

Com-ment No.	Page No.	Line No., Figure No., or Table No.	Commenter	Comment	Response
1	General		Benton County	This is in response to your e-mail of December 9, 2009, for comments on the Yakima River Basin Water Enhancement Project 2009 Work Group (Work Group) by close of business Monday, December 14th. In addition, comments requested to be submitted on the November 23rd Draft Plan of Study not later than December 2nd which we did submit, are still applicable but have not been included herein.	Benton County's comments were sent out in a follow up email. All the comments received were reviewed carefully and some were included. Comments not included were not consistent with the current stage of the planning process. Many of the items identified in the comments will be addressed in the 2010 basin study and associated environmental review.
2	General		Benton County	We view this document as a <u>status or informational report</u> of where the Work Group is at the end of six months of activities in structuring an Integrated Water Resource Management Plan for the Yakima basin (IWRMP). While the report speaks in terms of a consensus recommendation (page 4) we question if approval of recommended actions is being sought and if so by whom. Further, we agree with Yakima County's view that "At this time, full consensus between the stakeholders on the integrated package cannot be achieved due to lack of adequate means to evaluate and compare individual actions for integrated benefits to compose a package". (See comments on Plan of Study Draft 11/23/09, page 2).	It is not the intent to reach consensus on the final package at this time. There is sufficient information to make a consensus decision about the preliminary IWRMP that will be considered in greater detail in 2010.
3	General		Benton County	We suggest the document be restructured to consist of the following: 1. A Main Report addressing such matters as a concise statement of the basin's water resource problems being addressed including the current issue of domestic (exempt) wells, the Federal and State authorities for this undertaking, why the Work Group was formed, its representatives and its charge, why an integrated approach and its purpose, the seven proposed elements of the preliminary IWRMP, the Work Group's conclusions (identified in the draft as recommendations), and the activities to be accomplished during calendar year 2010 (essentially the Plan of Study), and the estimated cost of these activities. The foregoing generally consists of those items covered on pages 1 through 7 and the Plan of Study on pages 37 to the middle of page 39. In addition, Figure 1, page 16 should be included. Section 3.1 could possibly be deleted from the Main Report if desired and Appendix I (described below) referenced. It is probably desirable however, to include an estimate of the cost of the preliminary IWRMP in the Main Report with Table 6, page 35 being included in Appendix I. 2. Appendix I which is Attachment B "Preliminary Integrated Water Resource Management Plan Project Descriptions of your transmittal" plus Table 6, page 35. 3. Appendix II providing the technical information consisting of Exhibits 1 through 4, pages 12 through 15, and the information on estimated benefits (accomplishments) of Sections 3.3.1, 3.3.2 and 3.3.3 (pages 17 through 38). However, we suggest Section 3.3.4 and Table 5, pages 32 and 33 which presents information on a sample scorecard be deleted because the Work Group has not had any discussion of the criteria to be addressed for comparing results of IWRMP scenarios. Note the scorecard is referred to on page 4, line 16, and in the Draft Plan of Study. These references should be retained.	There are various ways a report of this nature could be structured. The basic structure of this report seems acceptable without these changes. However in order to make the report more readable, the lengthy exhibits and tables will be moved to follow the report text. The scorecard is provided as an example and can provide the basis for a scorecard to be developed in 2010.
4	General		Roza Irrigation District	1. As was discussed at one of the meetings, the issue of power subordination at both Roza and Chandler power plants is misstated and needs to be completely rewritten for the final plan document.	Update discussion with input from Roza and Reclamation
5	General		Roza Irrigation District	2. It is correctly stated that YRBWEP 2 allocated the benefits of the Cle Elum lift for fisheries, but that was based on the benefits of the KK pipeline going to irrigation. We need to revisit this to see if that is still the proper allocation. If dead storage was to be removed from Cle Elum, this would definitely change the scenario.	In order to characterize the size of benefits, the consultant team had to make assumptions. The elements highlighted in this comment should be part of a broader allocation discussion that needs to occur in the 2010 basin study

6	General		Roza Irrigation District	3. On utilizing dead storage from any reservoir we need to learn from the lessons of the past so as not to make the same mistakes. The reason we did not rebuild the Pumping plant at Cle Elum was because we determined at that time that a pump was not an effective or efficient method for removing the dead storage. As a reservoir draws down to low levels, that amount that can be discharged is on a daily decline. This makes it very difficult to draw the reservoir all the way down in time to effectively use the dead storage early enough in the irrigation season to be of much value. Also, once you start pumping, you must subtract from the net pumping gain the amount of water that is inflow to the reservoir that you would have anyway. For example, if you have pumping capacity for 600 cfs, and reservoir inflow is 200 cfs, your net gain is 400 cfs, while your pumping cost is for 600. Pulling the reservoir down in time for the dead storage to be of value was nearly impossible without wasting water. With a lowered discharge, not only do you not have pumping costs, you can start using this facility early in the season and eliminate the problems of reduced reservoir discharge at lower levels. This problem would be especially critical if we attempt to take 200K out of one reservoir. The capital costs may be higher on the front end, but the long term costs and the additional benefits would well offset it. We are therefore not in favor in making the same mistake twice. We believe a lower outlet is the only option for utilization of dead storage. We also would like to see further operational analysis of the ability to effectively utilize 200 k of dead storage from one reservoir.	These are points that need to be investigated further as this project is evaluated in greater detail
7	General		Roza Irrigation District	4. On Wymer reservoir we believe there are several potential benefits that could be achieved even on years of adequate water supplies that have not been identified. There are management strategies that could improve carryover storage and/or provide instream flows benefits on any given year, and we would like to see these benefits recognized. There are also potential flow control benefits that have not be evaluated.	These are benefits that would be described as part of the 2010 basin study.
8	General		Sunnyside Valley Irrigation District	The current list of projects is far more expansive than can be achieved. The Work Group needs to understand that the solutions will come from the list rather than complete list being the solution. In order to reach consensus on a legislative package it is important to reach consensus on realistic and achievable water supply demands. This means balancing supply demands against realistic funding opportunities.	Due to Workgroup comments, the preliminary IWRMP has been organized in 2 phases. Sequencing or phasing refinement is expected in the 2010 basin study, in coordination with the Workgroup.
9	General		Sunnyside Valley Irrigation District	Trying to achieve 70% supply for all proratable right holders plus addressing in-stream flow needs is just not a realistic approach. Trying to address global warming as it may impact this basin over the next 50-100 years is also not a realistic goal. If we just mitigate (even partially) the impacts of the droughts we have endured over the past 20 years, we will be highly successful.	The plan is phased for incremental improvements to be made over time, with opportunities for adaptation if conditions change.
10	General		Sunnyside Valley Irrigation District	Consistent with that approach, Wymer Reservoir with the KRD Feeder Canal looks like our best option. A Bumping Lake Reservoir in the 160-190 KAF range should also be pursued. I suspect that the K-K Pipeline, raising the operating level of Cle Elem Reservoir, and utilizing dead storage will all be ultimately not be determined to be feasible. Water from the Columbia River is not a realistic option at the present time. However, construction of Wymer Reservoir in the near term will provide an equalizing reservoir for Columbia River proposal that will have the support of future generations should the global warming trend continue as some believe it will.	The preliminary IWRMP is consistent with this comment. The 2010 basin study will provide feasibility information for the projects identified. The plan can be adapted to meet changing needs, based upon the rolling demand and supply analysis (see Figure 1 of the draft report).
11	General		Yakima-Tieton ID	First of all I like the structure of the document. When we move forward with the legislation itself and working with both the legislators it will need to be consolidated into a one or two page summary for discussion and then the more detailed items to back it up.	Agree that a more summary document will be needed in future communications. This will be prepared in 2010.
12	General		Yakima-Tieton ID	The phased approach as shown 0-10 years and 11-30 years I do agree with. The comments received by Yakima County in this regard take us in the wrong direction. We need to do the phased approach. As I have stated earlier we need to concentrate on IN BASIN storage, conservation, ecosystem improvements as so on <u>first</u> .	Document is consistent with this comment
13	General		Yakima-Tieton ID	The concept of a not less than 70% as an all or nothing number is not the best approach. Any additional storage (or supply increase) is an improvement whether it is Wymer, Bumping, Dead Storage, ASR and so on. Each one adds a percentage increase above where we are now. We can and need to be incremental and not get boxed in.	The plan is phased for incremental improvements to be made over time.
14	General		YBSA	YBSA is pleased to see the scorecard as part of the work plan; section 3.3.5. and that the range be 'bookended' by the do nothing option and the largest volume; Black Rock. We see some key criteria listed but find others missing.	Part of 2010 Plan of Study
15	General		YBSA	1. We believe that before we can proceed much further it is vital that a discussion on criteria have full vetting so we know what is important to whom and why.	Part of 2010 Plan of Study
16	General		YBSA	2. Then we need to see where we need to spend more time and resources.	Part of 2010 Plan of Study

17	General		YBSA	3. One of the least discussed issues to date is the matching of mainstem flow volumes to season, reaches, and species so as to determine the best regime to maximize fish production, for as difficult as it is to do, we still need to quantify production potentials for the competing alternatives.	Part of 2010 Plan of Study
18	General		YBSA	4. We are hopeful that the best methodology and expertise are employed to quantify flows and fish.	Ecology and Reclamation plan to use sound methodologies and qualified technical staff in completing this work.
19	General		YBSA	5. We also note that recreation is mentioned in 3.3.3, but believe it is maybe too narrowly scoped. We believe that all 3 counties have much at risk in planning how best to develop a broad and sustainable tax base, and that recreational development is crucial to water supply security, job creation, and economic sustainability, and therefore should be the core of the recreational assessment.	Recreation is not a primary objective of the preliminary IWRMP. However it is noted along with other secondary benefits expected. Recreation benefits will be noted for specific projects in 2010 when conducting the environmental review and further characterization of specific project benefits.
20	General		YBSA	6. We believe we have not adequately discussed Columbia River options, and the inherent costs, benefits, history and constraints.	Agree that we have not considered this information at this point. There isn't sufficient information to consider Columbia River options (e.g., Selah, Wymer, multi-staged pumping, others) at this time. The proposed Columbia River Pump/Storage Interbasin Transfer evaluation is planned in Phase I of the preliminary IWRMP. See Figure 2 of the draft report.
21	General		YBSA	7. We are glad power has been included for future discussion and hope that it is in conjunction with items 5+6	Part of 2010 basin plan
22	General		YBSA	8. As the last meeting showed, we need to have a much better understanding of how an IWRMP impacts YN treaty rights and visa versa, as it is very possible, failure to do so could see this effort end without success.	Treaty rights are an important consideration and the Yakama Nation will advise the Workgroup on any specific treaty concerns in future planning and implementation efforts
23	General		YBSA	9. We request Columbia pumped storage be in phase 1 not 3 because we think it offers the most bang for the buck and the urgency this problem requires.	Columbia pump storage needs further definition, which is why Phase I includes a more detailed evaluation of the Columbia River options. An implementation approach would follow completion of this evaluation.
24	General		Sunnyside Valley Irrigation District	Water conservation, water marketing, groundwater storage, and water transfers should all be encouraged because they will extend available supply in an environmentally friendly manner. It must be underscored that they will not replace the need for additional storage. In fact, additional storage will improve the extent and benefits of these water supply alternatives.	Agree
25	General		Sunnyside Valley Irrigation District	Finally, the final package needs to be structured to insure that in-stream and out of stream needs are both achieved. As has been stated repeatedly, this must be a comprehensive solution.	Agree
26	1	8	American Rivers and NWF	Add at the end of the paragraph: " <i>While some Workgroup members do not support all of the IWRMP elements described below, they do unanimously support the further study and analysis of the IWRMP. For Workgroup members, the ultimate decision to support or oppose the IWRMP and its elements depends on the final package assembled, as well as the analysis that supports that package.</i> "	Revise as suggested
27	1	28	Benton County	Add the following at the end of the sentence: "Section 1205(a)(6)(c) of Title XII of the Act of October 31, 1994, provide for a third phase of the Yakima River Basin Water Enhancement Project".	Revise as suggested
28	2	1	Benton County	Define DEIS.	Clarify that is referring to comments made on the Reclamation storage study and EIS on the public review draft

29	2	20	Benton County	Add the following "addressing in stream flows and aquatic habitat restoration and enhancement".	Revise as suggested
30	2	21	American Rivers and NWF	Replace "Provide supply reliability" with "Improve supply reliability"	Revise as suggested
31	2	33	American Rivers and NWF	<p>After "consensus recommendation," add "<i>for further study and analysis</i>"</p> <p>Other similar changes: Page 4, Line 28: Change "recommended projects" to "<i>projects identified for further study</i>" Page 5, Line 5: Change "the preliminary IWRMP" to "<i>a preliminary IWRMP for further study</i>" Page 5, Line 6: Change to: Section 3 describes <i>potential IWRMP elements that are recommended for further study and evaluation...</i> Page 8, Line 17: after "IWRMP actions" insert: "<i>recommended for further study and analysis</i>" Page 8, Line 25: Change to: "Actions and projects from all seven elements are <i>proposed for further study as Phase I projects.</i>" Page 10, Line 24: Change to: "Phase II <i>includes actions recommended for further study and consideration as potential projects for implementation</i> in years 11 to 30+. Projects included <i>for consideration</i> in Phase II include all the elements <i>under consideration for Phase I</i>, plus the projects listed below.)" Page 17, Lines 3-5: change to: "<i>The projects proposed for additional study and analysis as potential components of an IWRMP would allow for significant progress toward meeting the needs outlined in Section 2. These projects, or some subset thereof drawn from all seven elements, would improve water supply reliability in single and multiyear drought conditions. They would also...</i>" Page 18, Table 1: Title: Change to "<i>Phase I Projects (0-10) Years Proposed for Further Study and Analysis</i>" -- MAKE THE SAME CHANGE TO PP. 19-23. Page 34, Line 2: Change first sentence to read: "<i>Implementation of many of the projects proposed for further study in the preliminary IWRMP will depend, among other things, on developing...</i>" Page 34, Line 16: Change to "<i>The projects proposed for further study and analysis as part of a preliminary IWRMP are based...</i>"</p>	The Workgroup recommendation on page 3 qualifies that the elements and actions outlined in the preliminary IWRMP merit further analysis and evaluation. Additionally, lines 24-29 on page 4 further qualify the preliminary IWRMP may be adjusted based upon this further analysis and evaluation. Including additional references in the several suggested additional locations in the document is unnecessarily repetitive
32	2	33	Benton County	We suggest some of the input provided by Yakima County on the draft Plan of Study (page 2, 2 nd paragraph) be used in lieu of line 33 to elaborate on why consensus is not possible on an IWRMP at this time and why further investigation is required.	It is not the intent to reach consensus on the final package at this time. There is sufficient information to make a consensus decision about the preliminary IWRMP, with the added qualifications, that will be considered in greater detail in 2010.
33	2	2-3	Benton County	Indicate the authority Ecology used for the "separate evaluations of solutions."	See Chapter 90.90 RCW where Ecology is directed to aggressively pursue development of new water supplies for both
34	3	3	Benton County	Change to read "...package of actions for a Final IWRMP".	Change as suggested

35	3	7	Benton County	Has the Work Group concluded, "Programs and policies to reduce water demand should be mandatory?"	Revise report language to remove the term "mandatory" from the e.g., to where it would read (e.g., adoption of conservation and efficiency BMPs). Include as a consideration in 2010 plan, where conditions or requirements may be tied to receipt of new funding sources, along with incentives and voluntary measures in the preliminary IWRMP.
36	3	14	Benton County	Include "Black Rock" in the examples of potential strategies (see page 4, 3 rd bullet of your draft).	The Workgroup has not agreed to include Black Rock as a potential strategy. It is listed only as a scorecard bookend on page 4 (along with doing nothing, which the Workgroup is not recommending. Delete "(or without)" to have Columbia River with storage only. Update in other document sections, as appropriate.
37	3	15	Benton County	Include slack-water recreation as an additional opportunity.	See response to comment #19.
38	3	32	Yakama Nation staff	Change to "Adult and juvenile fish passage at all six Yakima Project reservoirs"	Change as suggested.
39	3	7-8	Yakima-Tieton ID	Page 3 line 7 and 8. It is not the purpose of this group to make conservation and efficiency programs and policies mandatory. We can accomplish the same goals through incentives and creative policy. Delete all of one and insert: <i>1. Programs and policies to reduce water demand through extensive water conservation measures for agricultural, municipal and residential users using incentive based programs and management practices determined at the local level.</i>	See response to comment #33.
40	3	7-10	Yakama Nation staff	Was mandatory conservation discussed as part of the consensus alternative.	See response to comment #33.
41	3	15-16	American Rivers and NWF	"Provide <i>additional analysis</i> of a tributary enhancement project..."	Change as suggested
42	3	15-17	Yakama Nation staff	There is not consensus to proceed with Pine Hollow. At present there is not agreement from the Yakama Nation to proceed with Pine Hollow. Given that YN is an essential participant in a potential Pine Hollow Project, it is clearly premature to include it in the package at this time.	The Pine Hollow reference is provided as an example of a tributary enhancement. It is not necessarily an endorsement of this specific project.
43	3	18-22	Yakama Nation staff	Remove the text: ", including transfer of agricultural water to municipalities for aquifer storage and recovery (ASR), and improved monitoring, management, and mitigation of permit exempt wells" The groundwater storage component does not of necessity include "transfer of agricultural water to municipalities for aquifer storage and recovery (ASR), and improved monitoring, management, and mitigation of permit exempt wells". Suggest striking the end of the sentence and possibly including that content in a more appropriate section.	Remove text as suggested. Update municipal ASR description in Appendix B by adding "Evaluate water supply options, including transfer of agricultural water to municipalities." See response to comment #76.
44	4	2-4	Yakama Nation staff	Change to read: "Habitat enhancement program addressing reach-level floodplain restoration priorities and <i>restoring access to key tributaries through restoration of flow, removal of fish barriers, and screening of diversions.</i> "	Change as suggested.
45	4	9	Yakama Nation staff	It is not clear from the context or location in the document what "this analysis" refers to.	Revise to read "As part of <i>the 2010</i> analysis and evaluation, we recommend:"
46	4	11	American Rivers and NWF	Add: " <i>This will be accomplished through a peer-reviewed demand analysis performed by Washington State University in conjunction with a larger analysis they are conducting for the Office of the Columbia River.</i> "	Change as suggested
47	4	13	American Rivers and NWF	QUESTION: Is "same cost basis" a term of art? What exactly does it mean?	Revise: "The cost basis for actions should be comparable"
48	4	17	American Rivers and NWF	Add before the period: " <i>and identifying least-cost means of achieving the various objectives, and estimating capital and operations and maintenance costs allocated to the responsible parties.</i> "	Change as suggested

49	4	17	Benton County	Delete "fish escapement" and use the term "fish production".	Delete this phrase. See response to comment #49.
50	4	17-18	Yakama Nation staff	Strike the last sentence. Are these bookends or dead ends? Black Rock has been studied exhaustively and rejected with finality, and no one at the table is proposing to do nothing. NEPA will require Reclamation to include a "No Action Alternative" in any EIS, so that will be evaluated whether it is in this report or not.	See response to comment #34.
51	4	17-18	Yakima-Tieton ID	On line 17 place a period after IWRMP and delete the rest of the sentence.	Change as suggested.
52	4	21	American Rivers and NWF	Add an additional bullet: <i>Formulation of administrative arrangements necessary to achieve sustainable economic, technical and ecological processes, including improved administration of water rights and supplies in the basin, mitigation of interference between surface and ground water use, efficiently meeting water quality standards, and increasing public safety</i>	This comment is broad and may be confusing implementation with plan elements. Many of the seven elements will require administrative arrangements that will need to be efficient in implementation. Other topics listed in the comment will be addressed in the 2010 basin plan and as part of the environmental review.
53	4	24	Benton County	Define "Yakima River Basin Study" perhaps by a footnote.	Insert on page 4 a cross-reference to Section 4, where reader can obtain additional information
54	4	28-29	Yakima County	Revise lines 28-29 to read "Recommended projects may be revised or deleted and other projects may be elevated in priority by the Workgroup."	Change as suggested.
55	4	26	Benton County	Rewrite as "...used to seek Congressional and State legislative authorization and funding".	Prefer to keep this more general
56	4	32-33	American Rivers and NWF	Change to read: <i>The final IWRMP should, to the extent possible, be composed of a package of complementary projects that in combination provide water supply, flow and habitat benefits that is greater than the sum of its parts</i> [AS WRITTEN, IT STRONGLY SUGGESTS (DEMANDS?) A LACK OF FLEXIBILITY FROM HERE ON OUT]	Revise: " The final IWRMP should be composed of a package of complementary projects drawn from all seven elements, that in combination provide water supply, flow and habitat benefits."
57	4	34-35	American Rivers and NWF	Delete after "flexible" and insert " <i>to accommodate anticipated trends, such as increasing drought, climate change and population growth, as well as unanticipated events.</i> "	Change as suggested
58	5	20-21	Yakama Nation staff	Edit to read "Dams and other obstructions <i>and lack of stream flow</i> block fish passage to upstream tributaries and spawning grounds".	Change as suggested
59	5	32-33	Yakama Nation staff	Edit to read "The annual late summer river operation <i>known as flip-flop</i> disrupts salmonid habitat and has negative impacts on aquatic insect populations."	Change as suggested
60	5		American Rivers and NWF	GENERAL COMMENT: One of the bullets should acknowledge water quality issues as well – some of the water conservation, flow improvement, and habitat restoration/protection measures in the plan of study should have some potential to address those at least in part.	The preliminary IWRMP is likely to enhance water quality and also provide additional benefits, such as additional recreation and power generation opportunities. The linkage to water quality and these other benefits will be addressed in the environmental review. Other processes and programs exist to address these topics. The primary focus of this plan is to address water supply and fish needs.
61	6	6-7	American Rivers and NWF	strike "may", change "reduce" to " <i>reduces</i> "	Change as suggested

62	6	7	Benton County	Add at the end of the sentence, "A critical issue at this time are domestic (exempt) wells in the Kittitas valley".	Not appropriate to include in this section as this is a direct quote from the state EIS. Permit exempt wells are noted on page 38 of the report
63	6	8	American Rivers and NWF	strike "The potential for"	Change as suggested
64	6	11	Benton County	following line 11 - - We suggest hydroelectric generation and slack-water recreation opportunities and flood control should be added as a new bullet. (See page 32, line 16)	See response to comment #57.
65	6	26	Yakima County	Insert at the end of the third bullet: "This problem is exacerbated during drought years."	Change as suggested
66	6	32	American Rivers and NWF	Insert: <i>Drought is a natural phenomenon that, while inevitable, creates significant challenges for irrigators, municipalities, and fish managers – particularly in an over-appropriated and generally arid river basin like the Yakima Basin. On the out-of-stream water-supply side...</i>	Change as suggested
67	7	9	American Rivers and NWF	Add at the end of the paragraph " Because demand for water supplies cannot be met in years with significantly low runoff, there is a need to more flexibly and efficiently respond to fluctuations in an inherently variable resource."	Change as suggested
68	8	22	American Rivers and NWF	Change the first two sentences to read: <i>"Phase I projects would be implemented within the first 10 years of the IWRMP. Projects and actions recommended for further study as potential Phase I projects were selected based on their likelihood of being cost-effective, potential to proceed relatively quickly ..."</i>	Change as suggested
69	8	27-29	Yakama Nation staff	Add sentence. "Perform feasibility and engineering work for adult and juvenile passage at Rimrock, Keechelus, and Kachess dams in that order."	Add the following sentence: "Conduct Phase I fish passage feasibility studies for Tieton, Keechelus, and Kachess Dams."
70	9	1	American Rivers and NWF	Change heading to: Subordinate Power at, or Remove, Roza Dam Other similar changes: Page 9, Line 5: Add <i>"Also consider removing the dam entirely feeding the Roza canal through an alternative diversion."</i> Page 14, Exhibit 3: Add "or remove" to Roza text box. Page 18, Table 1: Change "Subordinate Roza Power to "Subordinate or Remove Roza Power" - DO THE SAME WHERE ROZA DAM APPEARS IN SUBSEQUENT TABLES – AND ADD ANALYSIS OF THE EFFECT OF DIVERSIONS FOR ROZA IRRIGATION DISTRICT FROM ALTERNATIVE LOCATIONS (WYMER?) Page 35, Table 6: ADD SOMETHING ABOUT ROZA DAM REMOVAL, EVEN IF A COST ESTIMATE IS NOT AVAILABLE. Page B-1, Line 11: Add: <i>(and consider removing Roza Dam in coordination with other potential means to divert water to the Roza Irrigation District)</i> Page B-7, Line 6: Add: <i>"Removal of Roza Dam should also be considered, contingent on identifying a satisfactory alternative diversion point that is environmentally neutral or beneficial."</i> Page B-14, Line 8: Add at end of parentheses: <i>"...which could allow for removal of Roza diversion dam."</i>	Roza dam removal is a separate action from subordination, as is power plant removal. Delete text from page 3 related to power plant removal, as the power plant could operate without a diversion. Item for workgroup consideration
71	9	8-10	Yakama Nation staff	KID pumping is done by hydro pumps and is not related to the power generation at Chandler. Delete the reference.	Change as suggested
72	9	18	American Rivers and NWF	Add <i>"Explore ways to integrate this work with upcoming I-90 construction project and associated wildlife habitat mitigation/improvements."</i>	Change as suggested
73	9	25	Benton County	following line 25 - - Columbia River Pumping and Storage currently identified, as a Phase II Project should be included in Phase I. (See page 4, line 10). We have previously expressed our views on this before the Work Group and in written comments.	See comment response #23.
74	9	32	American Rivers and NWF	after "storage control" add <i>or whenever feasible and desirable in light of fish and irrigation needs)</i>	Change as suggested
75	10	5	American Rivers and NWF	Add <i>"with an eye toward permanent floodplain protection and restoration that provides fish, water quality, and public safety benefits."</i>	Change as suggested
76	10	7-9	Yakama Nation staff	Edit to read: "Implement projects with emphasis on passage and screening <i>and flow restoration</i> on the upper and middle Yakima tributaries, Wilson/Naneum Creeks, and the Yakama Reservation.	Change as suggested

77	10	10	American Rivers and NWF	Also include analysis and identification of a plan to secure long-term protections for habitat utilizing federal, state, and local legal or policy tools and funding sources to protect important river reaches, potentially in coordination with land and water trusts.	Change as suggested
78	10	14	American Rivers and NWF	Add: Also explore policies to ensure the widespread adoption of on-farm conservation and efficiency practices, including mandatory BMPs. Other similar comments: Page B-29, Line 24: Add at the end of the paragraph: "Conservation measures may include voluntary, incentive-based and regulatory measures, including mandatory compliance with best management practices." Page B-30, Line 26: Add "Political feasibility and administration of mandatory conservation practices."	See response to comment #33. On-farm conservation is included in agricultural conservation, as described in Attachment B
79	10	16	American Rivers and NWF	Add "and/or require" after "promote."	See comment response #33.
80	10	17	American Rivers and NWF	At end of sentence, add "and conservation." Also, add: In addition add a sentence that says "Improve monitoring, management, and mitigation for permit exempt wells."	Add "and conservation" as suggested. Water efficiency and conservation for homeowners using individual household wells is identified, but approaches to achieve this have not been discussed and will need to be assessed as part of the 2010 basin study. Change heading to "Municipal/Domestic Conservation," consistent with Appendix B.
81	10	20	American Rivers and NWF	Add "and take additional steps to promote water markets and to reduce impediments..."	Change as suggested
82	10	24	American Rivers and NWF	Change to: "Phase II includes actions recommended for further study and consideration as potential projects for implementation in years 11 to 30+. Projects included for consideration in Phase II include all the elements under consideration for Phase I, plus the projects listed below.)"	Change as suggested
83	10	27	American Rivers and NWF	Add "Municipal, domestic and" before "agricultural."	Change as suggested
84	10	31	American Rivers and NWF	Change "depending on" to "informed by"	Change as suggested
85	11	5	Benton County	Delete "Columbia River Pumping and Storage".	Change as suggested
86	11	6	American Rivers and NWF	Change to read "contingent on consistency with obligations to protect and restore Columbia River salmon and steelhead populations and on demonstrated need..." Other similar comments: Page B-20, Line 3: Add: "...contingent on consistency with obligations to protect and restore Columbia River salmon and steelhead populations and on demonstrated need..."	Change as suggested, but also adding, "and other requirements and obligations" after "populations and"
87	11	12	American Rivers and NWF	"storage control or when otherwise available and appropriate in light of instream and out-of-stream water needs."	Change as suggested
88	11	25	American Rivers and NWF	Change to "...between, within, and out of irrigation districts."	Change as suggested
89	11	29	American Rivers and NWF	Change to "general proposed schedule"	Change as suggested
90	12	Exhibit 1	Yakama Nation staff	The map does not accurately depict the boundaries of the Yakama Reservation as it does not include Tract D.	Update exhibit to show Tract D.
91	13	Exhibit 2	American Rivers and NWF	Change to "Projects Under Consideration in" – MAKE THE SAME CHANGE IN EXHIBITS 3 AND 4	Change as suggested
92	16	Figure 1	Benton County	The entry "Conduct Rolling Demand/Supply Forecast" should be explained. We assume this in reference to Section 3.4, page 34, lines 23 through 23).	Change as suggested

93	17	11-14 and Tables 1-4	Benton County	The narrative on page 17 says, "Tables 1-4 identify the estimated preliminary IWRMP benefits under 1992-1994 and 2005 drought conditions for Total Water Supply Available (TWSA) showing improved water supply for proratable water-right holders and instream flows". We find the tables difficult to use because for the storage projects it shows TWSA only in those years when used to improve the proratable irrigation supply. For example, Wymer Reservoir 1992 and 1993 is "0" and 1994 is 80,000 acre-feet, when actually the 80,000 acre-feet of reservoir capacity dedicated to dry-year irrigation is probably full in 1992 and 1993. Further, for Bumping Lake Enlargement one might believe from the table the reservoir is empty in 1993. Also, the irrigation proration levels are not provided for these years. A suggestion is to critique these tables to determine if they are providing the desired information in a comprehensive manner.	Add footnote to table clarifying information portrayed: "The tables use assumptions for the use of new storage during historical droughts. The new storage was not all used in the first year of a multi-year drought and was therefore not added to the TWSA in those years. However storage was used in following drought years and added to TWSA the year it was used. The actual volume of water released and pattern of releases from storage during droughts will depend on rules adopted when the project is implemented."
94	17	14	American Rivers and NWF	Add " <i>Potential</i> " before "benefits."	Change as suggested
95	17	15	American Rivers and NWF	Add " <i>likely</i> " before "have been."	Change as suggested
96	18	Table 1	American Rivers and NWF	PUT IN AT LEAST PLACEHOLDER LANGUAGE IN THE TABLE FOR THE WATER SUPPLY BENEFITS THAT WOULD ACCOMPANY ADDITIONAL CONSERVATION FROM THE IMPLEMENTATION OF BMPS IN THE MUNICIPAL, RURAL RESIDENTIAL, AND AGRICULTURAL SECTORS	BMP benefits are encompassed in the municipal and agriculture conservation actions
97	25	4	Yakama Nation staff	In Section 3.3.2 Habitat Benefits, include a paragraph on the habitat benefits of reestablishing passage into upper Wilson-Naneum and other tributaries.	No change. These and other benefits are generally covered for all tributaries in the discussion on page 32.
98	25	14-19	Yakama Nation staff	Add sentence: "Estimates of production capacities for habitat above Rimrock, Keechelus, and Kachess are not yet available, but are expected to be substantial, particularly for the forks of the Tieton River above Rimrock."	Change as suggested
99	32	14	American Rivers and NWF	WHY ONLY "MOST" ACTIONS IN THE RECOVERY PLAN? PROVIDE EXPLANATION FOR WHY NOT ALL IF SOME WILL BE LEFT OUT	Priority is focused on those projects that provide the greatest amount of benefit for project costs. Not able to solve every habitat problem in the basin but the program focuses on those that provide the biggest return on the investment
100	33		American Rivers and NWF	Add an " <i>Environmental Impacts</i> " category to scorecard. Add a " <i>Preliminary Cost Allocation</i> " subcategory to the Cost Criteria. Add a " <i>Necessary Administrative and Legal Changes</i> " category to scorecard.	Add environmental impacts to scorecard. The other two elements are noted for future consideration in scorecard development
101	35	Table 6	American Rivers and NWF	ADD A "SECURING LONG-TERM RIVER AND LAND PROTECTION" ELEMENT TO PHASES I and II. Other similar comment: Page B-1, Line 25: Add on next line: * Long-term river and land protection program for additional ecosystem benefits as well as any necessary mitigation	Addressed, at least in part, through habitat and floodplain elements. The preliminary IWRMP does not address all natural resource management topics in the Basin. Addressed through other forums
102	35	Table 6	Benton County	What is the basis for the \$3,000 to \$6,000 cost per acre-foot estimate used for Bumping Lake Enlargement? To what extent does it included the contingencies and noncontract costs comparable to those in Reclamation's PR/EIS?	Preliminary cost estimate and it does include contingencies and non-contract costs
103	35	Table 6	Yakima County	Add footnote to Phase I and II evaluations: "Includes Columbia River interbasin transfer, including technical evaluation, NEPA/SEPA review, and design."	Change as suggested

104	37	27-33	Yakama Nation staff	Add a sentence: "Demand for irrigated agriculture will be based on the estimates for additional supply needs provided by the irrigation water purveyors."	Add "The primary source for irrigated agriculture demand will be based on estimates provided by Reclamation and irrigation districts. This information will be reviewed through a third party evaluation."
105	37-40		Benton County	Plan of Study - - We note there have been some changes to the November 23 rd Plan of Study. However, it appears none of the comments provided by the four responders to your request (see your attachment) have been included. Further, Benton County's input was not included in your attachment.	Benton County's comments were sent out in a follow up email. All the comments received were reviewed carefully and some were included. Comments not included were not consistent with the current stage of the planning process. Many of the items identified in the comments will be addressed in the 2010 study and associated environmental review.
106	B-2	13	American Rivers and NWF	Change to " <i>There would be no changes to current operations that adversely affect water supply</i> " [OPERATIONAL CHANGES THAT COULD HELP FISH BUT NOT IMPACT IRRIGATORS OR OTHERS SHOULD BE CONSIDERED IF SUCH OPPORTUNITIES EXIST AND CAN BE AGREED UPON BY A RESERVOIR OPS SUBCOMMITTEE OR SOME SUCH ENTITY – SEEMS LIKE THERE'S NO REASON TO PRECLUDE THAT AT THIS POINT]	No change: The list of key assumptions, including no change in operations and no adverse effects to water supply, was developed by the Core team in the Phase I fish passage assessment (Reclamation 2005). These assumptions were developed with input from Reclamation biologists and engineers, Yakama Nation, irrigation interests, NOAA Fisheries, USFWS, USFS, BPA and WDFW (Core Team). Reclamation also has agreements with Yakama Nation and WDFW based upon these key assumptions.
107	B-13	32	American Rivers and NWF	Add: " <i>There may be potential to synchronize this project with I-90 road and wildlife overpass construction work in a manner that may allow for reduced environmental impact and the opportunity for improving wildlife habitat.</i> "	Change as suggested
108	B-23	1	American Rivers and NWF	Add: (prior to "storage control" <i>or when otherwise beneficial and desirable given instream and out-of-stream needs.</i>	Change as suggested
109	B-29	18	American Rivers and NWF	After "additional projects" insert " <i>include, but are not limited to,</i> "	Change as suggested
110	B-33	5	American Rivers and NWF	After "steps" add " <i>to promote and</i> "	Change as suggested
111	B-34	5	American Rivers and NWF	Replace "20-40 kaf" with " <i>enough water to make a significant contribution to water management flexibility in the basin</i> "	Change as suggested
112	B-34	6	American Rivers and NWF	Replace "40-80 kaf" with " <i>enough water to make a significant contribution to water management flexibility and increase the economic efficiency of drought response in the basin</i> "	Change as suggested