



Yakima River Basin Water Enhancement Project Work Group

The Yakima Basin Storage Alliance (YBSA) is a local “grassroots organization” formed to raise the awareness of the dependence of our Yakima River basin economy and environment on a reliable surface water supply and the need for additional stored water. YBSA is in a unique position in the Workgroup not being affiliated with any specific entity, agency or interest group. YBSA is focused solely on the challenge of an adequate and reliable water supply for the future in concert with our environmental and cultural values.

In March 2012, a Final Programmatic Environmental Impact Statement was completed in which two plan alternatives were evaluated; a No Action Alternative and the Integrated Plan. The Integrated Plan consisting of a surface water storage element and six complementary elements was selected as the Preferred Alternative to move forward for Congressional and State legislative authorization and funding for implementation.

YBSA supports the Integrated Plan concept, but we are deeply concerned with the adequacy and reliability of the surface storage element to meet long-term instream and out-of-stream water needs.

The Integrated Plan purports to restore sockeye salmon to the Yakima River basin by providing fish passage to streams above the five Yakima Project storage dams inaccessible to adult spawning.

We have been told the fish passage facilities would be designed and operated within existing operational constraints and Yakima Project operations would continue to serve exiting Reclamation water contracts. However, adult salmon are projected to range from 140,000 to 310,000 at the mouth of the Yakima River facing a summer in-basin migration of 150 to 215 miles upstream to the spawning grounds when peak irrigation diversions are occurring and flows in the lower 100 miles of the Yakima River are dependent solely on return flows from the irrigated lands and target flows over Sunnyside Dam which will not increase with the Integrated Plan.

- How do we know the instream flows are sufficient to improve water quality problems of temperature, phosphorous, and other parameters critical to anadromous fish migration and reproduction? This is particularly critical to adult sockeye and the effects of thermal blocks in the river during the summer migration.

Three entities have the majority of the junior water rights and will participate in the dry-year supplemental irrigation water supply from the Integrated Plan. These are the Kittitas Reclamation District, Roza Irrigation District, and Wapato Irrigation Project on the Yakama Indian Reservation. The water supply of these entities is significantly impacted in dry years when proration of the available irrigation is necessary. The Integrated Plan attempts to improve their junior supply to the extent needed to provide a 70 percent supply in dry years. The volume of supplemental irrigation water needed from the Integrated Plan will vary by the prevailing conditions. For example, an additional 355,000 acre-feet would be provided in a repeat of a dry-year like 2001 when the junior supply from the Yakima Project is reduced to about 32 percent.

Recent climate change studies however, indicate that watersheds like the Yakima River basin dominated by fall rain and spring snowmelt will be most affected by climate change. To assess the impact on the Integrated Plan three climate

scenarios were evaluated; less adverse, moderately adverse, and more adverse. Results indicate that increased air temperature would cause more precipitation to fall as rain rather than snow in the Cascade Mountains with snowmelt runoff occurring earlier than under current conditions. This suggests significant risks to the Yakima River basin's "sixth reservoir" of snowpack and the extended period of spring runoff which fills the reservoirs by about mid-June and provides natural unregulated runoff for irrigation diversions and instream flow maintenance for fish through the spring months.

With climate change, stored water releases required earlier in the year will affect reservoir operations including carryover of stored water and refill. Instream flow objectives are imperiled such as in the Bumping River when reservoir operations will require a significant September flow to meet downstream demands contrary to the objective of reducing the current flow. In other rivers, such as Cle Elum, streamflows in the late summer months would be less than the flow objectives

- How will the dry-year proratable irrigation water needs of a 70 percent supply be met when operation studies show the following for two of the three climate change scenarios: moderately adverse scenario of 14 drought years out of 25 years with the 70 percent criteria violated in every dry-year; and most adverse scenario of 24 dry years out of 25 years with the 70 percent criteria violated in 22 of these years?
- What assurance do we have that after incurring significant capital investments the conflict among instream uses with time immemorial senior Treaty rights will not subordinate junior out-of-stream rights in dry years?

One of the three projects of the water storage element is the construction of a new dam on the Bumping River about one-mile downstream of the existing dam. The numerous reports gathering dust in the bookcases of Reclamation offices are testimony to the failed efforts to bring an enlarged reservoir on-line since about 1950. Irrespective of this history of opposition, some are convinced that this time with a different form of "greening of the environment" Bumping Lake Reservoir enlargement will successfully move forward. YBSA is of a different opinion!

- In view of the long history of rejection of an enlarged Bumping Lake Reservoir why do we insist on going down the same path once again knowing full well the current opposition from some of the environmental groups and others?
- How can we precede with construction of any of the storage projects until the status of an enlarged Bumping Lake Reservoir is known?
- Taking into consideration the above, why is the assessment of an inter-basin transfer from the Columbia River which is a potential option in the Integrated Plan "if conditions warrant" being deferred? It seems prudent its viability and conjunctive operation be determined prior to authorization of an Integrated Plan.

An Amended Order of Determination of the Department of Ecology granting extension of the withdrawal of water of the Columbia River and its tributaries until December 23, 2014 was granted on March 5, 2013.

Sincerely,



Sid Morrison

Chairman, Yakima Basin Storage Alliance