

BOARD OF

YAKIMA COUNTY

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December 22, 2009

Derek Sandison, Director
Washington State Dept. of Ecology
Office of Columbia River
303 S. Mission St, #200
Wenatchee WA 98801

RE: Yakima County - Consensus Numbers for the IWRMP

Dear Mr. Sandison:

Based on conversation by Yakima County staff with Dan Silver and Ben Floyd at the conclusion December 17th meeting, the **specific question** before the Workgroup was to provide a consensus level of support for the actions contained in the text on Pages 3 and 4 of the Preliminary IWRMP with the use of the comment table emailed by Ben Floyd on December 18th.

Our understanding of the current text in that section now reads as follows -

The YRBWEP 2009 Workgroup finds that the elements and actions outlined below merit further analysis and evaluation as the Workgroup continues its work to identify a final package of actions for IWRMP inclusion that would provide water for irrigated agriculture and future municipal needs and improve habitat for anadromous and resident fish.

Water Supply

- 1. Programs and policies to reduce water demand through extensive water conservation and efficiency measures for agricultural and municipal water users as well as for residential water users not connected to a municipal delivery system.*
- 2. Additional water supply through a suite of at least some of the following actions: Wymer Dam, Cle Elum Dam (Pool Raise), Kachess Reservoir (Inactive Storage), enlarged Bumping Reservoir and direct pumping from the Columbia River with storage (e.g. Wymer, Burbank and Selah Creek locations). Explore possibilities for additional power generation opportunities. Provide for additional analysis of a tributary enhancement project such as the Ahtanum Creek Watershed Restoration Program, including a Pine Hollow Reservoir Project.*

3. *Groundwater storage including infiltration prior to storage control (or whenever feasible in light of fish and irrigation needs) and municipal aquifer storage and recovery, including transfer of agricultural water to municipalities for aquifer storage and recovery (ASR). Market-based reallocation of water rights through a water market and modification of existing laws and regulations, as necessary.*

Modifications of Existing Operations

4. *Modifications of existing facilities and operations including completion of the Wapatox canal piping, subordination of some or all of the Roza and Chandler power plants for fish flows during spring (and/or removal of the Roza Diversion Dam and Power Plant) and improvements of the Kittitas Reclamation District Canals through measures, including piping, to improve flow in tributaries.*

Fish Passage

5. *Adult and juvenile Fish passage at all six Yakima Project reservoirs.*

Habitat Enhancements

6. *Habitat enhancement program addressing reach-level floodplain restoration priorities and access to key tributaries through restoration of flow, removal of fish barriers and screening of diversions. Will include analysis and identification of a plan to provide tributary passage for fish and key long-term protection 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.*

As part of the 2010 analysis and evaluation, we recommend:

- *Testing assumptions regarding in and out of stream water needs to be met by an IWRMP. 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.*
- *Improving cost estimates for actions receiving further analysis and evaluation. The cost basis for actions should be comparable. Improving understanding of the joint effects of the various projects alone and in combination with potential packages of actions drawn from other elements receiving further study. Utilize a scorecard to display benefits and costs for all elements in the IWRMP, and indentifying least-cost means of achieving the various objectives, and estimating capital and operations and maintenance costs allocated to the responsible parties.*
- *Identify, evaluate and recommend project mitigation strategies for affected habitats, impacts to operating costs (e.g. power subordination) or other project-specific effects requiring mitigation.*

The Workgroup recommends it continue to meet in 2010 at key milestones to provide input as these further evaluations are carried out.

Given that support for the above was the question before the Workgroup, the Yakima County's "relative consensus number" is 2 – "Basically I like it".

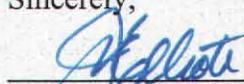
Yakima County had been under the impression during the meeting that support for the entire Preliminary IWRMP and related white papers regarding the Basin Study was the question being asked of the work group. Based on the Board's current understanding of those documents as edited in the meeting of December 17th, and the "Plan of Study Summary" (which is not yet in final form), was the question before the Workgroup, then Yakima County's "relative consensus number" is 5 – "I don't like it but I do not want to hold up the group".

The reason the two numbers are different is that Yakima County has concerns not with the actions proposed, but with the procedural or process that will be used to maintain the relationship of the Workgroup to the Basin Study, and the scope of the Basin Study itself. Some procedural and process issues were evident relative to timeliness of materials, time for review of materials, and the lack of clarity on the question before the group. Scoping issues regarding groundwater – the relationship of the study various aspects of groundwater, the degree of overlap between the current "permit exempt well" processes underway in the basin to the IWRMP or Basin Study, and the relationship of the Basin Study to the USGS groundwater effort and next steps to be taken on that road by Ecology, BOR and the Yakama Nation - need further discussion.

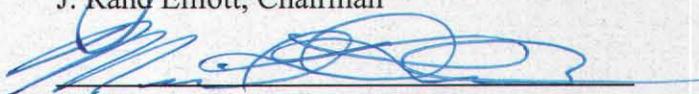
We have similar concerns regarding the scope of conservation efforts and water supply improvement to various types of irrigation entities and individual irrigators, etc. These scoping issues should be clarified or defined prior to initiation of the Basin Study or the Board fears the objectives of the Basin Study and the Workgroup itself may be compromised.

Yakima County shares Ecology's and BOR's concerns regarding the commitment of federal, state, tribal and local resources to evaluation of the "package", but those concerns go beyond the level of political support for the "package" and include an open, fair, and timely process for setting the objectives and focus of the Basin Study, and subsequent environmental review and the mechanisms for Workgroup participants agreement to move forward with implementation.

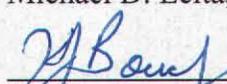
Sincerely,



J. Rand Elliott, Chairman



Michael D. Leita, Commissioner



Kevin J. Bouchey, Commissioner

*Constituting the Board of Commissioners
for Yakima County, Washington*

cc: Dan Silver, Facilitator
Benjamin Floyd, HDR Inc.
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