

March 13, 2013

Derek Sandison
Washington Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, WA 98902

Dear Mr. Sandison:

Please include this letter as public comment by Seattle Audubon for the March 13, 2013, Yakima Workgroup meeting.

Seattle Audubon has previously provided comment on the proposed Yakima Basin Integrated Plan, including both to your Workgroup on the discussion draft (November 20, 2009) and to the Bureau of Reclamation on the draft PEIS (January 3, 2012). In those comment letters [see attached], we raised significant questions and concerns regarding this proposal. Unfortunately, those questions and concerns have not been addressed.

Of particular concern to Seattle Audubon is the adverse impacts that would result from an enlarged Bumping Lake reservoir. We are deeply troubled by the proposal to inundate up to 1,000 acres of unique Eastside old growth forests that are critical habitat for the endangered northern spotted owl. Since 1986, Seattle Audubon has been a leader in the ongoing effort to protect remaining forest habitat for this species, and the environmental review process for this project to-date has failed to address the concerns we have raised.

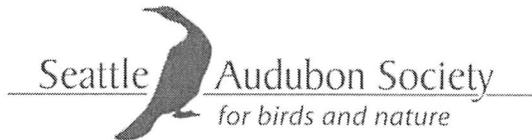
We request that your Workgroup help provide Seattle Audubon and other interested parties with specific information that responds to our numerous questions regarding the impacts the Bumping Lake Reservoir expansion component of the project would have on northern spotted owls. Without such answers, the positive benefits the overall proposal could provide for salmon and water are likely to become entangled in protracted battles regarding spotted owls.

I can be contacted via email at shawnc@seattleaudubon.org or phone at 206/523-8243. I look forward to receiving your response.

Sincerely,

A handwritten signature in black ink that reads "Shawn Cantrell".

Shawn Cantrell
Executive Director



January 3, 2012

Bureau of Reclamation
Columbia-Cascades Area Office
Attention: Candace McKinley
Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901

RE: Draft Programmatic Environmental Impact Statement for the Yakima River Basin Integrated Water Resource Management Plan

Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley:

Seattle Audubon is submitting this letter in response to the Draft Programmatic Environmental Impact Statement (DPEIS) for the “Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project”, Benton, Kittitas, Klickitat, and Yakima Counties, Washington, issued by the Bureau of Reclamation (BuRec) and the Washington State Department of Ecology (Ecology).

The mission of Seattle Audubon is to cultivate and lead a community that values and protects birds and the natural environment. Since 1916, Seattle Audubon has worked to protect birds of our region whose habitats are at risk. Our members have a long history of engagement on forest-related issues in Washington state and an on-going interest in the inter-relationship between bird habitat and human development activities in the forested landscape.

Seattle Audubon is deeply concerned with the potential impact of the Integrated Plan on habitat for at-risk bird species, including the Northern Spotted Owl (listed as a threatened species under the federal Endangered Species Act) and the Greater Sage Grouse (listed as a candidate species under the federal Endangered Species Act). While the DPEIS includes numerous statements that adverse impacts to existing habitat for such species would be offset by habitat/watershed protection and enhancement efforts (page 5-51) and that the long-term impacts of the habitat restoration projects in the Integrated Plan are expected to be beneficial (page 5-52 and page 5-53), the DPEIS fails to include adequate information to substantiate such claims.

In addition to the lack of information to support the conclusions in the DPEIS regarding habitat impacts to at-risk avian species, the DPEIS also includes internal contradictions regarding those impacts. For instance the document accurately notes that the proposed new surface storage at Wymer Dam / Reservoir would exacerbate ongoing losses of Greater Sage Grouse habitat, “*resulting in potentially substantial impacts to this species*” (page 5-60), and that expansion of the Bumping Lake Reservoir “*would further reduce available habitat for the Northern Spotted [sic] and could represent a substantial impact.*” (page 5-51) Yet elsewhere the document claims that overall impact of the Integrated Plan is expected to be positive for listed species.

It is essential that a revised environmental analysis of the Integrated Plan include substantially more detailed information for decision-makers and the public to be able to evaluate the actual impacts (beneficial and adverse) of the proposed action.

The Land Acquisition Program described in the DPEIS (pages 2-24 and 2-25) includes introductory paragraphs that highlight numerous potential benefits of protection and restoration of key landscapes, yet tellingly there is no mention of benefits to avian species such as northern spotted owls or greater sage grouse. While the DPEIS puts forward “targeted goals” for watershed protections and enhancements, it does not provide even minimal details on how much of the proposed targeted acreage is currently suitable habitat for these key species. It is essential that any Plan to enhance the amount and quality of habitat for listed and / or candidate species actually do so; sacrificing approximately 2,000 acres of high quality habitat – 980 acres of old growth habitat for northern spotted owls (page 5-51) and 1,000 of shrub-steppe habitat for greater sage grouse (page 5-56) – makes no sense without explicit articulation of the amount of replacement high quality habitats to be acquired that otherwise could be lost due to development under existing ownership. The closest the DPEIS comes to specifying such information is that in the land proposed for acquisition in the Little Naches headwaters, “most” of the land has been logged and “some” areas of old growth forests remain.

The document needs to be revised to explicitly identify the composition of the lands proposed for acquisition – how much of it is currently high quality habitat for these avian species, and how much is degraded habitat in need of restoration? In addition, what would be the approximate expected timeframe for the degraded habitat to be restored high quality habitat comparable to the lands permanently inundated?

The Bumping Lake Enlargement project has been studied repeatedly over the last three decades, and those analyses have failed to generate a positive benefit/cost ratio or Congressional authorization. As recently as December 2008, the BuRec concluded that a Bumping Lake Expansion should be dropped from its Yakima River Basin Water Storage Feasibility Study. Re-initiating efforts to inundate nearly 1,000 acres of high quality old growth habitat for northern spotted owls is likely to re-ignite highly contentious administrative, legislative, and judicial battles. This component of the Integrated Plan is particularly troubling in light of the recommendations of the U.S. Fish and Wildlife Service in the June 2011 Revised Recovery Plan for the Northern Spotted Owl. In that plan, the agency calls for increasing the amount of owl habitat, including the protection of both occupied sites and unoccupied, high quality habitat. (Recovery Plan at page III-51)

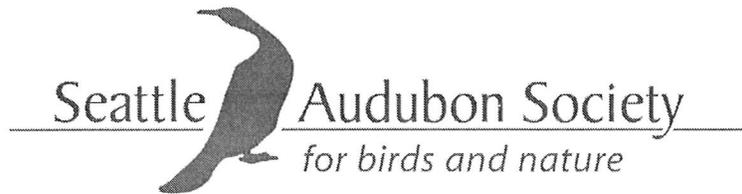
We appreciate the opportunity to comment on the DPEIS and look forward providing additional comment as the environmental review process moves forward. If you have any questions regarding Seattle Audubon’s comments or would like additional information, feel free to contact me by telephone at 206/523-8243 ext. 15 or by email at shawnc@seattleaudubon.org.

Thank you for your consideration.

Sincerely,



Shawn Cantrell
Executive Director



November 20, 2009

Derek Sandison
Washington Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, WA 98902

Dear Mr. Sandison:

This letter is provided as public comment for the November 23, 2009, Yakima River Basin Water Enhancement Project Work Group meeting on the Discussion Draft Integrated Packag...

Founded in 1916, Seattle Audubon's mission is to cultivate and lead a community that values and protects birds and the natural environment. With more than 5,000 members households, we are the largest Audubon chapter in Washington and actively engaged in a variety of bird conservation programs. Our volunteers and members have been deeply involved in protecting and restoring Northern Spotted Owls for over 30 years.

Habitat loss has been and continues to be one of the largest threats to this E.S.A. listed bird species. We currently are working hard to find ways to increase the amount of suitable spotted owl habitat in Washington State, so we were deeply troubled to learn that your Work Group was considering potential expansion of Bumping Lake. As you are likely aware, such an expansion would flood spotted owl critical area habitat, including nearly 2,000 acres of ancient forests. This would be the exact opposite of what is needed to help reverse the accelerating decline of Northern Spotted Owl populations.

Enlarging Bumping Lake has been considered and rejected many times over the past 50 years, due in large part to environmental concerns. As recently as last year the Bureau of Reclamation concluded "that the proposal for Bumping Lake Enlargement Alternative will be eliminated from further consideration in the Storage Study" because of the adverse environmental impacts such a project would create. (see *Yakima River Basin Water Storage Feasibility Study, FPR/EIS, Bureau of Reclamation, December 2008.*)

Seattle Audubon is strongly opposed to including an expanded Bumping Lake reservoir as part of any "Integrated Package." While we commend your group for working to address water issues in the Yakima basin, we urge you to not re-open old fights regarding Bumping Lake. Doing so would create significant new problems for your efforts by inserting highly sensitive spotted owl issues onto your already complex agenda.

If you have any questions or need additional information regarding our concerns, feel free to contact me via email at shawnc@seattleaudubon.org or phone at 206/523-8243.

Sincerely,

A handwritten signature in black ink that reads "Shawn Cantrell".

Shawn Cantrell
Executive Director

cc: The Honorable Christine Gregoire
The Honorable Patty Murray
The Honorable Maria Cantwell