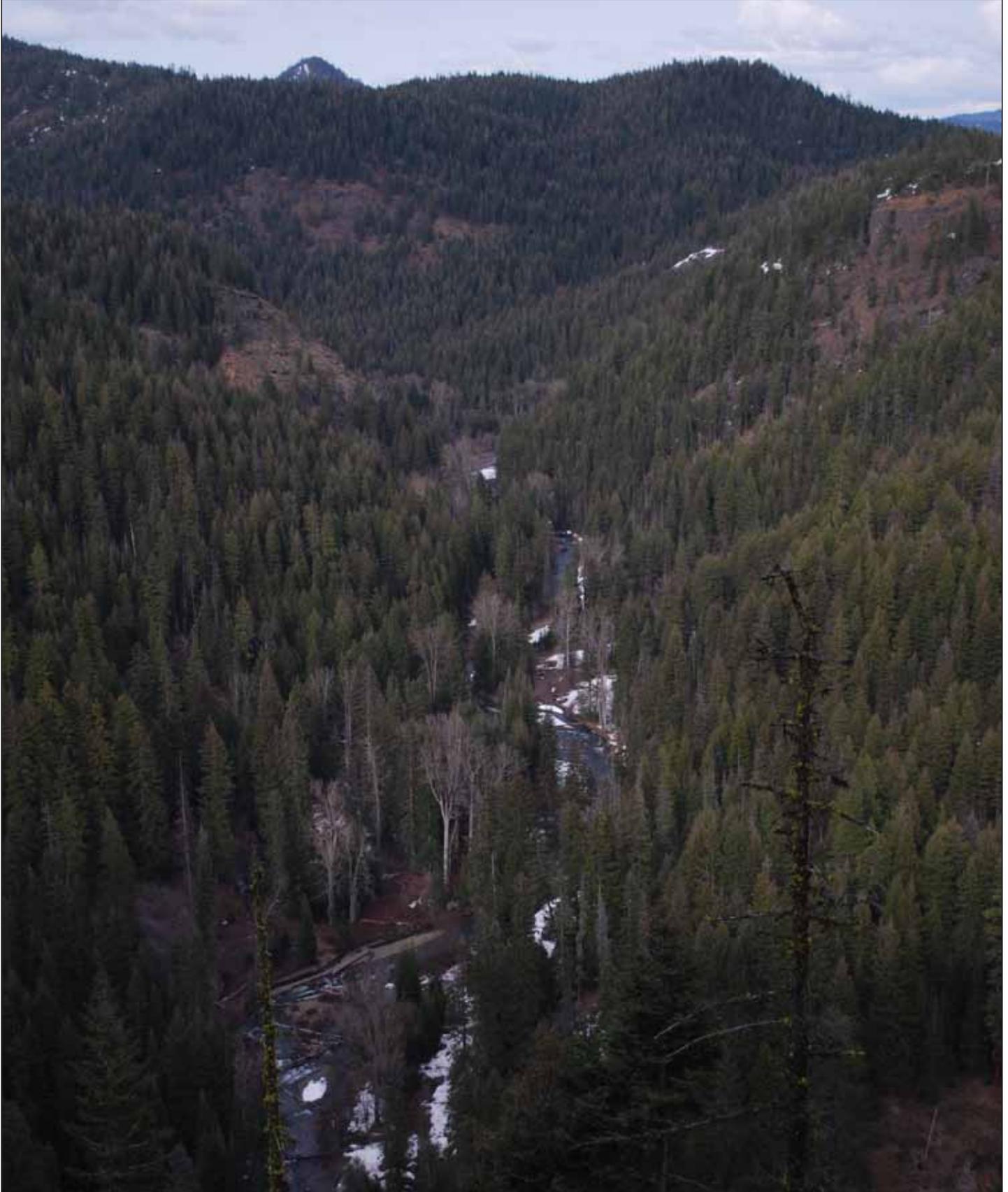


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# THE WILD CASCADES

THE JOURNAL OF THE NORTH CASCADES CONSERVATION COUNCIL    SUMMER/FALL 2013





## State funds Yakima Plan “early action items”

by Karl Forsgaard

In late June, the Washington State Legislature concluded its 2013 session by appropriating \$132 million in the capital budget to fund Yakima Plan “early action items.” These include State acquisition of Teanaway private forestland for almost \$100 million, early stages of Yakima River Basin water projects including water conservation and fish passage projects, and feasibility studies of the proposed irrigation storage dams that threaten ancient forest at Bumping Lake and shrub-steppe habitat at Wymer.

Unfortunately, by making the appropriation (and the related policy bill), the Legislature institutionalized a severely flawed Yakima Plan process that set many bad precedents for federal policies on forests, water, endangered species, off-road vehicle recreation, environment (NEPA) and advisory committee meetings (FACA). Furthermore, Plan proponents now see themselves in a stronger position to seek federal funding for the Plan, which has an estimated pricetag of \$5 billion.

In June the Yakima Plan proponents also retreated somewhat from their ill-advised National Recreation Area (NRA) proposal, although the two bad NRAs remain in the Yakima Plan.

Also in June, NCCC and allies received a grant from The Mountaineers Foundation to pay for scientific and legal advice regarding the Yakima Plan.

### **Teanaway acquisition**

The State acquisition of 50,272 acres of forestland managed by American Forest Land Company (AFLC) in the Teanaway River Basin is described in more detail in the companion article by Rick McGuire. It was reported in several newspapers and online blogs, and described as the state’s largest single acquisition of land in over 50 years, and one of the largest in state history. On July 15, the *New York Times* reported that when AFLC’s principal owner John Rudey listed his Connecticut home for sale at \$190 million, it was proclaimed

*Lake Cle Elum, in the Yakima Basin, with Teanaway peaks and Stuart Range in the distance.*

—KARL FORSGAARD PHOTO

the most expensive home ever formally listed in the United States. It carries more than \$120 million in debt, so paying his lenders was reportedly the reason Rudey was selling most of his Teanaway lands. Rudey and AFLC will retain a 900-acre block at the south end of the Teanaway valley that is the site of a proposed solar energy project.

The State will manage its Teanaway forestlands as a Community Forest, the State’s first use of the Community Forest Trust land management designation created by the Legislature in 2011 to protect working forests (i.e. loggable forests) with a high risk of conversion to non-forest uses, and with important value to the local community. The Department of Natural Resources and State Department

of Fish and Wildlife will co-manage the Community Forest, engaging the local community in setting priorities. The State will establish a local advisory committee, the Teanaway Community Forest Advisory Board, to provide advice on post-acquisition management.

The local community (upper Kittitas County) clearly cares enough about management of these newly acquired forestlands to provide detailed input to the State. In the public meetings conducted by Kittitas County under the Growth Management Act (GMA) in 2009-2010 regarding AFLC's proposal to develop these same lands with a "fully contained community," the Teanaway Grange hall was always full of Kittitas County residents and their Seattle-area allies advocating to protect the rural character of the Teanaway River valley. Under the GMA, Kittitas County had already designated most of the area as forestland of long-term commercial significance before Rudey bought it from Boise Cascade in 1999. Thirteen conservation organizations including NCCC, Kittitas Audubon, Kittitas County Conservation Coalition and Friends of the Teanaway opposed the "fully contained community" because the area can continue to be managed for commercial forestry, and conversion to other uses would adversely affect habitat for a wide range of species including bull trout, steelhead and spotted owls. The owl habitat on AFLC land is relatively unlogged compared with the rest of the heavily logged AFLC land; the owl circles are in the northern part of the AFLC land, near the boundary with federal land (the proposed NRA) where there are additional owl circles.

The legislation provides that after 12 years (by June 2025), if Yakima Plan water projects totaling 114,000 acre-feet have not been permitted and financed, the State can change the Teanaway land designation from Community Forest Trust to common school trust (i.e., fewer restrictions on logging), or dispose of it. Plan proponents say this acre-footage is the "exact" amount of the Cle Elum pool raise and Kachess inactive storage components, and that this provision is an "incentive" for the Teanaway community to support completion

of those water storage projects. However, the Kachess inactive storage component has not yet been designed, nor has it been subject to feasibility analysis or cost-benefit analysis, let alone project-level environmental review. Furthermore, we question whether the State agencies, after 12 years of engaging the local Teanaway community in forest management decision-making, would want to antagonize that community by downgrading the Teanaway Community Forest in 2025.

### **Water project cost-benefit analyses and feasibility studies**

In addition to the Teanaway acquisition, the Yakima Plan "early action items" funded by the Legislature include construction prep for a fish passage project (at Lake Cle Elum); geotechnical analysis and initial design for other fish passage projects (at Keechelus, Kachess, Tieton) and for operational modifications (the Keechelus-to-Kachess pipeline); construction prep for some storage projects (Kachess inactive storage, and Cle Elum pool raise); feasibility studies

for the two storage dams (Bumping and Wymer); and complete construction of certain agricultural conservation projects and tributary/mainstem habitat enhancement projects.

The capital budget also includes \$300,000 for the Washington Water Resource Center to prepare separate benefit-cost analyses by December 2014 for each significant water project proposed in the Yakima Plan. Located in Pullman, the Center was established by Congress and is a joint agency of Washington State University and the University of Washington. Section 5057 provides that the Center "must measure and report the economic benefits of each project on a disaggregated basis, so that it is clear the extent to which an individual project is expected to result in increases in fish populations, increases in the reliability of irrigation water during severe drought years, and improvements in municipal and domestic water supply." The cost-benefit analyses will be conducted on these projects:

- a. Tributary/mainstem enhancement
- b. Box Canyon Creek

- c. Subordination of power generation (Roza and Chandler)
- d. Aquifer storage and recovery projects
- e. Agricultural conservation
- f. Municipal conservation
- g. Water bank exchange programs
- h. Cle Elum reservoir
- i. Keechelus, Kachess, Tieton reservoir
- j. Keechelus to Kachess pipeline
- k. Wymer reservoir
- l. Bumping reservoir enlargement

In addition to the analyses of the dams at Bumping and Wymer, it will be interesting to see the cost-benefit analysis for the Kachess reservoir's inactive storage project, as some Plan proponents have informally said that due to its large capacity (200,000 acre-feet) and because they say it is relatively benign and cost-effective, it is more likely to be built sooner, and perhaps instead of, the dams at Bumping and Wymer. They informally refer to the Plan as a 40-year project, with Phase I consisting of ten years of projects costing \$700 million (including Kachess inactive storage), followed by the least-unpopular dam (ostensibly Wymer) with the most-unpopular dam (ostensibly Bumping) postponed until around 2040. For the remainder of the \$5 billion pricetag, they speculate the costs may be shared 50-50 federal-local.

Section 3016 provides funding to the Department of Ecology for completion of BuRec's "Yakima River Basin Water Storage Feasibility Study," including environmental review under NEPA and SEPA, "to evaluate potential in basin storage facilities such as the proposed Bumping Lake and Wymer reservoirs and other reasonable alternatives that will enhance water supplies and streamflows in the Yakima Basin."

Plan proponents have informally referred to this feasibility study as geotechnical investigations beginning in summer 2013 to evaluate whether the sites proposed for the Wymer and Bumping dams have "fatal flaws," from an engineering and safety perspective, anticipating that if either site is "fatally flawed" then it would be dropped. Concerns include the nature, depth and permeability of glacial sediment at the Bumping dam site, and the nature of the basalt flows and faults at the Wymer site. Their objective is to know by the end of two years which dams to advance to a formal feasibility study, which will then take about five years.

In August, the federal Bureau of Reclamation and U.S. Forest Service jointly sent

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*The Plan was developed by a defective process, and with defective economic analysis. Notably, Senator Karen Fraser removed herself as a co-sponsor of the policy bill.*

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## Yakima Plan

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a letter to “parties in the immediate vicinity of Bumping Reservoir Dam,” i.e., Bumping Lake cabin owners. The letter said BuRec “will be conducting geotechnical investigations downstream and in the general vicinity of the existing ...Dam over the next 2 years. The investigations will use a mobile drilling rig ... and a backhoe...” Several years of data gathering, numerous additional studies, and an EIS lie ahead. “None of these studies are yet scheduled for initiation because Reclamation must first assess if the Bumping Reservoir Dam proposal is feasible.”

In a June 7, 2013 letter to State Rep. Hans Dunshee, Sierra Club’s Washington State Chapter wrote “We do not support the overall Yakima Plan as proposed and remain opposed to funding in the budget for expansion of Bumping Lake and Wymer dams.”

In addition to the capital budget appropriations, in late June the Legislature also passed the policy bill regarding the Yakima Plan. The policy bill endorsed the Plan, and thus it endorsed all of the Plan’s defects – two new dams, destruction of 1,000 acres of ancient forest (including Critical Habitat for the northern spotted owl), two new NRAs for off-road vehicles (ORVs), inadequate water conservation,

and inadequate wilderness protection. The Plan was developed by a defective process, and with defective economic analysis. Notably, Senator Karen Fraser removed herself as a co-sponsor of the policy bill.

In September, the Washington Environmental Council (WEC) Board of Directors decided to remain neutral on the Yakima Plan. WEC Staff had recommended that the Board vote to support the Yakima Plan, but the Board declined to follow that recommendation, after listening to pro-and-con presentations by a Plan proponent and NCCC. For more than a year, the Yakima Plan campaign website had erroneously listed WEC as a supporter of the Plan, but the WEC Board had never voted to support it. After its September meeting, WEC was removed from the Yakima Plan campaign website’s list of Plan supporters.

### National Recreation Area proposal

The Yakima Plan’s proposals for federal land designations to be made by Congress, including the NRA Proposal for promoting off-road vehicle (ORV) use on National Forest lands of the Cle Elum District, were published by the Workgroup’s Lands Subcommittee in January 2012.

A year and a half later, in June 2013, the Workgroup’s Lands Subcommittee sent a letter to the Forest Service asking that the Lands Subcommittee proposals be included in the upcoming Forest Plan Revision DEIS alternatives, and “The Workgroup currently has no plan to seek formal Congressional designation for these lands as the Forest Plan Revision and Travel Management Planning processes go forward. Rather it is our intention to defer as these administrative processes develop ...” This looks like a substantial adoption of one of our main points about the Lands Subcommittee’s NRA Proposal, that it undermined those ongoing National Forest planning processes. It also reflects input from many conservation organizations during the informal Ross process. The threat of a Congressional bill to enact the NRA Proposal has now been “deferred.”

In late June, the Yakima Plan supporters’ and opponents’ perspectives were presented at the Washington Water Law Conference at the State Convention Center in Seattle. In response to the presentation of negative impacts of ORV use, the Yakima Plan representative said “we could not agree more,” and also agreed with our objections about process. Indeed, the supporters’ submission of written materials included their recent “rebuttal” article in the Water Report, a journal on water

law in the west, in which they said nothing about their NRA Proposal, even though they had been criticized for it in the prior article they were supposedly rebutting.

Although their letter to the Forest Service is a positive step by the Plan proponents, the NRAs are still a bad idea, and we do need to continue opposing the NRA Proposal. Because it does not require State funding, the NRA Proposal received very little attention in the State Legislature’s processing of the Yakima Plan. Because it is not a water project, the NRA Proposal is not subject to the cost-benefit analysis described above as required for major water project components in the Plan. The NRA proposal is still part of the Yakima Plan, so we need to continue opposing the Yakima Plan itself.

### Don’t support the March 2012 Yakima Plan

Especially since the proponents themselves are now backing away from the bad parts of the current March 2012 EIS version of the Plan, there is no reason to support it; the March 2012 version is not the one that will get federally funded and built. Despite the State appropriation of over \$100 million for “early action items,” our Congressional delegation is not rushing to seek federal appropriation of the remaining \$4.9 billion of the \$5 billion price tag. Parties who withhold support for the Plan (i.e., parties who oppose it or are neutral) have more leverage to improve the Plan than parties who have already promised to support the old version.

Although as of late September the Seattle news media had yet to begin covering the Yakima Plan controversy, in August and September the *Everett Herald* newspaper published an editorial, an op-ed from Plan supporters, and an op-ed from Plan opponents (see page 21). Remarkably, the Plan proponents’ op-ed did not mention Bumping Lake, did not mention Wymer, did not mention the proposed NRAs – in other words, the proponents’ story omitted the biggest, most expensive and most controversial parts of their Plan. Their sales technique is interesting, to say the least.

The Yakima Plan is the largest project in Washington State since WPPSS. It is highly significant and highly controversial. A large volume of information is available at the Sierra Club website on the Yakima Plan:

[www.washington.sierraclub.org/uppercol/ucr/yakima/water\\_overview.html](http://www.washington.sierraclub.org/uppercol/ucr/yakima/water_overview.html)

### What you can do:

Send Governor Inslee a strong message:

- Support water conservation and water banking in the Yakima basin.
- Oppose new money-losing dams in the Yakima Basin.
- Oppose new off-road vehicle designations in the Okanogan-Wenatchee National Forest outside of the existing National Forest planning process.
- Support Wilderness protection for roadless areas in the Yakima Basin, including the ancient forest surrounding the existing Bumping Lake.

Comments may be sent through the following website:

[www.governor.wa.gov/contact/default.asp](http://www.governor.wa.gov/contact/default.asp)

# State purchase of Teanaway lands raises disturbing questions

By Rick McGuire



**T**he Washington legislature has approved funding for the public purchase of approximately 50,000 acres of land from American Forest Holdings LLC\* in the lower Teanaway watershed near CleElum. The price paid for these lands, once owned by Boise Cascade, is almost 100 million dollars.

While NCCC is a big supporter of public land acquisitions in general, this purchase has raised a number of disturbing questions for NCCC and many other conservation groups.

This purchase is a central part of the “Yakima Integrated Plan,” an effort to provide more water to Yakima valley irrigators. Although there is nothing in the legislative language describing it as such, the Teanaway purchase is a clear political quid pro quo for the destruction of well

over a thousand acres of ancient forests for a new dam at Bumping Lake in the South Cascades east of Mt. Rainier.

Many believe that the tradeoff is a bad deal for the public, and for the cause of forest preservation. Although only a fraction of the acreage of the Teanaway purchase, the ancient forests at Bumping are arguably far more valuable, some of the best remaining in the state. Celebrated by Supreme Court Justice William O. Douglas in *Of Men and Mountains*, the Bumping Lake forests are home to species from both sides of the Cascades. A natural multi-aged mosaic, with some trees over 800 years old, they are all the more rare for growing on mostly flat ground.

Any attempt to nail down a hard number for loss of ancient forests at Bumping does not do justice to the scale of the destruction that a new dam would cause.

*This part of AFLC (now state) lands, also shown on the cover, had its old-growth forest logged decades ago. The second-growth forest seen in the photo survives because of spotted owl circles where state regulation kept more recent cutting at bay. It is perhaps the most scenic part of the acquired lands, and not at all typical of the otherwise heavily logged landscape there. —KARL FORSGAARD PHOTO*

The actual expanded reservoir footprint would be 2800 acres in addition to the 1300 acres occupied by the existing lake. There has been very little logging in the entire Bumping basin, and most of what would be flooded is unlogged, natural forest. As with all virgin forests, it is a mix.

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# State purchase

*Continued from page 15*

Timber magnate John Rudey has two companies referenced in these articles. American Forest Holdings LLC, which owns the land, is the seller. American Forest Land Company (AFLC), which manages the land, is far better known to the public, because it has had a local office and employees and is named on the signs people see on Teanaway roads.

Some places clearly merit being called “cathedral forest.” Other places have smaller trees, and most of the forest is a mix of the two. There is no one single, universally accepted definition of “old growth” or “ancient forest.” But you know it when you see it, and the forests at Bumping have it in plenty.

No one seems to know quite how the forests at Bumping escaped logging. One explanation that seems to ring true is that the Forest Service was reluctant to cross swords with Douglas, who for many years had a retreat at nearby Goose Prairie and loved the place. Just about every other part of the Naches District with trees was roaded and cut, but not Bumping. Whatever the reason, there is nothing else quite like it in the Cascades – a large, spacious valley with a great, sweeping extent of real ancient forest growing on mostly flat land. Expansion of the reservoir would have effects extending well beyond the actual inundation zone. An expanded reservoir will cut the heart out of the Bumping valley, taking the lowest elevation and best forests there. To destroy what many consider to be the finest remaining example of east side Cascade forests, for an expanded reservoir that would seldom even fill, would be tragic.

The newly purchased Teanaway lands could hardly be more different than those around Bumping Lake. Apart from some limited areas that spotted owl regulations kept from being completely cut, the Teanaway lands are among the most heavily logged in the state. Everything of value that could legally be cut has been taken. Supposedly now preserved as a “working forest,” the lands have been so thoroughly worked over that even proponents admit

that there will be nothing to cut for at least 50 years.

The Teanaway lands are to be jointly managed by the state’s Departments of Natural Resources and Fish and Wildlife. Any management activities will be a net drain on state coffers for the next 50 years. Some of the lands are at the dry lower limit of where trees can grow, at the forest/shrub-steppe boundary. Logging has been so severe that trees may never grow back there, with shrublands forming instead.

An alarming part of the deal is the breathtaking \$2000 per acre paid for the Teanaway lands, a price far above what any comparable “understocked timberland” or “stumpland” would fetch on the open market. Although there is some residential development potential on a limited number of choicer sites, the Teanaway price per acre is about eight times what King County paid for the development rights to the Hancock Snoqualmie Tree Farm, which is far more developable and much closer to Seattle.

The comparison between the two purchases is not quite exact, since the Teanaway was a full fee-simple purchase, while the Hancock purchase was for development rights only. But given the denuded state of the Teanaway lands, their value as timberland is not very high, so the comparison is useful, if still perplexing.

Traditionally, the state has picked up logged-out lands for low prices. In years past, many simply reverted to public ownership in lieu of unpaid back taxes. At a time of collapsing roads and bridges and extreme budget stress for the state, the amazing price paid for the Teanaway lands is one of the many credulity-stretching facets of the Yakima Plan. The Plan also calls for the establishment of large National Recreation Areas dedicated to off road vehicles, north of I-90 in the Teanaway (on National Forest lands, not on the lands newly acquired by the State) and south of I-90 in the Manastash area. Both areas are already suffering greatly from ORV impacts, which will multiply if the NRAs are established.

## **Sacrificing your backyard to save mine**

There is also a large question of “sacrificing your backyard to save mine.” Some groups have signed on as supporters of the Yakima Plan because they regard the “benefits,” such as the Teanaway purchase, as falling within their area of concern, while the costs, such as losing the ancient forests at Bumping, are somewhere else.

A little over a decade ago, NCCC was heavily involved in two land exchanges, between the Forest Service and Weyerhaeuser and the Forest Service and Plum Creek Timber. Both exchanges started out with plans to acquire lands mostly near Interstate 90 in exchange for National Forest lands elsewhere.

Many of the National Forest lands proposed for trading away had significant areas of ancient forests. An outcry soon was heard. The town of Randle, Washington, in the Cowlitz valley, was slated to lose scenically forested Watch Mountain, which stands right above the town. Never previously known as a hotbed of conservation, Randle rose up and said heck no, we are not going along with a plan to sacrifice our forests in order to preserve views from I-90. Defenders also rallied to save other forests near Mt. St. Helens and Mt. Rainier from being traded away and cut.

Eventually, almost all of the ancient forests slated to be traded away were removed from greatly slimmed-down land exchanges. If not everyone was happy about the outcomes, at least few were very unhappy. A general consensus seemed to emerge that it really wasn’t right to trade away other people’s backyards in order to save one’s own.

Although the Bumping for Teanaway trade isn’t quite as explicit and has more moving parts, the same questions arise. Some people gain from the Teanaway land acquisition. Property owners in the lower Teanaway will no longer need to worry about other houses in their views. More squares on the map near I-90 will be colored in green, and perhaps someday enough trees will grow back in the Teanaway to make it more attractive for recreation other than hunting or snowmobiling. But can that really be worth trading away the best ancient forests on the east side of the Cascades?

The forests at Bumping are of far greater importance and extent than those that were threatened by the I-90 land exchanges. It may not say it on the label, but everyone knows that the Teanaway purchase was done as a political sweetener to smooth the way for a new dam at Bumping. Is there any reason to celebrate a land acquisition that comes at the cost of sacrificing one of the last and best ancient forests left in the Northwest? Is that any way to run a “conservation” movement, or to protect anyone’s backyard?

Ironically, if the Yakima Plan’s main intended beneficiaries, the agribusi-

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# NCCC, coalition address concerns around proposed Skykomish Geothermal Consent to Lease

A recent letter to the Mt. Baker-Snoqualmie National Forest from 13 conservation organizations, including NCCC, provided comments on the Environmental Assessment (EA) for the proposed Skykomish Geothermal Consent to Lease process. The Bureau of Land Management is seeking to lease these lands for geothermal exploration in the area.

The Skykomish Ranger District is studying the potential impact of allowing leasing of subsurface lands for geothermal exploratory drilling on 12,000 acres of land located in “Wild Sky Country.” Over the last decade, this area has received strong, diverse support for the permanent protection of its old-growth and mature forests, preservation of world-class recreational opportunities, and river and watershed restoration.

While developing renewable energy sources like geothermal energy is important, NCCC and the other groups want to ensure that exploratory drilling does not threaten hard-fought protections for wild rivers, fish and wildlife habitat and clean and safe drinking water. The letter to the Mt. Baker-Snoqualmie Forest acknowledges that several stipula-

tions identified in the action alternative were initially raised by the 13 conservation groups in August 2012 in response to the scoping comments, including recognition of the importance of—

- the Wild Sky Wilderness
- recreational opportunities
- riparian areas, including potential Wild & Scenic Rivers
- habitat and migration corridors.

The letter also outlines several issues the EA failed to address. While the EA recommends a No Surface Occupancy stipulation (NSO) for Late Successional Reserves (LSR) greater than 80 years old and totaling 5,036 acres, the letter recommends that all LSRs should receive a NSO stipulation, regardless of their age. The letter also points out that it was not clear whether the EA had taken into account the value of viewsheds in the area, and did not seem to have recommended restrictions on use in these areas.

Next, the letter points out that the EA assumes equal geothermal potential for all land in the study which, based on the results of experimental drilling by the

Snohomish Public Utilities District, might not be the case. Additionally, while the Wild Sky Wilderness is not included in the geothermal leasing proposal, the letter recommends that directional drilling underneath the Wild Sky Wilderness also be expressly prohibited. Finally, the letter asks the agency to stipulate that all access for drilling shall take place using existing open roads, with drill pads either on existing road or immediately adjacent to it to minimize impacts.

The Environmental Assessment is the second opportunity for public comment on the possibility of allowing the BLM to lease these lands for geothermal exploration in this area. Last August, these organizations submitted scoping comments on the project advised the Forest Service on which issues to study in the EA. This July 26 letter responded to the recently released EA. NCCC and the other organizations will continue to monitor this project as it moves forward.

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## State purchase *Continued from page 16*

ness operations of the Yakima valley, get their new dam at Bumping, they are still unlikely to ever actually see their water allocations increased by much. The watershed above Bumping Lake is neither large enough nor rainy enough to justify a bigger dam. That’s why the dam there now is the size that it is. An expanded reservoir would not reliably fill. Even the Bureau of Reclamation, never known for underestimating the “benefits” of projects, has twice rejected the idea.

The one thing that would actually make a difference—meaningful and effective water conservation and marketing—is not to be found in the Yakima Plan, which pays only the barest lip service to the idea. The Plan seems designed to lock in the

current outdated and wasteful practices. Much of the water delivered in the Kittitas and Yakima valleys goes to low-value crops. Any sensible plan would allow and encourage growers of high value-added crops to bid on and pay a fair price for water, putting it to far better use than it is now.

But instead of taking steps that might actually increase food security and prepare for changing climates, the Yakima Plan simply encourages yet more of the colossal waste that is longstanding practice in the Yakima valley. Water will continue to be delivered for next to nothing to operations that value it accordingly, spraying it around wastefully to evaporate or simply blow away. The taxpayers will be expected

to continue picking up the bills for all of this. Irreplaceable ancient forests will be sacrificed. Crazy pumped storage schemes, defying every law of physics, economics and common sense, may be built. All this, just to allow business as usual to carry on in the Yakima valley for a few more years. If things stay on their present course, they don’t look to end well.

Yakima Plan coverage continues on page 21 with an editorial from the *Everett Herald*.

# New dams aren't the way to address water needs

By Chris Maykut, Brock Evans and Estella Leopold

*NCCC helped draft this Everett Herald piece about the Yakima Plan, published September 22, 2013*

*"In arid regions we attempt to offset the process of wastage by reclamation, but it is only too evident that the prospective longevity of reclamation projects is often short. In our own West, the best of them may not last a century."*

— Aldo Leopold, writing on "The Land Ethic" in "A Sand County Almanac"

The *Everett Herald* recently published a guest column by supporters of the Yakima Water Plan ("*Yakima Basin water plan benefits farmers and fish*," September 15, 2013). While the Yakima Water Plan has good elements — improving Yakima River salmon passage and some wilderness protections — the costs are too high.

The Yakima Water Plan proposes two new irrigation dams (Bumping Lake and Wymer) costing taxpayers billions and destroying places precious to people and wildlife. The Bumping Lake dam would drown magnificent ancient forests adjacent to the William O. Douglas Wilderness -- comparable to the Olympic's Hoh River Valley. The Wymer dam would drown sage grouse shrub-steppe habitat.

How did we get to this point? Weren't we just recently celebrating the removal of the Elwha dams?

First, dam proposals are the "undead." They never die. New Yakima Basin irrigation dams have been cussed and discussed for decades — but never built.

Under scrutiny, dam construction and maintenance are money-losers for taxpayers. Indeed, the 2012 Green Scissors report on wasteful and damaging federal projects includes both proposed Yakima dams.

Nationwide, dams and other infrastructure are largely built out — many deteriorating and in disrepair, as reported in October by the National Research Council. We can't afford existing dams, let alone new ones. New Yakima dams would merely "kick the can down the road." Water would go unused except in water-short

years — at first. But irrigation expands to use available water. Then we'll need another dam, and another.

Crops are water — and when we export such crops as hay for Japanese racehorses, we are exporting our most precious natural resource: Washington's water.

The costs of water delivery from new storage projects would be mostly borne by taxpayers, and by salmon and other wildlife that depend on these same waters, not by the irrigation districts that would benefit.

There are better, less costly ways to remedy the imbalance between water demand and limited water supply. Here are some:

- Yakima irrigators have not paid for the costs of the existing five federal dams. Market forces need to play a greater role to curb water waste.
- Rather than taxpayers spending billions, water conservation in the Yakima should be mandatory, not optional.
- Large volumes of federal water-project-grown hay are exported to Japan for racehorses. In a water-scarce basin, appropriate crop selection is essential.
- Canals and ditches need to be lined and piped to stop wasting precious water.

Finally, a word about ethics and public participation. From the start, the Bureau of Reclamation and the Department of Ecology manipulated the process and participants to achieve their desired outcome: new dams. "Anything to achieve an end" may expediently get to pouring concrete -- but it breaches trust and corrodes institutions.

Behind-closed-doors dealings help explain the Yakima Plan's provisions.

The Plan would have Congress forever constrain the Forest Service's ability to manage wildlife habitat and watershed in the Teanaway and Manastash-Taneum basins within the Okanogan-Wenatchee National Forest by designating 41,000 acres of our National Forest lands for "back-country motorized" National Recreation Areas (NRAs) degrading headwater habitat

with increased motorcycles on trails and snowmobiles cross-country.

The public had 45 days to comment on the agencies' draft Yakima Plan — until Jan. 3, 2012. One day later, on Jan. 4, Plan proponents revealed the motorized NRA provision, and later added it to the Plan. Not even Forest Service staff of the Cle Elum Ranger District was consulted. Now the Plan supporters are backing away from the proposal for NRAs, saying they will "defer" it until after the current Forest Plan process — but the proposal for NRAs is still in the Yakima Water Plan.

Because of all these substantive and procedural flaws, more than thirty conservation organizations have refused to support the Yakima Plan, its dams and its proposed NRAs, including the Sierra Club, Audubon, The Mountaineers, the Washington Environmental Council, Friends of Bumping Lake, Washington Wild, ALPS, the North Cascades Conservation Council, the Endangered Species Coalition and the Federation of Western Outdoor Clubs. Many of them testified in the state Legislature's hearings this year.

We need a new ethic for the lands and waters — for the Yakima, and far beyond. We cannot dam our way out of climate change and water shortages. Bumping Lake and the Wymer site (between Ellensburg and Yakima) are now threatened with destruction by new irrigation dams. You can help. Together we need to wave a big red stop sign at the Yakima Plan: STOP new dams and STOP water waste in the Yakima Basin.

The Yakima Plan does not deserve the support of elected officials, state and federal resource agencies, or any conservation organization. It does deserve more scrutiny by the *Everett Herald*. A lot more.

*Chris Maykut is a Seattle restaurateur who leads Friends of Bumping Lake. Brock Evans is President of Endangered Species Coalition, and served for many years as the Sierra Club's Northwest Regional Director. In 1972, he received the Washington Environmental Council's "Environmentalist of the Year" Award, the first time the award was given. Estella Leopold, youngest daughter of Aldo Leopold, is a paleobotanist who has worked to protect forests and waters of the Pacific Northwest.*