

**Workgroup Comments/Response Document – YRBWEP Workgroup Integrated Plan Summary (December 14, 2010)**

#	Section # Section Title	Agency	Comment	Response
1	1.0 Action	Yakima County	Add to the end of the third paragraph:  <i>When necessary during this review process and as approved, adaptive management will be used to meet the Integrated Plan Elements and Actions.</i>	See new Section 4.0 added to the document to more specifically address adaptive management, rolling needs review and plan updates.
2		Benton County	General Comment per second paragraph, first two sentences:  <i>... While we are most supportive of the Integrated Plan concept, we are hesitant to comment on the text of the draft decision document because by doing so it seems to imply approval of the Integrated Plan as outlined therein.</i>	Comment noted.
3		American Rivers and National Wildlife Federation	Add to the end of the first paragraph:  <i>The Workgroup will add a land conservation element that furthers the fisheries and ecosystem restoration goals of the Integrated Plan.</i>	Updated Section 1.0, second paragraph to describe that the land conservation and other mitigation measures will be incorporated during preparation of the Reclamation Integrated Plan Final Planning Report/EIS. YRBWEP authorization does not provide for adding land conservation as a plan element.
4			Revise second paragraph to read:  <i>By approving this decision document the Workgroup members support working to develop a strategy and agreement regarding implementing the Integrated Plan. The entire Workgroup will support administrative review of the Integrated Plan, including National Environmental Policy Act (NEPA), Endangered Species Act (ESA) and State Environmental Policy Act (SEPA) reviews. Depending on the outcomes of those reviews, the non-federal organizations represented on the Workgroup will support legislative authorization and appropriations for the Integrated Plan. All Workgroup members will support permitting and mitigation for actions in the Integrated Plan.</i>	Paragraph revised as suggested plus additional language inserted to address comment #3
5			Revise third paragraph, first sentence to read:  <i>To support, the Workgroup will organize an Implementing Subcommittee comprised of tribal, state, <del>and</del> local, and environmental entity representatives to oversee efforts to seek authorization and funding.</i>	Paragraph generally revised as suggested.

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6	2.0 Background	American Rivers and National Wildlife Federation	Add to the end of the third paragraph:  <i>A group of conservation community stakeholders are developing a proposal for a land conservation element to add to the plan to further the plan’s instream flow and ecosystem protection and restoration goals. If a land conservation element is agreed upon, that would be proposed as an addition to the Integrated Plan in early 2011, ideally in time for inclusion in the draft Integrated Plan.</i>	Text include as generally suggested but with some variations to address response to comment #3.
7			Revise fourth bullet point to read:  <ul style="list-style-type: none"> <li>• <i>Maximize benefits from in-basin supply opportunities first, and <del>seek</del> evaluate out-of-basin supply if triggered by rolling needs review.</i></li> </ul>	Revised as suggested.
8	3.0 Integrated Plan Elements and Actions	Yakima County	Add as second paragraph:  <i>Programmatic aspects of the integrated plan should include a “water needs reassessment” and a “fisheries infrastructure projects reassessment” at least once every five years. A “water infrastructure projects reassessment” should be conducted in the year following any “water needs reassessment” and “fisheries infrastructure projects reassessment” in order to assess, update and re-establish the objectives and milestones of the water supply/storage component of the integrated plan, including objectives or milestones that need to be amended to address growing knowledge of the effects of climate change.</i>	See new Section 4.0 added to the document to more specifically address adaptive management, rolling needs review and plan updates.
9	3.1 Fish Passage	Yakima County	Revise four bullet points into three bullet points, to read:  <ul style="list-style-type: none"> <li>• <i>Fish-passage facilities will be designed and operated within the existing operational considerations and constraints. Operations would continue to serve existing and future Reclamation contracts and other operational flow constraints.</i></li> <li>• <i>There would be no changes to current operations (i.e., quantity and timing of flow releases), but the flow pathway(s) could change to accommodate operation of the new fish passage facilities</i></li> <li>• <i>There would be no decrease in “total water supply available” (TWSA)</i></li> </ul>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
10		US Fish and Wildlife Services	Regarding first paragraph, second-to-last sentence (e.g. ...based upon evaluation studies):  <i>What does this mean exactly? Seems to infer that construction of passage facilities at these three dams depends on the results of evaluations. If I agree to this package, passage at these dams cannot be conditional. It HAS to happen. In my mind the only reason it is happening a bit later is because one cannot do everything at once. Look for another choice of words here.</i>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.

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#	Section # Section Title	Agency	Comment	Response
11	Section 3.1 continued	US Fish and Wildlife Services continued	<p>Regarding the bullet points:</p> <p><i>The first two of these bulleted items are unnecessary. The third might be considered questionable as well but I'll get to that in a moment. As long as Reclamation can meet existing contracts it makes no sense to say you can't change existing operations. Changing existing operations is what the Integrated Plan (IP) is all about. As far as having no impacts on TWSA is concerned, that has always been the constraint we accepted over the last decade as we have discussed fish passage. But aren't we dealing with a different game now? TWSA is going to increase with additional new storage and the inclusion of the dead storage in Kachess Lake. It seems reasonable if we are going to guarantee a minimum 70% water supply every year that in return we should expect to have some flexibility in operating fish passage facilities to maximize their effectiveness.</i></p>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
12		Washington Department of Fish and Wildlife	<p>Revise the first bullet point to read:</p> <ul style="list-style-type: none"> <li>• <i>There would be no changes to current <u>or anticipated future</u> operations (i.e., quantity and timing of flow releases), but the flow pathway(s) <u>will likely</u> change to accommodate operation of the new fish passage facilities</i></li> </ul>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
13			<p>Revise the second bullet point to read:</p> <ul style="list-style-type: none"> <li>• <i>Fish-passage facilities would be designed and operated within the existing <u>and anticipated future</u> operational considerations and constraints.</i></li> </ul>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
14			<p>Revise second paragraph to read:</p> <p><i>Providing for unimpeded fish migration past the existing storage dams in the Yakima basin would increase species distribution, allow for the reintroduction of extirpated sockeye runs, allow expanded migrations and genetic interchange for listed bull trout and other native fish and provide a strategy to cope with climate change by allowing fish to access higher elevation, high quality habitat.</i></p>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
15		Reclamation	<p>Revise portions of first paragraph to read:</p> <p><i>For Clear Lake dam and Box Canyon Creek, provide upstream passage for bull trout <u>based upon an evaluation study</u>. For Cle Elum and Bumping, install upstream and downstream fish passage. <u>For Cle Elum and Bumping, install upstream and downstream fish passage. Install upstream and downstream fish passage at Tieton, Keechelus, and Kachess dams where passage is determined to be feasible based upon future evaluation studies (or pursue</u></i></p>	See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.

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Section Title			
	Section 3.1 continued	Reclamation continued	<i>alternative fish restoration measures per 2002 HPA issued by WDFW). Provide <u>Reclamation clear congressional authority to construct fish passage at dams where passage is deemed economically feasible.</u></i>
16			Regarding the fourth bullet point:  <i>Suggest adding to “contracts” something along the lines of ‘as currently written’.</i>
17		American Rivers and National Wildlife Federation	Revise first paragraph, second-to-last sentence to read:  <i>Install upstream and downstream fish passage at Tieton, Keechelus, and Kachess dams <u>after it is installed at Cle Elum and Bumping.</u></i>
18			Revise four bullet points into three bullet points, to read:  <ul style="list-style-type: none"> <li>• <i>There would be no impacts on “total water supply available” (TWSA).</i></li> <li>• <i>Operations would continue to serve existing Reclamation contracts.</i></li> <li>• <i>Reservoirs with fish passage would be managed to protect and enhance fisheries benefited by the passage.</i></li> </ul>
19			Revise last paragraph to read:  <i>Providing for unimpeded fish migration past the existing storage dams in the Yakima basin <del>would</del> <u>will</u> increase species distribution, allow for the reintroduction of extirpated sockeye runs, and allow expanded migrations and genetic interchange for listed bull trout and other native fish.</i>
20		Yakama Nation	General Comment:  <i>Regarding scheduling of fish passage, our concurrence with the draft plan from last December was based on the understanding that the feasibility and engineering work for the remaining three reservoirs would begin immediately following authorization and would proceed concurrently with construction of passage at Cle Elum and Bumping, which would begin immediately after funding is appropriated to begin implementing the passage. The schedule in the current draft plan appears to push engineering work on passage at Rimrock, Kachess, and Keechelus, which is part of the plan back in time behind studying Columbia River alternatives which are not. We emphasize that passage at the reservoirs as well as flow and passage in the tributaries is a primary concern of the Yakama Nation. Yakama Nation</i>
			See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
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			See revised language in Section 3.1, which attempts to address common themes from several comments received on this topic, and to also reference existing agreements.
			Revised as suggested
			After reviewing the schedule, it appears to address your desired concurrency between completing studies and constructing early passage while studying passage projects scheduled later for implementation.  Also, see Section 4.2 for suggested principles to guide plan implementation, and adjustments, as necessary.

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#	Section # Section Title	Agency	Comment	Response
	Section 3.1 continued	Yakama Nation continued	<i>support for additional storage is contingent on full restoration of fish access to vital cold water habitats. We believe that several other work group members share this priority, and consensus of the group will only be reached if all reasonable measures to enhance fish runs are expeditiously pursued. No plan for dealing with climate change seems intelligent that does not include restoring full anadromous fish access to the cooler, pristine habitat of the higher elevation reaches of the watershed. Likewise, recovery of Bull Trout is dependent on restoring migration and reconnection of Bull Trout populations.</i>	Sentence added to the last paragraph of Section 3.1 describing how passage helps provide access to higher elevation habitat.
21	3.2.1 Cle Elum Dam (Pool Raise)	US Fish and Wildlife Services	General Comment:  <i>I realize that up to this point we haven't hesitated to throw pretty much everything and anything into this IP but this particular project is really a dog. The estimated cost (all inclusive) is nearly \$17 million with annual O&amp;M estimated at \$500,000. For the amount of additional water realized that is a pretty ridiculous cost.</i>	Comment noted.
22	3.2.2 Kittitas Reclamation District (KRD) Canal Modifications	Yakima County	Revise first two sentences to read:  <i>The proposed KRD Main Canal and South Branch Canal Modifications project (KRD Modifications) would improve KRD laterals along those canals designed to reduce seepage losses, and <u>allow greater flexibility in management of flows on the KRD</u>. The water <u>saved or transferred</u> would be used to enhance instream flows in tributaries to the Yakima River, including Taneum Creek, Manastash Creek, Big Creek, and Little Creek.</i>	Revised as suggested.
23		American Rivers and National Wildlife Federation	Add as second paragraph after the three bullet points:  <i>The tributary flow improvements will be coordinated with other actions in the Integrated Plan to ensure fish passage around the KRD canals and laterals.</i>	Generally revised as suggested but with cross-reference to habitat enhancement actions.
24	3.2.3 Keechelus to Kachess (K to K) pipeline	American Rivers and National Wildlife Federation	Revise first paragraph to read:  <i>Convey water from Lake Keechelus to Lake Kachess to reduce flows and <u>improve</u> habitat conditions during peak flow events below Keechelus, and provide more water storage in Lake Kachess for downstream needs.</i>	Revised as suggested.
25			Add as third (last) paragraph:  <i>Every effort will be made to coordinate construction of the K to K pipeline with ongoing construction of I-90, particularly on the Lake Keechulus end of the pipeline.</i>	Revised as suggested.

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#	Section Title	Agency	Comment	Response
26	3.2.4 Power Subordination	Yakima County	Revise first sentence to read (add “Steelhead”):  <i>Further subordinate water diversions for power generation at Roza Dam and Chandler Power Plant to support outmigration of <u>Steelhead</u>, spring Chinook, sockeye and coho juveniles, recognizing power is already greatly subordinated above what originally occurred when the dams were built.</i>	Revised as suggested.
27			Delete last two sentences.	Deleted last sentence, and included revised language as provided by KID – comment #29.
28		Roza Irrigation District	General Comment:  <i>The Roza Irrigation District will oppose any additional subordination of power production at either Roza or Chandler Power plants unless and until acceptable mitigation has been agreed to by the respective Roza and Kennewick Districts.</i>	Revised language as provided by KID – comment #29.
29		Kennewick Irrigation District & Reclamation	Add wording:  <i>Further power subordination will only be pursued on the condition that acceptable mitigation is agreed upon and approved by Reclamation, Bonneville Power Administration and either Roza or Kennewick Irrigation District as applicable.</i>	Revised as suggested.
30		American Rivers and National Wildlife Federation	Revise last part of the paragraph to read:  <i>Further subordination would <del>have to be mitigated to offset both financial and power impacts offset by additional generation elsewhere in the system. Failure to do so would make these plants no longer economically viable for BPA to support financially, and have major economic impacts to Roza and Kennewick Irrigation Districts.</del></i>	Revised language as provided by KID – comment #29.
31			Regarding the above deletion (e.g. ...elsewhere in the “system”):  <i>We recognize that there are issues here, but they need to be resolved in a manner that allows for subordination, and probable eventual removal of Roza Dam.</i>	Revised language as provided by KID – comment #29.
32	3.2.5 Wapatox Improvements	City of Yakima	General Comment:  <i>After discussion this AM with PacificCorp the City is NOT interested in participating in the Wapatox project. (Naches-Selah Irrigation District provided similar report)</i>	Revised project description to reflect comment

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#	Section # Section Title	Agency	Comment	Response
33	Section 3.2.5 continued	Naches-Selah Irrigation District	<p>General Comment:</p> <p><i>YRBWEP is reconsidering the passage benefits of removing the NSID gravel diversion. Benefits to the Naches River do not appear to justify the preliminary cost estimates produced for the Basin Study.</i></p> <p><i>Wapatox options are still being considered by NSID. Commitment to feasibility studies will be decided in 2011. I agree with Dave, the Wapatox proposal is looking less feasible for NSID too.</i></p>	Revised project description to reflect comment
34		American Rivers and National Wildlife Federation	<p>Regarding the last word of the last sentence (e.g. “losses”):</p> <p><i>Why isn't removal of the NSID diversion dam included here? From discussion to date, it sounds like an appropriate action to include explicitly.</i></p>	Recent discussions have indicated NSID dam removal may not be cost-effective. See comments #32 and #33 above.
35	3.3 Surface Water Storage	Yakima County	Delete <i>in-basin</i> from first sentence.	Revised as suggested.
36		Reclamation	<p>Revise third sentence to read:</p> <p><i>Congress should authorize Reclamation's <u>Yakima Project</u> to provide water for municipal and domestic uses, in addition to current authorities.</i></p>	Revised as suggested.
37		American Rivers and National Wildlife Federation	<p>Revise third sentence to read:</p> <p><i><u>After satisfactory administrative review</u>, Congress should authorize Reclamation to provide water for municipal and domestic uses, in addition to current authorities.</i></p>	No change made. The plan already includes a recommendation for clarifying Reclamation authority to provide municipal water supply. This recommendation will move forward through the final planning report/EIS process for consideration by Reclamation and Congress, as will all other proposals in the plan.
38	3.3.1 Wymer Dam	American Rivers and National Wildlife Federation	<p>Add to the end of the first paragraph, last sentence:</p> <p><i><u>...from upstream reservoir releases, which has the potential to mitigate for artificially high summer flows.</u></i></p>	Revised as suggested.

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Section Title				
39	Section 3.3.1 continued	American Rivers and National Wildlife Federation continued	Regarding the second paragraph, last sentence, last word (e.g. “Wymer”):  <i>We have a strong preference for Option 1 due to the instream flow potential of that option.</i>	Comment noted. Both options still under consideration at this time.
40			Revise the last part of the last paragraph to read:  <i>... existing Roza Canal intake structure. <del>The downstream conveyance alignment provides for connection with future potential storage sites within the Burbank and Selah drainages.</del> <u>Since Wymer has the potential to provide the source of Roza Irrigation District’s water supply, conduct a feasibility study for removal of Roza Dam. Actual removal will be contingent on completion of Wymer Dam.</u></i>	Revision similar in content made. Roza dam removal is not contingent on Wymer dam completion only. Wymer operations and pump station location also important factors that will need further evaluated.
41	3.3.2 Kachess Reservoir (Inactive Storage up to 200KAF)	Roza Irrigation District	General Comment regarding Inactive Storage:  <i>The District supports the use of inactive storage as a drought year backup supply, but based on the lessons learned from pumping inactive storage from Cle Elum reservoir, we believe a tunnel must be constructed instead of a pumping facility.</i>	Comment noted. Tunnel option may be best approach but further evaluation needed during environmental review to verify.
42	3.3.4 Columbia River Pump Exchange with Yakima Storage	Yakima County	Revise whole section to read:  <i>In order to insure that the objectives of the integrated plan are realized, it is important that the integrated plan evaluate water availability of Columbia River water as a supplement to or substitute for other water supply elements of the plan should any of those elements fail at any time to be fully implemented. Study of various physical configurations for pumping, routing and storing Columbia River water in the Yakima Basin should be authorized. Potential storage locations discussed include Wymer, and Selah and Burbank Creek drainages. Columbia River water availability analysis, including analysis of design and construction, should consider constraints of the Federal Columbia River Power System Biological Opinion target flows, effects on salmonids (migration, spawning and rearing), and cumulative impacts taking other water withdrawal proposals (e.g. Odessa) into account. The Columbia River supply evaluation should also include evaluation of substituting Columbia River supply for Yakima River supply for the Roza diversion and removal of the Roza diversion dam on the Yakima River.</i>  <i>The Washington State Department of Ecology has current statutory authority, under RCW 90.90.050, to proceed with the evaluation and study of these projects so as to support construction cost estimates sufficient for Congressional authorization. In order to avoid unreasonable delay of the Columbia River and Roza Alternate Supply projects, they should be fully authorized through construction together with other elements of the water</i>	See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.



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Section Title			
			<i>supply/storage component of the Integrated Plan.</i>
43	Section 3.3.4 continued	Benton County	<p>General Comment:</p> <p><i>Constraint on the Scope of Water Supplies</i></p> <p><i>The scope of potential water supply alternatives has been constrained to only those projects utilizing Yakima River basin (in-basin) water supplies. This was done unilaterally, without discussion by Ecology and Reclamation as a result of the Yakama Nations representative’s objection to consideration of the merits of out-of-basin water supplies such as from the Columbia River. Never-the-less, Columbia River water is being successfully used in the Umatilla River basin in a Reclamation developed water exchange project to sustain irrigated agriculture and salmon and steelhead, and Columbia River water is proposed for use in the Walla Walla River basin for a similar water exchange project being promoted by Ecology and the Corps of Engineers. In the Odessa area of the Columbia Basin Project Ecology and Reclamation are proposing Columbia River diversions to replace a diminishing groundwater supply. The irony of this constraint in the Yakima River basin is that the proposed Integrated Plan now under consideration includes the potential use of Columbia River water in the future if a major water supply project of the Integrated Plan is not authorized and implemented.</i></p> <p><i>Lack of Comparative Evaluation of Alternatives</i></p> <p><i>The decision by Ecology and Reclamation constraining consideration of water supply projects to only that using in-basin water has resulted in the lack of any comparative evaluation of alternatives plans. This decision also precludes the opportunity to assess the merits of phasing the proposed Integrated Plan water supply projects in contrast to development of a water supply project(s) fully capable of meeting present and future water needs. Also is the matter of being able to obtain funding at a later date to firm up the water supply in view of the significant State and Federal investments which would have been previously incurred to implement the proposed Integrated Plan.</i></p>
			<p>The Columbia River water exchange proposals referenced are different from what some have proposed for the Yakima Basin. Both the Umatilla and Walla Walla River proposals are “bucket for bucket” exchanges. The Odessa project is proceeding under a 1938 water right to continue development of the federally authorized Columbia Basin project.</p> <p>Regarding comparative analysis of alternatives, the Integrated Plan represents the YRBWEP Workgroup’s proposal and, as such, does not require an alternatives analysis. Once a final Integrated Plan is recommended to Ecology and Reclamation, then it will go through the process described in Section 1.0 of the summary document. This process includes preparing a Final Planning Report/EIS. Alternatives, including the Integrated Plan proposal, would be evaluated as part of this process.</p> <p>See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.</p>
44		US Fish and Wildlife Services	<p>General Comment:</p> <p><i>I really take issue with how the facilitators of this process have handled this “non-project”. I say “non- project” because that is what it appears to be. Workgroup members from the YBSA and the counties are determined that the transfer and storage of Columbia River water is the only alternative that will truly satisfy the current and future water needs of the Yakima Basin, both for out-of-stream and ecological purposes. They have made that position clear from the beginning of this process a year and a half ago. At the same time the Yakama Nation has</i></p>
			<p>Comment noted. See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.</p>

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	Section 3.3.4 continued	US Fish and Wildlife Services continued	<p><i>been adamant from the beginning that the inclusion of a project to divert water from the Columbia River will end their participation in the development of this plan. The pro-Columbia River transfer proponents have reiterated their position in several letters submitted prior to the last two workgroup meetings as well as at those meetings; the Yakama Nation clearly reiterated theirs at the last two meetings. I respect both positions but they obviously cannot coexist. We need to deal with this issue head on before we spend any more time on this. Either someone knows something that convinces them that the Nation's opposition to this project is conditional or that is not the case. If it is the case this project should have been much more thoroughly developed. If it is not it should have been dropped. But not before a serious discussion regarding the following- Two of the in-basin surface storage projects currently included in the IP involve serious ESA-related challenges. The third (Wymer) will as well if the sage grouse is listed before it is constructed, which seems likely. We really should face the prospect that one or more of these projects could be environmentally (or politically) infeasible. If the Yakama Nation can live with the idea it just seems wise that we would include a well-developed proposal for a project to acquire water from the Columbia River in the IP. If they cannot agree with this idea so be it. To have a major project (to say the least) represented by a weak placeholder in a plan we intend to send to Congress is embarrassing.</i></p>	
45		Roza Irrigation District	<p>General Comment:</p> <p><i>The Roza District will agree to additional study work on pumping from the Columbia River, but will not agree to any further authorization as part of the proposed draft legislation. If at some future date when all of the in basin projects have been implemented, if the supply for both instream and out of streams uses prove to be inadequate, the District would be willing to reconsider and out of basin transfer at that time.</i></p>	See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.
46		Kennewick Irrigation District	<p>General Comment:</p> <p><i>The District's position is that the Yakima River in-basin options identified in the Integrated Plan should be fully pursued prior to considering out-of-basin opportunities. Need for Columbia River water will depend on the in-basin projects being completed, how effective they are, how the Basin economy develops over time, and whether and how fast climate change occurs. If, after pursuing in-basin actions and evaluating how actions are performing to meet the Basin's water needs it is determined that needs are not being met, an likely will not be met by in-basin actions only, then this determination would trigger pursuing a Columbia River pump exchange with Yakima storage to address unmet needs.</i></p>	See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.

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#	Section Title	Agency	Comment	Response
47	Section 3.3.4 continued	American Rivers and National Wildlife Federation	Revise first paragraph, first sentence to read:  <i>After all authorized elements of the Integrated Plan are implemented, conduct a feasibility study for direct pumping from the Columbia River with Yakima Basin storage options.</i>	See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.
48			Revise first paragraph, fourth sentence to read:  <i>Columbia River water availability analysis should <del>consider</del> account for constraints for the Federal Columbia River Power System Biological Opinion target flows, effects on salmonids (migration, spawning and rearing), and cumulative impacts of other water withdrawal proposals (e.g. Odessa).</i>	
49			Delete the last sentence of the first paragraph.	
50			Revise the second paragraph, first sentence to read:  <i>The Columbia River and Roza Alternate Supply <del>projects</del> studies are shown as contingent on triggers relating to need and feasibility, for implementation.</i>	
51			Add “Potential” as the first word to the second paragraph, second sentence:  <i>(e.g. Potential need for Columbia River water...)</i>	
52			Delete the last sentence of the last paragraph.	
53			Regarding the last word of the last paragraph, “feasibility”:  <i>It appears possible to supply Roza from Wymer reservoir with Yakima River water. The feasibility study for dam removal should be contingent on Wymer’s construction, not Columbia pumping.</i>	
54	Yakama Nation	General Comment:  <i>Exclusion from the package of any authorization for Columbia River pumping is necessary for continued Yakama Nation participation in the work group and support of the plan. The plan that achieved consensus last December included Columbia River pumping only as a contingency that could be revisited only after all options for storing Yakima River water have been exhausted and have proven insufficient to meet needs when implemented in concert with all other components of the plan Section 3.3.4 of the draft IRWMP Work Group Agreement</i>	See revised language in Section 3.3.4, which has been updated in an attempt to find common ground on this controversial topic.	

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	Section 3.3.4 continued	Yakama Nation continued	<p><i>document ("Columbia River Pump Exchange with Yakima Storage") expands on that agreed-upon plan by front loading feasibility studies for a whole suite of Columbia River pumping and storage configurations. All of the major out of stream users and instream right holders and fisheries co-managers have agreed that we should exhaust the possibilities for storing and better managing Yakima River water before giving further consideration to any options for pumping water from the Columbia. Tribal support of the package a year ago was premised on that understanding. Any further analysis of the Columbia that is considered must not be tied to any authorization.</i></p> <p><i>The actual water yield from the in-basin alternatives in the package will not be fully known for many years. Seeking authorization and funding to do feasibility studies on a series of Columbia River options that would not even receive further consideration for decades seems like a waste of resources and would be questioned as a superfluous expense by congress and legislators considering the proposal. While we agree with the rationale for laying out triggers that would reinitiate consideration of Columbia River options, we believe that seeking authorization and appropriations for millions of dollars to study the feasibility of a back-burner option like the Columbia would jeopardize funding for the agreed-upon alternatives.</i></p> <p><i>The large uncertainties surrounding the hydrologic ramifications of climate change present a challenge to planning for water supply. One pattern that consistently appears in climate projections is earlier, higher peak flows and lower summer flows. This pattern supports the need for additional headwaters and groundwater storage of in-basin runoff. It would, on the other hand, make pumping from the Columbia even less viable as the pattern intensified, necessitating ever more pumping just to keep up.</i></p> <p><i>One inescapable fact associated with pumping from the Columbia is pumping cost. The Black Rock study put a price on annual pumping cost that amounted to a tenfold increase. Rather than an expensive and time consuming series of feasibility studies an initial assessment of pumping cost would likely serve to reinforce the lesson of Black Rock: that neither irrigation nor fisheries interests are willing to bear the excessive and unnecessary cost of pumping. Unless other sectors step forward to shoulder the expense of pumping or pass the costs along to taxpayers, ratepayers, or shareholders, there is no need for additional feasibility studies.</i></p>	
55	3.4.1 Shallow Aquifer Recharge	US Fish and Wildlife Service	<p>General Comment:</p> <p><i>I like the idea of this project providing it, and the other projects which will divert "excess" water during high-flow periods, don't get too carried away. But I have to wonder how one prevents the surface water diverted and stored in the shallow water aquifer from getting sucked up by the ever increasing number of exempt wells in the Yakima Basin. This gets back</i></p>	<p>Comment noted. Measures will need to be put in place during pilot testing and implementation to protect groundwater from unauthorized uses. The plan identifies future groundwater needs and will help with groundwater</p>

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#	Section # Section Title	Agency	Comment	Response
	Section 3.4.1 continued	US Fish and Wildlife Service continued	<i>to the concerns that Jim Milton expressed in the letter he submitted before the last meeting. I believe he was correct in stating that the draft IP is pretty much ignoring groundwater issues in the basin and I agree with him that this is big mistake.</i>	management by eliminating the need for emergency drought wells through enhanced surface supply, recognizing other processes (e.g. follow on efforts from USGS study, Kittitas County exempt wells response effort) are also underway to address groundwater management issues in a more direct way.
56		American Rivers and National Wildlife Federation	Add as the last sentence to the last paragraph:  <i>This project will be implemented in a manner that allows for the biological and geomorphological benefits of natural high flow events.</i>	Updated with suggested text and moved earlier in description.
57	3.4.2 Aquifer Storage and Recovery	American Rivers and National Wildlife Federation	Add as the last sentence to the last paragraph:  <i>This project will be implemented in a manner that allows for the biological and geomorphological benefits of natural high flow events.</i>	Updated with suggested text and moved earlier in description.
58	3.5 Fish Habitat Enhancement	American Rivers and National Wildlife Federation	Regarding the last word of the last paragraph, “Plan”:  <i>This needs more detail – perhaps mention some key priority projects we already know there is agreement on and give an overview of who will decide how the money is spent and when.</i>	Additional detail added per suggestions.
59	3.6.1 Agricultural Conservation	Reclamation	Revise last paragraph, last sentence to read:  <i>Projects to be implemented would be selected through detailed feasibility studies and evaluation by the existing <u>YRBWEP</u> Conservation Advisory Group (CAG).</i>	Revised as suggested.
60		American Rivers and National Wildlife Federation	Add as last paragraph:  <i>Access to the enhanced water supply made possible through the integrated plan shall be conditioned upon a “best management practices” standard determined the working group.</i>	No changes made as best practices are generally described already in the program description. A continued commitment exists to promote efficient irrigation district and farm irrigation practices. However, there are no readily accessible recognized standards that can be uniformly applied. Applicable practices are system-dependent

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#	Section # Section Title	Agency	Comment	Response
				and measures need to be applied geographically to realize water management benefits.
61	3.6.2 Municipal and Domestic Conservation Program	Yakima County	Revise last bullet point to read: <ul style="list-style-type: none"> <li>• <i>Determining appropriate conditions for accessing the new supply that would apply to homeowners, developers or <u>municipalities seeking water for new, non-agricultural uses.</u></i></li> </ul>	No change made as this bullet is addressing exempt well development only.
62		American Rivers and National Wildlife Federation	Revise second paragraph, first sentence to read: <p><i>Convene a <del>locally-based</del> <u>multi-stakeholder advisory committee, including local and environmental stakeholders</u> on municipal and domestic water conservation to organize outreach to local elected officials and provide liaison with Reclamation, WDOE and WDOH.</i></p>	Revised as suggested.
63			Revise third bullet point to read: <ul style="list-style-type: none"> <li>• <i>Establish <u>“best national practices” standards as a condition for accessing</u> <del>to</del> <u>the new supply developed through the Integrated Plan and dedicated to municipal use and municipal/domestic mitigation.</u></i></li> </ul>	Generally revised as suggested. Did not include “best national” practices language, as practices are contingent on climate, population size and other factors.
64	3.7 Market Reallocation	Roza Irrigation District & Kennewick Irrigation District	General Comment regarding Water Marketing: <p><i>The District supports water marketing as a drought year tool, but will not agree to it being relied upon to meet the 70% minimum supply for proratable districts. Water marketing is very expensive and is not a dependable supply of water in emergency situations. Crop values in any given year can play a major role in both the cost and availability of water to lease.</i></p>	Comment noted
65		American Rivers and National Wildlife Federation	Revise first paragraph, last sentence to read: <p><i>The proposal includes two phases— <del>a short term option that</del> <u>near-term, immediate efforts to builds on the existing water market programs, and a long term option that followed as quickly as possible by a program that requires more substantial changes to existing laws and policies.</u></i></p>	Generally revised as suggested.
66			Revise the second paragraph to read: <p><i>The <del>short</del> <u>near-term option program</u> would continue existing water marketing and banking programs in the basin, but take additional steps to reduce barriers to water transfers.</i></p>	Generally revised as suggested.

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#	Section # Section Title	Agency	Comment	Response
67	Section 3.7 continued	American Rivers and National Wildlife Federation continued	Revise the third paragraph, first sentence to read:  <i>The <del>mid- to long-term option program</del> would focus on facilitating water transfers <del>from</del> <u>between</u> irrigation districts.</i>	Generally revised as suggested.
68			Add to the end of the last paragraph:  <i>To facilitate this process, additional funding will be provided to non-federal irrigation districts not currently included in the Agricultural Conservation program to upgrade conveyance infrastructure in a manner that improves these districts' operational flexibility and ability to lease water to other irrigation districts.</i>	Generally revised as suggested. Also added sentence at the end of 3.6.1 clarifying the conservation program can fund non-federally served irrigation districts.
69		Yakama Nation	General Comment:  <i>Market based reallocation should continue to be part of the package. It is unclear how great a component this may become, but where cost effective, it should be pursued. Dry year options, which are mentioned in the 1994 YRBWEP legislation, but they have not been implemented. One objection that has been raised is the expense of annual payments. Consideration should be given to providing federal funding for dry year options.</i>	Need additional clarification. Will follow up to better understand comment intent.
70	Attachment 1 – Water Needs	Yakima County	Under Federally-Supplied Agriculture, delete <i>300,000 to</i> in the first paragraph, last sentence.	No change made – range is more appropriate since needs change annually.
71	Out of Stream Needs		Under Municipal and Domestic Water Uses, delete <i>annually</i> in the first sentence.	Revised as suggested.
72			Add section after Municipal and Domestic Water Uses section:  <i>Groundwater Depletion</i>  <i>Recent studies conducted by the USGS conclude that the surface and groundwater systems of the basin are interconnected. Areas within the basin, especially the deep basalt aquifer, are seeing significant declines in groundwater levels, which in turn are affecting stream flow and water supply available for irrigation. Improvement in drought-year surface water irrigation supply will offset a portion of the existing groundwater demand. Meeting future Municipal and Domestic needs through implementation of the Integrated Plan is targeted to reduce future impacts to instream flows and federally supplied agricultural water demands. The USGS groundwater study early estimate of deep basalt aquifer depletion is around 30,000 AF annually.</i>	Revised as suggested but included as part of expanded new subsection – Other Surface and Groundwater Considerations.

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#	Section # Section Title	Agency	Comment	Response
73	Attachment 1 – Out of Stream Needs continued	Kennewick Irrigation District	Request that “Federally Supplied Agriculture” be augmented with a specific reference to irrigation as a plan objective, and also ask that KID’s water supply needs and reliance on return flows be expressly noted in this section.	Need description expanded to address comment.
74		American Rivers and National Wildlife Federation	Under Federally-Supplied Agriculture, revise first paragraph, first sentence to read:  <i>The need to be met for single and multi-year droughts, based on recent hydrologic conditions, is <u>estimated at 70 percent of the water right entitlement each year for Kittitas Reclamation District, Roza Irrigation District and Wapato Irrigation Project.</u></i>	Revised as suggested.
75			Under Federally-Supplied Agriculture, revise second paragraph, first sentence to read:  <i>With potential climate change impacts, the estimated need would increase <del>an additional</del> by <u>roughly</u> 95,000 AF.</i>	Revised generally as suggested. Footnote added to clarify this is a conservative estimate.
76			Under Federally-Supplied Agriculture, revise second paragraph, second sentence to read:  <i>This additional amount reflects the potential need for all Districts supplied water by Reclamation, based on <del>the</del> <u>rough estimates of increased consumptive use for crops in the Yakima Project.</u></i>	Revised as suggested.
77			Under Federally-Supplied Agriculture, add as the last sentence to the last paragraph:  <i>It does not take into account potential crop changes due to climate change.</i>	Revised generally as suggested.
78	Attachment 1 – Water Needs  Instream Needs	Yakima County	Add at the end of the paragraph:  <i>It is difficult to quantify the instream water needs because each reach has a different flow need, which could be met either through operational changes or increased water supply.</i>	See revised language from Dale Bambrick, NMFS, inserted to provide further clarity on instream flow goals and management for the Integrated Plan.
79			In Table 1 – Yakima River Basin Instream Flow Needs By Reach, for Yakima River – Chandler Reach, revise third section, last sentence to read:  <i>Additional flow <u>and survival</u> benefits would occur if subordination is adopted.</i>	Revised as suggested.
80		Benton County	General comment regarding Completeness and “End Point” of the Proposed Integrated Plan:  <i>The proposed Integrated Plan does not provide reasonable assurance of completeness and an “end-point” to the water issues which have plagued the Yakima River basin for decades.</i>	See revised language from Dale Bambrick, NMFS, inserted to provide further clarity on instream flow goals and management for the Integrated Plan.



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	<p>Attachment 1 – Instream Needs continued</p>	<p>Benton County continued</p>	<p><i>Instream Flows</i></p> <p><i>The focus of instream flow needs and supply was on the tributaries and the upper 100 miles of the Yakima River above the Parker gage. With the proposed Integrated Plan there is no increase in the April-September flow regime in the lower 100 miles of the Yakima River with the exception of a dry-year spring flushing flow of 15,000 to 20,000 acre-feet over a 48-hour period. In all other years, the flow past the Parker gage to the lower Yakima River through which all Yakima River basin salmon and steelhead must migrate is the same as currently, or possibly less if the proposal that all saved water from implementation of water conservation measures in the 100,000 acre Wapato Irrigation Project can be used for developing additional irrigated lands. Consequently, there is no reasonable assurance the Yakima River basin will not still be faced with the issues of water for fish and agriculture with the fish and its time immemorial Tribal fishery treaty right subordinating agriculture. In addition, is the unknown of the yet to be completed Biological Opinion concerning the operation of the Yakima Project and the threatened and endangered fisheries of the Yakima River basin. Neither of these critical issues has been discussed by the Workgroup.</i></p> <p><i>Groundwater Withdrawals</i></p> <p><i>Preliminary information provided by U.S.G.S. representatives from their groundwater study (yet to be publically released) reinforces the matter of the connectivity of the surface and groundwater supplies of the Yakima River basin. The use of groundwater, which for the most part is junior to instream and out-of-stream surface uses, are impacting these senior water rights. While the proposed Integrated Plan does include a surface water supply for future municipal and domestic needs there has been little discussion of the connectivity issues, the impacts, and the need for conjunctive water management of these resources.</i></p>	
<p>81</p>		<p>Yakima Basin Storage Alliance</p>	<p>General Comment:</p> <p><i>...we should be optimizing fish productivity by modeling increased flows at critical mainstem reaches to maximize migration, spawning and rearing functionality.</i></p> <p><i>We believe Congress and others will want to know what is possible in the best case scenario or 'bookend'.</i></p> <p><i>This data would establish a target that would help us determine what solutions might retain high level function at lower flow volumes through future years of adaptive management.</i></p>	<p>Comment noted.</p>

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#	Section Title	Agency	Comment	Response
82	Attachment 1 – Instream Needs continued	Yakima Basin Fish and Wildlife Recovery Board	<p>Per Table 1 – Yakima River Basin Instream Flow Needs By Reach:</p> <p><i>It's not so much what is in the matrix- most are appropriate goals, though a few confusions remain. What bugs me is what is not articulated- essentially, any real goals for spring freshet management, except for drought yr pulse flows. This means that we show no real improvements in one of the most vital parts of the hydrograph, and it means that we have no metric to use to talk about when skimming can and can't occur (the 1000 cfs threshold the modelers use seems rather low as an across the Board standard. There are also some really screwy things going on with the model- which the matrix says sending 2000+ cfs more past Parker than current through the summer- that's 400kaf going out the basin below major diversions. At the same time the results at Kiona show flows lower than present (by 1000 cfs, May and June, and maybe 500 later)- so lots of water is disappearing (even if the model is showing huge irrigation savings and then using the Title XII to pass it over Parker, there's still a missing 1000 cfs). I'd see it as very appropriate to approve the decision document with the understanding that the instream committee will continue to meet in the new year to reconcile instream goals and the model results and present a more developed proposal for instream flows and how they could be managed. At the very least we should look at the final model runs, with unregulated and actual (for the modeled yrs) flows on top of the model runs.</i></p> <p><i>No idea where other are on this, but to me the long-term stakes of mis-framing this discussion are too high to just let it slip, even as in general I sense the "what does it matter anyway" malaise taking over all of us jaded meeting goers.</i></p>	<p>See revised language from Dale Bambrick, NMFS, inserted to provide further clarity on instream flow goals and management for the Integrated Plan.</p> <p>Also, see Section 4.1 discussion on adaptive management and assumed river operating rules revisions. Early implementation is where many of your comments would be more appropriately addressed.</p>
83			<p>For YBFWRB comments on Table 1 – Yakima River Basin Instream Flow Needs By Reach:</p> <p>See email with file of attached Table and associated comments.</p>	<p>This table can be further refined. See Section 4.1 discussion on adaptive management and assumed river operating rules revisions. Early implementation is where many of your comments would be more appropriately addressed.</p>
84		American Rivers and National Wildlife Federation	<p>In Table 1 – Yakima River Basin Instream Flow Needs By Reach, for Cle Elum River, revise first section, last sentence to read:</p> <p><i>Also <del>desire to</del> <u>work to</u> bridge peaks between spring and summer to improve cottonwood establishment.</i></p>	<p>Revise as suggested.</p>
85	Attachment 3 – Fisheries Benefits	US Fish and Wildlife and others	<p>Regarding the second table, markings for Deep Creek, Bumping River, Kachess River and Box Canyon Creek:</p> <p><i>These are minuses. They don't indicate neutral; they indicate a negative impact</i></p>	<p>Error corrected.</p>

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#	Section Title	Agency	Comment	Response
86	Attachment 3 continued	Yakima Basin Fish and Wildlife Recovery Board	Regarding the first table, “Recruitment”:  <i>Unclear meaning to lay person- use returns to Columbia?</i>	Footnote will be added to define recruitment, which is ocean population at the mouth of the Columbia River.
87			Regarding the first table, “Total Escapement” row:  <i>#s don’t clearly add up- mortality and harvest combining above and below Yak mouth? Or errors? Eg if max recruitment is 836k, 108 are harvested and escapement is 273k, where did the other 455,000 fish go? DOUBLE CHECK AND CLEAN PRESENTATION</i>	No change. Difference in values reflect mortality.
88		American Rivers and National Wildlife Federation	Regarding the second table’s key:  <i>Change “dependant” to “dependent”</i>	Comment no longer applicable with correction to key made in response to comment #85
89	Attachment 4 – Plan Costs	Benton County	General Comment regarding Economic and Financial Considerations:  <i>Ecology and Reclamation have stated that a monetary benefit and cost analysis will be conducted by Reclamation of the components of the Integrated Plan that are to be federally funded. The purpose of this analysis is to determine if there is economic justification for funding pursuant to criteria applicable to federal water resource projects. The components to be federally funded and their economic justification have yet to be determined.</i>  <i>We are being asked to approve an Integrated Plan of which there is no information regarding the allocation of the project costs, a repayment analysis, nor a financial plan for implementation. A cost allocation assigns costs to the project purposes some of which are reimbursable to be paid by the project beneficiaries and others which are nonreimbursable. A repayment analysis assesses the capability of water users to repay the reimbursable water supply costs within the prescribed period. A financial plan would address Federal and non-Federal funding for implementing an Integrated Plan requiring an investment of \$3.5 to \$5.9 billion. How can we possibly be expected to make a decision on the acceptability of the proposed Integrated Plan without the foregoing information?</i>	Comment noted. This information will be developed during preparation of the Reclamation Integrated Plan Final Planning Report/EIS described in Section 1.0, 2 <sup>nd</sup> paragraph.
90	Attachment 5 – Timing, Sequence and Triggers	Yakima County	Suggest adding to Programmatic Actions:  <i>5-year reviews for Water Needs, Fisheries Infrastructure Projects and Water Infrastructure Projects.</i>	See new Section 4.0 added to the document to more specifically address adaptive management, rolling needs review and plan updates.

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#	Section Title	Agency	Comment	Response
91	Attachment 5 continued	American Rivers and National Wildlife Federation	<p>General Comment:</p> <p><i>This section should be removed for now – there has not been sufficient (any?) real negotiation at the full workgroup regarding timing, sequence, triggers, and offramps.</i></p>	Comment noted. Further qualified the schedule and project relationships to be characterized as “Provisional Draft”.
92	General Document Comments	Yakima County	<p>Add to the title of the decision document:</p> <p><i>Draft</i></p>	Revised as suggested.
93		Roza Irrigation District	<p>General Comment:</p> <p><i>The Roza Irrigation District Board of Directors continues to support the seven elements of the Integrated Plan, as long as it includes both the enlargement of Bumping Lake reservoir and the construction of Wymer reservoir.</i></p>	Comment noted.
94			<p>General Comment:</p> <p><i>In summary, the Roza District believes that it is imperative that we continue moving forward without delay, in developing draft legislation for congressional consideration, and in Reclamation and the State moving forward with their required review processes for the Integrated Plan proposal. There may be some parties at the table who will be unwilling to support the Integrated Plan, or who may need more time for consideration. However, if all entities that are directly involved in diverting water from the river system, or entities who are directly involved in managing the instream flows for fishery resources are in support of this proposal, then we should immediately move forward into the next phase. We hope that those who may need more time or information can ultimately join in on support of the plan but do not support delaying implementation efforts in hopes that we may achieve total Workgroup support. Total consensus agreement should not be required to continue the process.</i></p>	Comment noted.
95		Kennewick Irrigation District	<p>General Comment:</p> <p><i>This letter is to express KID’s overall support for the seven elements contained in the Integrated Water Management Plan that is being finalized by the YRBWEP Workgroup. The District holds a pro-ratable water right from the Yakima River and long term water supply reliability in the Yakima basin is a critical issue to the landowners served by the District.</i></p> <p><i>KID agrees that in integrated plan is the best approach. A plan that includes only water conservation elements is not acceptable to the District due to the negative effects on future water supply that could result from a conservation-only plan.</i></p>	Comment noted.

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Section Title				
96	General Document Comments continued	KID continued	<p>General Comment:</p> <p><i>We recognize it is critical for basin interests to join together on a final integrated plan if we are going to successfully seek state and federal funding to improve the Yakima Basin's water supply and meet fisheries needs. While KID would like for all members of the Workgroup to support the integrated plan, we are prepared to move forward with only those who support the plan.</i></p>	Comment noted.
97		Benton County	<p>General Comment regarding Climate Change:</p> <p><i>Climate Change</i></p> <p><i>The affects of a moderately adverse change in climatic conditions is projected to result in reduced summer flows and an increased need for stored water. There will be more years when there will be less than a full water supply available, and the proposed Integrated Plan cannot meet the 70% proratable irrigation water supply criteria in dry years and instream flows will be less than the flow objectives.</i></p>	Climate change scenarios have been evaluated as part of the planning process. The plan represents a significant improvement over current conditions. The plan is also designed to be adaptive to changing conditions, as provided in Section 4.0
98		Yakima Basin Storage Alliance	<p>General Comment:</p> <p><i>YBSA is pleased to see many critical elements in the plan, and the interest by the stakeholders that has been maintained for the last 18 months.</i></p> <p><i>We believe the plan can be improved by addressing our concerns.</i></p> <p><i>We believe Congress will want to know how all options that have been studied with Federal funds compare, so we have continued to request a complete comparative matrix.</i></p>	Comment noted. General benefits are characterized in Attachments 2 and 3, identifying benefits with and without the Integrated Plan.
99			<p>General Comment:</p> <p><i>We know how difficult it is to forge a consensus and believe that funding the plan will be even more difficult to achieve.</i></p> <p><i>Who pays how much, for what benefits, is at the crux of political support.</i></p> <p><i>We believe the taxpayer portion of the payment can be significantly lower if pumped storage is incorporated into the plan.</i></p> <p><i>Pumped storage could significantly alter the composition of the plan.</i></p>	<p>Comment noted. Additional information on cost allocation will be developed during preparation of the Final Planning Report/EIS described in Section 1.0, 2<sup>nd</sup> paragraph.</p> <p>Pump storage could be considered as part of the feasibility study described in Section 3.3.4</p>

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#	Section # Section Title	Agency	Comment	Response
	General Comments continued		<i>YBSA remains committed to implementing the lowest cost, long term solution that meets the needs for instream flows and irrigation and municipalities in the Basin.</i>	
100		American Rivers and National Wildlife Federation	General Comment:  Suggested <i>adding Section 3.8 Land Conservation Element</i> pending result of conservation community discussion referenced in sections 1.0 and 2.0 above.	Updated Section 1.0, second paragraph to describe that the land conservation and other mitigation measures will be incorporated during preparation of the Reclamation Integrated Plan Final Planning Report/EIS. YRBWEP authorization does not provide for adding land conservation as a plan element.
101			General Comment:  <i>As indicated in our suggested edits regarding the process described in Section 1.0, we believe there needs to be more discussion of “how” we move forward. We may be nearing agreement on the “what,” but there has been insufficient discussion of the “how.” What is the process we’re agreeing to? How are actions tied together (or not), and what are the offramps?</i>	See additional detail for how the plan would be implemented, as provided in Section 4.
102			General Comment:  <i>Who pays for what? What’s the local, state, and federal share of funding. Is it to be determined, or have we decided?</i>	Additional information on cost allocation will be developed during preparation of the Reclamation Integrated Plan Final Planning Report/EIS described in Section 1.0, 2 <sup>nd</sup> paragraph.
103			General Comment:  <i>The model shows an additional 220,000 acre feet available in a non-drought year. How is that going to be used and divided up among in- and out-of-stream use? How much fish flow is dedicated from the new storage projects in any year remains vague, at least to us.</i>	See revised language from Dale Bambrick, NMFS, inserted to provide further clarity on instream flow goals and management for the Integrated Plan.  Also, see Section 4.1 discussion on adaptive management and assumed river operating rules revisions. Early implementation is where this comment would be more appropriately addressed.
104			General Comment:  <i>How will we ensure that existing and future groundwater use will not jeopardize the success</i>	Comment noted. The plan identifies future groundwater needs including providing up to 50,000 AF of surface water for municipal

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#	Section Title	Agency	Comment	Response
	General Comments continued	American Rivers and National Wildlife Federation continued	<i>of the integrated plan? We should discuss a way better manage surface and groundwater conjunctively to address the problems highlighted by USGS.</i>	and domestic purposes (that in some instances would directly offset or replace groundwater pumping). Further, the plan also helps with groundwater management by eliminating the need for emergency drought wells through enhanced surface supply. It is recognized other processes (e.g. follow on efforts from USGS study, Kittitas County exempt wells response effort) are also underway to address groundwater management issues.
105		Yakama Nation	<p>General Comment:</p> <p><i>The seven components of the integrated plan remain consistent with the policy direction I have received by resolution from the Yakama Tribal Council. If the report produced after the December 17th meeting maintains fidelity with these components, I will recommend they reiterate support for proceeding with the package. That will be contingent on resolving outstanding issues.</i></p>	Comment noted.
106			<p>General Comment:</p> <p><i>Business Rules</i></p> <p><i>The Yakama Nation and others on the work group have stressed the need for operating rules that will ensure that new storage is used to benefit both instream and out of stream interests. This means that additional capture of water in storage must not exacerbate existing flow problems downstream and that releases must be made in accordance with needs defined by the fisheries managers. This change from current operating assumptions must be further elucidated. Some explicit recognition of an additional quantity of water identified for instream flow for fish and other aquatic life to be released at the discretion of SOAC would likely be necessary to achieve this.</i></p>	<p>See revised language from Dale Bambrick, NMFS, inserted to provide further clarity on instream flow goals and management for the Integrated Plan.</p> <p>Also, see Section 4.1 discussion on adaptive management and assumed river operating rules revisions. Early implementation is where these comments would be more appropriately addressed.</p>
107			<p>General Comment:</p> <p><i>The integrated plan represents a unique opportunity to solve problems in the Yakima basin. Never in the history of the basin have the major out of stream water users and fisheries managers reached consensus on how to enhance all the basin's resources. We believe that the package should move forward for the good of all resources in the basin.</i></p>	Comment noted.

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Section Title				
108	General Comments continued	WDFW	<p>General Comment:</p> <p><i>My comment . . . [is] related to the 8th element. The lands element. The lands element is a place holder for what will turn into a comprehensive 8th element.</i></p> <p><i>The conversation with the conservation community is very consistent with WDFW's concerns and priorities.</i></p> <p><i>That conversation is making good progress and I am happy to let the description of that 8th element be broad and conceptual for now.</i></p> <p><i>The elements that are important to WDFW are forest conservation and shrub steppe conservation. The focus from our perspective should be on forest habitats that contain Northern Spotted Owl and Bull Trout and shrub steppe habitat that is as closely tied to Sage Grouse as possible.</i></p>	<p>Comment noted. Updated Section 1.0, second paragraph to describe that the land conservation and other mitigation measures will be incorporated during preparation of the Reclamation Integrated Plan Final Planning Report/EIS. YRBWEP authorization does not provide for adding land conservation as a plan element.</p>