

May 26, 2014

The Honorable Patty Murray
United States Senate
Washington, D.C.

RE: Yakima Plan – fish passage funding

Dear Senator Murray:

As you consider suggestions for federal contributions for the Yakima Basin, we want to provide you with our perspective on this complex set of issues as well as our strong support for funding fish passage while amending the troubling elements of the controversial Yakima Basin Integrated Plan (YBIP). The Yakima Basin is a huge and complex ecosystem. It has high natural values –forest, wildlife, rivers, sagebrush, mountains and canyons. The Yakima Basin also boasts a very productive agriculture economy, huge potential for salmon recovery, the rich traditions of the Yakama Nation, and opportunities for many forms of recreation as potential economic development. We believe that affordable solutions exist for meeting demands for water –both for fish and farmers—in the Yakima Basin that would respect the ecosystems, communities, and economic engines of the region and move to a more sustainable irrigation model.

Sierra Club supports fish passage in line with the Yakama Nation's vision of restoring the great salmon runs of central Washington. The Bureau of Reclamation dams in the Yakima Basin have blocked fish passage since their construction in the early 1900s. We ask that you fund the completion of the Cle Elum fish passage along with moving towards fish passage at Keechelus and/or above the Tieton/Rimrock over the next decade. Returning salmon and steelhead runs to the Tieton River would be a huge ecological step for the entire region. Of course all fish passage construction should be shown to have a very high likelihood of fish passage effectiveness through the pre-construction planning process.

As you know, we are strongly opposed to any Bumping Lake enlargement. The destruction of 2,000 acres of native forest, including spectacular groves of ancient forest and critical habitat for northern spotted owls and bull trout, is an unmitigatable impact for the region. The Bumping Lake forest is a rare treasure on the east slopes of the Cascades and the groves of giant Douglas firs are marvelous destinations for the many hikers along the lakeside trail. Sierra Club has proposed that the existing National Forest roadless area around Bumping Lake be added to the adjacent William O. Douglas Wilderness.

Fish need water; we support the Yakama Nation in their goal to restore the salmon runs, and adequate in-stream flows are essential to achieve salmon recovery. We believe that an expanded emphasis on water conservation will be a huge boon to the Yakama Nation's salmon efforts and should be highlighted as a major component of any early action plan. We want to help farmers and orchardists in achieving the highest level of conservation possible. We recommend an additional \$85 million for water conservation and education within the first 10 year phase of Federal funding for the YBIP. The calculation for water conservation under the integrated plan should be additional water conservation above the funding included in the current YRBWEP to secure 10 million acre-feet of conserved water per year over the next decade. Water conservation "hard" targets and timelines should be adopted in the Yakima River Basin to

ensure improved water efficiencies. Currently, the Yakima Basin lacks hard targets for mandatory municipal and irrigation water conservation. Conservation and other demand-supply strategies should be pursued before turning to costly and environmentally destructive water projects, including new dams. The Yakima Valley's irrigation of urban green lawns during August does not indicate a responsible sharing of water conservation

We believe that in the face of climate change, we need strategies such as aggressive water conservation, adoption of water efficiency standards and metering, water markets, low-impact storage projects (e.g., aquifer storage and recovery), forest and flood-plain restoration, and other strategies to promote natural storage. These strategies are much more cost-effective than new dams, and could vastly improve the efficiency of water use in Washington State. The historic, massive hydrologic re-engineering of Washington's rivers using dams and irrigation projects has caused historic environmental damage. We strongly urge decision-makers to focus on future water projects that fix existing problems, not cause new ones.

We support inclusion of several rivers within the Yakima Basin in the National Wild & Scenic Rivers System. Among these are the Cle Elum River and its major tributaries the Wapatus and Cooper Rivers. Also the three forks of the Teanaway within the National Forest should be included. We also believe a study of the segments of these rivers in the new Teanaway Community Forest would demonstrate their eligibility for protection under the national system.

The Bureau of Reclamation and Department of Ecology are also preparing environmental impact statements and State Legislation-mandated cost-benefit analyses on three projects: Kachess inactive storage, Keechelus-to-Kachess Pipeline, and the Cle Elum Pool Raise. We strongly urge that Congress wait until the conclusion of the NEPA process and state-mandated cost-benefit analysis in order to determine if these projects have merit and include a strong water user cost-share, avoid impacts to bull trout, and focus on normalizing flows in the upper Yakima River. Additional surface water storage via Wymer Dam (on Lmuma Creek) or Bumping Dam enlargement is neither prudent nor necessary: the proposed dams are incredibly expensive, there is continuing skepticism about their ability to refill in consecutive drought years, and they generate substantial adverse impacts to the native ecosystems and endangered species habitat.

In the headwaters of the Teanaway and Cle Elum Rivers are National Forest roadless areas that not only provide the best source of clean, cold water, but security habitat for wary wildlife with magnificent forests and meadows to roam. In 2000, you recognized these values for the Cle Elum and Keechelus headwaters, by including the Alpine Lakes Wilderness Study Area (WSA) as part of the Plum Creek land exchange bill. The U.S. Forest Service (USFS) recommended 11,000 acres for Wilderness during that study. As part of the Forest Plan revision, USFS recommended an additional 10,000 acres in their proposed action two years ago. We believe there are another 50,000 acres in the Teanaway that deserve and need Wilderness protection. That proposal has been sent to USFS, and they will incorporate it in one of the alternatives in the Forest Plan Draft EIS due out in Summer 2014. We hope to see these Wilderness additions become a reality someday, but in the interim, this plan should do nothing to make these roadless lands unsuitable for Wilderness or frustrate efforts to achieve that protection. The National Recreation Area proposed by the YBIP report would emphasize motorized off-road recreation for these National Forest wildlands, in total opposition to the Wilderness proposals that Sierra Club and others have

supported for over 40 years. The proposal for NRAs promoting off-road vehicles has been temporarily deferred during the National Forest Plan Revision process, but it remains a troubling component of the Yakima Plan, opposed by dozens of local, state, regional and national environmental and conservation organizations.

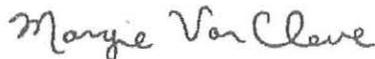
Land acquisition and conservation is also a key element of the plan. We fully support the acquisition of lands in the Little Naches watershed, along Manastash Ridge, and around I-90 west of Easton. We recommend an additional \$75 million for watershed protection and restoration within this phase of Federal funding for the YBIP.

As noted above, protection of the watershed through the preservation of forests and natural sagebrush, rather than the proliferation of exurban sprawl and ranchette development, is a critical component of YBIP and one we strongly support. The state's recent acquisition of the lower Teanaway valley was a great conservation accomplishment. A planning process through the state Department of Natural Resources and state Department of Fish & Wildlife, the two agencies given co-management responsibility, is underway to determine how logging and grazing can co-exist with recreation.

In closing, Sierra Club does support funding for fish passage to help restore salmon to the Yakima River Basin. However, we do not support the overall Yakima Plan as proposed, and we remain opposed to funding for expansion of Bumping Lake and Wymer dams. The public is awaiting results of a cost-benefit study of these two storage projects, mandated by 2013 state legislation. The public and decision-makers deserve to know the full economic and environmental consequences of funding these types of storage projects.

Thank you for your commitment and hard work on behalf of our environment. We would welcome an opportunity to discuss the Yakima Basin plan further with you.

Sincerely,



Margie Van Cleve
Washington State Chapter Chair
Sierra Club

