

RECLAMATION

Managing Water in the West

SUPPLEMENTAL INFORMATION REPORT

Odessa Subarea Special Study Area – Odessa Groundwater Replacement Program – EL47.5 Project and Amendment to the Renewal Master Water Service Contract

**Odessa Subarea Special Study Area
Columbia Basin Project, Washington**



**U.S. Department of the Interior
Bureau of Reclamation
Columbia-Cascades Area Office
Yakima, Washington**

January 2017

MISSION STATEMENTS

U.S. Department of the Interior

Protecting America's Great Outdoors and Powering Our Future

The Department of the Interior protects America's natural resources and heritage, honors our cultures and tribal communities, and supplies the energy to power our future.

Bureau of Reclamation

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.

Acronyms and Abbreviations

ARRA	American Recovery and Reinvestment Act of 2009
BA	Biological Assessment
BiOp	Biological Opinion
CEQ	Council on Environmental Quality
CBP	Columbia Basin Project
ECBID	East Columbia Basin Irrigation District
EL	East Low
ESA	Endangered Species Act
EA	Environmental Assessment
EIS	Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FONSI	Finding of No Significant Impact
I-90	Interstate 90
LRISRP	Lake Roosevelt Incremental Storage Releases Project
MWSC	Master Water Service Contract
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
OSSS	Odessa Subarea Special Study
RMWSC	Renewal Master Water Service Contract
ROD	Record of Decision
SCBID	South Columbia Basin Irrigation District
SIR	Supplemental Information Report
QCBID	Quincy-Columbia Basin Irrigation District

SUPPLEMENTAL INFORMATION REPORT

Odessa Subarea Special Study Area – Odessa Groundwater Replacement Program – EL 47.5 Project

Proposed Project /Action Title: East Low Canal 47.5 Delivery System Project and Amendment to the Renewal of Master Water Service

Existing Environmental Document: *Odessa Subarea Special Study Final Environmental Impact Statement*, August 2012

NEPA Lead Agency Name/Address: Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901

Contact Persons: Candace McKinley, Environmental Program Manager
Christina Davis-Kernan, Technical Projects Program Manager
Jennifer Hickenbottom, Odessa Project Manager

Contents

1	Introduction	1
1.1	Lake Roosevelt Incremental Storage Releases Project	2
1.2	Potholes Reservoir Supplemental Feed Route Project	2
1.3	CBP Irrigation Districts Coordinated Conservation.....	3
1.4	Odessa Subarea Special Study.....	3
1.5	Master Water Service Contract	4
2	Project Implementation Description	5
2.1	East Low 47.5 Delivery System	5
2.2	Analysis of Information Relevant to El 47.5 Delivery System	7
2.2.1	Land Acquisition.....	7
2.2.2	Cultural Resources	8
2.2.3	Endangered Species Act.....	8
2.3	Analysis of Information Relevant to the Amendment to the RMWSC.....	9
2.3.1	Land Acquisitions	10
2.3.2	Cultural Resources	10
2.3.3	Endangered Species Act.....	10
3	Conclusion	13
	Figure 1. East Low Canal 47.5 Delivery System Project (arrows shown on map indicate location of water deliveries).....	7
	Table 1. Environmental compliance completed for the proposed actions evaluated.	12

Supplemental Information Report

This Supplemental Information Report (SIR) documents the Bureau of Reclamation's evaluation and consideration of any potential changes in the Odessa Subarea Special Study (OSSS) project as it pertains to the implementation of the East Low Canal 47.5 (EL 47.5) Delivery System Project and the amendment of the Renewal Master Water Service Contract (RMWSC). The Council on Environmental Quality regulations provide direction regarding the review of an environmental impact statement (EIS) and preparation of supplemental statements. The purpose of the SIR is to (1) review the information used and presented in the *OSSS Final Environmental Impact Statement (FEIS)* and *OSSS Record of Decision (ROD)*, and (2) determine if any new or relevant information associated with the EL 47.5 Delivery System Project and the amendment to the RMWSC changes the analysis presented in the OSSS FEIS and ROD, and the *Lake Roosevelt Incremental Storage Releases Project (LRISRP) Finding of No Significant Impact (FONSI) and Final Environmental Assessment*.

This SIR has been prepared to determine if there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts as described in 40 CFR 1502.9. The SIR also summarizes Reclamation's completion of consultations, assessments, and agreements necessary for the EL 47.5 Delivery System Project and the amendment to the RMWSC.

1 Introduction

The Columbia River Water Management Program (Management Program) is a suite of projects that would provide surface water to the Odessa Subarea to alleviate pressure on the aquifer. The major components of the Management Program include storage, conservation, and other measures intended to meet the legislative mandate of developing new water supplies to meet instream and out-of-stream needs. The Revised Code of Washington 90.90 directs the Washington State Department of Ecology (Ecology) to focus efforts to develop water supplies for the Columbia River Basin to meet the following needs:

- Alternatives to groundwater pumping for agricultural users in the Odessa Subarea aquifer.
- Sources of water supply for pending water rights applications.
- A new uninterruptible supply of water for the holders of interruptible (junior) water rights on the Columbia River mainstem that are subject to instream flows or other mitigation conditions to protect stream flows.
- New municipal, domestic, industrial, and irrigation water needs within the Columbia River Basin.

- In addition to funding and implementing major water supply projects, the Management Program includes administrative functions such as development of a project inventory, a water supply and demand forecast, and a data management system.

In 2007, Ecology prepared the *Final Programmatic Environmental EIS for the Columbia River Water Management Program* (Ecology 2007). The Management Program EIS was intended to describe and evaluate potential direct, indirect, and cumulative impacts associated with implementation of the Management Program, including policy.

The Management Program EIS also evaluated potential impacts associated with implementation of several early actions including the LRISRP and the Potholes Reservoir Supplemental Feed Route Project. Key components of the Management Program are summarized in the following text; detailed descriptions are available in the Management Program EIS (Ecology 2007)

1.1 Lake Roosevelt Incremental Storage Releases Project

The LRISRP releases water from Lake Roosevelt for multiple purposes. Under a water service contract with Reclamation, Ecology has made available 25,000 acre-feet of water each year to improve municipal and industrial water supplies along the Columbia River mainstem. As part of the LRISRP and pursuant to the Ecology-issued water right S3-30486, 30,000 acre-feet of water will be conveyed to the Odessa Subarea to replace groundwater on approximately 10,000 acres of existing irrigated land. The district currently contracts with Reclamation for a portion of this water, which is the same water to be delivered through the EL 47.5 Delivery System.

Downstream from Grand Coulee Dam, 27,500 acre-feet of water will be available to enhance stream flows in the Columbia River to benefit fish. In drought years, an additional 33,000 acre-feet will be available to interruptible water-right holders; an additional 17,000 acre-feet will be available for instream flow augmentation. Ecology issued the Final Supplemental EIS for the LRISRP in August 2008 (Ecology 2008), and Reclamation issued an EA and FONSI for the project in June 2009 (Reclamation 2009). Reclamation and Ecology began the flow releases in September 2009.

As part of the LRISRP, Ecology provided funds to Reclamation for the design of the Weber Siphon Complex. The work consisted of constructing the second barrel of the Weber Branch and Weber Coulee Siphons on the East Low Canal. Completion of the siphons alleviates a flow capacity bottleneck where the East Low Canal crosses I-90.

In April 2009, the Weber Siphon Complex was named an American Recovery and Reinvestment Act (ARRA) project. Construction was completed December 2011, and the Weber Siphon Complex was operational in March 2012.

1.2 Potholes Reservoir Supplemental Feed Route Project

The purpose of the supplemental feed route project is to increase the reliability of transporting water from Banks Lake to Potholes Reservoir. While about two-thirds of the water used by

the South Columbia Basin Irrigation District (SCBID) each year is provided by Columbia Basin Project (CBP), return flows from the portion of the project that lies north of Potholes Reservoir. One-third (approximately 330,000 acre-feet) of the water must be conveyed directly from Banks Lake to Potholes Reservoir for use in the south half of the CBP. This water is known as “feed water.”

Currently, most of the feed water is transported via the Main Canal south through the East Low Canal to Rocky Coulee Wasteway where it is discharged into Upper Crab Creek near the north end of Moses Lake and Potholes Reservoir. Feed water is conveyed early and late in the irrigation season, when demand for irrigation water is low. At these times, the “unused” capacity in the East Low Canal is used to carry feed water to Potholes Reservoir.

Changes in irrigation practices and increases in water demand have reduced the effectiveness of the existing feed route. As a result, Reclamation and Ecology initiated the Potholes Supplemental Feed Route Project. Reclamation prepared an environmental assessment (EA) and identified the Crab Creek and Frenchman Hills Wasteway feed-route alternative as the preferred alternative for a supplemental feed route (Reclamation 2007). The selected alternative would involve an annual release of approximately 126,000 acre-feet of feed water from Billy Clapp Reservoir directly into the Crab Creek channel and on to Moses Lake and Potholes Reservoir. In the spring, approximately 25,000 acre-feet of feed water would also be conveyed via the West Canal to Frenchman Hills Wasteway and then to Potholes Reservoir. The supplemental feed route lies outside of the Odessa Ground Water Management Area and beyond the boundaries of the Odessa Subarea. However, East Low Canal capacity improvements that result from the project will help facilitate groundwater replacement efforts in the Odessa Subarea. Ecology funded improvements to the Frenchman Hills Wasteway in 2007 and has provided funding to Reclamation for land and easement acquisitions associated with this action.

1.3 CBP Irrigation Districts Coordinated Conservation

Ecology partners with SCBID, the East Columbia Basin Irrigation District (ECBID), and the Quincy-Columbia Basin Irrigation District (QCBID) to pipe and line their delivery systems in the CBP. In 2009, these irrigation districts lined and piped more than 27,600 feet of canal and saved 2,521 acre-feet of water. In 2010, they installed 54,388 feet of pipe and saved 2,929 acre-feet of water. In 2011, they lined and piped 77,969 feet of canal and saved 5,357 acre-feet of water. The water saved by these infrastructure improvements will be delivered to the Odessa Subarea. Since 2009, the Coordinated Conservation Program has saved approximately 10,800 acre-feet of water, which will provide replacement water for about 3,600 acres of land currently using groundwater for irrigation in the Odessa Subarea.

1.4 Odessa Subarea Special Study EIS

In August 2012, Reclamation completed the OSSS FEIS. The OSSS ROD was signed in April 2013 describing the selected Preferred Alternative, Alternative 4A: Modified Partial-Replacement—Banks with the revised Limited Spring Diversion Scenario, for phased

implementation in cooperation with Ecology and the CBP irrigation districts. Alternative 4A would provide CBP surface water to approximately 70,000 acres of lands north and south of I-90.

The average volume of water diverted from the Columbia River under Alternative 4A is 164,000 acre-feet. This volume of water is provided pursuant to Ecology-issued water right G4-33091P. As the surface-water supply system is brought online and water becomes available to eligible lands, superseding State groundwater rights would be issued, and wells currently used for irrigation would be placed in standby status and remain operational for emergency use.

Alternative 4A includes a provision for groundwater irrigators in areas distant from the East Low Canal to move their farming operations to previously disturbed lands closer to the canal so surface water could be delivered. Relocation would require an acre-per-acre exchange; i.e., 1 acre of groundwater-irrigated land would be retired for each acre of relocated land irrigated by replaced CBP surface water. The superseding water right would reflect the relocation of the place of use. The water delivery system would include the following:

- Enlarge 43.3 miles of the East Low Canal south of I-90, including adding a second barrel to all five existing siphons.
- Create a pressurized, pipeline distribution system to convey water to farmlands, which would consist of eight canal-side pumping plants, three re-lift pumping plants, regulating tanks, and approximately 150 miles of buried pressurized pipeline systems both north and south of I-90. This system would require numerous meter and equipment stations along the pipeline routes, primarily at farm delivery points, as well as approximately 150 miles of electric transmission lines. The EL 47.5 delivery system is one of these identified systems.
- Acquire additional easement width along the constructed portion of the existing Weber Wasteway south of I-90, and construct a gravity turnout at the southern end of the East Low Canal.

1.5 Master Water Service Contract

The original Master Service Water Contract (MWSC) had three previous contract supplements completed, and environmental compliance requirements were completed for each supplement. For Supplement No. 1, a FONSI and final EA was issued for limited irrigation development of 10,000 acres within the district (1982).

For Supplement No. 2, a FONSI and final EA was issued for the use of conserved water to irrigate approximately 2,100 acres within the district, which would replace groundwater extracted from deep wells in the Odessa Subarea (2005). An amendment was completed for Supplement No. 2 (Amendment No. 1 to Supplement No. 2) that increased the acres by approximately 7,900 acres to 10,000 acres of conserved water to replace ground water extracted by deep wells in the Odessa Subarea. For this action, Reclamation completed the

OSSS FEIS in August 2012 (INT-FES 12-40), and the OSSS ROD was signed on April 2, 2013. An amendment to the OSSS ROD was completed on September 27, 2013.

For Supplement No. 3 a FONSI and EA was finalized on June 12, 2009 (PN-FONSI-09-03) for the use of 30,000 acre-feet of water, allocated under Washington State Water Right Permit No. S3-30486 for the irrigation of up to 10,000 acres within the district that would replace groundwater extracted by deep wells in the Odessa Subarea. The use of the water allocated pursuant to this supplement was also evaluated in a Final Supplemental EIS prepared by the State of Washington for the LRISRP. Also, pursuant to the water right for Supplement No. 3, an additional 15,000 acre-feet was allocated to instream flows in the mainstem Columbia River.

In September 2015, Reclamation and the District executed a renewal to the original MWSC and the three supplements that authorizes the District to deliver a base quantity of up to 90,000 acre-feet of CBP water annually to 30,000 First Phase Continuation Acres located within the District, and continue delivery of additional water to land irrigated under the District's repayment contract during the peak period of irrigation water use annually.

2 Project Implementation Description

The following describes the activities associated with implementation of the EL 47.5 Delivery System and the execution of the amendment to the RMWSC. ECBID is responsible for constructing the delivery system and any associated transmission lines. Reclamation will negotiate an amendment to the RMWSC for the United States to assume title to the distribution rights-of-way and appurtenances involved. The SIR describes how ECBID's plans and the ultimate Federal assumption of title are consistent with prior National Environmental Policy Act (NEPA) and planning for the overall Odessa Groundwater Replacement Program. Pursuant to the terms of the RMWSC, the District is actively contracting for water service with participants who are willing to pay for their proportionate share of the construction of the EL 47.5 system and associated water service charges.

2.1 East Low 47.5 Delivery System

As stated in the OSSS FEIS, CBP water from the East Low Canal would be provided by pressurized pipeline distribution systems to the groundwater-irrigated and water service contract lands north and south of I-90. The entire OSSS system would be pressurized by canal-side pumping plants and re-lift pumping plants. Metering stations to record water deliveries would be placed at several locations along the pipeline route. The District has a preliminary layout for the entire system that will provide water to the full 70,000 acres under the proposed amendment to the RMWSC. For the purposes of this SIR, the following facilities are described for implementing the EL 47.5 Delivery System only:

- **Distribution Pipelines:** The distribution system would require approximately 7.3 miles of buried pipeline. Depending on the size of the pipeline, Reclamation would acquire

a 100- to 200-foot-wide easement for pipeline installation and would need to retain long-term access to and within the easement for any necessary repairs or replacements.

- **Canal-side Pumping Plant:** The canal-side pumping plant that would feed the EL 47.5 pipeline distribution system would be located in Section 17 of Township 18, Range 31. The project area is located within Sections 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, and 18 of Township 18 North, Range 31 East; and Sections 16, 17, 18, 19, 20, and 21 of Township 18 North, Range 32 East. The EL47.5 system lies within the District, northeast of Warden, Washington, in Adams and Grant counties. The pumping plant would be built on the east side of the East Low Canal at canal miles 47.5. Approximately 3 acres would be required to accommodate the pumping plant and equipment, an air chamber, and an electric-powered substation. The facility would be surrounded by a chain-link fenced topped with barbed wire for security. It would also be necessary to build a regulating tank along the pipeline up to 2 miles from the pumping plant site.
- **Meter Equipment Sites:** Metering equipment would be installed at several locations in the water distribution pipeline system. Most sites would be located where landowners tap into the system. These sites would total approximately 2,500 square feet, all within the pipeline easement and would be located specifically not to interfere with existing irrigation equipment or other infrastructure. Metering equipment would be placed near existing roads whenever possible
- **Transmission Lines and Access Roads:** ECBID is currently working with Big Bend Electric Co-Op to establish the need for transmission lines and a possible substation to serve the EL 47.5 system. The intent is for the District to use a combination of newly constructed lines, where necessary, and existing transmission lines where available. The District will acquire the necessary access to the pipeline and pumping plant for operation and maintenance (O&M). They will use the existing O&M road along the East Low Canal for access to the EL 47.5 pumping plant and will have access in the EL 47.5 easement for O&M of the distribution system.
- **Eligibility Criteria:** To receive surface water in the Odessa Subarea, landowners must own land within the Federal Columbia Basin Project, lands must have a valid State-issued groundwater right (permit or certificate), and lands must be within the Odessa Subarea Special Study area boundary/footprint. The District offered water service contracts to those landowners who met these criteria and who were willing to pay and participate in the Odessa Groundwater Replacement Program.

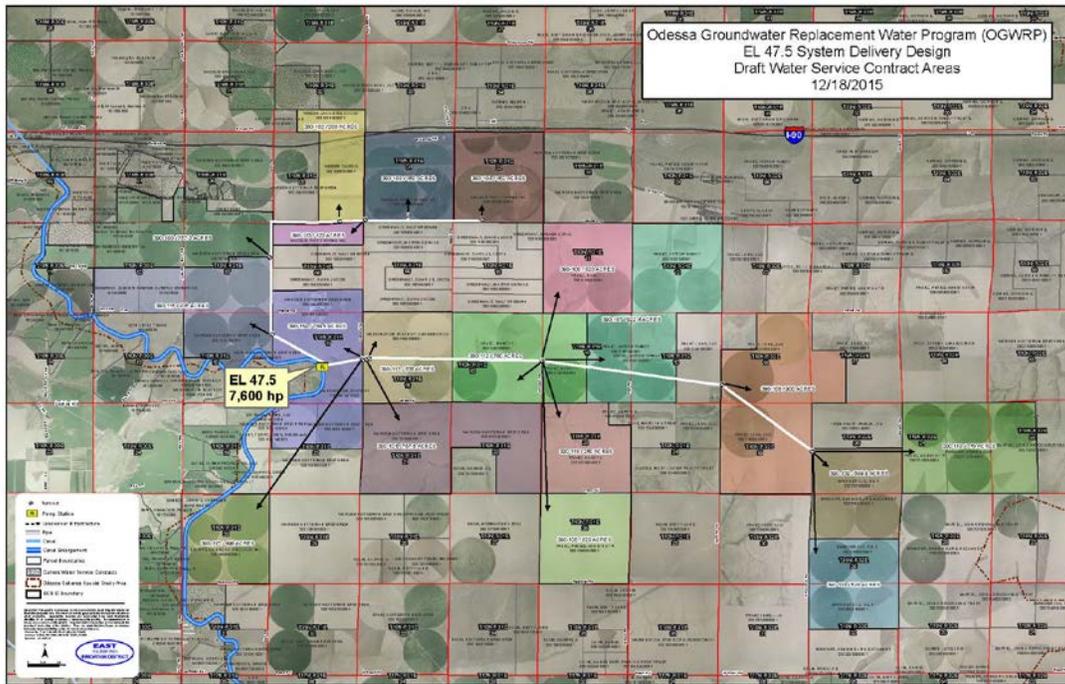


Figure 1. East Low Canal 47.5 Delivery System Project (arrows indicate location of water deliveries).

2.2 Analysis of Information Relevant to El 47.5 Delivery System

2.2.1 Land Acquisition

As stated in the OSSS FEIS, Reclamation would acquire significant land ownership interests in the form of easements for the East Low Canal extension, the pipeline distribution system, and required power transmission lines. Fee title land would also be acquired for pumping plants, a gravity turnout, and an operation and maintenance facility. ECBID would acquire temporary and permanent easements, rights-of-way, or other access authorizations from private landowners for the construction, installation, O&M, and replacement of the EL 47.5 delivery system. In compliance with the OSSS ROD, Reclamation would not fund the acquisition of these land interests. ECBID would acquire the land interests in accordance with Federal standards, so as to effectuate transfer of the easements to the United States.

To acquire the land, Fulcrum Environmental Consulting was contracted to conduct a Phase I environmental site assessment of the EL 47.5 corridor and associated lands. This area consisted of a 100-foot-wide, 11.2-mile corridor within a portion of 18 continuous Adams County tax parcels located northeast of Warden, Washington. The purpose of the site assessment is to assess any potential environmental conditions related to past and present activities associated with the properties. The site assessment review did not identify conditions indicative of release or threatened releases of hazardous substances, pollutants,

contaminants, petroleum and petroleum products, and controlled substances on or in the subject corridor.

Through a Reclamation contracting action, the RMWSC indicated that the pipeline and power line components would be completely district acquired and owned. This SIR describes the results of the environmental site assessment and a return to the original OSSS FEIS approach of Federal ownership and that this return has no previously undisclosed environmental consequences.

Future development of planned distribution systems that are anticipated to be within the parameters of the OSSS FEIS, and review will be accomplished and documented in the same manner as the EL 47.5 delivery system with full consideration given to the OSSS FEIS and other associated environmental compliance and consultation documentation.

2.2.2 Cultural Resources

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), a cultural resources assessment survey was conducted for the EL47.5 delivery system corridor and associated lands. As a result of the Class III survey, two historic isolates were identified. Both isolates have been determined as not eligible for listing on the National Register of Historic Places. The proposed intake and outlet for the EL 47.5 pumping plant will occur within a portion of the East Low Canal that has been newly widened and surveyed in 2013. The construction of the EL 47.5 pumping plant will not adversely impact this section of the East Low Canal, since it occurs within a non-contributing portion of the canal due to its prior widening. Reclamation made the determination that the East Low Canal will not be adversely affected by the proposed undertaking. On November 3, 2015, the Washington State Department of Archaeology and Historic Preservation concurred with Reclamation's no adverse effect determination and as a result consultation under Section 106 is complete.

2.2.3 Endangered Species Act

On October 3, 2012, Reclamation submitted to the U.S. Fish and Wildlife Service (Service) a biological assessment (BA) under Section 7 of the Endanger Species Act (ESA) of effects to threatened species and critical habitat from the implementation of the OSSS Project. The BA initiated informal consultation on potential effects to pygmy rabbit (*Brachylagus idahoensis*), Bull Trout (*Salvelinus confluentus*) and Ute Ladies'-Tresses (*Spiranthes diluvialis*). On October 10, 2012, Reclamation received a concurrence letter from the Service.

The proposed action identified in the consultation would provide surface water to 70,000 acres of existing farmland currently irrigated with groundwater. Construction activities under the proposed action included enlarging the East Low Canal south of I-90, adding a second barrel to all existing siphons south of I-90; constructing a pipeline distribution system fed by eight pumping plants along the canal and three re-lift stations; potential reconstruction of some existing road bridges over the East Low Canal, additional easement width along the existing Weber Wasteway; and new electric transmission lines to each pumping plant. Construction would occur in concurrent phases over approximately 10 years.

- **Pygmy Rabbit, Ute Ladies'-Tresses, Bull Trout** - The BA stated that most construction activities would occur in or along previously affected or disturbed areas which included the pipeline lateral distribution routes, East Low Canal rights-of-way acquisitions, as well as many of the proposed pumping station locations. Because most construction activities would occur along currently or previously disturbed areas, and in areas where pygmy rabbits have never been observed, the likelihood of pygmy rabbit exposure to these activities is extremely low. In addition, the likelihood of adverse effects to rabbit habitat or individuals is low due to the relatively small acreage that would be physically disturbed by construction activities related to facility infrastructure improvements.

As described for pygmy rabbit, the same applies for the Ute Ladies'-Tresses in that construction activities would occur along previously disturbed areas and the likelihood of Ute ladies'-tresses presence is considered low.

Upon review of the EL 47.5 Delivery System, there are no changes to the location of the delivery system to that described in the BA; therefore, an amendment to the BA is not required as the project conditions are no different than those described in the BA.

Construction activities related to the EL 47.5 Delivery System would not influence water quantity or water quality; therefore, these construction actions would have no effect on Bull Trout or critical habitat in the project area. In addition, Bull Trout do not inhabit any water bodies that could be impacted by construction activities. As a result, Reclamation has determined that Bull Trout would not be affected, and an amendment to the BA is not required as the project conditions are not different to those described in the BA.

- **ESA-listed salmon and steelhead species in the Columbia River Basin** — Construction activities related to EL 47.5 Delivery System would not influence water quantity or water quality; therefore, these construction actions would have no effect on the project area. In addition, salmon and steelhead do not inhabit any water bodies that could be impacted by construction activities. As a result, Reclamation has determined that 13 ESA-listed salmon and steelhead species in the Columbia River Basin would not be affected and an amendment to the BA is not required as the project conditions are not different to those described in the BA.

2.3 Analysis of Information Relevant to the Amendment to the RMWSC

Reclamation proposes to amend the existing RMWSC (Contract No. 159E101882, executed Sept 22, 2015) between Reclamation and the ECBID. The proposed amendment would authorize (pursuant to water right G4-33091P) ECBID to deliver up to 164,000 acre-feet of project water annually for up to 70,000 OSSS acres located within the boundaries of ECBID. Environmental compliance for the RMWSC was accomplished by Categorical Exclusion Checklist No. 2015-CCAO-20C, dated March 2, 2015. The RMWSC currently authorizes a base quantity of water of 90,000 acre-feet for a total of 30,000 acres. The proposed amendment will bring the total authorized amount of water pursuant to the RMWSC and this amendment to 254,000 acre-feet irrigating up to 100,000 acres of land.

Reclamation has reviewed and evaluated the amendment to RMWSC to ensure consistency with the preferred alternative identified in the OSSS FEIS and ROD, ESA consultation with NMFS and the Service, Section 106 consultation under the NHPA, and environmental site assessment compliance for acquisition of real property. The following information documents the completed compliance requirements which ensures this project presents no substantial changes or new, significant information relevant to the proposed action.

2.3.1 Land Acquisitions

The FEIS evaluated impacts associated with implementation of alternatives for delivery of CBP surface water to irrigated lands within the Odessa Subarea that currently rely on groundwater. Water deliveries authorized pursuant to the amendment to the RMWSC will be applied to private lands therefore having no impacts to acquiring lands.

2.3.2 Cultural Resources

Pursuant to Section 106 of the NHPA, the amendment to the RMWSC would be considered an undertaking that would have no potential affect to historic properties; therefore, Reclamation has no further obligations under Section 106, 36CFR 800.3.

2.3.3 Endangered Species Act

On October 3, 2012, Reclamation submitted a BA to the Service initiating informal consultation on the OSSS Project and received a concurrence letter from the Service on October 10, 2012.

The consultation covered the diversion of water from the Columbia River and use of the exiting storage capacity of Banks Lake to deliver an additional 164,000 acre-feet of surface water irrigation to the Odessa Subarea within the CBP and the construction of a pipeline distribution network, enlargement of the existing East Low Canal, construction of new pumping plants, refitting of existing pumping plants, and installation of utilities. The EL 47.5 Delivery System will deliver water from the Lake Roosevelt Project which is already under contract however, subsequent distribution lines will deliver the 164,000 acre-feet of surface water.

- **Pygmy Rabbit, Ute Ladies'-Tresses, Bull Trout** - Pygmy rabbit individuals or populations do not occupy habitat areas around Banks Lake or the Columbia River. As a result, they would not be affected by the hydrologic changes associated with either of these water bodies due to Proposed Action implementation.

Regarding Ute Ladies'-Tresses plants, it was analyzed in the BA that the reduction in Columbia River flow resulting from the project is low and consequently changes in water velocity and water surface elevation are likely immeasurable therefore would not affect the species. There are no changes with the timing or volume of water to be diverted and used for the amendment to the RMWSC; therefore, no amendment to the BA is required.

As analyzed in the BA, very few bull trout are expected to inhabit the Columbia River upstream of Grand Coulee Dam within the action area related to this project. The project is not likely to adversely affect Bull Trout that may be present in Lake Roosevelt due to the small amount of increased water diversions that would occur during the Banks Lake refill period relative to the amount of water remaining in Lake Roosevelt. In addition, no measureable water surface elevation changes would occur in Lake Roosevelt due to the project, and the timing of water withdrawals (primarily in October with very small and infrequent diversions occurring between November and June) would occur when Bull Trout are not likely to be active in Lake Roosevelt. No take of Bull Trout through pump entrainment or water-level fluctuations is expected to occur as a result of the Proposed Action.

Reclamation concluded that the implementation of the project may affect, but is not likely to adversely affect, Bull Trout or designated critical habitat for Bull Trout in the action area.

On October 10, 2012, Reclamation received a concurrence letter from the Service. There are no changes with the timing or volume of water to be diverted and used for the amendment to the RMWSC; therefore, no amendment to the BA is required.

- **ESA-listed salmon and steelhead species in the Columbia River Basin** - On November 6, 2012, Reclamation consulted with NMFS on 13 ESA-listed salmon and steelhead species in the Columbia River Basin.

During the irrigation season, Reclamation would supply an average volume of 164,000 acre-feet through the drawdown of Banks Lake to lands served by Alternative 4A identified in the OSSS FEIS. Reclamation will pump additional water from the Columbia River using the existing Keys Pump-Generating Plant (Keys Plant). The Keys Plant pumps water from Lake Roosevelt through Banks Lake for delivery to the CBP. Additional pumping to supply water to the Odessa Subarea will occur primarily in October, then on an opportunistic basis between the months of November through March in years when the full 164,000 acre-feet cannot be diverted entirely in October based on flow conditions, pump availability, and the electrical load shaping requirements of the Bonneville Power Administration. Additional diversion from the Columbia River to refill Banks Lake will follow a set of operational parameters that will constrain the timing and total volume of water withdrawn from the Columbia River. These parameters are identified in the NMFS BA dated October 2012 and the biological opinion (BiOp) dated January 2013. The amendment to the RMWSC will not change to the timing or volume of water used; therefore, no amendment to the BA is required and ESA consultation is complete.

Table 1. Environmental compliance completed for the proposed actions evaluated.

Proposed Actions	2009 Lake Roosevelt Incremental Storage Release Project EA	2012 Odessa Subarea Special Study FEIS
Amendment to the Renewal Master Water Service Contract	No actions were evaluated under this compliance for this proposed action	<ul style="list-style-type: none"> • 164,000 acre feet delivery of water • 70,000 acres of irrigation delivery service • Construction of future delivery systems, to include transmission lines, pumping plants and pipelines • Future land acquisitions which includes Rights of Way and Easements • Cultural Compliance • ESA Compliance and Consultation
East Low 47.5 Distribution System	<ul style="list-style-type: none"> • 30,000 acre feet delivery of water • 10,000 acres 	<ul style="list-style-type: none"> • Construction activities for this system as part of the overall OSSS implementation. Includes delivery systems, transmission lines, pumping plants and pipelines • Land Acquisitions • Cultural Compliance • ESA Compliance and Consultation

Table 1 summarizes the environmental compliance that has been completed for the proposed actions evaluated in this SIR. Also shown on Table 1, environmental compliance was completed under the LRISRP for the application of 30,000 acre-feet of water to be served by the EL 47.5 distribution system. The construction, land acquisitions associated with construction, and cultural and ESA compliance and consultation for EL 47.5 distribution system was completed pursuant to the OSSS FEIS as this system was one system of the full distribution system planned for the entire Odessa Subarea. Environmental compliance for the 164,000 acre feet of water and authorization for the amendment to the RMWSC authorizing irrigation service through future OSSS distribution systems for 70,000 acres was done pursuant to the OSSS FEIS. The OSSS FEIS covers the construction of future distribution systems for the Odessa Subarea 70,000 acres along with land acquisitions, cultural compliance and ESA compliance and consultation.

3 Conclusion

This SIR documents Reclamation's completion of compliance and consultation activities associated with implementing EL 47.5 delivery system and amendment of the RMWSC. Reclamation considered the following criteria:

- Are there any new, substantial environmental impacts from the project?
- Are there any new resources or issues with significant impacts to the human environment which were not considered in the EIS?
- Do the proposed project changes substantially change the environmental impacts or the methodologies needed to analyze the environmental impacts?

It has been determined that implementation of the proposed EL 47.5 Delivery System Project and amendment to the RMWSC would not have any significant changes to the analyses or findings presented in the OSSS FEIS and ROD; therefore, this SIR report describes the consistency with previous environmental documents and commitments as related to the EL 47.5 Delivery System and the amendment to the RMWSC. It also documents the process for land acquisitions, Environmental Site Assessment survey conducted for the acquisition of real property, and Section 106 consultation as required under NHPA, and ESA consultation. No further environmental evaluation or consultations are required prior to implementation.

For future development of planned distribution systems that are anticipated to be within the parameters of the OSSS FEIS a review will be accomplished and documented in the same manner as the EL 47.5 Delivery System and the amendment to the RMWSC with full consideration given to the OSSS FEIS and other associated environmental compliance and consultation documentation.