

Kittitas County, Washington

## BOARD OF COUNTY COMMISSIONERS

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December 15, 2010

Anchor QEA  
Ben Floyd  
1060 Jadwin Avenue, Suite 275  
Richland, WA 99352

### **RE: COMMENTS ON THE YRBWEP WORKGROUP IWRMP DRAFT SUMMARY SUPPORT DOCUMENT**

Dear Ben:

Thank you for the opportunity to comment on the Draft Summary Support Document as referenced. Kittitas County would like to reinforce our support for the decision document as previously stated during the YRBWEP workgroup meeting November 19, 2010. We have appreciated the work of all parties over the past 18 months in arriving to this point of the process. Additionally, we are pleased to continue as a member of the Workgroup and look forward to working collaboratively with stakeholders during the implementation process.

We have read with interest the many comments received from various Workgroup members and others over the last couple of weeks offering changes and additions to the Draft Summary Support Document. Many of the suggestions have improved the document and added clarity. The latest version of the Draft Summary Support Document sent via email 12/13/2010 incorporated many of the comments by members of the Workgroup. Please consider the following remarks as to several of the suggested changes.

#### 3.3 Surface Water Storage:

We are supportive of the additional comments added in the second paragraph. Kittitas County is supportive of the commitment to focus on in-basin solutions to address water supply concerns prior to pursuing other potential solutions. That being said, providing replacement projects that will supply at least an equivalent quantity of water should one or more of the identified projects become infeasible for any reason is critical to the overall success and stated intent of the integrated plant to provide 70% reliability to proratable supply during drought years.

#### 3.3.4 Columbia River Pump Exchange with Yakima Storage:

Kittitas County supports the revised language as presented. We particularly appreciate the specificity outlined in the first paragraph regarding the rolling needs assessment occurring every five years against the identified 70% proratable supply needs for irrigation, other out-of-stream needs, and instream flow objectives.

#### 3.4.1 Shallow Aquifer Recharge:

Our comments to this section are directly in regards to the last sentence added to the third paragraph which states “During the pilot phase, policy and legal protocols will be developed to ensure water stored through infiltration is not captured by unauthorized users”. As this was recently added and we do not recollect discussion within the Workgroup specific to this topic, we would like to request some clarification.

#### 3.6.2 Municipal and Domestic Conservation Program:

The new language added in the third bullet point under the second paragraph, to our mind, is a departure from the general consensus achieved by the Workgroup in previous discussions of this exact topic. We are aware that some members in the Workgroup have strong opinions as to the needs for conditional access standards to new municipal and domestic supplies. However, it is our understanding that the Workgroup agreed that such standards were beyond the scope and authority of this Workgroup. Hence, this language should be removed and we specifically request that the third bullet point revert to the language previously presented in the Draft Summary Support Document on November 19, 2010.

#### 3.7 Market Reallocation:

We remain fully supportive of the language in this section, including recent additions. In addition we would like to offer our perspective as the elements in the Draft Summary Support Document are specifically developed in the Integrated Plan. Our comments are directly related to the statement made in the second paragraph of this section which discusses taking additional steps to reduce barriers to water transfers.

It is our understanding that the water transfers being contemplated here are specific to irrigation purposes and especially as a drought mitigation tool. Additionally, they may be temporary or permanent. Kittitas County is supportive of improving the efficiency and flexibility of such water transfers.

It is important to note other actions are currently underway and being discussed within the Yakima Basin which may also be impacted by such efforts. Currently, water banks are being employed in Kittitas County for creating access to water for domestic purposes. This is a tool which may also be utilized in other areas of the Yakima Basin in the future. It is a new process which arguably has yet to be developed fully and may undergo substantial changes in the future. Additionally, it may be determined that water banks created for domestic use mitigation are more appropriately limited in geographic application than what is currently contemplated for irrigation use. We request that as the Integrated Plan is developed in regards to market reallocation it be specific that efforts in streamlining water transfers are targeted toward improving opportunities for irrigation purposes and drought mitigation only.

#### 4.0 Rolling Review and Future Plan Adjustments:

We are fully supportive of the addition of this section including and section 4.1.

4.2 Adjustments to the Integrated Plan Over Time:

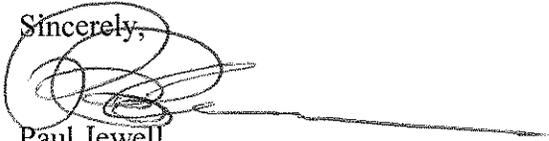
We are generally in support of the addition of this section as well. However, we do have significant concerns with the third bullet point which states: "Projects that can be implemented should not be delayed simply because other projects are delayed or encounter challenges". While we can understand the sentiment of this comment and hope that the spirit with which it is made is consistent with the agreed-upon principles of collaboration and cooperation, it does appear to be at odds with the concept of the Integrated Plan. It is our understanding that instream and out-of-stream projects within the Integrated Plan are to commence concurrently, ensuring the cooperation and support from all stakeholders and Workgroup members. Assuming this remains the intention of the Workgroup, additional clarifying language would be appropriate. That being said, we suggest the simplest remedy to our concern is to strike the statement in entirety.

Finally, Kittitas County is also supportive of the statements made by Benton and Yakima Counties in their belief for more urgency toward the incorporation of a Columbia River Pump Exchange within the Integrated Plan. As the Integrated Plan progresses through implementation, it may become clear that the only way to achieve the goals for both in-stream and out-of-stream use is through the utilization of an out-of-basin transfer from the Columbia River.

However, as previously stated Kittitas County is also willing to support and remain committed to focusing on in-basin solutions prior to consideration of out-of-basin transfers. We believe the Draft Summary Support Document does include opportunity for serious consideration of a Columbia River Pump Exchange should any of the other identified projects for reaching the plan's agreed goals become infeasible.

Kittitas County is pleased to support the Draft Summary Support Document and we look forward to working collaboratively with other agencies during implementation.

Sincerely,



Paul Jewell

Kittitas County Commissioner