

## Washington State Chapter

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#### TESTIMONY OF THE SIERRA CLUB

to the Energy and Natural Resources Committee
U.S. Senate
Washington, D.C.
On S. 1694

July 7, 2015

Madam Chair and Members of the Committee:

Thank you for the opportunity for the Sierra Club to provide comments on S. 1694. This bill concerns the Yakima River Basin Integrated Plan (Yakima Plan) in Washington State.

The Sierra Club has been involved with and provided comments to the Yakima Workgroup since the formation of the Yakima Workgroup in 2009. We are opposed to passage of S. 1694, as written. Specifically, our objections can be categorized into the following five areas with relevant concerns noted. We have also drafted recommended changes to the bill that address these concerns:

## 1. Yakima Plan and National Environmental Policy Act (NEPA) Final Programmatic Environmental Impact Statement

The bill defines the "Management Plan" as the plan described in the document entitled "Final Programmatic Environmental Impact Statement and Integrated Water Resource Management Plan, Yakima River Basin, Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, WA." (2012 FPEIS). The bill should not reference or incorporate the 2012 FPEIS because the 2012 FPEIS did not include a range of alternatives as required by NEPA. 40 CFR Sec. 1502.14. Instead the bill should reference the 2011 Workgroup Yakima Plan document.<sup>1</sup>

1

http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/plan/integratedplan.pdf

http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/2012meetings/2012 01-04/wtrlandssubfinal.pdf

The Yakima Plan, as defined in the 2012 FPEIS, includes projects which are environmentally damaging and not cost effective such as a proposed new Bumping Lake Dam that would destroy ancient forest and endangered species habitat. The 2012 Plan also includes the proposed Wymer Dam that would flood sage grouse habitat and is also not cost effective.

It is requested that Congress require these projects be "cost effective measures" rather than "maximizing benefits." In 2013, the Washington State Legislature was so skeptical of the 2012 Yakima Plan that they required an independent analysis of the benefits and costs by the Congressionally-established State of Washington Water Resource Center (WRC). The WRC's benefit-cost analysis of the Yakima Integrated Plan Project, released in 2014, found that "When implemented together as part of the IP, the major water storage projects as a group do not pass a B-C [benefit-cost] test."

(http://swwrc.wsu.edu/documents/2014/12/ybip\_bca\_swwrc\_dec2014.pdf)

We suggest these revisions to the bill which address the problems mentioned above:

#### 1.1 Authorization of the full Yakima Plan:

## **Page 4** (8) Lines 13-18 state:

"(8) to authorize and implement the Yakima River Basin Integrated Water Resources Management Plan as Phase III of the Yakima River Basin Water Enhancement Project, in a balanced approach to maximize benefits to the communities and environment in the Basin."

#### Amend to:

## Page 4 (8) Lines 13-18:

"(8) to authorize projects listed in new Section 1214(a)(2)(A) that are cost effective to provide benefits to the communities and environment in the Basin."

#### 1.2 Adoption of a flawed NEPA 2012 FPEIS:

### Page 5 (3) Lines 10-17 state:

"(8) Management Plan – The term 'Management Plan' means the plan described in the document entitled, 'Final Programmatic Environmental Impact Statement and Integrated Water Resource Management Plan, Yakima River Basin, Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, WA' (77 Fed. Reg. 12076 (February 28, 2012)).

#### Amend to:

## Page 5 (3) Lines 10-17:

"(8) Management Plan – The term 'Management Plan' means the Yakima River Basin Study (Yakima Plan) (08CA10677A ID/IQ) (April 2011), as amended by the Watershed Land Conservation Proposal (January 2012).

## 1.3 Authorization of Phase III as part of the Yakima Plan:

#### **Page 7 (3) Lines 3-16 state:**

"(18) Yakima Enhancement Project, Yakima River Basin Water Enhancement Project

— The Terms 'Yakima Enhancement Project' and Yakima River Basin Water

Enhancement Project' mean the Yakima River basin water enhancement project

authorized by Congress pursuant to this Act and other Acts. . . . . "

#### Amend to:

#### Page 7 (3) Lines 3-16:

"(18) Yakima Enhancement Project, Yakima River Basin Water Enhancement Project

— The Terms 'Yakima Enhancement Project' and Yakima River Basin Water

Enhancement Project' mean the Yakima River Basin Water Enhancement Project

authorized by Congress listed in new Section 1214(a)(2)(A) that are cost effective

pursuant to this Act and other Acts. . ."

## 1.4 Implementation of the full Yakima Plan in its entirety:

## Page 23 Sec. 1214(a)(1) Lines 21-23 state:

"(1) In General – It is the intent of Congress that the Management Plan shall be implemented in its entirety, in accordance with applicable laws."

#### Strikeout:

#### Page 23 Sec. 1214(a)(1) Lines 21-23

"(1) In General—It is the intent of Congress that the Management Plan shall be implemented in its entirety, in accordance with applicable laws."

#### 2. New National Recreation Areas on National Forest lands

The process used to include National Recreation Areas (NRAs) called out in the 2012 FPEIS was deeply flawed. The Yakima Workgroup added a new proposal for two NRAs within the Okanogan-Wenatchee National Forest after the close of the public period on the Draft Programmatic Environmental Impact Statement (DPEIS). As proposed, the Yakima NRAs are highly deficient because 41,000 acres are dedicated damaging off-road vehicle (ORV) per the FPEIS. Additionally, an NRA boundary included in the FPEIS overlays part of the existing Alpine Lakes Wilderness.

Because this element of the Yakima Plan was adopted after the close of public comment period of the DPEIS, we request this element be deleted from the Yakima Plan.

Decisions on establishing new NRAs in the Okanogan-Wenatchee National Forest are best made after the Okanogan-Wenatchee National Forest completes its forest planning processes. These processes are now in work.

We suggest this bill revision to address the problems mentioned above:

## 2.1 Delete the Okanogan-Wenatchee National Forest NRAs from the Yakima Plan: Add a new (E) on Page 27, after line 8:

"The Yakima Plan's designations for new National Recreation Areas (NRAs) within the Okanogan-Wenatchee National Forest with 41,000 acres of dedicated off-road vehicle use shall be deleted from the Yakima Plan. Any new NRA proposals shall be evaluated as part of the Okanogan-Wenatchee National Forest Plan revision process and Travel Management process."

#### 3. Federal Advisory Committee Act and Public Participation

The Bureau of Reclamation (Bureau) has skirted the Federal Advisory Committee Act (FACA) by establishing the Yakima Workgroup as an advisory group without a FACA charter and now asks Congress to continue to insulate the Yakima Workgroup from FACA. In the interests of good open government, as well as facilitating communication with Yakima Valley residents, we believe the Workgroup and all subcommittees of the Workgroup should be subject to FACA. In addition, the Secretary should not be able to add any projects to the Intermediate and Final Development Phases without public participation and comment.

We suggest these bill revisions to address the problems mentioned above:

#### 3.1 FACA

## Page 6 (4) Lines 23-24 state the Workgroup:

"(C) is not subject to the Federal Advisory Committee Act (5 U.S.C. App.)";

#### Amend to:

## Page 6 (4) Lines 23-24 state the Workgroup:

"(C) is subject to the Federal Advisory Committee Act (5 U.S.C. App.)":

## 3.2 Intermediate and Final Phases

## Page 26 (3), lines 8-16 state:

"(A) In general. — During the Intermediate and Final Development Phases of the Management Plan, any project that is determined by the Secretary, in consultation with the State of Washington and Work Group, to be appropriate to meet the obligations of the Management Plan shall be designed and constructed, subject to authorization and appropriation."

#### Amend to:

#### Page 26 (3), lines 8-16:

"(A) In general. - Any project proposed by the Yakima Workgroup for Federal funding beyond the Initial Development Phase shall be subject to a 90-day public comment prior to a review by the Bureau. No additional project beyond the Initial Development Phase shall be authorized or funds appropriated, without National Environmental Policy Act compliance.

# 4. Kachess Drought Relief Pumping Plant Project and Keechelus to Kachess Conveyance Project

The Bureau is asking this Committee to authorize the Secretary to negotiate long-term agreements with participating proratable irrigation entities for the non-Federal financing, construction, operation, and maintenance of the Kachess Drought Relief Pumping Plant Project and Keechelus to Kachess Conveyance Projects. However, these sections do not prohibit continued Federal funding of design or feasibility studies of these projects. In addition, the Bureau has not completed reviewing comments on the Draft Environmental Impact Statement for the Kachess Drought Relief Pumping Plant or Keechelus to Kachess Conveyance projects or issued a Final Environmental Impact Statement.

We suggest this bill revision to address the problems mentioned above:

## 4.1 Proratable irrigation entities

Amend to:

## Add a New (C) on page 26, beginning Line 8 as follows:

"(C) Other than NEPA compliance, no Federal funds shall be spent on the design or feasibility studies of inactive storage in Lake Kachess and a conveyance system to allow transfer of water between Lake Keechelus to Lake Kachess as set out in Sec. 2014 (a)(2)(A) (ii)(I) and (II). If non-Federal financing, construction, operation, and maintenance of these projects are carried out, the participating proratable irrigation entities in the Yakima Basin shall reimburse the Federal government for all Federal planning and study funds expended on these projects. Nothing in this Act shall circumvent the National Environmental Policy Act."

#### 5. Yakima Plan Discretion

S. 1694 contains sections with ambiguous language and discretion. For example, Sec. 1213 authorizes the Secretary to make grants to irrigation districts to carry out this title. Section 1215 appears to reinforce a long-term bias of putting water supply for other purposes rather than benefiting fish. Since the purpose of the Yakima Plan is to benefit both fish and downstream uses, this section is a step back from that approach.

We suggest these bill revisions to address the problems mentioned above:

#### 5.1 Phase III Grants

## Page 22 Sec. 1213 Lines 15-21 state:

"The Secretary may make grants or enter into cooperative agreements with the Yakama Nation, the State of Washington, Yakima River basin irrigation districts, water districts, conservation districts, other local governmental entities, nonprofit organizations, and land owners to carry out this title under such terms and conditions as the Secretary may require including the following purposes:

#### Amend to:

#### Page 22 Sec. 1213 Lines 15-21:

"The Secretary may make grants or enter into cooperative agreements with the Yakama Nation, the State of Washington, Yakima River basin irrigation districts, water districts, conservation districts, other local governmental entities, nonprofit organizations, and land owners under such terms and conditions as the Secretary may require for the following purposes:"

## 5.2 Feasibility Contingency

## **Page 27 (D), lines 3-5 state:**

"(D) Feasibility contingency – The Intermediate and Final Development Phases of the Management Plan shall be contingent on feasibility, as determined by the Secretary, in consultation with the Workgroup and in compliance with applicable laws."

#### Amend to:

## Page 27(D), lines 3-5:

"(D) Feasibility contingency – The Intermediate and Final Development Phases of the Management Plan shall be contingent on feasibility, cost-effectiveness, and a positive benefit-cost ratio."

### 5.3 Operational Control of Water Supplies

## Page 36, lines 19 -24 and page 37, lines 1-2 state:

"Section 1215. Operational Control of Water Supplies

The Secretary shall retain authority and discretion over the management of project supplies to obtain maximum operational use and flexibility to meet all appropriated and adjudicated water rights. That authority and discretion includes the ability of the United States to store, deliver, conserve and reuse water supplies deriving from projects authorized under this title."

#### Strikeout:

#### Page 36, lines 19-24 and page 37, lines 1-2:

"Section 1215. Operational Control of Water Supplies

The Secretary shall retain authority and discretion over the management of project supplies to obtain maximum operational use and flexibility to meet all appropriated and adjudicated water rights. That authority and discretion includes the ability of the United States to store, deliver, conserve and reuse water supplies deriving from projects authorized under this title."

## **Summary**

In conclusion, the Sierra Club remains concerned that:

- S. 1694 sets out the intent of Congress "that the Management Plan shall be implemented in its entirety";"
- That it seeks to create NRAs that were added after closure of the public comment period with a boundary that overlays part of existing Alpine Lake Wilderness;
- That it exempts the Yakima Workgroup from the Federal Advisory Committee Act;
- That it accepts a flawed 2012 Yakima Plan Final Programmatic EIS that failed to consider a range of alternatives;
- That it seeks to proceed with the Kachess Drought Relief Pumping Plant and Keechelus-to-Kachess Conveyance projects prior to a final EIS;
- And that has not incorporated benefit-cost analysis that would protect the Federal taxpayer.

The Sierra Club has provided comments to the Yakima Workgroup since its formation in 2009 and has a lengthy record of correspondence with the Workgroup, the Bureau of Reclamation, and various elected officials concerning this project. A listing of this correspondence can be found in Appendix A.

We also request that the attached Sierra Club's letters to Senator Murray, dated May 26, 2014, and April 27, 2015, be included in the hearing record.

Thank you for the opportunity to provide these comments.

Signed:

Margie Van Cleve

Washington State Chapter Chair

Margie Von Cleve

Sierra Club

APPENDIX A - Sierra Club Statements to the Yakima Workgroup and comments on the DPEIS:

- Comments of the Sierra Club, January 15, 2009, on the Yakima River Basin Integrated Water Resource Management Alternative Supplemental Draft Environmental Impact Statement reasserting its support of water conservation measures and opposition to new storage projects. We requested that conservation measures should be implemented before there is any further study or action on new water storage projects. In the face of climate change, 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 are much more cost-effective than new dams, and could vastly improve the efficiency of water use in Washington State.
- Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2009 Work Group July 15, 2009, in which the Sierra Club raised concerns that the membership established by the Bureau and Ecology does not meet basic requirements for public participation and that nothing to date has demonstrated that additional dams in the Yakima River Basin are either-cost-effective or environmentally acceptable.
- Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2009 Work Group Discussion Draft Integrated Package, November 9, 2009, in which the Sierra Club reaffirms its opposition to an expanded Bumping Lake Dam and support of water conservation measures.
- Statement of the Sierra Club to the Yakima River Basin Water Enhancement Project Work Group July 28, 2010, in which the Sierra Club supports conserving land in the Teanaway River watershed, but not as mitigation for an expanded Bumping Lake Dam or Wymer Dam.
- Comments of the Sierra Club on the Workgroup Agreement to Support Final Integrated Water Resource Management Plan, December 17, 2010, in which the Sierra Club raised specific concerns about the "Integrated Plan" and the Workgroup planning process.



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 Waptus 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

Margie Van Cleve

Sierra Club



April 27, 2015

The Honorable Patty Murray United States Senate Washington, D.C. 20510

RE: Yakima Plan - Federal Funding Concerns

Dear Senator Murray:

Thank you very much for your efforts in Congress to add 22,000 acres to the Alpine Lakes Wilderness in the Snoqualmie watershed, as well as Wild and Scenic River designations for the Middle Fork Snoqualmie and Pratt Rivers.

On May 26, 2014, Sierra Club sent you a letter (attached) conveying our support for federal fish passage and water conservation funding in the Yakima River Basin. We noted that, "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 funding for fish passage to help restore salmon to the Yakima River Basin. However, we do not support the current Yakima Plan, particularly because it funds the destruction of ESA critical habitat for Northern spotted owls and bull trout through expansion of Bumping Lake as well as destruction of important sage-grouse habitat through construction of Wymer Dam. The Water Research Center (WRC) report required by the State Legislature now confirms that a new Bumping Lake dam would return only 18 cents for every dollar spent, and the proposed Wymer dam would return only 9 cents for every dollar spent.

WRC Report, pages iii and iv.

http://swwrc.wsu.edu/documents/2014/12/ybip bca swwrc dec2014.pdf

We are currently reviewing the DEIS for the Keechelus-Kachess portion of the Yakima Plan. Initially we have our concerns: according to the DEIS, "Bull trout will be adversely affected [in Keechelus tributaries] for approximately 115 days in 81 percent of years." The DEIS also acknowledges that bull trout passage between Box Canyon Creek and Kachess Reservoir will be impeded due to habitat destruction (reduction of water flow) with resultant decline in population. We are concerned about loss of bull trout, which are protected by the Endangered Species Act. Additionally, the cost-benefit ratio for this portion of the plan is similarly low and given the potential environmental issues, causes us to further question whether this is appropriate stewardship of the public's resources.

Sierra Club continues to support fish passage in line with the Yakama Nation's vision of restoring the great salmon runs of central Washington. We continue to 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. We request that you 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 Waptus and Cooper Rivers. Also, the three forks of the Teanaway within the National Forest should be included.

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 efficiencies within the first 10-year phase of Federal funding for the Yakima Plan. The calculation for water conservation under the integrated plan should be additional water conservation above the funding included in the current Yakima Plan 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. Conservation and other demand-supply strategies should be pursued before turning to costly and environmentally destructive water projects such as new or expanded dams.

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 your office.

Sincerely,

Margie Van Cleve

Washington State Chapter Chair

Morgie Van Cleve

Sierra Club