



Board of County Commissioners
BENTON COUNTY

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Max Benitz, Jr.
DISTRICT 2

March 29, 2010

US Department of the Interior
Bureau of Reclamation
Attn. Wendy Christensen
CCA-1100
1917 March Road
Yakima, WA 98901-2058

Re: March 22, 2010, Department of Ecology Letter

Dear Ms. Christensen:

In response to your call on clarifying Department of Ecology's letter of March 22, 2010 on the four questions from the Board of Benton County Commissioners, I would like the Bureau of Reclamation's comments on the following questions:

Number 1. The question being asked is (1) what are the power pumping rates being charged and who are (or will be) paying the annual power costs for (a) pumping Columbia River exchange water in the Umatilla Project, and (b) the proposed delivery of surface water in lieu of the groundwater currently being withdrawn to irrigate lands in the Odessa area of the Columbia Basin Project, and how does this power rate compare to that being paid by other Columbia Basin Project irrigators currently receiving water from Reclamation? Columbia River pumping projects in Reclamation's December 2008 Final PR/EIS provide for pumping exchange water as well as supplemental irrigation water for exchange participants in dry years. The pumping cost for the economic analysis was estimated at \$50 million annually. We believe the rate(s) used for this estimate is considerably in excess of that charged for Federal Reclamation projects in the Pacific Northwest. For instance, we understand the preference power rate is in the range of about 8 mills per kilowatt hour. We would like to know the power rate that would be applied if a Columbia River pumping project is authorized and contracts entered into for pumping exchange water for instream flow purposes as well as supplemental irrigation water in dry years.. We would appreciate the rate information being provided using the same unit designation (e.g. per kilowatt hour) as that for the pumping rates in the Columbia Basin Project and the Umatilla Project.

In Derek Sandison's response, he indicated the foregoing information would have to be provided by you.

Number 2. This question relates to whether the proposed projects are going to be subjected to a test of economic justification and, if so, how are the monetary economic benefits to be determined? While Derek's response indicated that while neither the Integrated Water Resource Management Plan nor the associated Yakima Basin Study involve conducting benefit /cost analyzes using the federal principles and guidelines, benefits and costs will be evaluated to secure state funding. He also noted that Reclamation will conduct benefit/cost analyzes using federal principles and guidelines on individual components of the plan when federal funding is sought (emphasis added). We assume Reclamation concurs in this approach and would like to know (1) how this is to be accomplished to capture the "synergistic effects" of the package of projects as well as those of individual components for which federal funding will be sought, and (2) when will this be completed so we have reasonable assurance as we move forward in our Work Group discussions that the Integrated Plan meets the necessary prerequisites to secure authorization?

Number 3. Based on the use of Table 2.18 in the Final PR/EIS, it seems Reclamation felt it appropriately expressed the monthly volumes of Columbia River water available for pumping. We are at a loss of why this has not been discussed in the Work Group meetings during the time Columbia River pumping plans were being presented. It appears from Derek's response there is now to be a re-evaluation of the underlying assumptions used in the development of this table. We assume Reclamation concurs and we urge this be accomplished shortly, appropriately documented, and discussed with the Work Group.

Number 4. Has there been a discussion of what group or entity might be retained to conduct a third-party review of the products being developed by the Instream Flow Subcommittee and the Work Group to quantify the instream flow needs? At what point in the process will a selection be made?

Thank you for your consideration in regards to the above-mentioned items.

Sincerely,

Max Benitz, Jr., Commissioner
District 2

cc: Benton County Commissioners
Benton County Administration