- The potential risks and benefits of the Kachess to Keechelus Pipeline and associated pumping station to resident fish and sport fisheries should be assessed and described. It is uncertain how significant drawdowns during drought years might impact existing resident trout and future anadromous fish due to entrainment through new outlet structures.
- All three upper Yakima River reservoirs host popular recreational fisheries. Kokanee, rainbow trout, cutthroat trout, mackinaw, and burbot are all popular

fishing targets in these waters. While opportunity will be altered and perhaps supplemented with anadromous opportunity, the overall level and success of recreational fishing needs to be maintained or improved. Access to the lake at various pool levels must be maintained to the extent possible.

- Impacts are expected to occur when flow rates and water level fluctuations affect aquatic communities and primary productivity. Reservoir drawdowns reduce fish habitat availability, strand benthic organisms, adversely impact water quality and congregate predators with their prey. Faster turnover of lake input/output (i.e. decreased water retention time) can cause increased entrainment of both fish and their prey and loss of nutrients.
- However, fish lost from an upstream reservoir are not managed for available harvest in a downstream reaches and fishing opportunity lost in the reservoirs cannot be recovered in other waters because fishing opportunities on those waters are managed for wild production and kokanee and burbot won't likely survive.
- The utilization of the lower Cle Elum River to be inundated by spring spawning and rearing fish life (rainbow trout and cutthroat trout) is unknown and should be reviewed. The effects of inundation should be surveyed and identified to assess the significance to spring spawning resident fish life. If the adverse impacts are significant appropriate mitigation should be identified.

Recommendations:

Several actions are needed to ensure that resident fish and recreational opportunity are maintained.

- Cutthroat trout, rainbow trout and kokanee, and future anadromous stocks, may not be able to access spawning tributaries, or current spawning and incubation areas may be inundated under the new management scenarios. The project should assess how spawning resident fish, and future anadromous fish, would be adversely impacted and how to preserve tributary access.
- Pre and post project monitoring efforts should be directed at determining the best strategies for long-term adaptive management of upper Yakima River Reservoir fish and fisheries. These include:
    - Develop a zooplankton and water quality sampling protocol during Kachess and Keechelus reservoir drawdown and subsequent refill of the reservoirs to assess impacts on primary productivity and fish production.
    - Conduct fish inventory work, with emphasis on predator/prey relationships during drawdown; and rainbow trout and cutthroat trout spawning surveys in the new reaches of the lower Cle Elum River to be inundated.

- Shoreline observations as lake levels drop in Kachess and Keechelus Reservoirs, to identify index sites for potential kokanee and sockeye spawning locations.
- Study and implement ways to minimize entrainment of fish and zooplankton from reservoirs. Consider hydroacoustic studies to assess fish concentrations in the lower reaches of the reservoirs, particularly near the proposed pumping station in Kachess Reservoir to determine which actions will help reduce entrainment into the new outlet and how to avoid trapping bull trout in lower Kachess Lake.
- Provide resources so that WDFW can adaptively manage these fisheries to maintain or enhance fisheries value. For example, increased plants of artificially propagated fish, or enhanced public fishing access facilities might be necessary in order to maintain fisheries. Adaptations can include:
  - Changing fishing regulations ;
  - Altering fish stocking species mix, numbers, timing, or sizes;
  - Providing facilities or resources that increase fish stocks' self-sustainability;
  - Enhancing fishers access to the fishery

Bull Trout

- It appears there are various outlet structure designs for the K-K pipeline project proposal. There is concern that the new outlet works may increase the incidence of entrainment and diversion of bull trout from Keechelus Reservoir, into Kachess Reservoir. It is not indicated if fish screens will be installed to preclude diversion of bull trout from Keechelus Reservoir into Kachess Reservoir and what screening methods are to be used. There are often significant challenges in designing screens for winter operation. Diverting bull trout between reservoirs should be avoided or mitigated
- The potential adverse impacts to juvenile and adult bull trout passage to and from the Kachess and Keechelus under different water year scenarios should be examined to assess potential adverse impacts on all life histories of bull trout, including migration to and from tributaries utilized for spawning and rearing. There is need to investigate how bull trout use and access to Gold Creek, Cold Creek, in Keechelus Reservoir and Box Canyon Creek, Mineral Creek, and Kachess River and other tributaries might be affected, and how access can be maintained.
- Installing a pump station in lower Lake Kachess to access dead storage could create a fish passage barrier between the upper and lower lakes. If the lakes become disconnected, bull trout would likely be unable to access spawning and rearing habitat in the upper lakes. A deep draw down in the lower lake may also start a significant head cut within the accumulated fine sediments within

the reservoir bed, which may result in water quality and sedimentation concerns within spring chinook spawning and rearing habitat below the point of discharge. The potential adverse impacts should be studied and avoided.

- Ramping criteria must also be established to avoid increased incidence of stranding of fish and wildlife along the margins of the pool during pool drawdown in lower Kachess Reservoir. This could initially be done using bathometry.
- Scoping should include discussion of alternatives to improve bull trout access into tributaries from both the Keechelus Reservoir and Kachess Reservoir, which might involve structural channel modifications or supplementing stream flows via pumping, or using pressurized pipe from the Kachess and Keechelus pipeline via multiple discharge points. Bull trout access must be maintained at equal or better efficiency.

Transfer of Disease or Aquatic/ Invasive species

The potential for transfer of existing and future transmission of diseases between fish populations in Kachess and Keechelus should be assessed. Keechelus Reservoir should be inventoried for potential aquatic/ Invasive species now and in the future. Its proximity to I-90 could result in higher risk of infestation. The potential effects and risks of aquatic species such as Quagga and Zebra mussels into Kachess and Keechelus should be discussed and a response action identified.

Habitat

Shoreline Bank Protection

Landowners living adjacent to Cle Elum Reservoir have expressed concerns regarding potential erosion associated with elevating the pool. We have concerns that this work would primarily result in the addition of heavy rock armor rather that a bio-engineered approach that also incorporates large woody material and natural vegetation. Appropriate bio-engineering techniques should be investigated or mitigative actions incorporated into the upper reservoir near the mouth of Cle Elum River. Shoreline observations should be made in Kachess and Keechelus reservoirs as pool levels drop, to identify index sites for vegetation monitoring.

Waterfowl and Shorebirds

Altered reservoir elevations, and the timing and rate of filling and drafting reservoirs have potential to adversely affect shorebird and waterfowl populations in the project area. There is need to assess habitat with respect to timing and rate of pool elevation changes within the reservoirs and their shorelines. Include an assessment of

how riverine wetlands and associated waterfowl and shorebirds will be affected by changes in flow quantity and timing of flow releases with a focus on nesting impacts.

The potential impacts associated with the Cle Elum Reservoir pool raise on nesting birds and wildlife using the vegetated shallows at the upper end of the reservoir should be investigated. The number and diversity of species utilizing this area should be reviewed. HEP or similar methodology should be applied to lower gradient shoreline areas of the pools to assess the effects of changes in pool elevation, timing, and duration or inundation on wildlife associated with shoreline and/or wetland habitats and near shore nesting species must be assessed and mitigated.

Ecological Connectivity

We have significant concerns with regard to maintaining north-south ecological connectivity for wildlife in the eastern Cascades. WDFW along with various partners and WSDOT have invested significant effort in restoring and protecting ecological connectivity as part of the I-90 project. The same overhead clearance standards used for I-90 should apply to the Kachess to Keechelus pipeline project proposal. The pipeline alignment should complement existing I-90 corridors.

Yakima River Flows

It is unknown how the Kachess to Keechelus pipeline project proposal may affect streamflow within the bypass reach of the Yakima River between Keechelus Reservoir and the mouth of the Kachess River under various water year scenarios including; low, average, and above-average water years. Stream flows and timing of changes beyond baseline conditions should be modeled and described in detail. We are concerned that stream flows within this reach of the upper Yakima River will become more regulated and suffer a less normative hydrograph and that the frequency and duration of channel forming flows, important to channel and habitat maintenance, will be reduced.

The benefits or risks to various life history stages of fish life associated with altering winter and summer instream flow within the upper Yakima River should be determined and mitigated through modeling exercises.

Off Site Changes

A review of how “Flip-flop” operations in the Tieton and Naches Rivers might be affected by storage and flow alterations in the upper Yakima River resulting from these project proposal should be examined.

WDFW encourages Ecology and Reclamation to continue to work diligently with resource agencies, tribes, and various stakeholder groups to assure that the EIS

embodies a balance of public interests between the needs of users and the needs of fish and wildlife and the local economic activity they generate. WDFW looks forward to continued coordination and consultation through EIS development. Thank you for the opportunity to comment and please contact Mike Livingston at michael.livingston@dfw.wa.gov if you have questions or concerns.

Sincerely,

Mike Livingston
Region 3 Director

16151 SE 42nd St
Bellevue, WA 98006
December 15, 2013

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901

Ref: Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) Comments
Via email to: yrbwep@usbr.gov

Dear Ms. McKinley:

Following are my comments on the above referenced project:

I have listed my comments under the same categories as was used in the "Scoping Summary Report – Yakima River Basin Integrated Water Resource Management Plan" and I feel that EIS should include an analysis of these items.

Elements/Alternatives/Projects

Looking at the experience of the last 20 years, if the pumping plant had been installed, how many times would Lake Kachess been drawn down an additional 80 feet below its natural level?

How often is it projected that Lake Kachess would be drawn down an additional 80 feet below its natural level in the future? This estimate should include any effects that the Keechelus-to-Lake Kachess Conveyance would have on the operation.

Economics

Lowering the lake another 80 feet will impact the usability and value of property around Lake Kachess. The EIS should examine the loss of value of all the waterfront properties on the lake.

Recreation and Tourism

Lake Kachess is actively used by campers and boaters. Modifications to the boat launch would be necessary if the lake is lowered another 80 feet.

Groundwater

Groundwater wells for residences on Lake Kachess are known to fluctuate seasonally, approximately following the lake level. The EIS should investigate whether lowering the lake another 80 feet could make those wells unusable.

I look forward to seeing these comments addressed in the EIS.

Sincerely,

Jerald A Williams
425-747-8103
Email jaw.home@hotmail.com

I would like to receive a copy of the Scoping Document.
I want to receive email updates and information on the Environmental Impact Statement.
I want my name included on the mailing list to receive information on the EIS.

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Washington State Department of Transportation

Lynn Peterson
Secretary of Transportation

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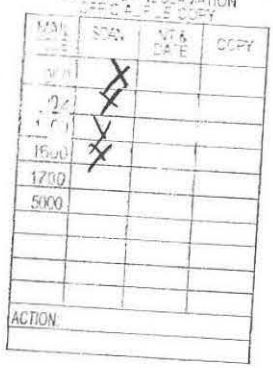


December 16, 2013

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

Attention: Candace McKinley, Environmental Programs Manager

Subject: Request for Comments on Scope of Environmental Impact Statement for the Keechelus Reservoir-to-Kachess Reservoir Conveyance, Kachess Inactive Storage Projects, and Cle Elum Reservoir Pool Raise - U.S. Department of Interior, Bureau of Reclamation & Washington State Department of Ecology

Thank you for the opportunity to provide comments on the NEPA scoping process for the above-mentioned projects. As part of the I-90 Snoqualmie Pass East project, we coordinate with your office on a regular basis. We also enjoy a high degree of coordination with your staff on other projects, as state highways and Bureau infrastructure are tied closely to one another in Central Washington. We look forward to continuing with that same spirit of cooperation and collaboration as your projects move through the NEPA phase and, hopefully, into construction. Please consider the following comments when preparing your NEPA documents:

1. Ensuring protection of I-90 Snoqualmie Pass East Project Connectivity Emphasis Areas (CEAs) between Hyak and Easton (MP 55.1 to MP 70). CEAs are areas that WSDOT has invested public funds for bridges, habitat restoration, fish and wildlife connectivity, and hydraulic connectivity within the I-90 footprint. To aid in your analysis, we have attached a map of CEAs within the I-90 Snoqualmie Pass East Project limits.
2. WSDOT would like to ensure that changes to existing reservoir operations or natural drainage flows within the Upper Yakima River Watershed will not adversely affect downstream WSDOT infrastructure. Our working assumption is that any operational changes to Yakima Project reservoirs are insignificant to downstream WSDOT infrastructure.
3. Proposed construction timing and sequencing of these projects with proposed or planned construction timing of I-90 Snoqualmie Pass East (MP 55.1 to MP 70) Project phases. Currently, I-90 construction near Keechelus Lake is funded through 2021. Therefore, it's likely that overlapping Bureau and WSDOT projects will create both opportunities and constraints. We will continue to coordinate with your Yakima office to minimize traffic management conflicts during construction.
4. Stormwater and surface runoff generated by these projects must be retained and treated on site and not permitted to flow onto WSDOT rights-of-way.
5. Avoiding potential adverse effects to our managed wetland mitigation/restoration sites.

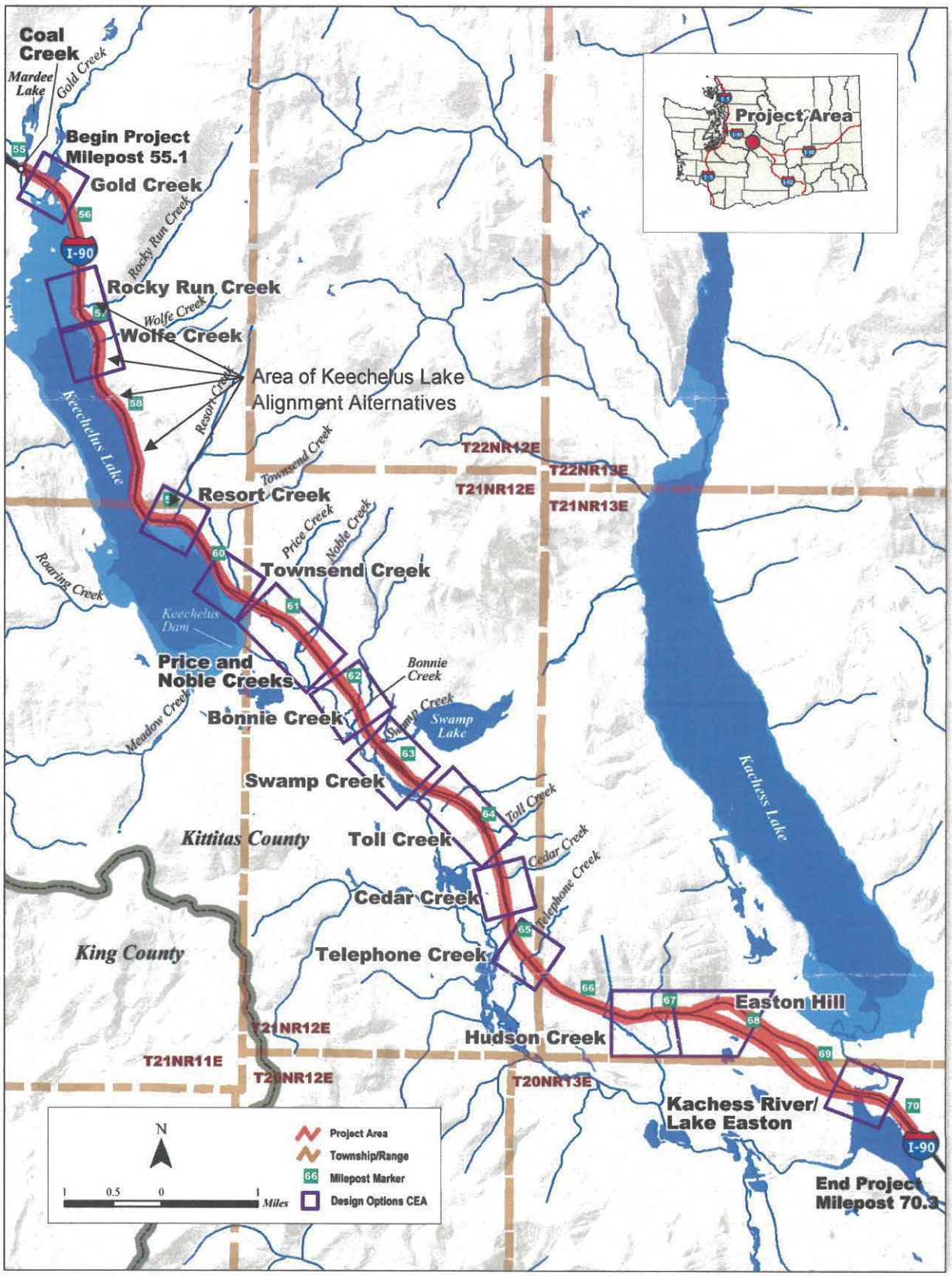
We have environmental data available from our 2005-2008 NEPA EIS process that we'd be happy to share. Please contact Mark Reynolds of my staff at (509) 577-1929 if you'd like to use it.

Sincerely,

Jason W. Smith
WSDOT South Central Region
Environmental Program Manager

LCM: mrr
Enclosures: I-90 Snoqualmie Pass East CEA Graphic

cc: Keith McGowan, US Bureau of Reclamation Environmental Protection Specialist
Brian White P.E., SCR Assistant Regional Administrator for Project Development
Paul Gonseth P.E., SCR Planning and Materials Engineer



CEA's in the I-90 Snoqualmie Pass East Project Area

Retention Code : ENV-6.00

Project # 1147997

Control # 1305 3469

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1917 Marsh Road
Yakima, WA 98901-2058

Attention: Candace McKinley, Environmental Programs Manager

Subject: Comments – Scope of Environmental Impact Statement for the Keechelus Reservoir-to-Kachess Reservoir Conveyance, Kachess Inactive Storage Projects, And Cle Elum Reservoir Pool Raise

We support the proposed Yakima River Basin Water Enhancement Project, Integrated Water Resource Management Plan. WSDOT recognizes the importance of agriculture to the central Washington region. We have the following comments.

- It appears that the conveyance tunnel between Keechelus Reservoir and Kachess Reservoir is proposed to cross I-90 in the vicinity of MP 62.3, which is Phase 2b of the I-90 corridor improvement project. Phase 2b is currently in the scoping and planning phase and the profile and horizontal alignment have not been finalized. Of most concern to us is the location of the proposed tunnel crossing in relation to any wildlife crossings or other structures WSDOT has planned in this vicinity. WSDOT requests more detailed information on the location and depth of the tunnel crossing. It is imperative that the conveyance project be coordinated with Phase 2b of the highway project for construction timing and sequencing.

- WSDOT will want to ensure that Connectivity Emphases Areas (CEAs) and other existing highway structures, including bridges and drainage features, are protected. CEAs are areas within the I-90 corridor that WSDOT has invested public funds into bridges, habitat restoration, fish and wildlife connectivity, and hydraulic connectivity within the highway footprint.

- WSDOT would like more information on how changes to existing drainage flows within the Upper Yakima River Watershed may affect downstream WSDOT infrastructure. The assumption is that any changes will be insignificant to downstream infrastructure.

- WSDOT requires that the construction technique planned for the highway crossing of the tunnel be identified and that the details of this technique and alternative techniques being considered, if any, are reviewed by WSDOT. We expect the tunnel will be bored below the highway, which is the preferred method in preventing disruption to traffic on I-90.

- Interstate 90 (I-90), including the ramps, is a fully-controlled limited access highway with a posted speed limit of 65 MPH. No direct access to I-90 will be allowed. Access to either side of the highway shall be via the Stampede Pass Interchange. WSDOT has construction activities planned for the segment of I-90 between Keechelus Lake and the Cabin Creek Interchange well into 2020. These activities will include traffic control. To minimize construction activity conflicts between the highway projects and the conveyance project, we highly discourage using the existing USA Forest Service/Bureau of Reclamation access connection at Highway Engineer's Station 1507+00 for construction access. WSDOT requests that the anticipated construction site access locations for both sides of the highway be identified.

Thank you for the opportunity to review and comment on this scoping proposal. If you have any questions regarding our comments, please contact Rick Holmstrom at (509) 577-1633.

Sincerely,

Paul Gonseth, P.E.
Planning & Materials Engineer

PG: rh/mls

cc: File #4, I-90
Jamil Anabtawi, Utilities Engineer
Jeff Minnick, Construction Project Engineer
Brian White, Assistant Regional Administrator
Terry Kukes, Area 1 Maintenance Superintendent

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SCOPING COMMENT FORM

Kachess Drought Relief Pumping Plant (Kachess Reservoir Inactive Storage) and Keechelus-to-Kachess Conveyance EIS

October 30 – December 16, 2013

Name (please print legibly): Bonnie Aguilar

Organization: Kachess Comm Assoc Lot 18 Div 1

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Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

___ I would like to receive a copy of the Scoping Document.

_X I want to receive email updates and information on the Environmental Impact Statement (EIS).

___ I want my name included on the mailing list to receive information on the EIS.

___ I want my name removed from the ___ email list and/or ___mailing list (please check one or both).

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 Kachess Drought Relief Pumping Plant are:

Kachess Lake would be lowered too drastically, which will indanger fish, otters, and other w!ldlife. It would also be devastating to recreation, and property values. and take many years to recouperate

My comments on the Keechelus-to-Kachess Conveyance are:

Seems like the water from Keechelus can be sent directly down stream, with all the money spent to divert it to Lake Kachess, first,

(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 by Dec. 16, 2013, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email ; phone (509) 575-5848, ext. 613.