

Scoping Summary Report – Yakima River Basin Integrated Water Resource Management Plan

PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Yakima Project, Washington Pacific Northwest Region



U.S. Department of the Interior Bureau of Reclamation Pacific Northwest Region Columbia-Cascades Area Office



Washington State Department of Ecology Office of Columbia River

Mission Statements

The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

The mission of the Department of Ecology is to protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations.

Scoping Summary

The Proposed Project

The Bureau of Reclamation and the Washington State Department of Ecology are joint leads in preparing a programmatic environmental impact statement (PEIS) on the Yakima River Basin Water Enhancement Project (YRBWEP) Integrated Water Resource Management Plan (Integrated Plan).

Purpose and Need for Action

The purposes of the proposed action are to implement a comprehensive program of water resource and habitat improvements in response to existing and forecast needs of the Yakima River basin, and to develop an adaptive approach for implementing these initiatives and for long-term management of basin water supplies that contributes to the vitality of the regional economy and sustains the health of the riverine environment. The proposed action is needed for the following reasons:

- Demand for irrigation water cannot always be met in years with belowaverage runoff, leading to reduced (prorationed) irrigation water for junior water rights holders in drought years.
- Demand for municipal and domestic water supplies is difficult to meet. Water rights in the basin are fully appropriated, making it difficult to acquire water rights to meet future municipal and domestic water demand. Pumping groundwater for irrigation and municipal uses may reduce surface water flows in some locations, which may affect existing water rights. The potential for hydraulic continuity between groundwater and surface water in the basin creates uncertainty over the status of groundwater rights and exempt wells within the basin's appropriative water rights system (first in time, first in right), potentially making groundwater use junior to nearly all surface water use.
- Anadromous and resident fish populations are seriously depleted from historic levels. Dams and other obstructions block fish passage to upstream tributaries and spawning grounds. Riparian habitat and floodplain functions have been degraded by past and present land use practices. Streamflows have been altered by irrigation operations, resulting in flows at certain times of the year that are too high in some reaches and too low in others to provide good fish habitat.

• Climate change projections indicate that there will be less runoff available from reservoirs, increasing the need for prorationing and reducing flows for fish.

Proposed Action

Reclamation and Ecology propose to implement an integrated water resource management plan in the Yakima River basin as part of the Yakima River Basin Water Enhancement Project to improve water supply reliability during drought years to 70 percent of proratable supply for participating irrigation districts; improve the ability of water managers to respond and adapt to potential effects of climate change; provide opportunities for comprehensive ecological restoration and enhancement addressing instream flows, aquatic habitat, and fish passage; provide economic stimulus to the Yakima River basin that will benefit the larger Central Washington area; and develop a comprehensive approach for efficient management of water supplies for irrigated agriculture, municipal and domestic uses, and power generation.

Scoping Process

This report summarizes the comments received during four public scoping meetings held jointly by Reclamation and Ecology for the Integrated Plan PEIS. Both Reclamation and Ecology sought comments from the interested public, including individuals, organizations, and government agencies. The process of seeking comments and public information is called "scoping." Scoping is a term used for an early and open process to determine the scope of issues to be addressed and to identify the significant issues related to a proposal. The comments received will assist in:

- Identifying the significant issues relevant to the proposal,
- Identifying those elements of the environment that could be affected by the proposal,
- Formulating alternatives for the proposal, and
- Determining the appropriate environmental documents to be prepared.

On March 31, April 4, and April 5, 2011, Ecology published public notices in area newspapers of a Determination of Significance (DS) and request for comments on the PEIS. Also, Ecology distributed a total of 746 scoping and meeting notices to interested individuals.

On April 5, 2011, Reclamation published a Notice of Intent (NOI) to prepare a PEIS in the *Federal Register*. Both Reclamation and Ecology issued a joint press release to local media on April 6, 2011, announcing the meetings. Meeting notices were mailed to interested individuals, Tribes, groups, and Government agencies which described the project, requested comments, and provided information about the public scoping meeting.

On May 3, 2011, Reclamation and Ecology held two public scoping meetings at the Hal Holmes Center in Ellensburg, Washington; one in the afternoon and one in the evening; 45 individuals attended the two meetings. On May 5, 2011, two public scoping meetings were held at the Yakima Arboretum in Yakima, Washington; one in the afternoon and one in the evening; 26 individuals attended the two meetings. At the meetings, the proposed Integrated Plan was described and attendees were given the opportunity to comment on the proposal, the NEPA/SEPA process, and resources being evaluated in the PEIS. The following resources will be evaluated in the Draft PEIS:

- Water Quality
- Water Rights
- Fish and Aquatic Resources
- Vegetation and Wildlife
- Floodplain and Riparian Functions
- Groundwater
- Surface Water
- Agriculture Crops and Resources
- Power
- Threatened and Endangered Species
- Visual Resources
- Climate Change
- Air Quality
- Noise
- Public Services and Utilities
- Recreation
- Land and Shoreline Use
- Geology

- Transportation
- Environmental Justice
- Historic and Cultural Resources
- Indian Sacred Sites
- Indian Trust Assets
- Socioeconomics
- Cumulative Effects

The scoping period was from April 2, 2011, to June 15, 2011, during which 76 comment letters were received. Reclamation and Ecology will use the comments received to assist in the following:

- Identifying the significant issues relevant to the proposed action
- Identifying those elements of the environment that could be affected by the proposed action
- Formulating alternatives to the proposed action.

The following are comments which were received during the scoping period and which will be considered by Reclamation and Ecology in the preparation of the Draft PEIS:

Elements/Alternatives/Projects

- Ahtanum Valley is in need of water; Pine Hollow Reservoir should be considered.
- Formulate a nonstructural alternative, i.e., water acquisition, conservation, and water marketing.
- PEIS should include an alternative that combines all Yakima basin irrigation districts and water right holders and eliminate the distinction between "proratable" and "nonproratable" water right holders. Water shortages would be shared equally among all water users.
- Oppose new water storage projects; these would flood endangered species habitat and adversely impact salmon runs.
- Removing Roza Dam would reconnect Yakima River and provide significant fishery and recreation benefits.
- Small-scale water storage projects (farm ponds) should be encouraged.
- Black Rock is the only answer!

- Large-scale water storage projects would transfer wealth from poor farmers in northeast Washington to rich farmers in the Columbia Basin. Grand Coulee Dam destroyed Stevens County agriculture.
- The Habitat Enhancement Program should have specific goals and priorities and support other restoration efforts in the basin. The best model to achieve the most cost-effective restoration is the process currently used for Salmon Recovery Funding Board grant review.
- The PR/PEIS should thoroughly compare the benefits to anadromous fish of siting the Wymer pump station at Thorp versus Roza. Current water management in the Upper Yakima arm results in low winter and spring flows and high summer flows. A Roza pump station would allow spring and winter flows to remain instream for approximately 40 more miles than would a Thorp pump station. This would have meaningful benefits to anadromous fish, as the affected reach is heavily used by salmon and steelhead. A Thorp pump station may allow artificially high summer flows to be reduced along this same reach from July through September if the KRD canal was improved to allow Wymer filling and irrigation deliveries simultaneously. NMFS expects that the Thorp site is of far less benefit than the Roza site.
- Suggest raising all reservoirs 3+ feet, or whatever is possible without major reconstruction.
- Suggest constructing a channel between upper Lake Kachess and lower Lake Kachess so that when the lake is drawn down to a minimum, the upper portion is completely drained.
- This Plan is not putting any more water in the basin; it is just reregulating the snowpack, and this will not do anything for the fish.
- Since the Integrated Plan primarily benefits the junior water right holders, what is their contribution to the project?
- Transfers of water rights could come with some kind of tax in the form of water as well.
- Investigate the use of monomolecular films of long-chain hydrocarbon molecules to reduce evaporation from water surfaces by 90%, saving as much as 40,000-50,000 acre-feet of water each year.
- Excellent job on pulling together the needs and proposed solutions into an Integrated Plan!
- Kachess proposal was not complete; where is the little Kachess? It is not shown in the diagram and pumping the dead water will separate the two lakes.
- Lower the outlet tunnels in the five reservoirs, or use pumping stations to drain the water to very low levels when necessary. Make sure the pumping stations stay afloat this time.

- Generate electric energy whenever possible and financially feasible.
- Bumping Lake Enlargement and Wymer are too expensive with very little benefit.
- Bumping Lake Enlargement should be dropped from consideration for the reasons noted in the 2008 Storage Study FEIS.
- When is drilling scheduled at Bumping?
- Would like to see more in-depth models, studies, showing water supply without the Bumping expansion in the short- and long-term.
- Water conservation should be of major emphasis in this plan; it has not been fully addressed.
- Fixing the KRD canal leaks and improving household water use should be high-priority projects.
- There are covenants in many areas around the K-K project that are in conflict with a 25-foot construction easement and cutting of trees.
- If the K-K pipeline is pursued, coordination with I-90 construction and its wildlife crossing structures and wetland restoration efforts should take place.
- If the K-K pipeline is pursued, it could affect the property values of neighboring lot owners, disrupt the Kachess Campground, and affect area wells.
- Need more definition of "market-based reallocations in the Yakima River Basin." Finding solutions that expand the amount of water available, rather than reallocating our current water resources, should be a priority.
- Focus on sustainable agriculture.
- Increased storage is key to addressing the water resource issues in the basin.
- There should be an alternative which results in minimum instream impacts, such as off-channel reservoirs.
- The Integrated Plan Summary Support Document, page 3, states: "At Clear Lake dam, replace the existing upstream passage facilities." The Integrated Plan, Vol. 1, page 24, states: "Upstream and downstream passage of adult bull trout would be improved by modifying the existing fishway or by constructing a new fishway at the spillway adjacent to the Clear Lake Dam." Did the Workgroup only agree to upstream passage facilities in the Summary Support Document?
- Describe the specific location and design of the proposed upstream and downstream passage for Clear Lake, Bumping, and Cle Elum Dams and all anadromous or resident fish species that would use it. Include a

comparison of expected increased numbers for each species from new upstream/downstream passage vs. current passage facilities or lack thereof.

- Figure 4-1, in the Integrated Plan (page 47) shows that with the Integrated Plan, only minor instream flow reach results from FWIP (<5%) would occur in the lower reach of the Yakima River from the Roza Diversion Dam down to Richland, WA. No improvement would occur and instream flow goals would not be met on the Naches River from Yakima to the confluence of the Tieton River. With only minor instream flow improvements in the lower Yakima and no instream flow improvements on the Naches River, how will fish passage at Clear Lake be enhanced?
- What is the reason for lack of progress on fish passage at Tieton, Keechelus, and Kachess Dams?
- Will the 3-foot raise on Cle Elum Dam be analyzed?
- I support the expansion of Bumping Lake.
- Water marketing is not a satisfactory solution. Water rights increase the value of property at least 1,000%. It doesn't make economic sense to separate water rights from the land.
- Integration of pumped storage provides financial strength needed to justify this project.
- Must storage projects move forward in order to obtain funding for habitat improvement projects?
- Will fish passage improvements be paid for by taxpayers or irrigation users?
- Bumping Lake expansion should be linked to proposed consolidation of Selah-Naches, Wapatox, City of Yakima, and Gleed irrigation diversions; these could all be served at existing Naches-Selah diversion.
- The potential Mabton Trestle replacement by SVID should be analyzed as a water conservation measure; would result in additional 150 cfs over Parker gage.
- Dams should be removed for benefit of species.
- Does subsurface micro-drip work in the Yakima River basin?
- Restoring beaver to mountain streams in northeast Washington will help mitigate the effects of reduced snow packs much more cost-effectively.
- PEIS should have specific proposed sequencing/phasing of elements.
- New storage should be used to the benefit of the river ecosystem, ensuring a more natural hydrograph by reducing dewatering and artificially high flows in mainstem habitats.

- Is there scientific evidence of the quantity of water that would come from the watershed? If there was a drawdown for irrigation, what is the time required to refill the reservoir?
- Dredge Keechelus, Kachess, and/or Lake Cle Elum to increase water storage.
- What are the flood impacts of living near a reservoir?
- Is Wymer dam a replacement for Roza Dam removal?

Water Resources/Water Quality

- What are the evaporation rates for Wymer? Enlarged Bumping?
- What are refill times for Wymer and Bumping assuming a complete drawdown during a drought year?
- For new storage reservoirs, how will impacts from soil contamination and erosion, upland discharge, surface water discharge, and earthquakes be analyzed, and mitigation measures identified?
- Suggest that there be a charge for all water diverted from the river.
- What is the true consumptive use of water (from wells)?
- There needs to be an assessment of the implications for having increased water rights because that's going to support housing and urban development.
- What is scope of water quality analysis? Will it include:
 - Potential for spills of contaminants w/emergency response plans, mitigation?
 - Which water bodies, shorelines might be impacted by construction of new reservoirs, including impacts, specific pollutants? Impact on TMDL? 303(d) listed waters? Additional dredging?
 - Anti-degradation provisions of the Clean Water Act?
 - Locations of impacted wetlands and how Section 404 requirements and EO 11990 Protection of Wetlands, compliance will be met?
 - o Riparian/wetland restoration along Yakima River or tributaries?

Water Conservation

- Integrated Plan should include specific targets and goals for water conservation.
- Identify all water conservation projects undertaken in the Yakima basin since 1979.
- The cost and economic benefits of water conservation must be fully documented. Water conservation should be exhaustively studied and

implemented before public funds are expended on billion-dollar storage projects.

- The PEIS should set out an alternative of maximum water conservation efforts in addition to the 170,000 acre-feet proposed under the Integrated Plan.
- On-farm conservation measures and their costs should be explored.
- The canal system must be made more efficient; KRD canal leaks should be fixed.
- Canal modifications for water conservation will likely affect recharge of local aquifer systems; these consequences must be considered and estimated.
- Has Reclamation applied the Central Valley Project Improvement Act criteria to any past or proposed water conservation plans?
- The 1998 DEIS on the YRBWEP stated a goal of "165,000 acre-feet of water savings in 8 years" under the Basin Conservation Program. Has this goal been achieved? By which irrigation districts?
- Why does the Integrated Plan fail to identify any specific water conservation improvements for the Wapato Irrigation District?
- How much water could be conserved by ending the exempt well provisions under Washington Water Law?

Water Marketing

- Integrated Plan should include specific targets and goals for water marketing and reallocation.
- Water Marketing may present problems with water reallocation; i.e., municipal and industrial users can pay significantly more for water than the agricultural user. To prevent agricultural decline, sideboards must be in place.
- Concerns that efforts to facilitate future market-based reallocation of water rights do not inadvertently induce unplanned and undesired growth, especially in rural areas. Future planning should emphasize the importance of locally approved land use and shoreline management plans.
- Will the PEIS include a list of all legal and institutional barriers to water markets?
- Will the PEIS include an estimate of the current water savings that could occur under existing Washington law?
- Do Reclamation and Ecology agree that up to 110,000 acre-feet of water may be available for inter-district water trades and up to 230,000 acre-feet of water may be available for intra-district trades? Doesn't this alternative alone have the capacity to meet the irrigation goals of the Integrated Plan?

- "Lack of adequate water supply" is a matter of more demand for irrigation water than is consistently available. This could be rebalanced by water marketing.
- There should be more discussion of water markets, including better accounting of the value of water left in the river for habitat values.

Habitat Protection and Enhancement Program

- Identify locations, ownership of targeted acquisitions and areas considered for Wilderness and Wild and Scenic Designations.
- Identify how much acreage contains critical habitat for listed species.
- Identify roadless acreage.
- Habitat protection/enhancement components must be part of stated Purpose and Need.
 - An open public process must be used to craft details of element.
 - A broad suite of protection tools for both private and public land components must be considered.
- Setting back dikes and levees as part of the Habitat Enhancement Program would reduce flooding in some areas. Benefits would presumably include reduced risk to life and property and reduced costs to fight and recover from flooding and erosion; these benefits should be described and quantified if possible.
- Who would get ownership of the land purchases, and what would be the management objectives for the properties?
- Preservation of the land tracts in the Habitat Enhancement Program would ameliorate the likely threat of development in watersheds critical to steelhead. Benefits to recreation, anadromous fish, snow storage, and other water resources should be analyzed.
- We support fully the planned protection and restoration actions for the Teanaway Basin.
- The Habitat Protection Program has a disparity of impact on Kittitas County. If this land is lost as far as development potential, there will be a permanent economic impact on Kittitas County; would the County be reasonably compensated?
- Are Transfer Development Rights or Community Forest Projects, or other more progressive techniques, an option?
- Expanding the Alpine Lakes Wilderness Area needs to be fully analyzed and the impacts and mitigation discussed.
- Wilderness designations have significant restrictions regarding roads and public access.

- Why the statement, "impacts may be primarily in loss of certain recreational activities" for land protection projects? Seems land protection would protect and enhance recreation opportunities in basin.
- The land component takes too much property off Yakima and Kittitas Counties' tax rolls.
- Will the PEIS list all diversion screens that have been installed since 1979 and explain why diversion screening is still needed?
- Is the 15,000-acre tract a separate project than the Wymer dam/reservoir project?
- What will be the impact of the 15,000-acre project acquisition on:
 - Domestic animals (cattle, horses, sheep)?
 - Elk, dear, big horn sheep, etc?
 - Bird species (eagles, owls, swans, ducks, pheasants, chickens, etc.) What will the limitations be on these species currently living on this property?
 - o Grazing on this land?
 - Soil, vegetation (grasses and grains) production, fruit trees?
 - Recreation activities on the property and the current financial benefits?
 - o Minerals, natural gas, oil, artifacts, etc., on the property?
 - Road access to cell/wireless towers and their current financial benefits?
 - Current irrigation systems?
- How will the NEPA/SEPA studies be conducted if access to the property is not granted by the current owners?
- What restrictions can be imposed on the property owners' and leasing entities' use and access of the 15,000-acre property, if the owners do grant access for studies? How will access be controlled?
- What impacts to assessed value of the property will occur? Will the property be rezoned? What are the financial impacts of rezoning on property owners and neighboring property owners?

Cultural Resources

- If interbasin transfer of Columbia River water into Yakima basin is pursued, an analysis of potential impacts to cultural resources should be made.
- How will the PEIS fulfill the requirements of Section 106 of the National Historic Preservation Act?

- Will the PEIS consider Tribal fishery impacts and effects on sacred sites and fishing grounds?
- Does the proposed Integrated Plan provide reasonable assurance that the irrigation water supply available will not be preempted in the future to meet the diminished time immemorial treaty reserved water right for fish?

Power

- PEIS should evaluate power consumption and generation ramifications of IP and identify solutions to power subordination concerns.
- The IP should fully disclose and analyze the cost of electricity to operate the project, utility rates for computing the cost of power, the dollar value of lost power production by storage of water and diversion of water to crop use, and how much will those benefitting from the water storage pay to construct, operate, and mitigate the projects.
- What is the power source for pumping all this water into reservoirs?
- What type of mitigation would be considered for power subordination?

Economics

- The PR/PEIS should describe assumptions about how various elements of the project will be funded and clarify how funding for plan elements could impact existing funding for water conservation, fish habitat restoration, etc.
- Economic benefits estimate is too high.
- Economic benefits estimate may be too low, given changes in cropping patterns to higher value crops in the past decade.
- Benefits should be estimated on each specific projects i.e., with Wymer, and without.
- Each significant element of the Integrated Plan should be analyzed to determine the ratio of cost to public benefit. The contribution of each element to both cost and public benefit should be considered in order to best assemble cost-effective and public benefit maximizing approaches.
- Drop expensive components to increase economic benefits.
- Recreation benefits are not evaluated in instream flow analysis.
- Have there been financing and payment plans discussed; it's hard to compare if we don't know the answers.
- The out-of-stream water needs assessment is weak; what price are the proratable irrigators willing to pay for 70% dry-year reliability?
- Integrated Plan should be evaluated under both 1983 P&Gs and the new, revised P&Gs, such as "costs are justified by public benefits," using nonmonetary values.

- What is the current water cost to irrigators (per acre-foot)?
- What is the current cost to irrigators for electricity; are they still subsidized by BPA?
- Have the districts repaid the costs of the existing Yakima Project? If not, what is the balance? What would be the true cost of irrigated crops if they had to pay market rates for water and power?
- What is the cost of the complete plan and how will this cost be paid?
- What will be the timeframe for the economic and social impacts—10, 20, 50 years?
- What is the cost of mitigation?
- Will the PEIS include:
 - Demand for hotel rooms?
 - Number of jobs, wage levels?
 - Impacts on property values and taxes?
 - Impacts to existing restaurants, hotels, etc.
 - Impacts to quality of life; potential dislocation of current residents due to increased cost of living?
- The economic analysis should include a description of expected beneficiaries, i.e., how many small, medium, and large landowners would benefit from improved reliability in irrigation water.
- The economic analysis would be more easily understood if the results were calculated for a range of discount rates with explanations of why and when each rate would be most appropriate.
- Concern by lack of in-depth discussion of economic justification/viability (NED), financial feasibility, non-Federal funding for implementation. A Maximum Net Economic Development Benefits Alternative should be presented.
- Question the propriety of using sockeye benefits in the economic analysis as a means of justifying the entire Integrated Plan and in allocating total project costs to project purposes.
- If a Secretarial exception to the P&Gs is expected to be necessary, this should be identified up front so the overriding reasons for proceeding are fully addressed.

Recreation and Tourism

• What does the statement that Wild and Scenic River designation for selected segments is "consistent with values and objectives of the Integrated Plan" mean? And, what is the degree of certainty implied?

- What impacts would Bumping have on the William O. Douglas Wilderness?
- What impacts would Bumping have on the recreational cabins?
- PEIS should evaluate all impacts of IP on recreation fishing, i.e., blueribbon trout fishery of Yakima River.
- Recreational, wildlife, cultural, habitat, and transportation/access impacts on the Yakima River Canyon Scenic Byway must be considered if Wymer is built.
- What would the effects of the IP and its projects be on tourism, travel, the tourism industry, and its contribution to the economy?
- The assessment of instream flow needs should consider river-based recreation, including specifically white water sports, rafting, and floating among others.

Groundwater

- The expansion and creation of wetlands along the Yakima River by diversion of peak spring runoff should be considered. The wetlands would create valuable fish and wildlife habitat, provide outdoor recreation, and recharge the basin's groundwater, providing large underground water storage at a very low cost.
- A more comprehensive strategy needs to be developed regarding potential future impacts of the continued proliferation of exempt wells.
- Under the 1945 Consent Decree, how would any water stored in aquifers be reallocated to instream flows?
- Groundwater impacts on streamflow are not adequately resolved; could lead to groundwater adjudication.
- The USGS groundwater study indicates more water needs to be stored to mitigate groundwater removal.

Crops

- Current cropping patterns may not continue as assumed in the document.
- Must not overestimate the conversion of cropland to non-crop use in Eastern Washington.
- What crops are grown in the Yakima Project? How much acreage is devoted to surplus crops? Is KRD still growing hay for the Japanese race horse industry?
- How many vineyards in the Yakima basin are sustainable and do not rely on irrigation or groundwater?

• What is the current contribution to early spring runoff from clearcuts on the Wenatchee National Forest, DNR land, and private forestry land in the Yakima River basin? The PEIS should look at halting timber harvesting in the Yakima basin to retain more snowpack and improve instream flows throughout the summer.

Climate Change

- Climate change precipitation predictions are not uniform between agencies.
- The PEIS should take into account impacts from the Pacific Decadal Oscillation and the El Nino/Southern Oscillation weather patterns.
- Analyze each major water supply element independently and in all possible combinations re: climate change; compare to No Action Alternative.
- Climate change is not addressed properly.

Fish/Wildlife

- Fish benefits estimate is too high.
- Lowering Lake Kachess 80 feet during dry years could impact the bull trout.
- The Bumping Lake expansion would have an impact on old growth trees and spotted owl habitat.
- The Bumping Lake expansion would present a major loss of successful bull trout spawning habitat.
- Some evidence points to frequent late or light salmon runs in the Columbia and Fraser Rivers in the past 200 years. The PEIS should take into account historical variability of salmon runs as part of any projections or estimates of future salmon returns.
- Analyze each major water supply element independently and in all possible combinations re: salmon; compare to No Action Alternative.
- Fish recovery, fish passage, and water conservation actions should be prioritized for immediate implementation.
- PEIS should carefully analyze expected fish restoration benefits of IP.
- Concern about whether this Plan will restore salmon production in the lower river and provide suitable conditions for summer migrating salmon.
- By concentrating storage in the upper basin, the Plan may not provide reliable water supply of sufficient magnitude for large-scale increases in both instream flows and irrigation needs.
- The Integrated Plan, if implemented in its entirety, would benefit the basin's native steelhead and salmon, which would be a significant benefit to the basin because it would greatly advance recovery without major

adverse impacts to stakeholders. The PR/PEIS should describe impacts and benefits to steelhead populations in terms of goals set forth in the steelhead recovery plan.

- The benefits and impacts of the plan for bull trout should be considered in the context of the USFWS bull trout recovery plan.
- The plan further reduces the instream flows; success of fish passage is severely compromised by inadequate volumes of water.
- Sage grouse habitat restoration mitigation could be done for Wymer dam.
- The PEIS should describe how the IP contributes to the recovery of the northern spotted owl (especially in relation to Bumping Lake enlargement) and the sage grouse (in relation to Wymer).
- Will the PEIS include:
 - Fishery impacts from vibration, sound, shading, wave disturbance, alterations to currents and circulation, scouring, sediment transport, erosion and structural habitat alteration, from any construction, and mitigation?
 - A biological assessment for Section 7 compliance?
 - Fisheries and benthic impacts to address requirements of an Essential Fish Habitat Assessment per the Magnuson Stevens Act?
 - An assessment of existing species, life stage, abundance; potential changes to habitat types and sizes; and potential for fishery population reductions for all final sites?
 - An assessment of impacts to fishing techniques and gear used by commercial and recreational fishermen?
 - The interconnections between benthic, fisheries, and avian resources?
 - All endangered, threatened, sensitive, candidate, and sensitive species and their critical habitat, and how they will be protected during construction?
 - Avian impacts, particularly on migratory birds?

Visual and Noise

- How will the PEIS address visibility of any proposed project and need for landscaping or buffers?
- How will the PEIS assess effects of light and glare from construction on adjacent properties?
- How will the PEIS assess effects of noise and vibration from construction on adjacent properties and biological resources?

Transportation

• How will the PEIS address transportation impacts and identify mitigation for increased trip generation, construction traffic/congestion, increases in traffic accidents, additional road maintenance near proposed projects?

Public Services and Utilities

- What will additional public safety and emergency services needs be during any dam construction?
- How will housing needs for employees be addressed?
- Will there be impacts to local school systems?

Geology

- Have geotechnical studies been done for any sites?
- Prior studies have raised concerns about earthquake faults and instability in the Bumping Dam area.
- Are there any seismic issues?

Environmental Justice

• Will the PEIS assess whether low-income and people of color communities will be adversely affected by the project and comply with EO 12898?

System Operations

- The Plan did not assign high-priority to changing the operations at Rimrock and reducing flow in the Tieton and Naches rivers during flipflop. Late-season high flows on the Tieton provide significant and popular recreation opportunities with significant economic benefits.
- Scientifically-rigorous wildlife surveys should be conducted to establish presence, absence, and effects to species and habitat from IP.
- The PEIS should describe how the IP contributes to the recovery of the northern spotted owl (especially in relation to Bumping Lake enlargement) and the sage grouse (in relation to Wymer).
- The PEIS and modeling should compare the contribution to supplies of an expanded Bumping reservoir and the other new storage sources with what could be achieved through more rigorous water conservation and water market reallocation.
- Flood control management is missing from IP; also PEIS should evaluate links between floodplain restoration and flood management.
- If total water supplies will increase with IP, what proportion will be dedicated in instream flows for salmon and steelhead?

- PEIS should specify how reservoirs will be managed when sockeye are reintroduced and fish passage facilities are in place.
- Idle acreage on the Wapato Irrigation Project (WIP) may be reactivated; which will remove additional water from the Yakima River at Parker. This would further aggravate instream flows or deplete stored supplies. The Yakama Nation has requested new ground be added to the WIP, which would further exacerbate the supply problem.
- Instream flow management is the single largest limiting factor for steelhead in the basin; the plan should clarify that managing instream flows is part of the plan itself and identify actual operational changes.
- PEIS needs to define rule set for future operations, such as redefinition of TWSA or WSAI, boundaries, legal requirements, and thresholds. IP needs an overall mission of philosophy with guiding business rules.
- The plan should clearly state that the 2002 Interim Comprehensive Basin Operating Plan will be modified based on the instream flow needs identified in the Integrated Plan.
- The PEIS should consider how existing resources and authorities can be used to make progress toward meeting the plan's goals until the plan is fully implemented.
- We (NMFS) are unaware of any empirical evidence or analysis that demonstrates that 70% is the best number for out-of-stream need for agriculture. We encourage a more thorough explanation of the need and how much it varies across different years, cropping patterns, and irrigation districts.
- In order to clarify if all of the identified capital projects are necessary, the PR/PEIS should fully consider if the existing infrastructure could be operated to meet or make progress toward meeting the new flow objectives.
- The availability of water needs to be confirmed sooner in the calendar year. Bankers are unwilling to lend operating funds if water availability is uncertain until after the growing season has begun.
- Describe the legal mechanism by which conserved water from KRD laterals could be transferred to enhance instream flows. Under the 1945 Consent Decree, would the KRD retain the same water rights to any reregulation reservoir water during a drought year?

Process/Scope

• The IP process excluded individuals and organizations that use and pay for the water, and those who have direct water rights that may be affected. Much time, effort, and money has been wasted because these people were not invited to be active participants.

- All proposed large storage projects should be subjected to an intense cost/benefit review by an independent third party such as a blue-ribbon team of economists and scientists not associated with the Bureau of Reclamation or Department of Ecology prior to issuance of the draft PEIS.
- Sequencing the elements and piecemeal implementation will break up the Workgroup.
- Comment periods are too short; the public needs at least 90 days to read and analyze complex EISs and scoping documents.
- The PEIS scope must include:
 - Impacts of climate change reducing snowpack as well as flows of the Columbia River.
 - Water conservation and use of best technology for conservation and metering for all withdrawals from both surface and groundwater.
 - Fees and costs for water withdrawals to induce conservation by setting fees based on value added and value of water withdrawn.
- The City of Roslyn should be shown on all planning maps and, as appropriate, the Domerie Creek Watershed, as the sole source of municipal water for the City.
- The Plan should include more detail of the current and planned municipal needs, growth projections, and strategies to ensure adequate municipal water supply.
- The Plan needs an overall mission of philosophy for what the plan is to achieve, guiding business rules for how decisions will be made regarding future policy and legal hurdles.
- Need better-defined standards for accessing new M&I and domestic water supplies.
- Modeling results should include actual empirical data, including current and FWIP models.
- The PEIS should be completed for each separate project; not just programmatic.
- Phasing the Integrated Plan only becomes viable when storage sites have been verified, including project costs and cost allocation, and habitat issues are addressed.
- The proposal does not supply adequate water for irrigation, fish habitat, or municipal uses.
- Will the PEIS clarify whether the 2006 Settlement Agreement between the Yakama Nation and Reclamation obligates the Reclamation to undertake fish passage at the five existing large storage reservoirs independent of any

further action under the proposed Integrated Plan? If Reclamation has an independent obligation to carry out fish passage planning and projects, then this section should be deleted from the Integrated Plan.

- The PEIS should explain how the Cle Elum FEIS fits into the Integrated Plan.
- How many elements of the Integrated Plan are dependent on voluntary participation?
- What consultation will take place with Tribes, communities, school districts?
- The PEIS should include a list and summary of all Workgroup Executive Subcommittee and Implementation Subcommittee meetings, with minutes.
- Will the PEIS disclose the relationship of the Conservation Advisory Group to the establishment of the Workgroup? Was the Workgroup established under FACA?

Other Impacts/Issues

- How will the PEIS assess impacts related to hazardous materials?
- What projects, actions, and other withdrawals from the Columbia River will the PEIS consider in evaluating cumulative effects?
- How do the proposals in this EIS relate to those contained in the June 2009 Ecology EIS, and why have several of the proposals changed?
- SAR project benefits may not be realized in same season.
- What are the "adverse actions" referred to regarding Box Canyon Creek?
- Air quality impacts of new storage projects should be analyzed.
- Describe legal mechanism by which Wymer or Bumping water could be transferred to instream flows.
- Will the PEIS evaluate the U.S. Supreme Court's May 2, 2011, decision in *Montana v. Wyoming* (563 U.S. _____ (2011) and possible legal effects on water rights in the Yakima basin?

The NOI, DS, press release, and comment letters are attached to this report, along with handouts from the meeting.

Attachments

- Notice of Intent
- Determination of Significance
- News Release
- Comment Letters
- Scoping Meeting Handouts

Federal Register 4/5/11

DEPARTMENT OF THE INTERIOR

Bureau of Reclamation

Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington

AGENCY: Bureau of Reclamation, Interior.

ACTION: Notice of intent to prepare a combined planning report and programmatic environmental impact statement, and notice of scoping meetings.

SUMMARY: The Bureau of Reclamation (Reclamation) proposes to prepare a combined Planning Report and Programmatic Environmental Impact Statement (EIS) on the Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project. The Washington State Department of Ecology (Ecology) will be a joint lead agency with Reclamation in the preparation of this Programmatic EIS, which will also be used to comply with requirements of the Washington State Environmental Policy Act (SEPA). **DATES:** Written comments on the proposal, reasonable alternatives to the proposal, potential environmental impacts, and mitigation measures will be accepted through May 19, 2011 for inclusion in the scoping summary document.

Scoping meetings, preceded by open houses, will be held at the following communities, dates, and times:

• Ellensburg, Washington; May 3, 2011; open house and scoping meeting 1:30 to 3:30 pm and again from 5 to 7 pm.

• Yakima, Washington; May 5, 2011; open house and scoping meeting 1:30 to 3:30 pm and again from 5 to 7 pm.

Requests for sign language interpretation for the hearing impaired or other special assistance needs should be submitted by April 26, 2011. **ADDRESSES:** Send written scoping comments, requests to be added to the mailing list, or requests for sign language interpretation for the hearing impaired or other special assistance needs, to Bureau of Reclamation, Columbia-Cascades Area Office, Attention: Candace McKinley, Environmental Program Manager, 1917 Marsh Road, Yakima, WA 98901; or by e-mail to *yrbwep@usbr.gov.*

The Ellensburg open house and scoping meetings will be held at the Hal Holmes Center, 209 N. Ruby Street, Ellensburg, Washington 98926. The Yakima open house and scoping meetings will be held at the Yakima Area Arboretum, 1401 Arboretum Way, Yakima, Washington 98901. The meeting facilities are physically accessible to people with disabilities.

Information on this project may also be found at *http://www.usbr.gov/pn/ programs/yrbwep/index.html*.

FOR FURTHER INFORMATION CONTACT: Contact Candace McKinley, Environmental Program Manager, Telephone (509) 575–5848, ext. 237. TTY users may dial 711 to obtain a tollfree TTY relay.

SUPPLEMENTARY INFORMATION:

Background

In 1979, Congress initiated the Yakima River Basin Water Enhancement Project (YRBWEP) in response to longstanding water resource problems in the basin. The YRBWEP was charged with developing a plan to achieve four objectives: (1) Provide supplemental water for presently irrigated lands; (2) provide water for new lands within the Yakama Indian Reservation; (3) provide water for increased instream flows for aquatic life; and (4) identify a comprehensive approach for efficient management of basin water supplies. Initial efforts in the mid-1980s (Phase 1) focused on improving fish passage by rebuilding fish ladders and constructing fish screens at existing diversions. Phase 2 in the 1990s focused on water conservation/water acquisition activities, tributary fish screens, and long-term management needs. Efforts under these initial phases were hindered by the ongoing uncertainties associated with adjudication of the basin surface waters that began in 1978. With the adjudication process now largely completed, most of these water right uncertainties have been addressed.

In 2003, Reclamation and Ecology initiated the Yakima River Basin Water Storage Feasibility Study to examine storage augmentation in the Yakima River basin. This study emphasized evaluation of a proposed Black Rock Reservoir, which was the focus of the Yakima River Basin Water Storage Feasibility Study Draft Planning Report/ Environmental Impact Statement (PR/ EIS) issued in January 2008.

The narrow focus of the legislative authorization in combination with comments on the Draft PR/EIS prompted Ecology to separate from the National Environmental Policy Act (NEPA) process. In mid-2008, Ecology initiated a separate evaluation of the Yakima basin's water supply problems, including consideration of habitat and fish passage needs. Reclamation continued the NEPA process consistent with its legislative authorization and issued the Yakima River Basin Water Storage Feasibility Study Final PR/EIS in December 2008. Following issuance of the Final PR/EIS, Reclamation selected the No Action Alternative. Ecology completed its study and issued a separate Final Environmental Impact Statement (FEIS) for the Yakima River **Basin Integrated Water Resource** Management Alternative in June 2009 under SEPA.

The Integrated Water Resource Management Alternative evaluated in the Ecology FEIS relies upon a range of water management and habitat improvement approaches comprised of seven major elements to resolve the long-standing water resource problems in the basin. Elements of the Integrated Water Resource Management Plan that will be analyzed in the Programmatic EIS include, but are not limited to:

1. Fish Passage (fish passage improvements at Cle Elum, Bumping, Clear Lake, Keechelus, Kachess, and Tieton Dams);

2. Structural/Operational Changes (subordination of power generation at Roza and Chandler Power Plants); 3. Surface Storage (new Wymer Dam perso and Reservoir, Bumping Reservoir be ma

enlargement, Kachess inactive storage); 4. Groundwater Storage (groundwater

infiltration prior to storage control); 5. Fish Habitat (mainstem floodplain

restoration program); 6. Enhanced Water Conservation (agricultural water and municipal/ domestic conservation); and

7. Market-Based Reallocation of Water Resources (institutional improvements to facilitate market-based water transfers).

The proposed plan may affect Indian trust assets of the Yakama Nation and the Confederated Tribes of the Umatilla Indian Reservation. There are no known adverse or significant impacts to minority or low-income populations or communities associated with this proposal.

Reclamation is requesting early public comment and agency input to help identify significant issues and alternatives to be addressed in the Programmatic EIS. Information obtained during the scoping period will help in developing information to be included in the Programmatic EIS. A Draft Programmatic EIS is expected to be issued in winter of 2011, followed by an opportunity for public and agency review and comment. The Final Programmatic EIS is anticipated for completion in spring of 2012. A Record of Decision, describing which alternative is selected for implementation, and the rationale for its selection, would then be issued following a 30-day waiting period.

Public Involvement

Reclamation and Ecology will conduct public scoping meetings to solicit comments on the alternatives for the Integrated Water Resource Management Plan, and to identify potential issues and impacts associated with those alternatives. Reclamation and Ecology will summarize comments received during the scoping meetings and from letters of comment received during the scoping period, identified under the **DATES** section, into a scoping summary document that will be made available to those who have provided comments. It will also be available to others upon request. If you wish to comment, you may provide your comments as indicated under the ADDRESSES section.

Public Disclosure

Before including your name, address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Dated: March 29, 2011.

Steven L. Brawley,

Acting Regional Director, Pacific Northwest Region. [FR Doc. 2011–7969 Filed 4–4–11; 8:45 am]

BILLING CODE 4310-MN-P

AFFIDAVIT OF PUBLICATION

STATE OF WASHINGTON

COUNTY OF KITTITAS

) SS

JANA E. STONER, being duly sworn on oath, deposes and says that she is the publisher of the NORTHERN KITTITAS COUNTY TRIBUNE, a weekly newspaper. That said newspaper is a legal newspaper and has been approved as a legal newspaper by order of the Superior Court in the county in which it is published and it is now and has been for more than six months prior to the date of the publications hereinafter referred to, published in the English language continually as a weekly newspaper in Cle Elum, Kittitas County, Washington, and is now and during all of said time was published in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a true copy of

DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE YAKIMA RIVER BASIN INTEGRATED WATER RESOURCE MANAGEMENT PLAN

The Washington State Department of Ecology's Office of Cocompiled over the past 30 years and to formulate a comprehensive solution for the basin's water supply and aquatic resource' problems.

In March 2011, members of the Workgroup agreed to advance' a proposed Integrated Plan for further evaluation and refinement including analysis of the plan in a Programmatic FIS. The proposed

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dress those problems through development and implementation of measures to protect, mitigate, and enhance fish and wildlife habitat as well as to improve the reliability of water supplies for irrigation, municipal, industrial, and domestic uses in the basin. The proposed Integrated Plan, which is the focus of the EIS, is based on a series of studies and management actions dating back to the authorization of the Yakima River Basin Water Enhancement Project (YRBWEP) by Congress in 1979 and culminating with the current Yakima River Basin Study, being conducted through a partnership between Reclamation and Ecology.

In 2009, Reclamation and Ecology convened a Workgroup under Reclamation's YRBWEP authority composed of representatives of the Yakama Nation, federal agencies, Washington State and local governments, an environmental organization, and irrigation districts. The Workgroup was tasked with gleaning the most useful information from studies and other information power generation at Roza and Chandler Power Plants);

 Surface Storage (new Wymer Dam and Reservoir, Bumping Reservoir enlargement, Kachess inactive storage);

 Groundwater Storage (groundwater infiltration prior to storage control);

 Enhanced Water Conservation (agricultural water and municipal/domestic conservation); and

 Market-Based Reallocation of Water Resources (institutional improvements to facilitate marketbased water transfers).

The programmatic EIS will provide a general evaluation of the alternatives and potential significant adverse impacts associated with the proposed Integrated Plan. Additional project-level environmental review under NEPA and SEPA would occur when individual projects within the plan are proposed for implementation.

The proposed Integrated Water Resource Management Plan can be viewed at: http:// www.ecy.wa.gov/programs/wr/ cwp/images/pdf/ProposedIPlanD raft.pdf

Information on this project may also be found at: <u>http://www .usbr.gov/pn/programs/yrbwep/ index.html</u>

Proponent: Washington State Department of Ecology

Location of Proposal: The proposal addresses the Yakima River Basin in Benton, Kittitas, Klickitat, and Yakima Counties, Washington

SEPA Lead Agency: Department of Ecology, Office of Columbia River

SEPA Responsible Official: Derek I. Sandison

EIS Required: The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030 (2)(c) and will be prepared.

Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Written comments will be accepted through May 19, 2011. Send written scoping comments, requests to be added to the mailing list, or requests for sign language interpretation for the hearing impaired or other special assistance needs, to:

Bureau of Reclamation, Columbia-Cascades Area Office

Attention: Candace McKinley, Environmental Program Manager, 1917 Marsh Road

Yakima, WA 98901; or by e-mail to

yrbwep@usbr.gov.

Scoping Open Houses: Scoping open houses will be held at the following communities, dates, and times:

• Ellensburg, Washington; Hal Holmes Center, 209 N. Ruby Street; May 3, 2011, scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 pm.

• Yakima, Washington; Yakima Area Arboretum, 1401 Arboretum Way; May 5, 2011; scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 pm.

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DATE: March 31, 2011

(Published in the N.K.C. TRIBUNE, March 31, 2011.)



DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE YAKIMA RIVER BASIN Integrated Water Resource Management Plan

The Washington State Department of Ecology's Office of Columbia River is initiating preparation of a programmatic Environmental Impact Statement (EIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). The Department of Ecology (Ecology) and the Bureau of Reclamation (Reclamation) are the joint lead agencies for this EIS, which is being prepared in accordance with the State Environmental Policy Act (SEPA) and the National Environmental Policy Act (NEPA).

Description of Proposal:

The Yakima River Basin is adversely affected by a variety of water supply and aquatic resource problems. The proposed Integrated Plan is intended to address those problems through development and implementation of measures to protect, mitigate, and enhance fish and wildlife habitat as well as to improve the reliability of water supplies for irrigation, municipal, industrial. and domestic uses in the basin. The proposed Integrated Plan, which is the focus of the EIS, is based on a series of studies and management actions dating back to the authorization of the Yakima River Basin Water Enhancement (YRBWEP) Project by Congress in 1979 and culminating with the current Yakima River Basin Study, being conducted through a partnership between Reclamation and Ecology.

In 2009, Reclamation and Ecology convened a Workgroup under Reclamation's YRB-WEP authority composed of representatives of the Yakama Nation, federal agencies, Washington State and local governments, an environmental organization, and irrigation districts. The Workgroup was

Ellensburg Daily Record, Ellensburg WA 4/4/11

tasked with gleaning the most useful information from studies and other information compiled over the past 30 years and to formulate a comprehensive solution for the basin's water supply and aquatic resource problems.

In March 2011, members of the Workgroup agreed to advance a proposed Integrated Plan for further evaluation and refinement, including analysis of the plan in a Programmatic EIS. The proposed Integrated Plan is comprised of seven major elements that incorporate a broad range of water management and habitat improvement approaches intended to address the long-standing water resource problems in the basin. Elements of the Integrated Plan include:

Fish Passage (fish passage improvements at Cle Elum, Bumping, Clear Lake, Keechelus, Kachess, and Tieton Dams);

Fish Habitat (mainstem floodplain restoration, tributary enhancement, and watershed enhancement programs);

Structural/Operational Changes (Kechelus to Kachess Pipeleine and subordination of power generation at Roza and Chandler Power Plants);

Surface Storage (new Wymer Dam and Reservoir, Bumping Reservoir enlargement, Kachess inactive storage);

Groundwater Storage (groundwater infiltration prior to storage control);

Enhanced Water Conservation (agricultural water and municipal/domestic conservation); and

Market-Based Reallocation of Water Resources (institutional improvements to facilitate market-based water transfers).

The programmatic EIS will provide a general evaluation of the alternatives and potential significant adverse impacts associated with the proposed Integrated Plan. Additional project-level environmental review under NEPA and SEPA would occur when individual projects within the plan are proposed for implementation.

- The proposed Integrated Water Resource Management Plan can be viewed at: http://www.ecy.wa.gov/programs/wr/cwp/images/pdf/ProposedIPlanDraft.pdf Information on this project may also be found at: http://www.usbr.gov/pn/programs/yrbwep/index.html Proponent: Washington State Department of Ecology Location of Proposal: The proposal addresses the Yakima River Basin in Benton, Kittitas, Klickitat, and Yakima Counties, Washington SEPA Lead Agency: Depart₂ ment of Ecology, Office of Columbia River SEPA Responsible Official: Derek I, Sandison EIS Required: The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is re-RCW quired under 43.21C.030 (2)(c) and will be prepared. Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. Written comments will be accepted through May 19, 2011. Send written scoping com-
- written comments will be accepted through May 19, 2011. Send written scoping comments, requests to be added to the mailing list, or requests for sign language interpretation for the hearing impaired or other special assistance needs. to:
- Bureau of Reclamation, Columbia-Cascades Area Office
- Attention: Candace McKinley, Environmental Program Manager, 1917 Marsh Road
- Yakima, WA 98901;

or by e-mail to yrbwep@usbr.gov. Scoping Open Houses: Scoping open houses will be held at the following communities, dates, and times: Ellensburg, Washington; Hal Holmes Center, 209 N. Ruby Street; May 3, 2011, scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 Dm. Yakima, Washington; Yakima Area Arboretum, 1401 Arboretum Way; May 5, 2011; scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 pm. Requests for sign language interpretation for the hearing impaired or other special assistance needs should be submitted by April 26, 2011 to Candace McKinley, Environ-mental Program Manager, Telephone (509) 575-5848,

ext. 237. TTY users may dial

711 to obtain a toll-free TTY

DATE: April 4, 2011

relay,

DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE YAKIMA RIVER BASIN INTEGRATED WATER **RESOURCE MANAGEMENT PLAN**

The Washington State Department of Ecology's Office The Washington State Department of Ecology's Office of Columbia River is initiating preparation of a pro-grammatic Environmental Impact Statement (EIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). The Department of Ecology (Ecology) and the Bureau of Reclamation (Reclamation) are the joint lead agencies for this EIS, which is being prepared in accordance with the State Environmental Policy Act (SEPA) and the National En-vironmental Policy Act (NEPA).

Description of Proposal: The Yakima River Basin is adversely affected by a variety of water supply and aquatic resource problems. The proposed Integrated Plan is intended to address those problems through development and implementation of measures to protect, miligate, and enhance fish and wildlife habitat as well as to improve the reliability of water supplies for irrigation, municipal, industrial, and domestic uses in the basin. The proposed Inte-grated Plan, which is the focus of the EIS, is based on a series of studies and management actions dating back to the authorization of the Yakima River Basin Water Enhancement Project (YRBWEP) by Congress in 1979 and culminating with the current Yakima River Basin Study, being conducted through a partnership between Reclamation and Ecology.

In 2009, Reclamation and Ecology convened a Work-group under Reclamation's YRBWEP authority com-posed of representatives of the Yakama Nation, feder-al agencies, Washington State and local governments, an environmental organization, and irrigation districts. The Workgroup was tasked with gleaning the most useful information from studies and other information compiled sum the series 20 compiled over the past 30 years and to formulate a comprehensive solution for the basin's water supply and aquatic resource problems

In March 2011, members of the Workgroup agreed to advance a proposed Integrated Plan for further evalua-tion and relinement, including analysis of the plan in a Programmatic EIS. The proposed Integrated Plan is comprised of seven major elements that incorporate a broad range of water management and habitat im-provement approaches intended to address the longstanding water resource problems in the basin. Ele-ments of the Integrated Plan include:

Fish Passage (fish passage improvements at Cle Elum, Bumping, Clear Lake, Keechelus, Kachess, and Tieton Dams);

· Fish Habitat (mainstem floodplain restoration, tributary enhancement, and watershed enhancement programs):

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Surface Storage (new Wymer Dam and Reservoir. Bumping Reservoir enlargement, Kachess inactive storage);

Groundwater Storage (groundwater infiltration prior to storage control);

· Enhanced Water Conservation (agricultural water and municipal/domestic conservation); and

 Market-Based Reallocation of Water Resources (in-stitutional improvements to facilitate market-based water transfers)

The programmatic EIS will provide a general evaluation of the alternatives and potential significant ad-verse impacts associated with the proposed Integrated Plan. Additional project-level environmental review un-der NEPA and SEPA would occur when individual projects within the plan are proposed for implementation

The proposed Integrated Water Resource Management Plan can be viewed at: http://www.ecy.wa.gov/programs/wr/cwp/images/pdf/Pr oposedIPlanDraft.pdf

Information on this project may also be found at: http://www.usbr.gov/pn/programs/yrbwep/index.html

Proponent: Washington State Department of Ecology Location of Proposal: The proposal addresses the Yakima River Basin in Benton, Kittitas, Klickitat, and Yakima Counties, Washington

SEPA Lead Agency: Department of Ecology, Office of Columbia River

SEPA Responsible Official: Derek I. Sandison EIS Required: The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact state-

Legal Notices

DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE YAKIMA RIVER BASIN INTEGRATED WATER RESOURCE MANAGEMENT PLAN

The Washington State Department of Ecology's Office of Columbia River is initiating preparation of a pro-grammatic Environmental Impact Statement (EIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). The Department of Ecology (Ecology) and the Bureau of Reclamation (Reclamation) are the joint lead agencies for this EIS, which is being prepared in accordance with the State Environmental Policy Act (SEPA) and the National En-vironmental Policy Act (NEPA).

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The programmatic EIS will provide a general availua-tion of the alternatives and potential significant ad-verse impacts associated with the proposed Integrated Plan. Additional project-level environmental review un-der NEPA and SEPA would occur when individual proj-ects within the plan are proposed for implementation.

The proposed Integrated Water Resource Manage-ment Plan can be viewed at: http://www.ecy.wa.gov/programs/wr/cwp/images/pdf/Pr oposediPlanDraft.pdf

Information on this project may also be found at: http://www.usbr.gov/pn/programs/yrbwep/index.html

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Bureau of Reclamation, Columbia-Cascades Area Office

Attention: Candace McKinley, Environmental Program Manager, 1917 Marsh Road

Yakima, WA 98901; or by e-mail to yrbwep@usbr.gov.

Scoping Open Houses:

Scoping open houses will be held at the following communities, dates, and times:

Ellensburg, Washington; Hal Holmes Center, 209 N. Ruby Street; May 3, 2011, scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 pm. Yakima, Washington; Yakima Area Arboretum, 1401 Arboretum Way; May 5, 2011; scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 pm.

Requests for sign language interpretation for the hear-ing impaired or other special assistance needs should ing impaired or other special assistance needs should be submitted by April 26, 2011 to Candace McKinley, Environmental Program Manager, Telephone (509) 575-5848, ext. 237. TTY users may dial 711 to obtain a toll-free TTY relay.

DATE: April 4, 2011

(09556949) April 4, 2011

Proponent: Washington State Department of Ecology Location of Proposal: The proposal addresses the Yakima River Basin in Benton, Kittilas, Kilckitat, and Yakima Counties, Washington

SEPA Lead Agency: Department of Ecology, Office of Columbia River SEPA Responsible Official: Derek I. Sandison

EIS Required: The lead agency has determined this proposal is likely to have a significant adverse impact

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(09556949) April 4, 2011

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ship between Reclamation and Ecology. In 2009, Reclamation and Ecology convened a Work Becology convened a Work te cology convened a Work Becology convened a Work Water Resource Manage ment Plan can be viewed Mater Resource Manage ment Plan can be viewed Mater Resource Manage ment Plan can be viewed the Yakama Nation, federal agencies. Washington State and local govern-ments, an environmental districts. The Workgroup was tasked with gleaning from studies and other in-pasi 30 years and to for mulate a comprehensive solution for the basin's water supply and aquatic in March 2011, members of the Workgroup agreed in State and comprehensive solution for the basin's water supply and aquatic in March 2011, members of the Workgroup agreed in State and comprehensive solution for the basin's water supply and aquatic the Workgroup agreed in State and comprehensive solution for the basin's mater supply and aquatic the Workgroup agreed in State and comprehensive solution for the basin's the workgroup agreed in State and comprehensive solution for the basin's the workgroup agreed in the workgroup agreed i

In March 2011, members of Yakima Counties, Kilckitat, and the Workgroup agreed to ton advance a proposed In-legrated Plan for further SEPA Lead Agency: evaluation and refinement, bepartment of Ecology, Of-including analysis of the Plan in a Programmatic SEPA Responsible Of-EIS. The proposed In-ficial: Derek I. Sandison tegrated Plan is comprised EIS Required: The lead of seven major elements arange of water manage-significant adverse impact tended to address the source problems in the ba-sin. Elements of the In-corptication of the In-corptication of the In-scoping: Agencies, afment and nabital im-provement approaches in-tended to address the long-standing water re-source problems in the ba-sin. Elements of the In-tegrated Plan include:

Bureau of Reclamation Columbia-Cascades Area

Columpia Cascados - Mac Office Attention: Candace McKin-ley, Environmental Program Manager 1917 Marsh Road Yakima, WA 98901;

vrbwep@usbr.gov.

b) 3:30 pm and again from 5:00 to 7:00 pm.
b) Yakima, Washington; Yakima Area Arboratum, 1401 Arboratum Way; May 5, 2011; scoping open houses 1:30 to 3:30 pm and again from 5:00 to 7:00 pm.
Requests for sign language interpretation for the hearing impaired or other special assistance needs should be submitted by April 26, 2011 to Candace McKinley, Environmental Program Manager, Telephone (509) 575-5848, ext. 237. TTY users may dial 711 to obtain a toll-free TTY relay.

DETERMINATION OF DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR THE YAKIMA RIVER BASIN INTEGRATED WATER RESOURCE MANAGEMENT PLAN The Wathington State

The Washington State Department of Ecology's in Elements of the ba-Columbia River is initiating preparation of a mage improvements at Cle or discontent of the public are invited to sage improvements at Cle or the Yakima River Basin Lake, Keechelus, Kachess, on alternatives, mitigation ment of Ecology (Ecology) and the Bureau of Rec-mational teaction of the state Environment ins Els You may comment tegrated Plan). The Depart flood plain restoration, tribu-tamation (Reclamation) are programs; the joint lead agencies for pared in accordance with the State Environmenta in accordance with the State Environmenta in accordance with the State Environmenta subordination of programs; bis Els which is being pre-pared in accordance with the State Environmenta the Aste Environmenta in accordance with the State Environmenta in accordance with the State Environmenta the Aste Environmenta the Aste Storage (new Winer Dam and Reserver, Description of Proposal: * Surface Storage (new Winer Dam and Reserver, Bused State Environmenta ter accordence with the State Environmenta th The Washington State Department of Ecology's Office of Columbia River is

Policy Act (NEPA). The Yakima River Basin is Bumping Reservoir adversely of water supply and inactive storage): aquatic resource problems. The proposed integrated Plan is intended to address those problems through prior to storage control): Yakima, WA 988 to be addressed by a strength of the proposed integrated those problems through prior to storage control): Yakima, WA 988 to be addressed by a strength of the proposed integrated those problems through prior to storage control): Yakima, WA 988 to be address to be address those problems through prior to storage control): Yakima, WA 988 to be address to be



Pacific Northwest Region Boise, Idaho

Media Contact:

- John Redding
- (208) 378-5212
- Candace McKinley (509) 575-5848 ext. 232

Released On: April 06, 2011

Reclamation and Ecology Host Scoping Meetings for Integrated Water Resource Management Plan

The Bureau of Reclamation and Washington State Department of Ecology will conduct public scoping meetings next month for a combined Planning Report/Programmatic Environmental Impact Statement (PR/PEIS) for an integrated water resource management plan under the Yakima River Basin Water Enhancement Project (YRBWEP).

The combined open houses/scoping meetings will be held from 1:30-3:30 p.m.; and from 5:00-7:00 p.m. on the following dates:

May 3: Hal Holmes Center, 209 North Ruby Street, Ellensburg, Wash. May 5: Yakima Area Arboretum, 1401 Arboretum Way, Yakima, Wash.

Ecology is joint lead with Reclamation in the preparation of the PR/PEIS that will satisfy the requirements of both the National Environmental Policy Act and the Washington State Environmental Policy Act.

The scoping meetings will give the public and agencies the opportunity to identify issues and concerns associated with the proposed Integrated Plan and to identify other potential alternatives that could be considered in the EIS.

During the past 18 months, Reclamation and Ecology have led the basinwide YRBWEP Workgroup and Yakima River Basin Study to develop a well-defined set of strategies for resolving water supply and streamflow imbalances, as well as ecosystem restoration enhancements. This effort has resulted in a proposed Integrated Plan for the Yakima basin.

The Integrated Plan includes seven elements:

Fish Passage at existing reservoirs; structural and operational changes to existing facilities; new or expanded storage reservoirs; groundwater storage; fish habitat enhancements; enhanced conservation; and market-based reallocation of water resources. Additional information about these efforts can be found at: http://www.usbr.gov/pn/programs/yrbwep/index.html.

A draft PR/PEIS is expected to be issued in winter of 2011, followed by an opportunity for public and agency review and comment. The final PR/PEIS is anticipated for completion in spring of 2012. The meeting facilities are physically accessible to people with disabilities. Requests for sign language interpretation for the hearing impaired or other special assistance needs should be submitted to Ms. Candace McKinley, Bureau of Reclamation, Environmental Program Manager, 1917 Marsh Road, Yakima WA 98901-2058, (509)-575-5848, extension 232; or by email to yrbwep@usbr.gov, by April 26, 2011.

Reclamation published a Notice of Intent to prepare a combined PR/PEIS in the Federal Register, and Ecology published a Determination of Significance in local newspapers concurrent with the release of the Notice of Intent.

In addition to comments received at the scoping meetings, written comments will be accepted through May 19, 2011. Please submit comments to Ms. McKinley using the contact information noted above. For additional information or questions, please call (509) 575-5848, ext. 613.

###

Reclamation is the largest wholesale water supplier and the second largest producer of hydroelectric power in the United States, with operations and facilities in the 17 Western States. Its facilities also provide substantial flood control, recreation, and fish and wildlife benefits. Visit our website at <u>www.usbr.gov</u>. **Relevant Links:**

http://www.usbr.gov/pn/programs/yrbwep/index.html

Dear Sir:

First of all I'd like to thank the BOR for inviting comments from the public. It should also be noted that the YRBWEP members have also accomplished quite a bit to date, at least in terms of plans and studies, of which the Yakima Basin has been nearly buried with.

My comments are aimed directly at the YRBWEP members and the Yakima River Basin Resource Management Plan. The plan itself purports to A. promote fish and wildlife restoration and B. improve the reliability of water for irrigation, municipal and domestic uses. All well and good. However, I see nothing in the plan to mitigate, control or to prevent flooding for those citizens who actually live on or near the river. Indeed, are there any members or alternates of this council who actually live on or nearby the river itself? My guess is not. Otherwise, this subject would and should have been considered at the Arboretum discussions.

Water storage in the reservoirs this year has averaged 150% or above normal. Twice this year to date water flow below the Teanaway confluence the Yakima River has crested at over 7000 cfs. Both of these events have severely eroded my property and my neighbor's of banks, stripped topsoil, and has caused massive debris formation. On my land alone I have lost over 300 linear feet of land due to this massive runoff. I contend that because these reservoirs were kept at above normal levels Reclamation was unable to mitigate the flooding...something that would have been possible at normal reservoir water levels. Instead of limiting water outfall, especially at Lake Cle Elum, water was actually released during these flood events.

Nobody denies that riverbeds change naturally. I do believe, however, that flood control should be recognized as an important part of any plan for the Yakima Basin, especially when flooding can be prevented or mitigated by those agencies controlling storage and water flow.

Sincerely,

D. Leavitt, Jr. Thorp, WA

From:	Phillip A. Cooke
To:	<u>yrbwep@usbr.gov.</u>
Cc:	<u>"Dan"; briancooke.haiti@gmail.com; Alex Cooke (Alex Cooke); "elizabeth reeder"; LeMae Cooke; nncooke@comcast.net</u>
Subject:	bumping lake water storage EIR
Date:	Tuesday, April 19, 2011 9:38:47 AM

Nancy Nutley and I married nearly 50 years ago (1962). We annually stay at Bumping Lake in cabin 16, at first with our four children and now with most of them and most of our 13 grandchildren. The cabin has been in Nancy's family since they built it in the 1930s. Because the family gathers from Kansas, Idaho and California, and we have grown in numbers we joined another family relative and purchased cabin 13 several years ago and took over the forest service land lease at that location.

Since Nancy's father, Van Nutley, worked as an irrigation engineer in Washington, we are mindful of water use in eastern Washington and how it benefits many landowners who produce food. If one day it makes sense to increase the size of Bumping Lake, we would be very interested in keeping a lease and moving the cabins to higher ground. While that would be a substantial undertaking, our family members, no matter where they lived through the years, find stability and "home" in returning to what has been the family homestead site for the past half century.

Phillip A. Cooke Law Offices of Phillip A. Cooke 1215 Plumas Street, Suite 1800 Yuba City, CA 95991 Telephone: (530) 671-1100 Facsimile: (530) 671-1461




128 North Second Street · Fourth Floor Courthouse · Yakima, Washington 98901 (509) 574-2300 · 1-800-572-7354 · FAX (509) 574-2301 · www.co.yakima.wa.us

VERN M. REDIFER, P.E., Director

April 20, 2011

Derek I. Sandison, Director Office of Columbia River State of Washington Department of Ecology 15 W Yakima Av, Ste 200 Yakima WA 98902-3452

CLAMATION MAI 52 ... NT 6 DAT≓ COPY 1000 1002 1100 1600 1700 5000

Wendy Christensen Columbia-Cascades Area Office US Bureau of Reclamation 1917 Marsh Road Yakima WA 98901-2058

RE: IWRMP Study Volume II – Technical Support Documents, Yakima County Comments

Dear Mr. Sandison and Ms. Christensen:

Thank you for the opportunity to comment on Volume II of the Integrated Water Resources Management Plan (IWRMP). The following are Yakima County's comments submitted with General Comment and Specific Comments:

I. General Comment on IWRMP Volume II:

Yakima County has the following comments related to the overall focus of the Volume II and its relationship to Volume I. The most important document in Volume II is the section entitled "Environmental, Legal and Policy Barriers". We believe that this document underestimates all of these barriers given that there currently are no boundaries, legal requirement, or thresholds in the IWRMP for how the project would be operated. The entirety of both documents seem to be based on the belief that if all of the parties at the table agree that there is sufficient water supply to implement the proposed actions in the IWRMP, once those actions are implemented, existing instream or out-ofstream water use will not be impaired. Without some explanation of boundaries or constraints on when water is stored and how water is used, there is no certainty in regards to implementation of any of the actions. The IWRMP needs to have an overall Mission or Philosophy for what the plan is designed to achieve, guiding business rules for how

Yakima County ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, national origin, or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For questions regarding Yakima County's Title VI Program, you may contact the Title VI Coordinator at 509-574-2300.

If this letter pertains to a meeting and you need special accommodations, please call us at 509-574-2300 by 10:00 a.m. three days prior to the meeting. For TDD users, please use the State's toll free relay service I-800-833-6388 and ask the operator to dial 509-574-2300.

Mr. Sandison Ms. Christensen April 20, 2011 Page 2

> decisions will be made in the future, and ideally a trusted proponent (i.e. no one agency as lead) that anticipates future policy and legal hurdles, as well as addresses them as they arise. The decision tree for how decisions will be made seems central to the IWRMP and especially the EIS process.

II. Specific Comments on the elements of IWRMP Volume II:

<u>Water Needs Document</u> – Page 7. Same discussion as in Basin Study that water use for non-federally supplied agriculture decreases in drought years. While surface water usage may decrease, groundwater usage increases above the 200 KAF noted on this same page, and based on the USGS report, effects stream flow in the drought years and subsequent years. This seems like a critical water need to accurately portray.

Water Needs Document - Page 32. There is a statement to the effect that conservation and irrigation efficiencies do not have much of an effect in drought years, we would argue that those projects have their greatest effect in drought years through increased control and management of the system.

<u>Water Availability Document</u> – Page 40. This document concludes with "From this, it is expected that Columbia River water would not be available for direct use during the majority of the irrigation season during drought years." While this conclusion may be true, it is also just as true that "In every year of the record, water is available in the Columbia River during the irrigation season in September and October. In all years water available is in excess of 2000 cfs, sufficient of satisfying more than 50% of the 2001's unmet water needs." In drought years, this water could be used directly for irrigation, in non-drought years this water could supplement in-basin supply and allow for an increase in carry-over storage or for instream flow. Such a dependable source of supply would be invaluable, especially in multiple year droughts such as 92-94.

Economic Effects Document – Page 4. There is an error the top of page 4 - "The *Principles and Guidelines* recognizes that, when a water resources project results in an increase in the production of some crops – especially those such as wheat and corn that are not traded in global commodity markets – the accompanying impact on the crops' prices in local, regional, and national markets may reduce the value of crops produced by farmers elsewhere in the U.S." Obviously wheat and corn are traded in global commodity markets, this statement should be changed.

<u>Economic Effects Document</u> – Page 8. The evaluation of the economic effects for municipal/domestic water supply is not consistent with the Principles and Guidelines. Economic effects of increased municipal and domestic water supply on the major capital markets of the Yakima Basin are not discussed. The availability of a reliable water supply is a major determinant of investment and value of property in this basin. Also not mentioned is the value in the food processing sector that is additional to farm income during drought years. The document needs to define the relationship between <u>current</u> <u>market rates</u> for muni-domestic and wholesale reclamation estimates. There is a market in the basin now for muni/domestic water which did not exist in 2006 when these values for muni water were formulated. At minimum the document should contrast the two estimates. Mr. Sandison Ms. Christensen April 20, 2011 Page 3

Modeling Report – Page 32. The document states that "It is possible that future M&I demands might be constrained by the available water rights. For this analysis the assumption was that future demand would not be water-right limited." Without business rules and some examination of how M&I demands will be integrated into the IWRMP, and whether sufficient water supply will exist to not impair existing rights/entitlements, we believe that M&I needs will be water-right limited.

Modeling Report – This report suffers from a lack of calibration data. We strongly suggest that from this point forward actual empirical data on use should accompany any model data, including the current and FWIP models. This type of empirical data is really the only way both the fish and irrigation communities can evaluate the effect of changes to the system relative to what they have <u>actually experienced</u> in the past. We believe that the modeled stream flows should be accompanied by standard errors of the estimated flow, for all parties to better evaluate the certainty of anticipated benefits. We also believe that depiction of empirical versus modeled flows will show that the BOR and its suite of tools to manage the river on a day to day basis work very well, providing much more water management efficiency than the models are capable of portraying.

Groundwater (GW) Infiltration – This document makes a statement that "Thus, return flows of increased groundwater infiltration from KRD would become part of TWSA, whereas WIP would need to capture diversions at Parker (by using artificially stored groundwater) in order to reduce reservoir releases and benefit TWSA." We are unaware that the GW infiltration project was specifically designed to meet TWSA needs; our belief was that there are instream flow benefits apart from TWSA that should be examined and overtly designed into the GW Infiltration pilot project.

Finally, "Environmental, Legal and Policy Barriers" Document – The document states that there are no environmental barriers to the GW infiltration project. This is in contrast to many statements in the GW infiltration document itself that lists the environmental, legal and policy constraints to implementation of pilot and full implementation. These documents should be rectified.

Thank you for your consideration of these comments.

Sincerely,

Donald H. Gatchalian, P.E. Assistant Director of Public Services Yakima County Public Services

cc: Board of Yakima County Commissioners Vern M. Redifer, P.E., Public Services Director Ben Floyd, ANCHOR QEA Andrew Graham, HDR Candace McKinley Bureau of Reclamation Environmental Program Manager

May 1, 2011

Re: Integrated Water Resource Management Plan

Dear Ms McKinley

I have several concerns that should be answered before any final decisions are made.

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Received in Mailroom

MAY 0 3 2011

Yakima, Washington

- 1. The proposal as currently stated does not supply adequate water for future use for the basin or irrigation or fish habitat or municipal communities.
- 2. The mitigation plan as proposed takes too much property off of our country tax roles, in both Yakima and Kittitas Counties.
- 3. I feel that there is no financial assessment as to the source of funds for this project. We need to know how and when funding would be obtained.
- 4. There is too much opposition from environmental factors for the success of an enlargement of Bumping Lake as well as Wymer. I don't believe that it can ever be accomplished.

Sincerely,

Daniel T. Martinez S. Martinez Livestock, Inc.

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Retention Code : ENV-4, DO

601der #: 1148002

	DEPARTMENT OF ECOLOGY
	BUREAU OF RECLAMATION HEARING COMMENTS
Re:)
Yakima Riv	ver Basin Integrated Water)
Resource M	Janagement Plan Planning)
TCPOT C/ LTC	
	COMMENTS FROM THE DIDLIC
	COMMENTS FROM THE FOBLIC
	Tuesday, May 3, 2011
	209 N. Ruby Street
	Ellensburg, Washington
REPORTED E	3Y: AMANDA SUE VARONA, CCR 3131

1	SPEAKERS APPEARING
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4	Mr. Steve Senger
5	Mr. Paul Jewell
6	Ms. Clay Mier
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1 -000-May 3, 2011 2 1:30 p.m. 3 ELLENSBURG, WASHINGTON 4 -000-5 6 7 MR. SENGER: My name is Steve Senger, and I'm president of the Central Washington Homebuilders 8 9 Association. 10 Basically, the comment I had, as far as additional storage, I have not heard anybody express any 11 opinions regarding lowering the bottom of Keechelus or Lake 12 Kachess or Lake Cle Elum; they're very shallow. It would 13 take moving a lot of material to increase the storage, but I 14 15 think they could certainly lease that space to excavation contractors and they could sell the aggregate. 16 17 Excavation guys are always looking for pits, and I think the State could absolutely lease those to 18 excavators during the summer months when the lake is down 19 and let them mine the rock out of it and increase the 20 21 storage substantially without any impact to additional 22 spaces above, without having to raise the pool. We have an I-90 project that is probably 23 24 going to buy a billion dollars worth of aggregate. It certainly seems to me that that could be supplied right from 25

local there and also increase the depth of the pool, 1 2 increasing the storage capacity. So I just wanted to put that on the report. 3 My address is P.O. Box 730, Cle Elum, 98922. 4 5 -000-6 7 MR. JEWELL: My name is Paul Jewell. I'm chairman of the Board for the Kittitas County Commissioners, 8 9 the Board of County Commissioners. 10 I guess my first comment is just to say thank 11 you for holding this hearing in Kittitas County; we certainly appreciate it. 12 13 Kittitas County remains supportive of the process and the seven elements of the integrated plan, and 14 15 we're certainly supportive of the work product to date. We believe that increased storage 16 17 infrastructure is imperative to the future of this basin and the Yakima basin as a whole in providing water for future 18 needs, including people, commerce, and aquatic resources. 19 We're supportive of the process, and we look forward to 20 21 seeing and assisting in moving it forward with all 22 deliberate speed. That being said, we do have a few issues that 23 24 we would like to see addressed in the EIS, and most of our concerns have to do with the recent introduction into the 25

1	plan of the elements in Section 3.1.5 titled, "Habitat
2	Protections and Enhancements of the Proposed Integrated
3	Water Resource Management Plan." This element was dropped
4	in at the last moment without adequate opportunity for
5	discussion and/or evaluation by anyone within the original
6	work group except for the proponents of the proposal.
7	The proposal has a disparity of impact on
8	Kittitas County and our residents, and no meaningful attempt
9	to engage with us prior to the introduction of this element
10	had occurred. As a result, we have concerns on several
11	levels.
12	First of all, our concern is the proposal is
13	relatively vague in that it does not clearly define how the
14	proposed lands will be conserved. For instance, will they
15	be purchased and turned into public land, or will a portion
16	be converted into public land and others not converted? Or,
17	even further, will all of it remain in private ownership?
18	And are other, more progressive techniques
19	for conservation an option, such as TDRs transfer
20	development rights or perhaps community forest projects
21	or others?
22	If the land is converted from private to
23	public ownership, who will own it and who will manage it?
24	There are other concerns of ours; for
25	instance, will it be federal management or state management

1	or other management?
2	Second, how much will the proposal cost?
3	There are no estimates currently in the plan for what this
4	proposal will cost as it sits in the plan or the different
5	versions of it, and we expect that cost to be substantial.
6	That's a glaring omission and it needs to be evaluated. Who
7	will pay for it, I think is also very important.
8	Third, if the land is converted, the tax
9	burden that was being paid by the owners of that property
10	will shift to other private landowners within Kittitas
11	County; how will that be mitigated?
12	Fourth, currently most of the land being
13	proposed for conservation is working resource land; in the
14	proposal it appears that it would not remain so. Is that
15	the case? If not, what will it look like? If the land is
16	converted and it's no longer working resource land,
17	permanent economic impacts will occur and should be
18	mitigated, and those are not temporary; those would be
19	permanent.
20	The land, at least some of it, also has
21	development potential. Kittitas County, with our large
22	resources of publicly-owned properties well over
23	64 percent only has a limited amount of developable land.
24	This would certainly diminish that inventory, and if it's
25	lost, there will be a permanent economic impact on Kittitas

1 County and its residents.

2	Much has been talked about regarding the
3	recreation aspect and the potential value for the tourism
4	and recreation industry that this proposal may represent,
5	but again, it's important to remember that 64 percent of
б	Kittitas County is already public land. Therefore, will the
7	addition of this particular amount of public land really
8	have any positive impact that offsets the economic costs?
9	Also included in the proposal is an expansion
10	of the Alpine Lake Wilderness Area located within Kittitas
11	County. Wilderness designations have significant
12	restrictions regarding roads and other types of access.
13	When it comes to public land, access is an important issue;
14	in fact, many may consider it the most important issue.
15	Also, this potential expansion needs to be
16	fully analyzed and the impacts discussed, along with
17	mitigations to offsetting any of those impacts, and that has
18	not been done.
19	The areas targeted in the Upper Teanaway and
20	between Kachess and Cle Elum Lakes as well as the Upper
21	Taneum and Manastash Creeks, now these are snowmobile areas,
22	an industry extremely important to Kittitas County,
23	especially, obviously, in the wintertime. No clear mapping
24	was included with the proposal which precisely identifies
25	the lands being targeted. I think we need to know exactly

1 what properties are being targeted.

Wild and scenic river designation expansion is also proposed for some river corridors specifically, and then it's stated that other eligible rivers should also be considered. Again, this is very vague. We need good mapping to show exactly what is being proposed and if alternatives are being considered and what impacts those designations will bring and how to mitigate.

9 We believe the best way to clearly evaluate 10 the ecosystem restoration and enhancement proposal and the 11 various alternatives to consider to meet its goals, as well as the impacts and appropriate solutions for offsetting 12 13 those impacts, is to engage with Kittitas County and its citizens in a meaningful way as the EIS is developed. 14 So 15 far, we haven't been asked how we feel about this proposal and what we think it means, and we should be. 16

The vast majority of the areas targeted for 17 acquisition of some form occur in Kittitas County. To be 18 frank, we review (sic) this request as a potentially 19 enormous imposition on the citizens of our county. We 20 21 believe it is critical to consider it and point out the fact and the potential disparity of impact to our citizens while 22 the greatest benefits of the IWRMP are to be realized 23 24 further down the Yakima basin outside of our county. In other words, we cannot accept a plan which requires the 25

1	citizens of Kittitas County to permanently bear the primary
2	burden for mitigation and ecosystem restoration and
3	enhancement without reasonable compensation while others
4	enjoy the majority of the benefits of the IWRMP without
5	equally sharing in those costs.
6	That's it.
7	
8	-000
9	MS. MIER: I'm Clay Mier. I'm a resident of
10	Ellensburg. I work in Yakima and I have family in Roslyn,
11	so the whole area that's being discussed here is of interest
12	to me, but if I hadn't walked in the door of the library and
13	been invited by a friend, I wouldn't have known it was here.
14	So I encourage the Reclamation, Department of Ecology,
15	anyone involved, to really get it out, the information,
16	because it's going to impact everyone, whether they're
17	interested in the Tribes, the government aspect, or the
18	individuals the water, provide their food, or their
19	recreation that will sustain the future of the land in this
20	part of Washington.
21	That's it. They need a lot more public
22	relations and marketing to get people in the door.
23	
24	(End of Comments.)
25	

1	CERTIFICATE	
2	STATE OF WASHINGTON)	
3) ss. COUNTY OF KING)	
4	This is to certify that I, AMANDA SUE VARONA, Certified	
5	Court Reporter and Notary Public in and for the State of	
6	Washington, residing at Seattle, reported the within and	
7	foregoing public comments; that said public comments were	
8	taken by me in shorthand and thereafter under my supervision	
9	transcribed, and that the same is a full, true, and correct	
10	record of the proceedings.	
11	I further certify that I am not a relative or employee	
12	or attorney or counsel of any of the parties, nor am I	
13	financially interested in the outcome of the matter.	
14	IN WITNESS WHEREOF I have set my hand and affixed my	
15	seal this 10th day of May, 2011.	
16		
17		
18	Amanda Sue Varona	
19	Certified Court Reporter No. 3131 Notary Public in and for the State	
20	of Washington, residing at Seattle. My commission expires 6/29/11.	
21		
22		
23		
24		
25		

	DEPARTMENT OF ECOLOGY
	BUREAU OF RECLAMATION HEARING COMMENTS
Re: Yakima Riv Resource I Report/Pro)) ver Basin Integrated Water) Management Plan Planning) ogrammatic EIS)
)
	COMMENTS FROM THE PUBLIC
	Tuesday, May 3, 2011
	Tuesday, May 3, 2011 5:00 p.m. 209 N. Ruby Street Ellensburg, Washington
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	Tuesday, May 3, 2011 5:00 p.m. 209 N. Ruby Street Ellensburg, Washington
REPORTED H	Tuesday, May 3, 2011 5:00 p.m. 209 N. Ruby Street Ellensburg, Washington BY: AMANDA SUE VARONA, CCR 3131

1 -000-May 3, 2011 2 5:00 p.m. 3 ELLENSBURG, WASHINGTON 4 -000-5 6 MR. NOVACK: The question is what's the 7 benefit, the primary benefit of all this is to the junior 8 9 rights holders, water rights holders, so the question is 10 what is contribution that they are -- what is their 11 contribution to the project? What do they give up. Is that a comment? What are they giving up? Like, a possible 12 13 example would be the KRD junior rights water holders have a canal that crosses their property, and in return for 14 15 improved junior rights they could provide public access for nonmotorized travel on the KRD canal, basically. 16 Another comment: What's the power source for 17 pumping all this water into the reservoirs? 18 The land purchases, who would get ownership 19 and what would be the management objectives for the 20 21 property? And then there needs to be an assessment of 22 the implications for having increased water rights because 23 24 that's going to support development, housing development, urbanized development. 25

1 So there's going to be sort of compounded 2 impacts to habitat especially if these developments occur in the floodplain. 3 Those are the primaries one but, too, it 4 talks about changing laws and policies, but essentially a 5 big part of our problem is that these rights are essentially 6 7 private property, so maybe part of what the junior rights holders could give up as their contribution is giving up a 8 9 right as a private-property right and having it more as a 10 long-term lease for that water right. And a caveat to that 11 could be transfers of water rights could come with some kind of tax in the form of water as well. That could be a 12 13 contribution of the junior water rights holders. Thank you. 14 15 -000-16 17 MR. O'BRIEN: My name is Obie O'Brien. Ι 18 represent Kittitas County District Three. And looking at the Yakima Basin River, this whole project, and just trying 19 to figure out what are the pros and cons. And so far I'm 20 21 figuring the pros are water would be more available for agriculture and for fish and conservation, possibly more for 22 recreational use and things like that, and some of that may 23 24 be recreational development around some of the enhanced lakes and storage would be a good thing. 25

In hydropower development there's some talk 1 2 about putting some hydros on the dams, you know, hydro-electrical. But if -- and this is big if for me, that 3 this makes more water available for development and for 4 5 easing or removing the exempt well moratorium; then it becomes very much a winnable idea, or productive or 6 7 whatever -- good idea. What worked you want to put in there. 8 9 And one of the things I'd like the Department 10 of Ecology to look at in this whole thing is what is the 11 true consumptive use of water. You know, for water that comes out of the wells, how much is it actually used. 12 Not 13 what they say can be pumped, but how much is used and how much goes back into the ground through septic systems and 14 15 all the rest of that. Some of the big concerns I have is that if 16 17 the Teanaway -- large 64,000 Teanaway acres was taken off 18 the public rolls, then tax base support for the county is reduced and the taxpayers have to pay more for the services 19 that they all expect. 20 21 Then there's some of the concerns about, like, the Wymar Reservoir area, the loss of grazing lands 22 23 and personal property that's owned by one family, the 24 Eatons; Jack Eaton is the dad, John Eaton is one of the sons. I only know John. I haven't met the others. 25

The ideas -- I've had some answers tonight 1 2 about the wilderness areas destinations and the scenic river designations. I'm less concerned about those because I'm 3 hearing that the idea is that those wilderness areas that 4 5 are currently in the Forest Service will still remain in Forest Service and be actively logged and farmed, tree 6 7 farmed, so that's something we very much need to do. The trees in our county are very sick. There's a lot of bug 8 9 kill and diseases, so we need to get in and do some chainsaw 10 management to get the diseased trees out of there. And if 11 we can do that, that provides public use and public funding 12 and school funding and all that. But it also -- if we're doing the timber farming, one proposal -- I know there was a 13 company that wanted to build a lumbar mill back here in 14 15 Ellensburg, and if there's a lumbar mill here, then the trees can be harvested and you don't have to haul them so 16 far; they become economically viable. 17

So there's a lot of the bits and pieces that 18 need to work together for this to be a really productive 19 environment. And so I'm really looking forward to 20 21 productive economic impact offsetting the negative impact 22 that we've had. A lot of the environmental impact study work that was done for the water moratorium, the economic 23 24 side of it, was seriously flawed and built on some very bad 25 errors. And you can't -- their report said there will be no

2 plain not true. So if we can have this process take in account what the economic impact will be for Kittitas 4 County, then I think we have the possibility of a winning 5 project. We really have to work this and well it well in 6 order to keep all of these things in the surface and in view 7 of what we need to do. 8 That's it. Thank you. 9 10 (End of comments.) 11 12 13 14 15 16 17 18 19 20 21 21 22 23 24 25	1	impact on small business. That doesn't work. It's just
account what the economic impact will be for Kittitas County, then I think we have the possibility of a winning project. We really have to work this and well it well in order to keep all of these things in the surface and in view of what we need to do. That's it. Thank you. (End of comments.) (End of comments.) 10 (End of comments.) 11 20 21 22 23 24 25	2	plain not true. So if we can have this process take in
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1	CERTIFICATE
2	STATE OF WASHINGTON)
3) ss. COUNTY OF KING)
4	
5	This is to certify that I, AMANDA SUE VARONA, Certified
б	Court Reporter and Notary Public in and for the State of
7	Washington, residing at Seattle, reported the within and
8	foregoing public comments; that said public comments were
9	taken by me in shorthand and thereafter under my supervision
10	transcribed, and that the same is a full, true, and correct
11	record of the proceedings.
12	I further certify that I am not a relative or employee
13	or attorney or counsel of any of the parties, nor am I
14	financially interested in the outcome of the matter.
15	IN WITNESS WHEREOF I have set my hand and affixed my
16	seal this 10th day of May, 2011.
17	
18	
19	Amanda Sue Varona
20	Certified Court Reporter No. 3131 Notary Public in and for the State
21	of Washington, residing at Seattle. My commission expires 6/29/11.
22	
23	
24	
25	

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 3, 2011- Ellensburg, Washington

Name (please print legibly): Karen Bicchieri			
Organization: Tapash Sustainable Forest Callaborative			
Mailing Address: 209 S. Anderson St			
City, State, and Zip Code: Ellensburg, WA 98926			
Telephone: 509 · 899 · 6451	E-mail: Kbicchieri@tnc. org		

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

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 $\sqrt{}$ I want to receive email updates and information on the Environmental Impact Statement (EIS).

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- ___ I want my name removed from the ____ email list and/or ____mailing list (please check one or both).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

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(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>vrbwep@usbr.gov;</u> phone (509) 575-5848, ext. 613.





Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 3, 2011- Ellensburg, Washington

Name (please print legibly):	Charlie de La Chapelle
Organization:	YBSA
Mailing Address:	PO Box 10303
City, State, and Zip Code:	Vaking WA 98909
Telephone: S29 91	193358 E-mail: cherliedeler BEarthlink. net

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

____ I would like to receive a copy of the Scoping Document.

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Not shre costs are good anesses - when is
drilling scheduled @ BLES
there the been financine + payment plans
discussed - hard to compare if dont know
The grachers.

(Use back of sheet or additional sheets as necessary)

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U.S. Department of the Interior Bureau of Reclamation



Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 3, 2011- Ellensburg, Washington

Name (please print legibly): Kathie Wise
Organization:
Mailing Address: 10711-180th Ave E
City, State, and Zip Code: Bonney Lake WA 98391
Telephone: (253)862-4930 E-mail: 3pecialkew@ comcastinet
 Request to be placed on the mailing list and/or receive a copy of the Scoping Document: I would like to receive a copy of the Scoping Document. I want to receive email updates and information on the Environmental Impact Statement (EIS). I want my name included on the mailing list to receive information on the EIS. I want my name removed from the email list and/ormailing list (please check one or both).
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My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are: <u>Attached on Sepanate</u> Sheets
(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>yrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.



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DEPARTMENT OF

ECOLOGY

State of Washington

The Habitat Protection and Enhancement references a "15,000 acre tract in the Yakima River canyon, including the valley bottom and eastern slopes, from the Yakima River to I-82" and is currently acreage owned by Jack Eaton and various family members. This site is listed in planning documents as the "preferred site."

According to Wendy Christensen, Water Reclamation, the property owners can say "no" if they are not interested in releasing the designated 15,000 acres. The same is also noted in the plan as follows: "If the preferred site cannot be acquired... If the preferred site cannot be acquired, a different preferred site would be located. The plan further states "additional lands are eligible and have been recommended."

Please clarify if the 15,000 acre tract listed in the Habitat documentation is a separate project from the Dam/Reservoir project? Noted in the Summary documentation, there is reference for the removal of the Roza Dam by around 2016 which suggests the Wymer Dam project is the replacement. Please clarify if the Wymer Dam Project remains as proposed?

Under the "Endangered Species Act" and any related study required by NEPA and/or SEPA, etc, what will the impact be on wildlife such as the Big Horn sheep, elk, deer, and other related or like species as a result of the project proposed on the 15,000 acre tract Eaton property? What will the limitations be on these species now living on this tract?

Under the "Endangered Species Act" and any related study required by NEPA and/or SEPA, etc, what will the impact be on domestic animals cattle, horses, sheep, and other related or like species as a result of the project proposed on the 15,000 acre tract Eaton property? What will the limitations be on these species now living on this tract?

What impact will be on the ability to raise cattle, horses and sheep, and related domestic livestock as it may relates to native vegetation and native grasses currently available to feed such livestock as a result of the project on the 15,000 acre tract Eaton property? What limitations will be imposed on grazing of the wildlife and domestic livestock as a result of the project(s)?

What will the impact will the projects have on the soil as it relates to future production of vegetation, grasses and grains for such livestock and related animal species. What will the limitations be?

What are potential restrictions that could result in raising domestic animals on natural vegetation if either or both project move forward?

What impact will there be to the available ground and grazing rights for the planting and harvesting of vegetation, grasses and grains for such livestock and related animal species. What will the limitations be?

What impact will there be to the bird species and related winged wildlife that migrate and or live on the 15,000 acre tract Eaton property, including but not limited to eagles, owls, swans, ducks, pelicans, loons, pheasants, bats, bees, chickens, and like species. What will the limitations be?

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What impact will there be on fruit trees on 15,000 acre tract Eaton property as a result of the proposed project and adjacent or adjoining properties? What will the limitations be?

What impact will there be to property access for recreation and sporting activities which are currently authorized and provide financial benefit on the 15,000 acre tract Eaton property –such as Hand-gliding and paragliding, hunting, and related sporting/recreational activities?

What impact will there be to the minerals which may exist on the property as a result of the project proposed on the 15,000 acre tract Eaton property; and/or the Dam/Reservoir construction?

What impact will there be to the Eaton property road access to cell and wireless towers on the Eaton property which currently provide financial benefit? What will the limitations be?

What impact will there be for property owner access on the 15,000 acre tract Eaton property for raising cattle, moving cattle across the property during grazing season. What will the limitation be?

What impact will there be as far as any business related access into the Eaton property for on-going and routine ranching activities, which provide financial benefit, require in the raising of livestock, grains, hay, etc.? What will the limitation be?

What impact will there be to current irrigation systems on the 15,000 acre tract Eaton property. How will the current irrigation which includes pumping stations, wheel lines, etc, be limited? How will the same be enhanced? What are potential restrictions that can result for irrigation as a result of the Habitat project and all potential restrictions that can result for irrigation as a result of the Dam/Reservoir project.

How will financial loss be addressed for all activities that currently generate financial benefits to the property owners, if the Dam/Reservoir project and/or the 15,000 acre tract Eaton property acquisition should occur?

What impact will there be on potential natural resources which may exist on the 15,000 acre tract Eaton property, which could provide financial benefit to the property owners, including but not limited to natural gas, oil, etc.?

What impact will there be on "materials" that exist on the 15,000 acre tract Eaton property, that provides financial benefit to the property owners, including but not limited to such things as Ellensburg Blue, agates, petrified wood, opal, Indian artifacts, and related kinds of specimens and materials?

How will the various required studies under NEPA, SEPA, EPA, etc. be conducted, if access by property owners is not granted?

What implications and restrictions can be imposed on the owners use and access of the 15,000 acre tract Eaton property, as a result of the ESA and its findings, if property owners grant access for studies.

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What implication and restrictions can be imposed on the property owners and leasing entities on the property as far as limiting use and access of the 15,000 acre tract Eaton property, as a result of the findings under NEPA, SEPA and other required studies.

What implications or restrictions can be imposed on the property owners and leasing entities on the property as far as limiting access to privately owned adjoining property to the Wymer Dam/Reservoir, if property owners agree to sell some acreage.

What impact will occur to assessed value of the current 15,000 acre tract Eaton property as it relates to potential zoning/rezoning /categorizing of the property for tax and use purposes. Will the 15,000 acre tract be rezoned? What impact will rezoning have on current property owners financially? What impact will rezoning have on neighboring properties financially? What are potential limitations, restrictions, requirements imposed on property owners and neighboring properties as a result of rezoning?

What changes will occur that will impact property owners and neighboring property owners as it relates to property insurance for potential flood—natural or man-made, as a result of living near a Dam / Reservoir.

If access is allowed to the property for either conducting studies, or for any potential future development, how will access be controlled? How will individuals be expected to conduct themselves and what repercussions can the owner take if there is property damage, trash requiring clean-up, gates left open affecting the containment of livestock. How will the claims be addressed by the offices that oversee the projects?

From:	Dan
To:	BOR YRBWEP, sha-UCA
Subject:	Yakima River Basin Integrated Water Resource Management Plan, Commenting on the Scope of the EIS, Attention: Candace McKinley, Environmental Program Manager
Date:	Wednesday, May 04, 2011 9:26:37 PM

Thank you for the opportunity to comment on this EIS. I am the owner of a recreational cabin on Forest Service lease land at Bumping Lake. I would like the impacts of enlarging Bumping Lake on my recreational cabin considered in this EIS. If Bumping Lake is selected for implementation, my preference would be for my cabin to remain at its current location. However if the new lake level would not make that possible, my preference is that the cabin be relocated either directly upslope from its current location or to another lakefront location. My cabin was built in the 1930s and has historical significance to my family.

Thank you.

Dan Haller, Bumping Lake Summer Tracks, Cabin 13

Written responses to: 1770 Longmire Lane, Selah, WA 98942, or zerbert@elltel.net.



1				SPEAKERS	APPEARING
2	Mr. D	aniel	Martine	ez	
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1 -000-2 May 5, 2011 1:30 p.m. 3 YAKIMA, WASHINGTON 4 5 DANIEL MARTINEZ: The plan as being proposed is totally inadequate to solve the problems of the 6 7 Yakima Basin. For one thing, it's just not going 8 to put anymore water in the basin. It's just 9 reregulating the snow pack that comes off and if 10 we don't get a snow pack, we don't have any water. 11 And the second item is that nobody knows who is 12 going to be paying for this or how costly it is 13 ever going to be. And with all of the things that 14 are going to have to happen, and the Environmental 15 community will never let it happen. They will 16 just keep fighting it and fighting it and it will be tied up years and years in court, or 17 18 litigation, I guess you should say. That's about I did send in a written comment as well. 19 it. 20 Also, this doesn't do it, not one thing for 21 fish. It's the same amount of water going in the 22 same river and we got the same problems with high 23 water temperatures of the lower reaches. And the only way to cure that is more water and cooler, 24 more water will have cooler temperatures, which 25

5/5/2011

everybody knows that. You're not fixing the 1 2 problem, you're just changing the time of year. 3 That's it. 4 5 -000-6 I'm concerned about the lower BOB TUCK: Yakima River and whether or not this package of 7 8 actions addresses in stream flow and water quality 9 challenges in the river below Union Gap. And whether or not this package would, if implemented, 10 11 would restore salmon production in the river below 12 Union Gap and allow -- or provide, rather than allow, would provide suitable conditions for 13 14 summer migrating salmon. 15 I am concerned that we are continuing to 16 concentrate the storage in the upper basin, which 17 we have historically and with detrimental results 18 to flows and fish in the lower part of the Yakima 19 Basin. It does not appear to me that this 20 package, if implemented, provides reliable water 21 supply of sufficient magnitude for both large 22 scale increase in in-stream flows and for security 23 for the irrigation districts. 24 (End of Comments.) 25

1 CERTIFICATE 2 STATE OF WASHINGTON)) ss. 3 COUNTY OF YAKIMA) 4 This is to certify that I, Phyllis Craver Lykken, 5 6 Certified Court Reporter in and for the State of 7 Washington, residing at Yakima, reported the within 8 and foregoing public comments; said public comments 9 being taken before me on the date herein set forth; that said proceedings was taken by me in shorthand and 10 11 thereafter under my supervision transcribed, and that 12 same is a full, true and correct record of the 13 testimony of said witnesses, including all questions, 14 answers and objections, if any, of counsel. 15 I further certify that I am not a relative or 16 employee or attorney or counsel of any of the parties, 17 nor am I financially interested in the outcome of the 18 cause. 19 IN WITNESS WHEREOF I have set my hand this 20 day of , 2011 21 22 PHYLLIS CRAVER LYKKEN, RPR, CCR NO. 2423 23 24 25

5/5/2011



Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 5, 2011- Yakima, Washington

Name (please print legibly): Marjorie J. Hart
Organization:
Mailing Address: 14390 Hwy 24
City, State, and Zip Code: Moxee /La. 98936
Telephone: $597454 - 1170$ E-mail:

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

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My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

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You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>vrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.



U.S. Department of the Interior Bureau of Reclamation


SCOPING COMMENT FORM

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 5, 2011- Yakima, Washington

Name (please print legibly): CIARL	ES J. KLARICH
Organization: Retired	
Mailing Address: 1231 BLA	INS RQ.
City, State, and Zip Code: Zilloh	, WA, 98953
Telephone: 840-2759	E-mail: KLARICH (+G) CHARTER-NST
Request to be placed on the mailing list	and/or receive a copy of the Scoping Document:
I would like to receive a copy of the Scoping	Document.
\times I want to receive email updates and information \times I want my name included on the mailing list t	o receive information on the EIS.
I want my name removed from the email	list and/ormailing list (please check one or both).
demonstrate that disclosure would constitute a clea this burden. In the absence of exceptional, docume make submissions from organizations or businesse officials of organizations or businesses, available fo	rly unwarranted invasion of privacy. Unsupported assertions will not meet entable circumstances, this information will be released. We will always s, and from individuals identifying themselves as representatives or or public disclosure in their entirety.
My comments on the Yakima River Bas	sin Integrated Water Resource Management Plan EIS are:
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U.S. Department of the Interior Bureau of Reclamation



Comments (continued) A ST 12010 + Chace The hop Property oddress Kennel Change Lo water study (11565) indicate, more that ground 2 stored miligate pround celler_ 10 lo-co-tole 5 les 10-2 lin TEN CON wil a) 115 allee L and CÊ-P. ACS 10 enought Ke in deter th ourer ema ć 20 and 10020 he 2200 lunp C the Let will create a more portion on in the Yaking Rover norma

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SCOPING COMMENT FORM

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 5, 2011- Yakima, Washington

Name (please print legibly): Sid Morri	son
Organization: Yakima Basin Storage	Alliance
Mailing Address: P.O. Box 30	
City, State, and Zip Code: Prosser, WA	99350
Telephone: (509) 840-2759	E-mail: yakimabasinstoragealliance@yahoo.com

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

I would like to receive a copy of the Scoping Document.

VI want to receive email updates and information on the Environmental Impact Statement (EIS).

VI want my name included on the mailing list to receive information on the EIS.

I want my name removed from the _____ email list and/or ____mailing list (please check one or both).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

May 19, 2011

The following are YBSA's concerns and comments on the Integrated Plan.

Climate change forecasts indicate a need for additional irrigation water to sustain future increases for crop consumptive use.

Forecasts show increased drought frequency and magnitude. This will reduce the water supply available in summer months and carryover.

Climate change will reduce snowpack storage and further reduce summer water supplies for crops and instream flows.

Ground water supply problems are not adequately resolved by the package and could lead to ground water adjudication which would most likely freeze federal investment. Ground water utilization by homes and farms has already significantly reduced instream flows in the lower Yakima River.

The success of fish passage elements are severely compromised by inadequate volumes of water, which compromises smolt survival around dams, and transit an production in the lower Yakima River. We believe the plan further reduces the instream flows in the already degraded lower Yakima River.

We believe that higher flow volumes in the lower Yakima River are required to improve water quality problems of temperature, phosphorus and other parameters. The current plan has not been adequately analyzed for costs and benefits which will inhibit national investment. This process must compare previously investigated alternatives by the same metrics, and is best accomplished with a scorecard or matrix.

What is the cost of implementing the complete plan? How will this cost be paid? The public needs to know who is expected to pay and how much. We note that many items have yet to be aired.

We believe that the integration of pumped storage provides the financial strength to justify this project, and the political support of a large constituency.

Sequencing the elements will lead to a piece meal implementation and breaking up the structure that is essential for everyone around the table to stand together, and we believe, is at odds with Representative Hasting's written comments to the Workgroup.

The Department of Ecology's attempt to bring a number of environmental interests through uncertain and unpriced mitigation to support the Plan for water storage, opposition to Bumping and Wymer is daunting, and with the help of the ESA, and other restrictive regulation, and the actions of individual citizens, history show these two reservoirs will most likely never be built after decades of infighting.

Irrigation needs failed to take into account idle acreage on the WIP which currently do not use water may be re-irrigated in that there will be some rehab with this plan and commodity prices are at record levels. When they are reactivated additional water will be removed from the Yakima River at Parker further aggravating instream flows, or depleting stored supplies. The amount could be on the order of 120 kac-ft/vr. We also note that the Yakama Nation has requested new ground be added to the WIP, which would further exacerbate the supply problem.

The availability of water needs to be confirmed sooner in the calendar year. Bankers are unwilling to lend operating funds if the availability of a critical crop input (water) is uncertain until after the growing season has begun.

Water marketing is not a satisfactory solution. Water rights increase the value of property at least 1000%. It doesn't make economic sense to separate water rights from the land.

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>yrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.



U.S. Department of the Interior Bureau of Reclamation



From:	<u>Maykut</u>
To:	BOR YRBWEP, sha-UCA
Subject:	Bumping Lake EIS
Date:	Saturday, May 07, 2011 5:09:07 PM

Thank you for the opportunity to comment on this EIS. I am the owner of a recreational cabin on Forest Service lease land at Bumping Lake. I would like the impacts of enlarging Bumping Lake on my recreational cabin considered in this EIS. If Bumping Lake is selected for implementation, my preference would be for my cabin to remain at its current location. However if the new lake level would not make that possible, I would hope that the cabin be relocated either directly upslope from its current position or to another lakefront location. My cabin was built in the 1930s and six generations of my family have been privileged to enjoy it. It is so dear to my family that three Weddings have been held there and the ashes of very dear people scattered in the vicinity. Members of my immediate family call it the "Center of the Universe" and treasure every day we get to spend there. It could not possibly be closer to our hearts.

We understand the need for water in the lower valley as my father, Van E. Nutley, was Manger of first the Kennewick Irrigation District and finally the Roza Irrigation District. We hope the final decision will reflect everyone's best interests including ours.

Sincerely,

Naydene (Nutley)

Owner, Cabin

Maykut

#16 Bumping Lake Tract

To: Candace McKinley Environmental Program Manager 1917 Marsh Road Yakima, Wa. 98901

Re: Bumping Lake expansion project/Wymer Dam/ Colombia River pumping

Hello Candace,

I have grown up in the Yakima Valley on a small fruit orchard outside of Zillah. I fully understand the concerns, year after year, about enough water for irrigators.

At the same time, I also understand the continual ignoring of bringing efficiency into the canal systems and onto farmed land. Although there have been some improvements over the years for water delivery and runoff, this does little to economize the often limited resource of water from snow melt off.

My spouse, Sharon and I live just south of the river outside of Toppenish on two acres. We are continuing to bring efficiency into our water use. Unless we begin the challenging work of negotiating around the technologies available to us, we will continue to spend our limited resource money into these 'fixes' - all of which continue to ravage our environmental ecosystems while reducing the potential for continued resources for the future generations of 'our' species.

Thank you,

Michael Moritz, LMP Sharon Grandi, LMP Stillpoint Resources 3205 River Rd. Yakima, Wa. 98902

From:	Doug Peters
To:	BOR YRBWEP, sha-UCA
Cc:	Nancy FOWLER
Subject:	Water studyenvironmental commentsBUMPING LAKE
Date:	Monday, May 09, 2011 12:03:36 PM

I wish to submit the following concerns to be addressed in the

study: 1. Is there scientific evidence of the quantity of water that would come from the water shed? On the same topic, if there was a drawdown for irrigation needs what is the time to refill the reservoir.?

2. What impact or intrusion, direct or indirect ,would the new boundaries effect the William O. Douglas Wilderness?

3. As you know, the expansion proposal on Bumping Lake, has a long history.....In an earlier time, there was a scientific study done be geologist Newell Campbell that raised concerns about the placement of the dam due to earthquake faults and also deep instability of the subsurface, due to earlier geologic activity.

Thank you. DOUG PETERS 1208 FREMONT HILLS DRIVE SELAH, WA 98942

From:	Janet Miller Gerry Pollet
То:	BOR YRBWEP, sha-UCA
Subject:	Yakima River Basin EIS Integrated Water resource Management Plan EIS scoping comments
Date:	Saturday, May 14, 2011 9:17:50 AM

RE: Comments on EIS Scope - Integrated Water Resource Management Plan, Yakima River Basin

The EIS scope must consider the reasonable alternatives to enlarging Bumping Lake, any new dam or pumping water out of the Columbia River into the Yakima basin, involving both federal and state policies and rules for requiring:

a) water conservation and use of best technology for conservation and metering for all withdrawals from both surface and groundwaters. Groundwater withdarawals permitted by the State greatly impact returns and flows of the surface waters.

b) fees and costs for water withdrawals to induce conservation by setting fees based on value added and value of water withdrawn;

The EIS scope must include impacts of climate change reducing flows of the Columbia River

We oppose any consdieration of withdrawals of water from the Columbia, including any revisit of the Black Lake Reservoir concept (which would threaten to mobilize additional contaminaton from Hanford to the Columbia); and, construction of an enlarged Bumping Lake dam within the Wenatchee National Forest, a new Wymer dam, and pumping water out of the Columbia River into the Yakima Basin. The proposed dam projects would flood endangered species habitat, and pumping water from the Columbia River would also adversely impact existing salmon runs.

Instead of spending federal tax payer dollars on more dams, the Bureau of Reclamation should focus on water conservation and water marketing to meet irrigation demands in drought years.

Gerry Pollet Heart of America Northwest 1314 NE 56th St. #100 Seattle, WA 98105 office@hoanw.org

From:	Walter Kloefkorn
To:	BOR YRBWEP, sha-UCA
Subject:	RE: EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin
Date:	Sunday, May 15, 2011 11:23:49 PM

RE: EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin

Please include these comments as part of the <u>environmental impact statement</u> scoping process for the Yakima River Basin Integrated Water Resource Management Plan. I am opposed to the construction of an enlarged Bumping Lake dam within the Wenatchee National Forest, a new Wymer dam, and pumping water out of the Columbia River into the Yakima Basin. The proposed dam projects would flood endangered species habitat, and pumping water from the Columbia River would also adversely impact existing salmon runs.

Instead of spending federal tax payer dollars on more dams, the Bureau of Reclamation should focus on <u>water conservation</u> and water marketing to meet irrigation demands in drought years. Encouraging small-scale water storage projects (and by small-scale I mean very small, farm ponds) as well as restoring beaver to mountain streams in northeast Washington (where I live) will also help to mitigate the effects of reduced snowpacks much more cost-effectively.

Spending tax dollars on large-scale irrigation projects such as enlarging Bumping Lake Dam and building a new Wymer Dam effectively transfers wealth from poor farmers in northeast Washington to rich farmers (usually agribusiness corporations) in the Columbia Basin. The Bureau of Reclamation destroyed Stevens county agriculture by building Grand Coulee Dam. My county was one of the top five agricultural producers in Washington state prior, and since has become and remained one of the poorest counties. Instead of talking about compensating this area, you are now proposing more destructive dams to keep funneling wealth to monied interests in the basin. You should be ashamed of yourselves, although I suspect that's too much to expect from folks following in the footsteps of Floyd Dominy.

Sincerely, Walter Kloefkorn Higher Ground Farm Springdale, Washington

From:	<u>Drusha Mayhue</u>
To:	BOR YRBWEP, sha-UCA
Subject:	Comments: Water Resource Management Plan, Yakima River Basin Plan
Date:	Sunday, May 15, 2011 2:11:03 PM

RE: EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin

Please include these comments as part of the environmental impact statement scoping process for the Yakima River Basin Integrated Water Resource Management Plan.

We are relying on old solutions to fix our natural resource problems. Building a dam will only kick the ball down the road for future generations to find better solutions that don't impair our natural habitat on which humans and wildlife depend.

I am opposed to 1) enlarging the Bumping Lake dam within the Wenatchee National Forest, 2) a new Wymer dam, and 3) pumping water out of the Columbia River into the Yakima Basin. Pumping water from the Columbia River will adversely impact the already the poorly functioning salmon runs.

I don't want my tax dollars spent on building more dams. The Bureau of Reclamation should focus on water conservation and water marketing to meet irrigation demands in times of drought.

Yours truly,

Drusha L. Mayhue 226 E Koch, Unit C Bozeman, MT 59715

"No people can be both ignorant and free." - Thomas Jefferson

>^..^<



CITYOF ROSLYN

National Historic District and Preserve America Community

May 16, 2011

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

RE: Comments on Yakima River Basin Integrated Water Resource Management Plan (Plan) and Environmental Impact Statement (EIS) Scope

Dear Ms. McKinley,

Thank you for the opportunity to comment on the Plan and the proposed scope of the EIS. The City of Roslyn greatly appreciates the leadership provided by the Bureau of Reclamation in establishing a shared vision and common plan for the future of our water basin.

Given the general nature of the plan at this point in the process we do not have many specific comments, but we do have some thoughts that hopefully will help guide subsequent efforts. Our first comment is a small one, but never-the-less an important one. We would respectfully request that the City of Roslyn be shown on all planning maps and as appropriate, our Domerie Creek Watershed. Depicting Roslyn on the map will serve as a reminder that the affected communities extend well beyond the lower Yakima Valley. In addition, the City of Roslyn relies on the Domerie Creek Watershed for our sole source of municipal water and the protection of this resource is of critical importance to our community.

We also hope that ongoing planning efforts will considerably expand the analysis of Municipal and Domestic Uses on page 18-19 of the Plan. A more detailed understanding of the current and planned municipal needs is especially important. In accordance with the provisions of the Washington State Growth Management Act we are required to integrate our land use and capital facilities planning and it would be appropriate to make sure that the growth projections identified in the plan are in fact consistent with local plans. In addition, making sure that the plan has clear strategies to ensure an adequate supply of water for municipal water purveyors is of paramount importance.

We are also concerned about the potential future impacts associated with the continued proliferation of exempt wells and believe that a more comprehensive strategy needs to be developed to make sure that we are in fact managing all of our water resources. Furthermore, we are concerned that efforts to facilitate future market-based reallocations of water rights do not inadvertently induce unplanned and undesired growth, especially in the rural areas of our counties. In particular, we should be wary of practices that would allocate scarce water resources to development proposals that feature density bonuses in excess of local zoning in rural areas. New development should pay for the full costs associated with supporting that development and all development should occur in accordance with the spirit and intent of the Growth Management Act. Toward that end, we trust that future planning documents will emphasize the importance of preparing and implementing plans in accordance with locally approved land use plans.

With respect to the scope of the EIS the scoping document doesn't provide much of an insight into what is going to be analyzed and how it is going to be analyzed so it is very difficult to comment. Consistent with our preceding comments, we hope that the EIS focuses on the impacts to municipal water providers as well as the potential adverse effects associated with uncontrolled or induced growth. A detailed assessment of the impacts associated with the continued proliferation of exempt wells would be extremely important.

As a final note, we would like to formally request that the City of Roslyn be made a party of record for this project and receive notices of all meetings and copies of all project documents. In addition, given our interests we hope that you will actively seek our input throughout the planning process. If you would like additional information for the City on these or related matters, please don't hesitate to contact our City Administrator George Martinez at 509-649-3102 or roslynadmin@inlandnet.com or our planning consultant, Gregg Dohrn of G. R. Dohrn and Associates at 206-679-7507 or greggdohrn@comcast.net.

Sincerely,

CITY OF ROSLYN Devege Martiney FOr

Jeri Porter, Mayor

CC: Roslyn City Council George Martinez, City Administrator Margaret King, City Attorney Lisa Haley, City Planner Adam Gravely, Water Attorney Gregg Dohrn, Planning Consultant Paul Eisenberg, Suncadia

> City of Roslyn 100 E. Pennsylvania Ave., P.O. Box 451, Roslyn, WA 98941 PH 509-649-3105, FAX 509-649-3174 <u>Roslyn@inlandnet.com</u>

RE: EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin

Please include these comments as part of the environmental impact statement scoping process for the Yakima River Basin Integrated Water Resource Management Plan. I am opposed to the construction of an enlarged Bumping Lake dam within the Wenatchee National Forest, a new Wymer dam, and pumping water out of the Columbia River into the Yakima Basin. The proposed dam projects would flood endangered species habitat, and pumping water from the Columbia River would also adversely impact existing salmon runs.

Instead of spending federal tax payer dollars on more dams, the Bureau of Reclamation should focus on water conservation and water marketing to meet irrigation demands in drought years.

I have worked for over forty years on issues related to protecting water resources including many in the Pacific Northwest. We have now as a society realized that dams cost us more than they give us. They should be removed. New ones should not be built. Salmon and other critters are worth far more than the benefits proposed by these projects.

Samuel H. Sage, President and Senior Scientist Atlantic States Legal Foundation, Inc. 658 West Onondaga Street Syracuse, New York 13204-3711



Comments on the Yakima River Basin Study Proposed Integrated Water Resources Management Plan.

To Whom It May Concern:

This plan was designed to include proposals for: 1. Fish passage, 2. Structural and operational changes, 3. Surface water storage, 4. Ground water storage, 5. Fish habitat improvements, 6. Enhanced water conservation and 7. Market based reallocations in the Yakima River Basin. How could this study be done without even mentioning the Ahtanum watershed of the Yakima River Basin?

It is ridiculous to include a proposal for a future reservoir on Luma Creek for water storage when Pine Hollow Reservoir Project is not on top of the list for completion. The report did not even mention Pine Hollow project which is light years ahead of anything in the plan the committee is trying to do.

The Ahtanum sub-basin covers 181 square miles and produces 62,000 acre feet of water. Pine Hollow, when completed, will reduce or stop the use of 257 irrigation ground water wells. It will improve 90 miles fish/riparian habitat; stabilize agricultural water usage and conservation on 180,000 acres and allow for fish passage. Studies have shown 8% of the Salmonid population in the greater Yakima River Basin would be benefited by the Pine Hollow Project. Pine Hollow reservoir project has been worked on since the 1990's and has completed most of the planning, engineering phases and is cost effective and environmentally sound. Pine Hollow Reservoir is essentially ready to build. To ignore the project and the watershed in this supposed comprehensive study of the Yakima River Basin is ludicrous and has a bad smell. To put any funds into a Luma Creek proposal before Pine Hollow is built lacks common sense, should be hotly contested and should be a political hot potato.

Sincerely.

Justin Waddington, President Yakima County Cattlemen's Association

Larry Ölberding, President Washington Cattlemen's Association

Mr Justin Waddington 3111 Brownstewn Rd. Harrah, WA 98933 日本で ちちょうち ちちゃく Candale Mckinley BOR Environmental Programs 1917 Marah Rd. Programs Yalimin Marah Rd. Programs Manager N A R NDF : ר צי CON FURENCE

Candace McKinley Environmental Program Manager Bureau of Reclamation 1917 Marsh Road Yakima, Washington

Dear Ms. McKinley:

Subject: comments regarding the latest iteration on additional storage for irrigation in the Yakima Basin

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Yakima, Washington

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Please accept the following comments regarding Yakima River Basin Integrated Water Resource Management Plan of 2011.

There appear to be two (three) disparate plans included which have only one element in common, the Yakima River Basin: adding additional irrigation capacity and activities intended to improve the habitat of native species, both acquisition of upland areas and improvements to the existing irrigation infrastructure for improve habitat for native salmonids. What are the linkages between these two types of projects? That is, must the additional capacity projects go forward in order to obtain funding for the habitat improvement projects? If there is a linkage, WHY? The improvements are long overdue! Will the improvements to fish passages be paid for by the taxpayers or the users of the irrigation systems dependent upon the major dams?

The ISSUES statement "Lack of adequate water supply" prejudices the discussion by focusing on creating additional sources for irrigation water in low water supply years instead of recognizing that the problem is an imbalance between available water and water "demand" (desire). As several of the bullet points under this heading indicate, the problem is more a matter of more demand for irrigation water than is consistently available, as is incorporated in the term "junior water rights". There are at least two ways to rebalance the demand versus available which focuses on the demand side: taking land off the irrigation systems and providing a more flexible allocation of water between users, that is a market system (which is included in the proposals). I would go further with the market proposal and suggest that there be a charge for all water diverted from the river (which remains the property of the State and its citizens even though a water right establishes the priorities for users of that water, as I understand it there is no legal prohibition on charging the users for the water taken.) Our current system of water rights where the only costs for using the water are for the cost of delivering the water is a weakly managed commons, avoiding the worst potentialities outlined by Garrett Hardin in the "Tragedy of the Commons" but hardly achieving an efficient distribution of water between competing uses, especially the earliest established uses - providing habitat for the native aquatic fauna.

There should be a fuller discussion of the use of markets for allocating water uses, including better accounting of the value of water left in the river for habitat values. From an irrigator's perspective, diverting water at one location and returning it further down river is of limited concern, to aquatic organisms flows bypassing river reaches may be more important and needs to be discussed explicitly – that is inefficient delivery and usage systems may not significantly affect total irrigation if they can be captured and used downstream but the diminished flow between the original diversion and where it returns reduces the available habitat for aquatic organisms.

The economic analyses would be more readily understood by people who don't work with discount rates on a regular basis if the results were calculated for a range of discount rates which might apply along with an explanation of why or when each rate would be most appropriate.

The presentation of economic impacts of the project would be more readily comprehended if values such as "increase annual jobs in the local economy by about 1,300 to 1,400, labor income by about \$42 to \$44 million" were broken out into categories such as 4,000 additional seasonal (three months total during the year) field workers (1,000 annual equivalent), 200 existing part time laborers would add 3 months work each year (50 annual equivalent) and 250 full time supervisory and management staff positions. The part time workers would receive \$21 million and the full time workers \$21 million. This is very different from the addition of 1300 full time jobs paying from \$25 thousand to \$35 thousand per year, which is the best that can be surmised from the statement in the report.

The economic analysis should include a description of the expected beneficiaries, e.g., how many small, medium and large landowners would benefit (e.g., less than 100 acres, 100 to 1000 acres and over 1000 acres) from improved reliability in irrigation water supply.

In the analysis of the range of options to be considered, there should be an option which results in the bare minimum impact on the aquatic system, for example, all storage and conveyance systems are "out of channel" and only the most minimal diversion structure is in the river. This is needed to provide an estimate of the environmental value sacrificed in the absence of an explicit assessment of the value of the environmental impact (at present there appears to be no concensus on how to conduct such an assessment beyond direct economic impacts, such as loss of fisheries).

Thank you for considering these concerns.

Phelps Fréeborn 3409 Taylor Way Yakima, Washington 98902 (509) 454-0871

SCOPING COMMENT FORM

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

May 5, 2011- Yakima, Washington

Name (please print legibly): Pholos Free 60000
Organization: none
Mailing Address: 3409 Taylor (Day
City, State, and Zip Code: YAKUMA Washing tor 58002
Telephone: $454-087$ E-mail: $(nore)$

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

- I would like to receive a copy of the Scoping Document.
- ____ I want to receive email updates and information on the Environmental Impact Statement (EIS).
- <u>____</u>I want my name included on the mailing list to receive information on the EIS.
- ____ I want my name removed from the ____ email list and/or ____mailing list (please check one or both).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

See accon

(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>yrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.



U.S. Department of the Interior Bureau of Reclamation



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Yakima River Basin Integrated Water Resource Management Plan **NEPA/SEPA PR/PEIS** BUREAU OF RECLAMATION

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My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

The Yakima Valley Audubon Society recognizes and appreciates
light although the Interrated Plan is remained as a mater
that a mough the Dritegrand that is viewed as a water
Supply project, there are many ecosystem restoration benefits
We do not want to be newed as obstructionists, however, we
are concorned that the expansion of Bumping Lake is included
in this nackage as it presents a major loss of successful built tout
(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email vrbwep@usbr.gov; phone (509) 575-5848, ext. 613.



U.S. Department of the Interior **Bureau of Reclamation**



Comments (continued)

Spawning habitat and hearthy old growth forest critical owlin addition to northern spotted to other We would like to see more indepth models , studies. that show what - the water supply Dicture LOOK Without the Bumping Expansion in the Sh Could this reduction in water su erm. exploration of water Conservation and more VIADIO Water Market reallocation

Water conservation and market reallocation have been touted as two of the seven major components of the Integrated Plan, but specific targets and goals do not appear to have been identified. We strongly urge these elements to be further developed and defined

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>vrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.

From:	Arthur Unger
To:	BOR YRBWEP, sha-UCA
Subject:	EIS Scoping, Yakima River Basin
Date:	Tuesday, May 17, 2011 3:14:04 PM

RE: EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin

Please include these comments as part of the environmental impact statement scoping process for the Yakima River Basin Integrated Water Resource Management Plan. I am opposed to the construction of an enlarged Bumping Lake dam within the Wenatchee National Forest, a new Wymer dam, and pumping water out of the Columbia River into the Yakima Basin. The proposed dam projects would flood endangered species habitat, and pumping water from the Columbia River would also adversely impact existing salmon runs.

Instead of spending federal tax payer dollars on more dams, the Bureau of Reclamation should focus on water conservation and water marketing to meet irrigation demands in drought years.

Does sub surface micro drip work in the Yakima River Basin?

If my health improves, I will visit to look for sage grouse.

Thank you for the opportunity to comment,

Arthur Unger

2815 La Cresta Drive

Bakersfield, CA 93305-1719

(661) 323 5569

artunger@att.net preferred



Naturam Expellas Furca

Tamen Usque Recurret

WISE USE MOVEMEN

P.O. Box 17804, Seattle, WA 98127

May 17, 2011

Attention: Candace McKinley Bureau of Reclamation, Columbia-Cascades Area Office Environmental Program Manager 1917 Marsh Road Yakima, WA 98901 Via Email to: <u>yrbwep@usbr.gov</u>

Dear Ms. McKinley:

The Wise Use Movement submits the following scoping comments on the "Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington," as set out in the April 5, 2011, Federal Register Notice:

The Wise Use Movement continues to oppose spending taxpayer money on more dam studies in the Yakima River Basin. We continue to oppose the Bumping Lake enlargement project, the Wymer project, and pumping water from the Columbia River to the Yakima River Basin. It's plain that proposing the same old, tired, unimaginative, generally unscientific, often thwarted and likely illegal solutions to competing, conflicting and irreconcilable wants will accomplish little more than exercise the time, talents and purses of a host of attorneys.

The National Environmental Policy regulations (40 CFR § 1502.14) require that all reasonable alternatives be included, including those that may require changes to existing laws. As part of the scoping process the Bureau of Reclamation should include an alternative that addresses water conservation and water marketing, instead of structural dam projects.

In addition, the Bureau of Reclamation's draft Environmental Impact Statement should include an alternative that would combine all Yakima River Basin irrigation districts and water right holders so that any shortage of the total water supply available is shared equally among all irrigation water users. Such a reallocation would eliminate the distinction between proratable and non-proratable water rights ("senior" and "junior" rights) among and within irrigation districts in the Yakima River Basin. This alternative may have the same capability of meeting the 70% target of water rights for the Kittitias Reclamation District, Roza Irrigation District and Wapato Irrigation Project as the proposed Work Group plan. Please send us a copy of the draft EIS when it becomes available.

Sincerely,

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John de Yonge

President Wise Use Movement

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P.O. Box 563 Yakima, Washington 98907-0563 Phone (509) 249-0226 Fax (509) 249-0233

May 18, 2011

BUREAU OF RECLAMATION 1917 Marsh Road --Yakima, Washington 98901-2058

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RE: Written comments regarding the Yakima River Basin Water Enhancement Project (YRBWEP) draft Planning Report/Programmatic EIS (Integrated Water Resource Management Plan)

To Whom It May Concern:

The Ahtanum Irrigation District is astounded by the omission of the entire Ahtanum watershed from the draft YRBWEP PR/PEIS. We fail to understand how a truly comprehensive and unbiased report can exclude a significant portion of the Yakima watershed and fail to mention the proposed 25,000 acre foot Pine Hollow Reservoir Project. This project has been studied for 20 years, has over \$1,500,000 worth of completed studies under its belt, and is currently at the construction EIS stage as part of the Ahtanum Creek Watershed Restoration Program (ACWRP). No other project listed in the YRBWEP draft document appears as advanced.

This oversight becomes doubly disconcerting as several of the YRBWEP committee members, who represent multiple local, state, and federal entities, were actively participating members in the Dept. of Ecology led scoping groups for most of the completed Pine Hollow studies. The current and previous Boards of Yakima County Commissioners have also submitted written letters of support.

To refresh the memories of those preparing this report, we are attaching a detailed recap of all our completed studies.



BUREAU OF RECLAMATION Written Comments re the YRBWEP PR/PEIS May 18, 2011 Page 2

The entire basin would realize multiple benefits from the Ahtanum Creek Watershed Restoration Program, such as reliable irrigation water for the Wapato Irrigation Project, the Ahtanum Irrigation District, and the John Cox Ditch Company; flood control, fire protection, habit rehabilitation, reduced pumping from ground water wells, reduced use of electrical irrigation pumps, the possibility of hydroelectric power generation, and not least of all, the possible restoration of one or more salmon species into the upper watershed.

As is obvious, a tremendous amount of time, energy, and resources have been invested in this project. The Ahtanum Creek Watershed Restoration Program, which includes the Pine Hollow Reservoir Project, needs to be at the top of the list of projects to be implemented and completed for the benefit of the Yakima River Basin Water Enhancement Project.

Sincerely,

AHTANUM IRRIGATION DISTRICT

Kenneth P. Bates Nr

Kenneth P. Bates, Jr. President

KPB:bab

Attachment

AHTANUM IRRIGATION DISTRICT PINE HOLLOW RESERVOIR PROJECT PHASE RECAP

1991-1996 COMPREHENSIVE WATER CONSERVATION PLAN (A/K/A REF. 38) -- CH2MHILL & NORTH YAKIMA CONSERVATION DISTRICT

Lead Agency: WA State Dept. of Ecology

 Funding: \$133,000 (\$66,500 Dept. of Ecology Grant, \$53,200 Dept. of Ecology Loan to Grantee (AID), \$13,300 Ahtanum Irrigation District funds.
Source of funding: Agricultural Water Supply Facilities Referendum 38, Chapter 173-170 WAC, November 1980.

Parties: Ahtanum Irrigation District (AID), WA State Dept. of Ecology (DOE), and various local, state, and federal agencies, tribe.

1998-2001 PHASE I CONSTRUCTIBILITY – DAMES & MOORE/SEATTLE (NOW URS CORPORATION)

Lead Agency: WA State Dept. of Ecology

Funding: \$300,000 Dept. of Ecology Grant
\$300,000 Matching Funds – Ahtanum Irrigation District
\$50,000 Dept. of Ecology Grant in favor of Yakama Indian Nation for cultural resources review.

Parties: AID, DOE, WA Dept. of Fish & Wildlife (WDFW), and Yakama Indian Nation (YIN)

2001-2004 AHTANUM CREEK WATERSHED ASSESSMENT (ACWA) (GOLDER ASSOCIATES/SEATTLE)

Lead Agency: Ahtanum Irrigation District

Funding:\$375,000 WA State Dept. of Agriculture Grant (Federal Farm Bill)Parties:AID, DOE, WDFW, YIN, U. S. Fish & Wildlife (USFW), Yakima County
Public Works Dept., Wapato Irrigation Project (WIP), and NOAA
Fisheries (NOAA)

2004-2005 AHTANUM CREEK WATERSHED RESTORATION PROGRAM (PROGAMMATIC EIS) (ACWRP) (ESA ADOLFSON/SEATTLE)

Lead Agency: WA State Dept. of Ecology

Funding: \$325,000 WA State Supplement Budget (Drought Preparedness Account) \$50,000 WA State Capital Budget (for DOE/EIS Coordination, State Building Construction Account)

Parties: AID, DOE, WDFW, YIN, USFW, Yakima County Public Works Dept., and NOAA

May 18, 2011

Page 1 of 2

AHTANUM IRRIGATION DISTRICT PINE HOLLOW RESERVOIR PROJECT PHASE RECAP

2005- AHTANUM CREEK WATERSHED RESTORATION PROGRAM (CONSTRUCTION EIS)

Lead Agency: WA State Dept. of Ecology

\$75,000 WA State Capital Budget for the purpose of formalizing ACWRP, including identification of site-specific habitat improvement projects and a determination of the most appropriate restoration program alternative to implement (a portion of these funds have been spent by DOE to date); \$475,000 WA State Capital Budget to fund a construction level EIS for ACWRP, including construction of the Pine Hollow Reservoir, provided there is agreement among the Yakama Nation, AID, and other jurisdictional federal, state, and local agencies and entities to proceed with the EIS. (No monies spent to date). (Note: This funding will expire June 30, 2011; however, it is expected that these funds will roll over into the next Capital Budget).

Parties:

Funding:

a 1 % ...

AID, DOE, WDFW, YIN, USFW, Yakima County Public Works Dept., and NOAA

May 18, 2011

Re: Draft Yakima Water Management Plan

Greetings:

I am writing you to express support for the draft Yakima water management plan and to thank you for your efforts on behalf of the river and its fish. The recovery measures included in the plan have tremendous potential to improve conditions within the basin for ESA listed salmon and steelhead. The plan is ambitious to say the least and some storage projects will require substantial federal funding. It is critical that moving forward fish recovery and water conservation actions be prioritized for immediate implementation, even in the absence of the 4 billion dollars required for the implementation of the plan in its entirety. Alterations to the Yakima's hydrograph have a profound impact on the ecology of the river and its ability to support healthy anadromous runs, and measures which would increase runoff during the smolt migration and reduce artificially high summer flows should be adopted immediately.

While our organization recognizes the reality of irrigation demands in the Yakima basin and the importance of the agricultural sector for the region's economy, we ask that projects to increase storage capacity be implemented only after thorough environmental review and a determination that they will not have undue impact on listed trout and salmon. Additionally, wherever possible new storage should be used to the benefit of the river ecosystem ensuring a more natural hydrograph by reducing dewatering and artificially high flows in mainstem habitats.

Planned passage at dams in the basin should also be implemented posthaste as access to previously blocked habitat coupled with improved conditions in the mainstem Yakima and Naches will pay immediate dividends for salmon and steelhead. We also support fully the planned protection and restoration actions for the Teanaway basin.

Thank you for the opportunity to comment on the proposed plan, we believe it has tremendous promise for wild fish in the Yakima. We look forward to working with you on further development and implementation of the plan and to a brighter future for the Yakima basin.

Sincerely, William Atlas FFF Steelhead Committee; Chair Candace McKinley,

read in the e-version of the Yakima Herald-Republic that comments are still being taken regarding the Yakima Basin Water Plan.

i do not have a copy of said plan, so am wondering if it is in regards to the Yakima River and Tributaries, or if it involves the Columbia River upstream of the mouth of the Yakima River and including the Yakima River.

in any event, the difficulties of devising a plan for the area, much less implementing, would be a daunting task. politically maintaining irrigation, socially saving the fish, and assurances to the general populace that there will be water to drink. what an endeavor.

although the Bureau of Reclamation is usually thought of as dams and reservoirs to provide irrigation, perhaps more of the issue will be how to help fix the fish restoration processes. better water (quality and quantity), passage issues, and maybe, the desire to restore fish to ancient (really not that long ago) rivers, streams and lakes.

i hope you are successful. rather, you need to become successful.

best wishes.

Doug Miller

Goldendale, Washington

#1 Put the final nail in the coffin of Black Rock. It was always a con-job proposed by a few speculators who hoped to get rich developing the area around the proposed lake, at public expense. Kill it.

#2 I support expansion of Bumping Lake. Also, I suppoort all the mitigation efforts to protect in-stream uses.

#3 The Yakima Valley has become grossly overdeveloped for agriculture. I propose letting some water rights die of attrition as junior water rights holders go broke on their speculative land purchases as the climate becomes drier. With the shift from apples and similar high water usage crops to wine grapes and hops, with dry land farming techniques, there should be less demand for water during the summer.

Tom Utterback 220 N 42nd Ave Yakima, WA 98908 509-573-3309

LOWER COLUMBIA BASIN AUDUBON SOCIETY 9016 Sunset Trail Pasco, Washington 99301

May 19, 2011

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

Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley,

We are writing to comment on the Federal Register Programmatic Environmental Impact Statement (PEIS) Federal Register scoping notice for the "Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington. *76 FR 18780 (April 5, 2011)*.

We are deeply concerned that water conservation has not been fully addressed. Water conservation is the most economical and environmentally benign means of providing additional water. Water conservation should be exhaustively studied and implemented before public funds are expended on billion dollar storage projects.

The expansion and creation of wetlands along the Yakima River by diversion of peak spring runoff should be considered. The wetlands would create valuable fish and wildlife habitat, provide outdoor recreation and recharge the basin's ground water providing large underground water storage at a very low cost.

The Bureau of Reclamation and Washington Department of Ecology have squandered millions of dollars over the past ten years studying large storage projects such as the Black Rock and Lower Crab Creek reservoirs. These have all proven to have cost benefit ratios that could not justify construction. It is highly unlikely that the Wymer Dam or Bumping Lake large storage projects will be found to be economically justifiable. New studies should focus on conservation. All proposed large storage projects should be subjected to an intense cost/benefit review by an independent third party such as a blue ribbon team of economist and scientist not associated with the Bureau of Reclamation or Department of Ecology. This review should be conducted as early as possible – and by all means prior to the issuance of a draft EIS. One of the objects of the review would be to weed out projects that will not be justifiable as early as possible and save the taxpayers millions.

The country has been struggling to deal with one of the most severe recessions in its history. Government budgets at all levels, federal, state and local are insufficient to meet our basic needs. It is unconscionable to squander funds on questionable water projects when our citizens are suffering cuts in education, social security, and health care. Our highway transportation system is on the point of collapse. We simply cannot spend scarce funds on studying projects which hold little promise of being viable. The Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project should fully disclose and analyze the cost of electricity to operate the project, the utility rates for computing the cost of power should be fully disclosed, the dollar value of lost power production by storage of water and diversion of water to crop use, and how much will those benefitting from the water storage pay to construct, operate and mitigate the projects. The cost and economic benefits of water conservation must be fully documented.

We absolutely oppose enlarging Bumping Lake. Our chapter has fought for thirty years to protect old growth timber in Washington. We were among the original petitioner's to list the spotted owl as an endangered species. It makes no sense to flood the old growth timber adjacent to Bumping Lake.

Enlarging Bumping Lake would inundate approximately ten miles of perennial and intermittent stream habitat downstream from the existing dam and upstream of the existing reservoir, affecting the aquatic ecosystem and fishery resources. This is compounded by the recent designation of Deep Creek and Bumping River as critical habitat for bull trout.

We recommend dropping enlargement of Bumping Lake from further consideration.

Comment periods are entirely too short. The public needs at least 90 days to read and analyze the complex Environmental Impact Statements and scooping documents which will be issued as this plan evolves.

Please send the Lower Columbia Basin Audubon Society a copy of the draft Programmatic EIS when it becomes available.

Finally, from my reviews of recent EIS's for Black Rock and Lower Crab Creek reservoirs, I have found the quality and comprehensiveness of these studies to be lacking. I am also concerned that the Bureau of Reclamation and Department of Ecology pay little attention to public input and comment. I hope that you will value and heed the comments of the public – remember they are the taxpayers who foot the bill and suffer the consequences of your decisions. All public comments should be recorded, specific concerns addressed and responded to in a report published in print and posted to the internet for further public review.

I request the Bureau of Reclamation provide a response directly to the Lower Columbia Audubon Society addressing the concerns we have raised.

Thank you!

Sincerely,

Richard J. Leaumont Chairperson Conservation Committee

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City, State, and Zip Code: Cle Elum, Wa 98922				
Telephone: 509 9626112 office E-mail: Clerfl@hutr	nail.com			

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

- \underline{V} I would like to receive a copy of the Scoping Document.
- \checkmark I want to receive email updates and information on the Environmental Impact Statement (EIS).
- $\underline{\checkmark}$ I want my name included on the mailing list to receive information on the EIS.

following statement

____ I want my name removed from the ____ email list and/or ____mailing list (please check one or both).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>vrbwcp@usbr.gov</u>; phone (509) 575-5848, ext. 613.



See

U.S. Department of the Interior Bureau of Reclamation



Gentlemen:

I have lived in the Kittitas Valley all of my nearly 70 years. I grew up on a farm east of Kittitas and began working on the family farm in the mid-1950's. I still farm part of the Clerf family farm of approximately 700 acres, using water from the Kittitas Reclamation District and the Cascade Irrigation District.

I have read and studied most of the materials available at the Ellensburg Open House on May 3rd. While I am very familiar with the irrigation systems in Kittitas County, I am not as knowledgeable about those in Yakima and Benton Counties.

The Yakima River Basin Integrated Water Resources Management Plan (the Plan) is an extremely complicated multifaceted and very unrealistic plan.

There is a \$5 billion price tag on the Plan which is way too low to accomplish everything listed in the materials. A more realistic figure of \$10 to \$20 billion would be required to do what is described in the literature. Don't you know we are broke? The United States is broke! We have a current account debt of \$14.4 trillion with unfunded liabilities of \$60 to \$100 trillion coming at us in the next 30 years. We face a very real possibility that the buying power of the dollar will decrease by 50% in three to five years, and 80% to 90% in ten years.

The United States could not balance its budget even if income tax receipts were to double. That would ruin the economy faster than what we are seeing now. We can't work our way out of our present debt situation without default or hyperinflation which would impoverish everyone in the country. And now you are coming for \$5 billion and really much more for a pie in the sky plan as if we could easily afford it.

As you should know, the State of Washington was more than \$5 billion short for the next biennium and everyone who receives state funds is going to feel the pinch. Do you expect the State to help finance the Plan? The Plan is also unrealistic in its broad conception. This is not a plan, it is a Christmas shopping list buying gifts for everybody. The five reservoirs were originally designed and built to serve as reservoirs for irrigation, with flood control a secondary benefit. Now, every self-appointed, self-righteous would be guardian environmental group in the West wants to use the Plan to be a vehicle to further its agenda of Federal or State ownership or control of the land and its resources. This would be at the expense of private ownership and private property rights. Their requirement that 71,000 acres of private land be purchased in order to secure their support of the Plan is blackmail pure and simple.

-2-

We need more land, not less, in private ownership where the land and its resources can be managed and used for productive purposes and payment of taxes.

If the main purpose of the Plan is to secure a more reliable supply of water for the irrigated land of the watershed, there is not a stated list of priorities, i.e., projects that should be done first to give the most and quickest results for dollars spent. The truth is that you could spend \$10 to \$20 billion and still not be able to guarantee that junior water districts will have a minimum of 70% of their water allocation every year!

The Plan calls for spending \$5 billion at least. Will this be an outright taxpayer subsidy, or will it be a liability against the approximately 500,000 acres of irrigated land in the watershed? That is \$10,000 per acre. At 5% interest that would be an assessment of \$500 per acre per year before any payback. The land will not support this kind of payment, not even half that.

The Plan proposes to spend many millions of dollars on fish and wildlife habitat and mitigation all over the watershed. Where and when is the financial return on this investment? Here are a few low-cost projects that could bring increased water supply in a short time.

1. Raise Lake Cle Elum three or more feet, whatever is possible without major reconstruction of the dam or other facilities. Do the same for all the lakes where possible.

2. Construct a channel between Lower Lake Kachess and Upper Lake Kachess so that when the lake is drawn down to a minimum, the upper portion is completely drained.

3. Investigate the use of monomolecular films of long chain hydrocarbon molecules that can reduce evaporation from water surfaces by 90%. The five major reservoirs plus Clear Lake and Lake Easton have a surface area of more than 16,000 acres; maybe as much as 40,000 or 50,000 acre feet of water could be saved each year.

4. Lower the outlet tunnels in the five reservoirs, or use floating pumping stations to drain the water to very low levels when necessary. Make sure the pumping stations stay afloat this time.

5. I firmly believe that the Bureau of Reclamation must do a better job in managing the water supply that we have available to us each year. Past performance leaves a lot to be desired.

6. Transferring excess water from Lake Keechelus to Lake Kachess via open canal or pipeline is a worthwhile project if the costs are not prohibitive.

7. Generate electric energy whenever possible and financially feasible.

8. Lining or piping of canals and laterals should be done only where seepage is excessive. A little seepage maintains some wetlands which would dry up without it. The water is not lost. It shows up again a few days, weeks, or months later in the aquifer and eventually back into the river.

On the other hand, the Wymer dam project is a billion dollar farce! To build a pumping plant at Thorp, enlarge 20 some miles of canal, including a tunnel $\frac{3}{4}$ mile long, enlarge the Wippel Pumping Plant, enlarge five more miles of canal, then dig ten more miles of new canal including a mile long tunnel through hard basalt, and finally a large dam and outlet structures would be extremely costly for very little benefit.

The Bumping Lake enlargement is a good project provided it is cost effective. However, I don't have sufficient information to make a correct judgment on that project or some of the others.

In conclusion, I will say that most farmers will probably approve the Plan until they realize it will have to be paid for with borrowed money and cost much more than \$5 billion Whenever has the government, state and/or federal, completed a project at the estimated cost? If the costs are to be borne by the taxpayers, we can't afford it. If the costs are to be borne by the farmers, we can't afford it.

-4-


The Extreme Cost of Government Money-Saving

By



 $\frac{05/17/11}{What may}$ Buenos Aires, Argentina – Are you paying attention, Fellow Reckoner? What may well go down as the greatest tragicomedy in history is playing out right before our very eyes.

Lucky us!

Some time today – or was it yesterday? And does it even matter? – The United States of America will crash through its so-called "debt ceiling," the somewhat arbitrary \$14.29 trillion dollar mark above which it must implement

"extraordinary measures" in order to keep the lights on and its "services" running. Such are the extraordinary times in which we live. The event – which inspired little more than a rather sanguine "Humph" in the markets yesterday – sets in motion what *The Wall Street Journal* describes as an "uncertain, 11-week political scramble to avoid a default."

No doubt about it. The Leviathan is starving, unable to sustain the cost of output the modern welfare/warfare model requires of it. Flailing and squealing under the weight of its own self-imposed obligations, the beast portrays a curious, almost pitiful kind of incompetence, like a slug writhing in the middle of the road on a hot summer's day. We almost – almost – feel pity for the poor, wretched thing. Then we remember what it is, what it does, and we are happy to see it firmly, resolutely marching down the road to perdition.

This year alone, the US Government has committed to pay out \$3.7 trillion. Yet it will only take in between \$2.1-\$2.2 trillion in tax "revenues." As such, its available funds will barely cover 60% of the state's 2011 operating budget. The difference, the budget deficit, will total around \$1.65 trillion. Expressed another way, the budget shortfall for this single year is equal to about 12% of total GDP output. Gross federal debt, mind you, is already well over 100% of GDP...and ticking ever northward.

How did it come to this? You'd think the state – being able, as it is, to write its own tax code and to issue its own, legally unchallengeable currency – would have enough of an unfair advantage to keep its head above water. This is not rocket science. All it has to do is spend less than it steals. Any common crook ought to be able to manage that. Ahh...but the government is no common crook. It is a crook of the commons, feasting on the toils of the productive economy only to pour the accumulated wealth and value into the bottomless vortex of its own engorged belly.

One need only take a cursory glance at the absurd debt reduction "solutions" being proposed to understand the mentality required to squander such an exorbitant advantage. Let's start with a proposal from the head of the beast (emphasis added):

"President Obama says he wants to 'trim' \$4 trillion from the federal budget over the next 12 years," observed Eric Fry in yesterday's *Daily Reckoning* (

). "To most Americans, that sounds like debt reduction. But it's not. *It is only a cut in planned spending*, the effect of which would make the planned budget deficits slightly less obscene.

"In other words, Obama's 'money-saving' budget proposals would *cost* America trillions of dollars – trillions that the government does not possess, that taxation alone could not raise and that foreign creditors would be increasingly unlikely to provide."

According to analysis by the Congressional Budget Office (CBO), the president's budget would produce average annual deficits of nearly \$1 trillion over the next 10 years. Total indebtedness would soar by a massive \$10 trillion over that timeframe, as total annual spending would surge 57 percent – from \$3.7 trillion this year to \$5.8 trillion in 2021. In reality, these deficit numbers would probably be much higher still.

"The CBO's terrifying projections include an array of hopeful assumptions," continued Eric, "the most significant of which are that interest rates remain near generational lows and that tax revenues climb at a robust pace. *The president is counting on tax revenues to double over the next ten years.*"

Adding his two cents to the dearth of intelligent discussion emanating from the nation's halls of power, former Treasury Secretary Robert Rubin had this to say on the matter:

"I think the failure to meet any commitment would be viewed by the markets as default and would be deeply unnerving."

"We don't know" what would happen in the event of default, warned Rubin, who is perhaps best know for raiding pension funds during the Clinton era in an effort to maintain the appearance of an honest budget. "But I think it is totally irresponsible to take the risk of trying to find out."

Apparently escaping the former secretary's mind is the irresponsibility of continuing to add more debt to a system already unable to meet its current obligations. Had the US simply defaulted during his tenure as Secretary, it might find itself in a more credible situation today...possibly without a decade and a half of reckless malinvestment piled on top of the already shaky foundation he helped to erect in the first place.

To be fair, living within one's means can at times be difficult. It is responsible, yes. And it is honest. But it can be difficult. Nevertheless, this is what the market requires, to one extent or another, of all non-governmental entities. Spend more than you earn for too long and you go broke. Try it if you don't believe us.

Of course, the government is not a non-government entity at all. Ergo, rather than tighten its belt, rather than do what is responsible and honest, the state simply extends the limit on the national credit card, rolling over old debt with newly borrowed money...money to one day be repaid by people who are not yet born and who, conveniently for the state, therefore have no say in the matter whatsoever. To hoodwink the living is easy. To steal from the future...ah, that takes a concerted application of moral depravity.

In fact, Secretary Timothy Geithner is already engaging in various "extraordinary measures" to stave of the Day of Reckoning. Reports *The Washington Post*:

"Geithner, who has already suspended a program that helps state and local government manage their finances, will begin to borrow from retirement funds for federal workers."

But not to worry. The Feds are "legally required to reimburse the program," writes the Post. Hmmm...

The maneuver, employed in tandem with a few other accounting sleights of hand, only buys Geithner a couple of months, according to the *Post*. Then what?

When asked why he robbed banks, Willie "The Actor" Sutton famously replied, "Because that's where the money is."

Now... Where might a greasy mitted bureaucrat find a fat, juicy pile of someone else's cash to pilfer? Any guesses?

for The Proceeding



Joel Bowman is managing editor of . After completing his degree in media communications and journalism in his home country of Australia, Joel moved to Baltimore to join the Agora Financial team. His keen interest in travel and macroeconomics first took him to New York where he regularly reported from Wall Street, and he now writes from and lives all over the world.

Special Report: Ben Bernanke's Dirty Secret... Head of the Fed Ben Bernanke is kicking the printing presses into overdrive to "save the economy." But by doing so, he's stuffing his dirty paw into YOUR pocket and handing your hard-earned wealth to his Washington and Wall Street chums. Now's the time to get the scoop on what inflation REALLY means for the economy and you...

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The articles and commentary featured on the Daily Reckoning are presented by

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THE YAKIMA COUNTY FARM BUREAU

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www.yakimacountyfarmbureau.com

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May 23, 2011

Candace McKinley BOR Environmental Programs Manager 1917 Marsh Road Yakima, WA. 98901

Re: Comments on Expanded Water Storage

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The Yakima County Farm Bureau is a grass roots organization representing farmers and ranchers and allied industries on issues affecting their ability to stay economically viable while protecting a long standing way of life. Yakima County Farm Bureau has over 3,000 members and is affiliated with the Washington State Farm Bureau.

We appreciate the opportunity to provide input on this very important proposal. The Yakima River Basin is in dire need of additional water storage for the host of items mentioned in your report.

The key to this basin's continued success will be additional water storage, in significant quantities to meet our future needs for the next 100 years. Water conservation has and will continue to play a role, as technology progresses. However, it will not create new water nor will it provide the amounts of water this basin requires to move into the future. Water transfers may address a certain priority, but will not allow for growth nor will they allow the land to continue to be productive. If our land is not productive, the tax base will shrink. If the tax base shrinks, the backbone of our community is depleted.

We were surprised that there was no mention of the Pine Hollow Reservoir Project in this proposal. It seems odd that so much time, effort and money spent on this proposal did not even warrant mention or consideration. At one time, there was tremendous support for this project,

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which has a very high fisheries and tribal component. One would think that with all the money and planning spent on this project, that it would be part of a comprehensive basin plan. Why is the Pine Hollow Reservoir project not part of this plan?

While our organization supports additional water storage for the Yakima Basin, we do have issues with how this plan was put together and who was invited to participate, as it excluded individuals and organizations who use and pay for the water. It also excluded those who have direct water rights that may be affected by this proposal. Many of these interests were part of the Watershed Planning Process and had been very well versed on the basin water issues. Much time, effort and money has been wasted because these people were not invited to be active participants.

Another item of concern is "Market based reallocations in the Yakima River Basin." While we do not know exactly what this refers to, we are concerned that it will take water away from the land. Land without water in this area has a very diminished value and I would think that Yakima County and other entities may have a concern about this. With roughly 25% of the land in Yakima County in private ownership, anything that negatively affects ownership of that land, will negatively affect county economics. Therefore, coming up with solutions that expand the amount of water available for the uses mentioned in your report should be the priority, rather than reallocating our current water resources.

Thank you for the opportunity to allow us to express our views in regards to this matter. Please feel free to contact me if you have any questions.

Sincerely yours,

Steven E. George – President 509-930-2335

c. Legislators 13th, 14th and 15th Legislative Districts Yakima County Commissioners

		Received in Mailroon	
Kathie Wise		c jun 09 2011	Retention Code : EIVV-1.10
From: Sent:	Kathie [specialkew@comcast.net] Sunday, June 05, 2011 8:33 PM	A D Yakima, Washington	Control #: 11047829
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To: cmckinley@usb	r.gov	ougenal	Sint Oyemail
Subject: Yakima R	<u>org</u> iver Basin Integrated Wa	ter Resource Ma	anagement Plan
May 31, 2011			
Candace McKinley			
Environmental Program	Manager	1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	
Bureau of Reclamation			
1917 Mar g h Road			
Yakima, WA 98901			
Dear Ms. McKinley,			
It was nice to meet you a Resource Management P	nd others at the May 3 Scoping Plan.	meeting on the Yakir	na River Basin Integrated Water
Dear Ms. McKinley, It was nice to meet you a Resource Management P	ind others at the May 3 Scoping Plan.	meeting on the Yakir	na River Basin Integrated Water

The property owners of the proposed Habitat Protection and Enhancement project on the 15,000-acre tract in the Yakima River canyon, and the Wymer Dam/Reservoir have not been briefed bout the proposal by Department of Ecology, US Department of the Interior Bureau of Reclamation or Water Reclamation. Two agency members met and/or spoke on separate occasions informally with some of the property owners primarily about the possible acquisition, but the implications of the projects have not been discussed. Some technical documents on the projects have been provided to the property owners. In order for the property owners to consider the proposals and the impacts to the property and possible acquisition, as well as implications of the proposed project on those who currently lease tracts on the Eaton property, several questions need to be addressed.

Please provide written responses to the following:

The Habitat Protection and Enhancement plan references a "15,000 acre tract in the Yakima River canyon, including the valley bottom and eastern slopes, from the Yakima River to I-82" is property currently owned by Jack Eaton and various family members. This site is listed in planning documents as the "preferred site" for the Habitat Protection and Enhancement project. According to Wendy Christensen, Water Reclamation, the property owners can say "no" if they are not interested in releasing the designated 15,000 acres. The same is also noted in the Proposal as follows: "If the preferred site cannot be acquired... If the preferred site cannot be acquired, a different preferred site would be located. The plan further states, "additional lands are eligible and have been recommended." Please clarify in writing if the acquisition of the 15,000 acres is a separate project from the Wymer Dam project or if the two projects are in fact one project.

A similar statement was made by Derek Sandison, Department of Ecology, regarding "if property owners are not interested, owners just say No and <u>they</u> go away". I believe I heard Mr. Sandison further state, "however, the Wymer Dam Project will still remain". Please clarify in writing who "they" are in Mr. Sandison's statement referenced above, e.g. who goes away – Ecology, Water Reclamation, etc.?

Please clarify in writing if the Wymer Dam project is separate from 15,000 acre tract listed in the Habitat proposal and explain if the property owners have the same option to say no if they are not interest?

Noted in the Summary documentation is reference for the removal of the Roza Dam by around 2016. This seems to suggest the Wymer Dam project is the replacement Dam. Please clarify in writing if the Wymer Dam Project is identified to replace Roza.

Based on the answer to the above question related to the Wymer Dam proposal, please respond in writing to the following questions.

What will the limitations and/or impact be on wildlife such as the Big Horn sheep, elk, deer, and other related or like species as a result of the project Dam project, assuming the acquisition of approximately 4,000-acre tract versus the proposed 15,000-acre tract Eaton property?

What limitation and restrictions will result or impact domestic animals such as cattle, horses, sheep, and other related or like species as a result of the Dam project proposed on the 4,000-acre tract Eaton property? What will the limitations be on these species now living on this tract?

What limitations will result on the ability to raise cattle, horses and sheep, and related domestic livestock as it may relate to native vegetation and native grasses currently available to feed such livestock, assuming the acquisition of approximately 4,000-acre tract for the Dam Project?

What limitation and/or impact will the Dam project have on the soil as it relates to future production of vegetation, grasses and grains for such livestock and related animal species? What restrictions will be imposed to the available surrounding ground and grazing rights for the planting and harvesting of vegetation, grasses and grains for such livestock and related animal species,

What impact will there be on fruit bearing plants and trees grown on adjacent or adjoining properties assuming the acquisition of approximately 4,000 acre tract for the Dam project? What will the limitations and/or restrictions be?

What limitations or restrictions will there be as it relates to property access for recreation and sporting activities such as Hand-gliding and paragliding, hunting, and related sporting/recreational activities --currently authorized on the Eaton property and providing financial benefit-- assuming the Dam project.

What impact will there be to road access on the Eaton property leading to the cell and wireless towers under land leases on the Eaton property—and providing financial benefit, assuming the Dam project on the 4,000-acre tract? What will the restrictions or limitations be?

What limitations will there be on the property owner's access for raising cattle, moving cattle across the property during grazing season, if the Dam project moves forward? What will the restrictions be?

What limitation will be imposed to related business activities occurring on the Eaton property for the on-going and routine ranching activities required in the raising of livestock, grains, hay, etc. and which provide financial benefit? What will the restrictions be?

What impact will there be to current irrigation systems on the Eaton property. How will the current irrigation which includes pumping stations, wheel lines, etc, be limited and/or restricted? How will the same be enhanced? List all potential restrictions that can result for irrigation as a result of the Dam/Reservoir project.

How will financial loss be addressed for all various activities that currently generate financial benefits for the property owners, if the Dam/Reservoir project occurs on the 4,000-acre tract? How will compensation be addressed as it relates to activities currently generating yearly financial benefit for the property owners if the 15,000-acre tract Eaton property acquisition should occur?

How are property owner mineral rights addressed as it may relate to minerals/natural resources that may exist on the 15,000-acre tract Eaton property and/or the 4,000 site of the Dam/Reservoir? How is potential financial benefit addressed with the current property owners, including but not limited to mineral rights, natural resources such as natural gas, oil, etc., and including but not limited to such things as Ellensburg Blue, agates, petrified wood, various gems and stones, and related kinds of materials, which are either known to exist or found as a result of excavation/construction?

How will the various required studies under NEPA, SEPA, EPA, etc. be conducted, if access by property owners is not granted?

<u>List</u> the implications and restrictions that can be imposed on the owners use and the 15,000 acre tract Eaton property, as a result of the findings, should the property owners grant property access for the sole purpose of conducting studies, including but not limited to EPA, NEPA, SEPA.

<u>List</u> the implication and restrictions that may be imposed on the leasing entities on the 15,000-acre tract Eaton property, as a result of the findings of the studies including but not limited to NEPA, SEPA and other required studies.

<u>List</u> the implications or restrictions that can be imposed on the property owners and leasing entities on the property as far as limiting access to privately owned adjoining property to the Wymer Dam/Reservoir, if property owners agree to the acquisition of 4,000 acres? For the acquisition of the 15,000 acres.

What impact will occur to the assessed value of the current 15,000 acre tract Eaton property as it relates to zoning/rezoning /categorizing of the property for tax and use purposes. As it relates to the acquisition of 4,000 acres? Will the 15,000-acre tract be rezoned? What impact will rezoning have on current property owners financially? What impact will rezoning have on neighboring properties financially? List all potential limitations, restrictions, and requirements imposed on property owners and neighboring properties as a result of rezoning if the acquisition of 4,000 occurs for the Wymer Dam project?

What changes will impact property owners and neighboring property owners as it relates to property insurance for potential flood—natural or man-made, as a result of living near a Dam / Reservoir.

If access is allowed to the property for either conducting studies, or for any potential future development, how will access be controlled? How will individuals be expected to conduct themselves and what repercussions can the owner take if there is property damage, trash requiring clean-up, gates left open affecting the containment of livestock. How will the claims be addressed by the offices that oversee the various projects?

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Please send your written responses to these questions to the address shown below and a copy to Jack Eaton at 12771 SR 821, Ellensburg, WA 98926.

As soon as we receive your written responses, the property owners will meet to review and then contact you for further discussion.

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Sincerely,

Matherine levisi

Katherine Wise

10711 180th Ave. East, Bonney Lake, WA 98391 Alpine Lakes Protection Society Endangered Species Coalition North Cascades Conservation Council Pilchuck Audubon Society Sierra Club Western Lands Project Western Watersheds Project

June 7, 2011

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

RE: Yakima River Basin Integrated Water Resource Management Plan Scoping Comments

Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley:

The Sierra Club has reviewed the Federal Register Programmatic Environmental Impact Statement (PEIS) Federal Register scoping notice for the "Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington. *76 FR 18780 (April 5, 2011)*. In addition to compliance with the National Environmental Policy Act, according to the Federal Register notice, the proposed PEIS will also be prepared under the Washington State Environmental Policy Act.

GENERAL COMMENTS

Since the 1979 passage by Congress of the Yakima River Basin Enhancement Project, the Bureau of Reclamation (BuRec) and Washington Department of Ecology (Ecology) have failed for over thirty years to seriously address issues of water-spreading, water-pricing, water metering, project repayment, surplus crops, and water conservation in irrigation districts in the Yakima Basin.

The Sierra Club remains strongly opposed to efforts to construct massive new water storage dams for irrigators in Eastern Washington. Projects such as the Bumping Lake Enlargement would flood ancient forest roadless land within the Wenatchee National Forest. The Bumping Lake Enlargement and Wymer Dam proposals would likely cost over two billion dollars if they were ever built. These projects have been studied repeatedly over the last three decades and have failed to generate a positive benefit/cost ratio or Congressional authorization. During this same time period, Yakima irrigation districts have only been asked to undertake voluntary water conservation and have yet to pay off the existing BuRec's Yakima Basin Project.

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 for the following reasons:

The William O. Douglas Wilderness Area, approximately 170,000 acres, is adjacent to the existing Bumping Lake. None of the reservoir enlargement options that have been considered were within the Wilderness Area boundary. However, a common concern voiced was that the enlarged reservoir would be visible from various vantage points and detract from the scenic vistas and aesthetic value of the Wilderness Area through reservoir drawdown and exposure of the reservoir bottom area.

About 2,800 acres of terrestrial habitat, including approximately 1,900 acres of oldgrowth timber [ancient forest], would be inundated if Bumping Lake were enlarged to a capacity of 400,000–458,000 acre-feet. Old-growth timber serves as habitat for the spotted owl, an ESA-listed endangered species.

Enlarging Bumping Lake would inundate approximately 10 miles of perennial and intermittent stream habitat downstream from the existing dam and upstream of the existing reservoir, affecting the aquatic ecosystem and fishery resources. This is compounded by the recent designation of Deep Creek and Bumping River as critical habitat for bull trout.

The larger-capacity reservoir would not fill on a regular basis and would not be a reliable source of water. Previous studies identified approximately 14 summer homes within the impact area of the enlarged reservoir. It was proposed that these summer homes would need to be relocated downstream from the new dam. A number of the owners opposed downstream relocation. The enlarged reservoir also would inundate existing recreational facilities and approximately 9 miles of U.S. Forest Service road, plus approximately 17 miles of road that would be closed, terminating all vehicle traffic above the damsite and road access to campgrounds above the existing reservoir. In addition to the roads, about 4 miles of trails would be inundated. These actions would hamper accessibility to areas above the reservoir. Increased traffic associated with construction activities at the new dam, including logging of the enlarged reservoir area, would have an adverse impact on the community of Goose Prairie. Further, increased recreation use at an enlarged reservoir also could adversely affect the community. While the concept of a natural (unregulated) hydrograph was not a primary issue in the past, it has become a significant concern in recent years. Representatives of the Washington Department of Fish and Wildlife and others expressed considerable reluctance at the spring 2007 Storage Study Roundtable discussions to include an enlarged Bumping Lake as a storage alternative to be carried into the planning report and environmental impact statement phase of the Storage Study." BuRec Final Report/EIS, p. 2-129 (December 2008).

The PEIS should address the following:

* What are the Yakima irrigation districts growing? How much acreage is devoted to surplus crops? Is the Kittitas Irrigation District still growing hay for the Japanese race horse industry?

* What have the Yakima irrigation districts actually done on the ground since 1980 on water conservation?

* What are the current costs to the irrigators of water (per acre-feet) and electricity (are they still subsidized by the BPA)?

* Have the Yakima River Basin irrigation districts repaid the costs of the existing Yakima Basin Irrigation Project? If not, what is the amount left to be repaid? What would be the true costs of irrigated crops if they had to pay market rates for water and power?

* How many vineyards in the Yakima River Basin are sustainable and do not rely on irrigation or groundwater?

* What is the current contribution to early spring runoff from clearcuts on the Wenatchee National Forest, DNR land and private forestry land in the Yakima River Basin? The PEIS should look at the alternative of halting timber harvesting in the Yakima River Basin to retain more snow pack and improve in-stream flows throughout the summer.

More Specific Comments

As set out in 40 C.F.R. Section 1501.7(2) and WAC 197-11-408(1), the Sierra Club has identified significant issues to be analyzed in depth in the PEIS. The following are specific comments on the elements presented in the proposed Yakima River Basin Study Integrated Water Resource Management Plan (PIWRMP) (Vol. 1), dated February 2011 and The Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup Integrated Water Resource Management Plan Support Document (YRBSSD) (March 23, 2011):

3.1 Fish Passage

* The PIWRMP references a 2006 "Settlement Agreement between the Yakama Nation and Reclamation." *PIWRMP Vol. 1, page 25.* Will the PEIS clarify whether this settlement obligates the BuRec to undertake fish passage at the five existing large storage reservoirs independent of any further action under the proposed "Integrated Plan"? If the BuRec has an independent obligation to carry out fish passage planning and projects, then this section should be deleted from the "Integrated Plan."

* The Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup Integrated Water Resource Management Plan Summary Support Document (YRBSSD) (March 23, 2011) does not adequately describe the proposed "Integrated Plan." The YRBSSD, page 3, states: "At Clear Lake dam, replace the existing upstream passage facilities." The PIWRMP Vol 1, page 24 states: "Upstream and downstream passage of adult bull trout would be improved by modifying the existing fishway or by constructing a new fishway at the spillway adjacent to the Clear Lake Dam." Did the Work Group only agree to upstream passage facilities in the YRBSSD? * Describe the specific location and design of the proposed upstream and downstream fishway. Describe all anadromous or resident fish species that would use the improved existing or new Clear Lake Dam fishway. Provide an estimate for each anadromous or resident fish species of the expected increased numbers due to the proposed new upstream and downstream fishway vs. improvements or modifications to the existing fishway.

* Figure 4-1, Improvements in Instream Flows under Integrated Plan (PIWRMP, Vol. 1, page 47) shows that with the "Integrated Plan," only minor in-stream flow reach results from FWIP (<5%) would occur in the lower reach of the Yakima River from the Roza Diversion Dam down to Richland, WA. No improvement would occur or ISF Goals would not be met on the Naches River from Yakima to the confluence of the Tieton River. With only minor in-stream flow improvements in the lower Yakima and no in-stream flow improvements on the Naches River, how will fish passage at Clear Lake be enhanced?

* Clear Lake Dam lies above Tieton Dam. The PIWRMP (Vol. 1, page 25) states that upstream and downstream fish passage would be installed at Tieton Dam where passage is determined to be feasible based on future evaluation studies. How can anadromous salmonid access to habitat above Clear Lake dam be provided without fish passage at the lower Tieton Dam?

* The YRBSSD, page 3, states: "At Box Canyon Creek (Kachess Lake tributary), ensure effective passage for pre-spawn adult bull trout." What specific steps would be taken to "ensure effective passage"? The PIWRMP (Vol. 1, page 58) states that for Box Canyon Creek the "Integrated Plan" would result in adverse impacts. What are these adverse impacts and what mitigation is proposed?

* The YRBSSD, page 3, states: "For Cle Elum dam, install downstream juvenile passage facilities and fish ladder and collection facility for capture and upstream transport by tanker truck." Describe the specific location and design of the proposed downstream juvenile passage facilities and fish ladder and collection facility. Describe all anadromous or resident fish species that would use these passage facilities. Provide an estimate for each anadromous or resident fish species of the expected increased numbers due to the proposed passage facilities.

* Figure 4-1, Improvements in Instream Flows under Integrated Plan (PIWRMP Vol. 1, page 47) shows that with the "Integrated plan," only minor in-stream flow reach results from FWIP (<5%) would occur in the lower reach of the Yakima River from the Roza Diversion Dam down to Richland, WA. With only minor in-stream flow improvements in the lower Yakima how will fish passage at Cle Elum dam be enhanced?

* On April 13, 2011, the BuRec issued a Notice of availability of the FEIS for the Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project in the Federal Register (76 FR 20707). The PEIS should explain how this separate FEIS fits into the "Integrated Plan." If this is an independent project, then it should be deleted from the "Integrated Plan."

* The YRBSSD, page 3 states, "For Bumping dam, install upstream and downstream fish passage as part of the proposed Bumping Lake enlargement, or at the existing dam if the enlargement is not authorized." Describe the specific location and design of the proposed

upstream and downstream fish passage facilities. Describe all anadromous or resident fish species that would use these passage facilities. Provide an estimate for each anadromous or resident fish species of the expected increased numbers due to the proposed passage facilities.

* Figure 4-1. Improvements in Instream Flows under Integrated Plan (YRBS Vol. 1, page 47) shows that with the "Integrated plan," only minor in-stream flow reach results from FWIP (<5%) would occur in the lower reach of the Yakima River from the Roza Diversion Dam down to Richland, WA. No improvement would occur or ISF Goals would not be met on the Naches River from Yakima to the confluence of the Tieton River. Only minor in-stream flow reach improvement from FWIP (<5%) would occur in the lower Bumping River. With only minor instream flow improvements in the lower Yakima and lower Bumping River and no in-stream flow improvements on the Naches River, how will fish passage at Bumping Lake be enhanced?

* The YRBSSD, page 3, states, "Install upstream and downstream fish passage at Tieton, Keechelus, and Kachess dams, subject to further evaluation of alternatives to determine the most feasible approach for providing passage at each dam." What is the cause for the lack of progress on feasibility studies on fish passage at Tieton, Keechelus, and Kachess dams given that this was part of the 2006 Settlement Agreement between the Yakama Nation and BuRec?

* The PIWRMP Volume 1, page 24 states, "Providing unimpeded fish migration past the existing storage dams in the Yakima Basin would increase species distribution. ..." The PEIS should clarify how this goal of providing unimpeded fish migration is consistent with existing storage dams? Is the BuRec equating proposed fish passage as the equivalent of a free-flowing river?

3.2 Structural and Operational Changes

3.2.1 Cle Elum Dam (Pool Raise)

* This proposed project was not evaluated as part of Ecology's 2009 Yakima River Basin Integrated Water Resource Management Alternative Final EIS. Will the PEIS identify the adverse environmental impacts to the Cle Elum Reservoir shoreline, vegetation, fish forage habitat, and wildlife? How long would the three-foot elevation rise inundate previously unflooded shoreline area during a normal water year? A drought water year? Assuming that the three foot rise would kill the inundated forest/vegetation, what decrease in shading and insect production would occur as a result of this project?

3.2.2 Kittitas Reclamation District (KRD) Canal Modifications

* Describe the legal mechanism by which conserved water from the KRD laterals could be transferred to enhance in-stream flows. Under the 1945 Consent Decree, would the KRD retain the same water rights to any re-regulation reservoir water during a drought year?

3.2.3 Keechelus to Kachess (K to K) pipeline

* This project would be coordinated with on-going construction of I-90. How realistic is this given the time period need to complete this PEIS and any additional site-specific EIS review?

3.2.4 Power Subordination

* This project requires mitigation agreed upon and approved by BuRec, Bonneville Power Administration and either Roza or Kennewick Irrigation District as applicable. What type of mitigation would be considered?

3.2.5 Wapatox Improvements

* The YRBSSD, page 3, states that this project could consolidate diversions into the Wapatox Canal such as the Naches Selah Irrigation District, the City of Yakima Water Treatment Plant and the Gleed Ditch but that these water users may choose to not participate in the project. How many elements of the "Integrated Plan" are dependent on voluntary participation? The PEIS should prepare a range of participation for each element dependent on voluntary participation.

3.3 Surface Water Storage

The following are specific comments and issues to be addressed as part of any draft PEIS on the proposed development of any construction of new storage reservoirs in the Yakima River Basin, including any dam storage sites proposed for storage of water pumped from the Columbia River.

1. Alternatives

* The PEIS should evaluate other alternatives that restore in-stream flows to the Yakima River Basin and tributaries including a greater range of water conservation savings (see comments on enhanced water conservation below).

2. Earth Resources

* How will the PEIS evaluate the construction of new storage reservoirs' potential impacts and identify potential mitigation measures for those impacts such as impacts of upland discharge, including soil contamination and erosion; impacts of surface water discharge, and potential impacts resulting from earthquakes?

3. Air Resources

* How will the PEIS evaluate the construction of new storage reservoirs' potential impacts on existing air quality?

* How will the PEIS evaluate the construction of new storage reservoirs' compliance with the requirements of the Clean Air Act for construction and operation phases?

* What would be the construction of new storage reservoirs' contribution to climate change gases?

* What would be the construction of new storage reservoirs' carbon footprint?

* How extensive will the assessment of air quality and visibility impacts be? Will emission sources to be studied include emergency generators and other secondary sources? Will the PEIS evaluate the impacts on air quality and visibility caused by fugitive and exhaust emissions from construction, traffic, and all point source emissions?

4. Water Resources

* Will the PEIS include a description of the potential for spills of contaminants into waters of the United States and the measures such as an emergency response plan to mitigate impacts?
* What is the scope of the water quality analysis? Will the PEIS disclose which water bodies may be impacted by the construction of new storage reservoirs, the nature of the potential impacts, and the specific pollutants likely to impact those waters? Will it also report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether the Washington Department of Ecology has developed a water quality restoration plan (Total Maximum Daily Load) for the water bodies and the pollutants of concern? If a Total Maximum Daily Load (TMDL) has not been established for those water bodies on the 303(d) list, in the interim will the PEIS demonstrate that there will be no net degradation of water quality to these listed waters?

* Will the PEIS explain how anti-degradation provisions of the Clean Water Act would be met for the construction of new storage reservoirs?

* Will any damage to the shoreline or other waterfront impacts result from the construction of new storage reservoirs and associated uses in the area?

* Will the PEIS discuss how Clean Water Act (CWA) Section 404 requirements for wetlands would be met and evaluate potential impacts to adjacent wetlands or indirect impacts to wetlands such as hydrologic changes due to increases in impervious surface? Will the PEIS disclose where there are known waters or wetlands that would be directly or indirectly affected by the proposed construction of new storage reservoirs?

* Will the proposed construction of new storage reservoirs incorporate any riparian/wetland restoration along Yakima River or tributaries?

* Will the PEIS address compliance with Executive Order (E.O.) 11990, Protection of Wetlands?

* Will the proposed construction of new storage reservoirs require any additional dredging?

5. Fishery Impacts

* Will the PEIS address impacts to fishery habitat from vibration, sound, shading, wave disturbance, alterations to currents and circulation, water quality, scouring, sediment transport, shoreline erosion (landfall) and structural habitat alteration?

* Will the PEIS address physical and acoustical impacts during construction and operation?

* Will the Biological Assessment required for compliance with Section 7 of the

Endangered Species Act (ESA) be a clearly identifiable section?

* Will an assessment of fisheries and benthic impacts specifically address the

requirements for an Essential Fish Habitat Assessment per the Magnuson Stevens Act?

* Will studies for all final sites include an assessment of: 1) species type, life stage, and abundance; based upon existing, publicly available information, 2) potential changes to habitat types and sizes; and 3) the potential for fishery population reductions.

* Will the PEIS assess potential indirect impacts to fish, mammals, and turtles that may result from changes in water movement, sediment transport, and shoreline erosion?

* Will the PEIS include an assessment of potential impacts to fishing techniques

and gear types used by commercial and recreational fishermen? The PEIS should identify all potential conflicts with existing fishery use patterns and the potential for fishery elimination due to the consequences of the construction of new storage reservoirs. The PEIS should include a review of existing literature and databases to identify and evaluate commercial and recreational fish data and abundance data in the Yakima River Basin. Data to be reviewed should include: National Marine Fisheries Service (NMFS) Commercial Data, NMFS Recreational Data, Washington Department of Fish and Wildlife Commercial Data, and supplemented with intercept surveys.

* Will the PEIS comprehensively address the interconnections between the benthic, fisheries and avian resources? The predator-prey interactions are important considerations in fully

understanding the potential impacts in siting additional dam projects within the Yakima River Basin.

6. Biological Resources

* Will the PEIS analyze potential impacts on fish, wildlife and their habitats from every element of the construction of new storage reservoirs, along with identification of mitigation measures?

* How will the PEIS consider ecological objectives? Will ecological objectives be designed to protect water quality and to maintain and/or enhance the natural habitats in the Yakima River Basin for the benefit of fish and wildlife resources and the public?

* Will the PEIS address measures that compensate for the loss of habitats of value to fish and wildlife?

* Will the PEIS identify the endangered, threatened, and candidate species under the ESA, and other sensitive species within the Yakima River Basin? In addition, will the PEIS describe the critical habitat for these species and identify any impacts the construction of new storage reservoirs will have on these species and their critical habitat?

* Will the PEIS describe the current quality and potential capacity of habitat, its use by fish and wildlife in the Yakima River Basin and identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation?

* Will the PEIS evaluate effects on fish and wildlife from habitat removal and alteration, aquatic and terrestrial habitat fragmentation caused by roads, land use, and management activities, and human activity? How will endangered species and habitat, including steelhead and salmon in the Yakima River Basin, be protected?

* Will the PEIS address whether northern spotted owls are present on nearby National Forest lands, State Department of Natural Resources lands, or private forestry lands and whether the species or individuals of the species may be affected by construction and operational activities?
* What major plant communities are present and affected? Will the PEIS consider impacts on sensitive plant species, particularly those endemic to the Yakima River Basin? How will

sensitive plant species in the vicinity be protected?

* What impacts would new dam construction and operation have on the Pacific Lamprey? Will the PEIS discuss how the "Integrated Plan" contributes to the recovery of the Pacific Lamprey?

7. Avian Impacts

* How will the PEIS describe the impacts to the Yakima River Basin, particularly on migratory birds? How will the PEIS establish a baseline data set? The species, number, type of use, and spatial and temporal patterns of use should be described. Information derived from other studies, which provides a three-year baseline data set, should be included if available. Information should be based on (1) existing, published and unpublished research results, especially research that describes long-term patterns in use, and (2) new field studies undertaken for this PEIS. Data on use throughout the year, especially in spring for migratory species, and under a range of conditions should be collected. Data collection should allow a statistically rigorous analysis of results. Issues needing to be addressed include: (1) bird migration, (2) bird flight during storms, foul weather, and/or fog conditions, (3) food availability, (4) predation, and (5) benthic habitat and benthic food sources.

* Will the Biological Assessment required for compliance with Section 7 of the ESA be a clearly identifiable section?

8. <u>Noise and vibrations</u>

* How will the PEIS address the potential for underwater noise and vibrations associated with construction and operation of the facilities?

* The PEIS should include an assessment of the magnitude and frequency of underwater noise and vibrations, and the potential for adversely affecting fish and mammal habitats and migration. It should also include an assessment of fish and mammal tolerance to noise and vibrations, with particular emphasis on noise and vibration thresholds that may exist for each of the species. The PEIS should also include the potential of noise impacts to human activity at any of the proposed dam construction sites.

* How will the PEIS address identification of existing noise levels and evaluation of the construction of new storage reservoirs' potential short-term and long-term noise impacts along with potential mitigation measures?

* Have noise contour maps been developed for construction of new storage reservoirs and does it show day-night average sound level (DNL)? How will any DNL's that are in excess of local ordinance requirements be mitigated?

* Will the PEIS evaluate noise generating activities associated with construction and on-going operations, including traffic to and from any project site?

9. Environmental Health

* How will the PEIS address impacts of hazardous materials and identification of mitigation measures?

10. Land and Shoreline Use

* How will the PEIS address compliance with land-use laws, plans and policies?

* How will the PEIS address compliance with the State Shoreline Management Act?

11. Aesthetics

* How will the PEIS address visibility of any proposed project and need for landscaping or buffers? How will the PEIS assess effects of light and glare from construction on adjacent properties and communities?

12. Recreation

* How will the PEIS address any proposed project's impacts on recreational use of the Yakima River and tributaries?

13. Transportation

* How will the PEIS address the any proposed project's potential transportation impacts and identification of mitigation measures?

* Will the PEIS identify existing traffic levels and transportation infrastructure, impacts of and proposed project on both, potential increases in traffic accidents, additional maintenance, and minimization of traffic impacts?

* How many vehicle trips would be generated, including trips by employees and service and delivery vehicles from any proposed project?

* Will the PEIS evaluate the level of service and overall traffic generation from various

activities at any proposed project site including: construction traffic and the level of service and overall traffic generation reasonably expected from project-associated growth in the surrounding communities? Will this evaluation be made on a daily, weekend, and seasonal basis?

* Will the traffic study calculate road maintenance costs attributable to any proposed project?

* What is the scope of mitigation of traffic impacts that will be considered in the PEIS?

* What is the capacity of local roads to accommodate additional traffic associated with the construction of any proposed project? Will there be congestion at the interchanges serving any proposed project?

* What transportation impacts to Goose Prairie would occur due construction of a Bumping Lake Enlargement project?

14. Public Services and Utilities

* What will be the need for additional public services, including public safety and emergency services during any proposed dam construction?

* What impacts to local school systems in the Yakima River Basin can be expected?

* How will housing needs for employees be addressed? Where will employee construction housing be developed?

15. Cultural Resources

* How will the PEIS address requirements to comply with federal and state laws concerning cultural resources?

* Will the scope of the cultural resources analysis include identifying all historic properties or cultural resources potentially impacted by the project or associated offsite development, including traditional cultural properties, other Native cultural resources, and non-Native historic properties? Will the PEIS evaluate the impacts to any identified historic properties and cultural resources, i.e., what are the impacts of the project and associated off-site development (e.g., housing, amenities)?

* How will historical Tribal uses of this area be factored in, including effects on sacred sites and fishing grounds?

* How will the project affect the cultural heritage of the area?

* Will the PEIS consider Tribal fishery impacts?

* How will the PEIS fulfill the requirements of Section 106 of National Historic Preservation Act including coordination with the State Historic Preservation Officer?

16. Environmental Justice

* Will the PEIS consider, based on the experience of such projects elsewhere, effects on levels of poverty?

* Will the PEIS assess whether low income or people of color communities will be impacted by the proposed project and disclose what efforts were taken to meet environmental justice requirements consistent with Executive Order (EO) 12898?

17. Socio-Economics

* Will a comprehensive economic analysis be undertaken to identify potential effects of any proposed project on the Yakima River Basin?

* What will be the time frame for the assessment of economic and social impacts; 10, 20, 50 years?

* For comparison purposes, will the socioeconomic effects of other similar projects on other communities in the state be examined?

* Will the demand for hotel rooms in the Yakima River Basin be calculated?

* How many jobs will be created; at what wage levels? What percentage of work would be reserved for local contractors?

* What will be the consequences on property values and property taxes in the Yakima River Basin?

* How will impacts from any project impact existing restaurants, hotels, motels, RV facilities, and other overnight tourism lodging facilities? Will the PEIS assess whether there will be a loss of workers from existing businesses? What nationally accepted professional or scholarly data will be used to evaluate the potential impacts over the next ten years?

* Will the PEIS assess the current social and economic impacts of not having adequate public and essential commercial services (e.g., housing, medical, emergency) for current and future workers?

* How will effects on quality of life, including community character, demographics, and small-town atmosphere, be assessed?

* Will the potential dislocation of current residents due to an increased cost of living be considered?

* How will the PEIS address safety considerations during construction of any project?

18. Other Issues

* Will Tribal consultation occur with nearby Indian tribes in a manner consistent with Section 20(b)(1)(A) of IGRA, the Department's trust responsibilities to tribes, and the 1994 Executive Memorandum entitled Government-to-Government IGRA Section 20?

* How will Washington communities be consulted with and involved in the NEPA and SEPA processes?

* What consultation with school districts and other service providers will occur?

* What other permits and approvals are required?

* Have geo-tech studies been done for any proposed project site?

* Would any proposed project be affected by seismic faults or fractures?

* Will the PEIS address the potential for increased litter?

* Will the PEIS address the disposal of solid waste?

* What drilling data is available to show the profile and nature of the proposed dam sites for the Bumping Lake Enlargement and the Wymer Dam project?

* Please describe the habitat that would be inundated by a Wymer Reservoir, including the extent of sage grouse habitat existing and the number of sage grouse that currently use the proposed inundated area.

* What is the potential for shoreline erosion from using a Wymer Reservoir as a pump storage project?

* For both the Wymer and Bumping Lake projects, describe the legal mechanism by which Wymer or Bumping Lake water could be transferred to enhance in-stream flows. Under the 1945 Consent Decree, wouldn't the senior irrigation districts retain the same water rights requiring allocation of any Wymer or Bumping Lake reservoir water to the TWSA during a drought year?

* Under the 1945 Consent Decree how can any water retained in an enlarged Bumping Lake or Wymer Reservoir be allocated to in-stream flows?

* What are the estimated evaporation rates for both a Wymer and Bumping Lake reservoir?

* What are the estimated refill times for both a Wymer and Bumping Lake reservoir assuming a complete drawn down during a drought year?

* Regarding the Lake Kachess Inactive Storage project, how does accessing this inactive storage conflict with fish passage/habitat enhancement proposed for Lake Kachess?

* The PEIS should evaluate all impacts from proposed construction on the Bumping River, Goose Prairie, and the William O. Douglas Wilderness Area.

3.3.4 Columbia River Pump Exchange with Yakima Storage

* Identify all potential dam sites in the Yakima Basin proposed for storage of water pumped from the Columbia River, including but not limited to Black Rock, Selah Canyon and Burbank Canyon and all significant adverse environmental impacts..

* Identify all legal and biological constraints from interbasin transfer of water from the Columbia River to the Yakima River Basin.

* Identify all cumulative impacts of other water withdrawal proposals from the Columbia River.

3.4 Groundwater Storage

3.4.1 Shallow Aquifer Recharge

* Under the 1945 Consent Decree how would any water stored in shallow aquifers be treated under the Total Water Supply re-allocated to in-stream flows?

3.4.2 Aquifer Storage and Recovery

* Under the 1945 Consent Decree how can any water stored in underground aquifers be allocated to in-stream flows?

3.5 Habitat Protection and Enhancement

3.5.1 Targeted Watershed Protections and Enhancements

The YRBSSD, pages 8 and 9, describe a list of watershed protections and enhancements that were first presented to the Yakima River Basin Work Group in March of 2011. Many details of this proposal are lacking. The targeted acquisitions include:

- 46,000 acre tract in the middle and lower Teanaway River Basin comprised of mid-to-high elevation mixed conifer forest, lower elevation grand fir and ponderosa pine.

* Identify the location of this tract. Clarify the current ownership of this acreage. Clarify the targeted acquisition of the 46,000 acres. How much of this acreage consists of contiguous roadless areas greater than 5,000 acres? If any, where are they located? How much of this acreage contains critical area for listed ESA species? Identify all northern spotted owl habitat and current populations. Identify all known bull trout habitat and current populations. If any, where are they located? How much of this acreage is proposed for public ownership? If any, where is it located? How much of this acreage would remain in private (non-governmental) ownership? If any, where is it located? What is the remaining volume of marketable timber? If any, where is it located? Would the 46,000 acres continue to be subject to logging? What are

alternative uses and environmental impacts to this tract assuming that this tract is dropped from the "Integrated Plan"?

- 15,000 acre tract in the Yakima River canyon, including the valley bottom and eastern slopes, from the Yakima River to I-82.

Clarify the current ownership of this acreage. How much of this acreage consists of contiguous roadless areas greater than 5,000 acres? If any, where are they located? How much of this acreage contains ESA habitat? Identify all northern spotted owl habitat and current populations. Identify all known bull trout habitat and current populations. If any, where are they located? How much of this acreage is proposed for public ownership? If any, where is it located? How much of this acreage would remain in private (non-governmental) ownership? If any, where is it located? What is the remaining volume of marketable timber? If any, where is it located?

- 10,000 acres at the headwaters of the Little Naches River and lands surrounding the headwaters of Taneum and Manastash Creeks.

* Clarify the current ownership of this acreage. How much of this acreage consists of contiguous roadless areas greater than 5,000 acres? If any, where are they located? How much of this acreage contains ESA habitat? Identify all northern spotted owl habitat and current populations. Identify all known bull trout habitat and current populations. If any, where are they located? How much of this acreage is proposed for public ownership? If any, where is it located? How much of this acreage would remain in private (non-governmental) ownership? If any, where is it located? What is the remaining volume of marketable timber? If any, where is it located?

- If these preferred sites cannot be acquired, a combination of alternative sites of equivalent conservation value may be selected as long as alternatives collectively meet the following targets:

Conservation Target for High Elevation Watershed Enhancement: 45,000 acres

Conservation Target for Shrub-Steppe Habitat Enhancement: 15,000 acres

Conservation Target for Forest Habitat Enhancement: 10,000 acres

Additional lands are eligible and/ or have already been recommended for federal Wilderness and Wild and Scenic River designation through other processes. In addition to the conservation targets provided above, protection of the following lands is consistent with values and objectives of the "Integrated Plan:"

* Identify the location of these conservation target lands and any additional lands eligible or already recommend for federal Wilderness and Wild & Scenic River designation.

- Wilderness designation should be pursued for the land around Bumping Lake that is not consumed by the reservoir expansion.

* Identify the acreage of National Forest roadless area that would be inundated by an expanded reservoir around Bumping Lake.

* Identify any previous BuRec reservoir project that has inundated National Forest roadless area and what mitigation was proposed or carried out.

- Wilderness or other appropriate designation should also be sought for roadless areas in the Teanaway, in the area between Kachess and Cle Elum Lakes, and in the upper reaches of Manastash and Tanuem Creeks in order to protect headwaters streams, snow pack, and forests.

* Identify the roadless acreage in the above areas. How does the proposal for roadless area protection in the upper reaches of Manastash and Tanuem Creek different from the 10,000 acres at the headwaters of the Little Naches River and lands surrounding the headwaters of Taneum and Manastash Creeks? Is this double-counting?

- Wild and Scenic River designation should be sought for the American, Upper Cle Elum, and Waptus rivers. Other rivers determined eligible and recommended for designation in future forest plans should also be considered.

* The purpose of the federal Wild and Scenic Rivers Act is to preserve rivers in "free-flowing condition." What additional specific dams are proposed for the American, upper Cle Elum and Waptus rivers that threaten the free-flowing condition of these rivers? If there are no dams proposed for these river segments, what is the purpose of a wild or scenic river designation?

* The PEIS should identify all threatened or endangered species within the Yakima River Basin and identify all designated critical habitat.

3.5.2 Fish Habitat Enhancement

* The proposed "Integrated Plan" proposes approximately \$460 million in habitat enhancement measures included flow restoration, removing fish barriers, and screening diversions. Screening diversions was one of the original programs to be carried out by the YRBWEP authorized in 1979. Will the PEIS list all diversion screening that has taken place since 1979? Will the PEIS disclose why diversion screening is still needed over thirty years later? Will the PEIS disclose which fish habitat enhancement measures are voluntary in nature?

*Without significant improvements to in-stream flows in the lower Yakima River, how will fish habitat enhancement improvements in the upper Yakima River Basin be ensured?

3.6 Enhanced Water Conservation

3.6.1 Agricultural Conservation

The proposed agricultural water conservation program under the "Integrated Plan" proposes to conserve up to 170,000 acre-feet of water in good water years. However, the "Integrated Plan" does not identify specific projects for implementation. As a result of this decision, water conservation is put at a significant disadvantage as the BuRec and Ecology are all to eager and willing to identify precisely the dam storage projects they intend to build, while disdaining to even hint at what or where water conservation projects would take place. In addition it is apparent that unlike dam storage projects which BuRec and Ecology would like to have authorized and constructed, water conservation projects would remain voluntary.

* This section identifies only a single goal of conserving up to 170,000 acre-feet in good water years. The Work Group prepared a Summary Results – Water Needs Assessment Yakima River Basin Study (Task 2), date July 20, 2010. Table 2 lists 213,595 acre-feet of water conservation savings from projects recommended for inclusion. What accounts for these discrepancies in water conservation? The PEIS should set out an alternative of maximum water conservation efforts, in addition to the 170,000 acre-feet proposed under the "Integrated Plan."

* Assuming that the proposed water conservation program would conserve up to 170,000 acrefeet of water in good water years, how many acre-feet of water would be conserved during drought years?

* Identify all water conservation projects undertaken in the Yakima River Basin since 1979.

* Under the Central Valley Project Improvement Act of 1992 (CVPIA) and the Reclamation Reform Act of 1982 established Criteria for Evaluating Water Management Plans. These plans must contain the following information:

- 1. Description of the District
- 2. Inventory of Water Resources
- 3. Best Management Practices (BMPs) for Agricultural Contractors
- 4. BMPs for Urban Contractors
- 5. Plan Implementation
- 6. Exemption Process
- 7. Regional Criteria
- 8. Five-Year Revisions.

Has the BuRec applied the CVP Criteria to any of the past or proposed Yakima River Basin irrigation district water conservation plans? The PEIS should list all BuRec approved water conservation plans for the Yakima River Basin.

* According to the BuRec Draft Programmatic EIS on the Yakima River Basin Water Enhancement Project, dated April 1998, page 33, "Under the Basin Conservation Program, a goal of the legislation is to achieve 165,000 acre-feet of water savings in 8 years." Has this level of acre-feet of water savings been achieved? If so, in which irrigation districts?

* The Department of Ecology FEIS on the Yakima River Basin Integrated Water Resource Management Alternative (dated June 2009, #09-11-012) Tables 2-3 and 2-4 display 223,596 acre-feet of potential conserved water savings from Yakima River water users and an additional 20,003 acre-feet of potential conserved water savings from Naches River Water Users. Why does the "Integrated Plan" propose less than half of the water conservation potential proposed just two years ago?

* These Tables disclose 84,700 acre-feet of water conservation potential on the Wapato Irrigation Project (WIP). Why does the "Integrated Plan" fail to identify any specific water conservation improvements for the WIP?

3.6.2 Municipal and Domestic Conservation program

* How much water could be conserved by ending the exempt well provisions under Washington Water Law?

3.7 Market Reallocation

* Will the PEIS provide a list of all legal and institutional barriers to market reallocation?

* Will the PEIS provide an estimate of the current water savings that could occur under existing Washington Water Law?

* Will the PEIS evaluate the results of the Market-Based Reallocation of Water Resources (Yakima River Basin Study Task 4.12, November 19, 2010, Power Point page 14)? Do BuRec and Ecology agree that up to 110,000 acre-feet of water may be available for inter-district water trades and up to 230,000 acre-feet of water may be available for intra-district trades? Doesn't this alternative alone have the capacity to meet the irrigation "goals" of the "Integrated Plan"? Will the PEIS evaluate this alternative?

4.0 Rolling Review and Future Plan Adjustments

* The Department of Ecology has created a Yakima Work Group "Implementation Subcommittee" with limited participation and meetings that are not subject to public notice. A listing and summary of all Work Group "Implementation Committee" meetings should be included in the PEIS.

5.1 Potential Barriers to Plan Implementation and Mitigation Strategies

* A Conservation Advisory Group (CAG) was appointed by the Secretary of Interior under Title XII on July 13, 1995 (membership includes two Yakima River Basin irrigators, one from the Yakama Indian Nation, one from environmental interests, one from Washington State University Ag Extension Service, and WDFW). Will the PEIS disclose the relationship of the CAG to the establishment of the Yakima Work Group?

* Will the PEIS provide an analysis on how water stored or pumped in a new or expanded reservoir and already allocated under the 1945 Consent Decree may be reallocated to in-stream flows?.

* Failure to comply with the Federal Advisory Committee Act (FACA) is a potential barrier to plan implementation. The Federal Advisory Committee Act (Pub. L. 92-463, 6 October 1972) seeks to curtail the rampant "locker-room discussion" that had become prevalent in administrative decisions. These "locker-room discussion" are masked under titles like "task force," "subcommittee," and "working group" meetings, which are less than full FACA meetings so they do not have to be open to the public. Will the PEIS disclose whether the Yakima Work Group was established under FACA? Will the PEIS disclose all meetings of the Yakima Work Group Executive Committee, the minutes from those meetings and how public notice was given? Will the PEIS disclose all meetings of those meetings and how public notice was given?

* Will the PEIS evaluate the U.S. Supreme Court's May 2, 2011, decision in *Montana v*. *Wyoming* (563 U.S. ____(2011)) and possible legal effects on water rights in the Yakima River Basin?

Finally, as set out in 40 C.F.R. Sec. 1502.14, alternatives are the heart of the environmental impact statement. The BuRec has an affirmative obligation to "[R]igorously explore and objectively evaluate all reasonable alternatives, including those that may require changes to existing law or not within the jurisdiction of the lead agency. 40 C.F.R Sec. 1502.14(a)-f). Any PEIS must include a non-structural alternative including both water conservation and water marketing to provide the public and Congress with a fair comparison and range of choices and not just an *ad hoc* justification of a limited work group hand selected by the BuRec and Ecology.

Please send us a copy of the draft Programmatic EIS when it becomes available.

Sincerely,

Alpine Lakes Protection Society Rick McGuire, President 11025 24th Ave NE Seattle WA 98125

Endangered Species Coalition Brock Evans, President P.O. Box 65195 Washington D.C. 20035

North Cascades Conservation Council Marc Bardsley, President P.O. Box 95980 Seattle, WA 98145-2980

Pilchuck Audubon Society Katherine Johnson, Forest Practices Chair 927 Quinn Ave. Marysville WA 98270

Sierra Club Washington State Chapter Tristin Brown, Chair, Conservation Committee 180 Nickerson St., Suite 202 Seattle, WA 98109

Western Lands Project Janine Blaeloch, Director P.O. Box 95545 Seattle, WA 98145 Western Watersheds Project Katie Fite, Biodiversity Director P.O. Box 2863 Boise, ID 83701

June 8, 2011

Candance McKinley Environmental Program Manager Bureau of Reclamation 1917 Marsh Road Yakima, WA.

Re: Scoping for the Proposed Integrated Plan PR/EIS

Dear Ms McKinley:

My decision to comment during the public scoping period for the proposed Planning Report/Environmental Impact Statement (PR/EIS) on the Integrated Water Resource Management Plan (Integrated Plan) was difficult. On the one hand I fully endorse the need to address the long-standing water supply issues of the Yakima River basin and believe the best way is by discussion and collaboration of a representative group of stakeholders such as the Workgroup that has been functioning since mid-2009. On the other hand I have been concerned during this appraisal study activity by the lack of commitment for an open and in-depth discussion of critical issues such as economic justification, financial feasibility, treaty water rights for fish, and non-Federal funding for implementation. This is contrary to the primary objective of an appraisal study which is to determine whether a feasibility study is warranted and it leaves the Workgroup uniformed on issues critical to a successful conclusion.

In the work to date there has been little effort to determine the economic viability of the seven principal Integrated Plan elements, either individually or conjunctively. This is necessary to structure a plan which meets the National Economic Development (NED) criteria of the *Economic and Environmental Principles and Guidelines of Water and Related Land Resource Implementation Studies (P&Gs).* The P&Gs prescribe that the NED plan is to be comprised of only elements that have net NED benefits. Elements which do not provide net NED benefits may be included in other plans if they are cost-effective for addressing specific concerns. However, the plan recommending Federal action is to be the plan with the greatest net NED benefits consistent with protecting the Nation's environment (the NED plan) unless the Secretary of the Interior grants an exception. If it appears a Secretarial exception is going to be necessary it should be identified "upfront" so all stakeholders, including the Congressional delegation and appropriate State legislators, are aware and the "overriding reasons" for proceeding are fully addressed.

Financial feasibility is another critical issue. This pertains to the capability to allocate the project costs to the project purposes and the repayment of those costs which are determined to be reimbursable. Economic justification and financial feasibility are intricately related and have been cornerstones of Reclamation planning and Reclamation law.

Based on Reclamation's experience with its most recent water resource study efforts in the State of Washington where the results show plans are not economically justified and economics were not adequately considered in plan formulation, one would expect Reclamation to be acutely aware that the Integrated Plan may not be economically justified and financially feasible. Yet, the decision to move forward with a feasibility study was made with little consideration of these aspects.

Reclamation to their credit did look at the potential economic effects of the Integrated Plan.¹ Section 4.9 of Volume 1 of the Integrated Plan states the following:

This section summarizes findings from an assessment of expected economic effects of the Integrated Plan on the Yakima River Basin. Information currently exists to quantity some, but not all, of the costs and benefits of implementing the Integrated Plan – some financial in nature and others that can be considered only in qualitative terms. The economic assessment was not designed to provide all of the information required under the Federal Principles and Guidelines for evaluating water resource projects. However, it provides some initial information on the expected economic performance of the Integrated Plan. Further assessment as required by the Principles and Guidelines is planned for the next phase of investigation.

Quantified capital and operation and maintenance costs and benefits were expressed as a present worth value over a 100-year period using a 4.375 interest rate. The estimated expenditures for capital, operation, and maintenance are shown to have a present value of about \$3.0 billion. The present worth value of the economic benefits were estimated at \$400 million for irrigation, \$100 million for municipal and domestic water, and \$1.7 to \$3.3 million for increased production of salmon and steelhead. The total for these three benefit categories ranges from \$2.2 billion to \$3.8 billion.

In a way, the economic effects analysis provides a false sense of security that a NED plan of net benefits can be structured. This is because it was looked at on the basis of a total plan and total economic benefits without consideration of the seven individual elements and the economic benefits that each element generates when integrated into a multipurpose plan. In this case, the preponderance of the increased production of salmon and steelhead results from the reintroduction of sockeye to the Yakima River basin and is directly related to the fish passage element proposed at the five major Yakima Project dams.

To illustrate this concern, the attached table was prepared using information from Table 4-7 (page 84) and Table 4-8 (page 85) of Volume 1. This table shows the total salmon and steelhead

¹ Economic Effects of Yakima Basin Integrated Water Resource Management Plan Technical Memorandum, March 2011, ECO Northwest.

maximum recruitment population for three scenarios and the increased population attributed to each scenario when compared to the Future Without Integrated Plan.

The Integrated Plan documents indicate reintroduction of sockeye to the Yakima River basin is dependent on the fish passage element and that such facilities would be operated within existing operational considerations and constraints. Consequently, <u>it appears the costs and the resulting sockeye population and economic benefits are specific to the fish passage element</u>.² In other words, if fish passage were to be deleted from the Integrated Plan the \$325 to \$570 million construction cost for passage facilities at the five dams would not be incurred and all of the estimated 680,000 sockeye recruitment population indicated on the attached table would not be realized.

The sockeye fishery appears to represent about 88 percent of the salmon and steelhead recruitment population increase from the Future Without Integrated Plan scenario. Assuming the economic benefits are proportionate to the increased recruitment populations the \$3.3 billion present worth value is significantly dependent on the sockeye benefits of about \$2.8 billion. This raises the question of the propriety of using the sockeye benefits in the economic analysis as a means of justifying the entire Integrated Plan and in the cost allocation to distribute total project costs to the project purposes.

The Summary Judgment entered in the Adjudication Court on November 29, 1990, found that the treaty reserved water rights for fish in the Yakima River and its tributaries have been substantially diminished. The maximum scope of the diminished water right for fish remaining is the specific "minimum instream flow" necessary to maintain anadromous fish life in the river, according to the annual prevailing conditions as they occur as determined by the Project Superintendent in consultation with the Yakima River Basin Systems Operating Advisory Committee, Irrigation District and Company Managers and others. To date there has been no discussion with respect to the question of "does the proposed Integrated Plan provide reasonable assurance that the irrigation water supply available will not be preempted in the future to meet the diminished time immemorial treaty reserved water right for fish?" Such a question seems prudent in view of the proposed construction cost of \$3.1 to \$5.6 billion.³ No matter how delicate this may be it should be addressed as a critical concern regarding the sustainability of the future irrigation and municipal and domestic water supply to be provided by the Integrated Plan.

Non-Federal funding for project implementation has been postponed for later discussion. Since a water resource project will not move forward today without non-Federal funding this is

 $^{^2}$ In the cost allocation these costs would be identified as separable costs.

³ These construction costs are from Table 3-1 of Volume 1 and are exclusive of the yet to be determined costs of acquiring 71,000 acres for "targeted watershed protection and enhancements".

especially critical in view of the current national and regional economic climate and the need for the recent special budget session of the Washington State Legislature to address revenue deficiencies. There is no information on what the irrigation entities receiving supplemental water in dry-years will pay nor is there information on the cost of future municipal and domestic water.

Irrespective of not having information on the foregoing issues, the decision was made to proceed with a PR/EIS which will require additional time and additional expense. I am not so delusional to believe my comments will alter the decision to proceed with a feasibility study. However, I would hope that Reclamation, in conjunction with the State of Washington Department of Ecology and the Workgroup, would give some priority to addressing these matters as early action items so the results of this feasibility study are different than those that have been recently completed in the State of Washington.

Sincerely,

Larry Vinsonhaler

Copy to: Wendy Christensen (with attachment)

Larry Vinsonhaler 2567 Lynx Way Boise, Idaho, 83705

Anadromous Fish Recruitment Population ⁴									
Species	Future Without	Restoration	Change Due to	Restoration +	Change Due to	Total Change			
			Restoration	Passage	Passage	From FWIP			
Spring Chinook	38,434	59,949	21,515	72,058	12,109	33,624			
Steelhead	11,954	23,868	11,914	27,904	4,036	15,950			
Coho	38,098	46,648	8,550	48,791	2,143	10,693			
Fall Chinook	31,082	47,259	16,177	47,259	0	16,177			
Summer Chinook	11,775	24,877	13,102	24,877	0	13,102			
Subtotal	131,343	202,601	71,258	220,889	18,288	89,546			
Sockeye	0	0	0	681,255	681,255	681,255			
All Combined	131,343	202,601	71,258	902,783	699,543	770,801			
Species									

Attachment to June 8, 2011, PR/EIS Scoping Comments

Note: The "Anadromous Fish" narrative on page 82 of Volume 1 of the Integrated Plan refers to the three scenarios as representing "the fish population <u>increases</u> compared to the baseline". However, based on the information provided in section 3.2, "EDT Numeric Fish Benefits" of the *Fish Benefits Analysis Technical Memorandum, May 2011*, the numbers represent the total population and the increase (or absolute difference) is determined by subtraction.

⁴ Information from *Volume 1: Proposed Integrated Plan, April 2011*, Table 4-7 (page 84) and Table 4-8 (page 85). All populations represent high estimates.



Naturam Expellas Furca

Tamen Usque Recurret

WISE USE MOVEMENT

P.O. Box 17804, Seattle, WA 98127

June 8, 2011

Attention: Candace McKinley Bureau of Reclamation, Columbia-Cascades Area Office Environmental Program Manager 1917 Marsh Road Yakima, WA 98901 Via Email to: <u>yrbwep@usbr.gov</u>

Dear Ms. McKinley:

The Wise Use Movement submits the following additional scoping comments on the "Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington," as set out in the April 5, 2011, Federal Register Notice:

* In "Farming the Frontier – The Agricultural Opening of the Oregon Country 1786-1846," by James R. Gibson (University of Washington Press, 1985), before dams were constructed in the Columbia River Basin, before the deforestation, before the hatcheries, before the onslaught of European settlements, Gibson notes that salmon runs in the Pacific Northwest were not dependable:

"In both rivers [Columbia River and Fraser River], however, the salmon runs were not infrequently late or light. The bourgeois of Stuart's Lake reported in 1815 that salmon generally failed "every second year and completely so every fourth year.' . . .John McLean, clerk at the same post in 1834 noted: 'The salmon (the New Caledonian staff of life) ascend Frazer's River and its tributaries, from the Pacific in immense shoals. . . they fail in this quarter every fourth year.' New Caledonia's salmon run was 'abundant' in 1825, 1829, 1833, 1837, 1841, and 1845 but scanty in the intervening years. The failures of 1827 and 1828 were both described as 'unprecedented'; hundreds of Indians starved and fur returns dropped. . . The frequent shortage of salmon caused [George] Simpson to complain to London in 1834 that whenever the catch was small in New Caledonia, the men at the posts spent the winter seeking provision ('which is too frequently the case in this inhospitable region') to the detriment of trade. 'No salmon, no furs' was a saying 'the west side of the mountains.'" pp. 24-25.

In summary, the Hudson's Bay Company of that era had no explanation for why salmon runs failed. Over two hundred years later, we still don't have a clear explanation for why salmon runs fail. Therefore the Bureau of Reclamation's draft Environmental Impact Statement should take into account the historical variability of salmon runs as part of any projections or estimates of future salmon returns.

* Similarly, the Pacific Decadal Oscillation along with the much shorter term El Niño/Southern Oscillation are known to have impacts to Pacific Northwest weather patterns, snowpack and instream flow conditions. The Bureau of Reclamation's draft Environmental Impact Statement should take into account both these oscillation patterns and the historical variability of salmon runs as part of any projections or estimates of future salmon returns.

* In September 15, 2010, the United States Fish and Wildlife Service (USF&S) published a Federal Register Notice announcing the availability of the Draft Revised Recovery Plan for the Northern Spotted Owl. The Bureau of Reclamation's draft Environmental Impact Statement should describe and explain how the Integrated Water Resource Management Plan contributes to the recovery of the Northern Spotted Owl, given that the proposed Bumping Lake Enlargement proposes the flooding of a known spotted owl management area within the Wenatchee National Forest.

* The Bureau of Reclamation's draft Environmental Impact Statement should describe and explain how the Integrated Water Resource Management Plan contributes to the recovery of sage grouse, given that the proposed Wymer Dam proposes the flooding of known sage grouse habitat.

Sincerely,



John de Yonge

President Wise Use Movement

P.O. Box 203 Easton, WA. 98925 June 13, 2011

Candace McKinley, Environmental Program Manager, Bureau of Reclamation 1917 Marsh Road, Yakina WA 98901-2058

Dear Ms McKinley,

I attended a scoping meeting on the yrbwep programmatic PEIS in Ellensburg and have been reading and looking at the material from the meeting as well as material on line from the website. I have not read everything but concentrated on the areas of what lloked like the greatest concern to me.

I have some comments.

- 1) This is all extremely had to follow. Especially online, where one forgets where one read something, and can have a hard time finding it again.
- 2) My primary concerns are environmental. See items 5 and 6.
- 3) Living at Lake Kachess and seeing the map, we have figured out that we will be directly influenced by the construction of the proposed Keechelus to Kachess Pipeline if it is indeed constructed. We own 2 lots along Kachess Lake Road near the intersection of the Lake Road and Via Kachess.

-We have questions about the 25 foot construction easement. Our covenants require land owners to maintain a 50 foot setback from the lot line along roads in a natural condition. No cutting of trees or other vegetation is allowed. This is designed to give cabin owners privacy from the road and vice versa. This covenant is the most strongly supported covenant by our community. Some have already cut up to the 50 foot line and cutting into that 25 feet could affect them dramatically.

- Would the 25 foot construction easement mean cutting of trees? If so is their a plan to reimburse owners for trees cut?

One of our lots is a narrow 3.5 acre lot between Lodge Creek and Kachess Lake Rd. right at the intersection. We are concerned that if the pipeline went in on the south east side of the road it could make our lot less desirable as there is a set back from the creek as well as the covenant setback from the lot lines. Cutting of trees would diminish the privacy considerably, make it harder to position a cabin, well, septic and could lower the value of the lot.

-We also have some large old trees growing along Kachess Lake Road on that side we would hate to lose.

- 4) We are concerned about the potential negative impact of this major construction project on our community and the area. Putting a gigantic 8 foot diameter pipeline in the ground along the only road into the area of many homes, cabins and a major campground on Lake Kachess could cause major traffic problems.
 - When the original project was studied in the 1980's there were few living in the area and only a percentage of lots were built on. Now most of the lots have houses and cabins on them. There are now full time residents in the area. (We were among the first ones in the 80's to live there full time).
 - Kachess Campground is now one of the most heavily used campgrounds in the greater Seattle area. Lots of large RV's, boats and cars are roaring up and down the road all summer and into fall when the campground closes. The campground frequently fills up on the weekends and cars can be backed up clear into our development waiting to get in.
 - Another concern for those in this area is the potential of impact on our wells of lowering the level of Lake Kachess down another 80 feet from the proposed storage pool during dry years. We have noticed an effect on our well during dry years, it seems to us there is less water available in our well.
- 5.) I am concerned about the impact on endangered Bull Trout of lowering Lake Kachess another 80 feet during dry years by using the storage pool. The Bull trout only go up Box Canyon Creek at the end of Little Kachess and that access could be left high and dry and we could lose the Bull Trout there!

For a plan whose stated aim is to enhance habitat for threatened fish and other Wildlife, this does not make sense.

6.) Another area which I am really concerned about is Bumping Lake. It is obvious that this plan would have a major negative impact and mean sacrificing this spectacular ecosystem of over 1000 acres of huge ancient old growth trees near the lake.

This area is important spotted owl habitat, something we are trying to save, not Destroy.

- endangered Bull Trout could also be negatively impacted.
- The sacrifice of facilities now enjoyed by the public as well as public access to the local forest is questionable at best. This is an important campground and cannot be replaced from the sounds of it.

I am against enlarging Bumping Lake for these reasons.

I am also against the Lake Kachess plans.

The Wymer project looks as though it could be acceptable to me. I realize the concerns about Sage Grouse. I am on the TAC for Wild Horse Wind Farm as an alternate rep from Kittitas Audubon. From involvement there I see that PSE's habitat restoration, spring restoration and lighter grazing of the land has had a very beneficial impact on the habitat
for Sage Grouse. The habitat recovery has been dramatic. Old timers say it is the best condition that the habitat has been in for possibly 50 years. They are not seeing more Grouse yet but it is possible that at some point that it could happen. I think the same type of habitat restoration could be done at Wymer to help mitigate for habitat destroyed by the reservoir. The access to water from the reservoir could be helpful as well for brood rearing since it is so critical to the chicks along with forbs.

We will have to see exactly how many sage grouse are actually found in this area already in the specific EIS, when it comes out, to see how much of an impact there would be if a lot of habitat is flooded and also what the quality of the current habitat is.

Water conservation is and should be of major emphasis in this plan. Fixing the KRD canal leaks and improved household water use should be high on the list of these projects.

Thank you for this opportunity to comment.

M. Janet Nelson



UNITED STATES DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration NATIONAL MARINE FISHERIES SERVICE Northwest Region 7600 Sand Point Way N.E., Bldg. 1 Seattle, WA 98115

June 13, 2011

Bureau of Reclamation Attn: Candace McKinley 1917 Marsh Road Yakima, WA 98901-2058

Re: Comments on the Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, combined planning report/programmatic environmental impact statement (PR/PEIS)

Dear Ms. McKinley

NOAA Fisheries has participated in the development of the Integrated Plan because a more balanced approach to managing water in the Yakima Basin is long overdue. Historically, water management in the basin has heavily favored out of stream uses with little consideration of the harm done to aquatic ecosystems. This imbalance has severely impacted native fish to the extent that coho and sockeye salmon were extirpated, steelhead and bull trout have been ESA-listed, and fish stocks no longer support recreational, commercial, tribal fisheries, and their attendant economies to the degree they did historically. Our participation in this latest planning process signifies our hope that implementation of this plan can lead to an amicable resolution of the challenges facing water-dependent uses in the basin, particularly restoration of anadromous fish.

NMFS supports the broad goals and outline of the plan, recognizing that numerous details need to be resolved during the current process and in future years. Overall, NMFS expects that the plan, if implemented in its entirety, would benefit the basin's native steelhead and salmon. Elements of the plan that would have particular benefits include fish passage, power subordination, habitat enhancement, and watershed protection. Effects of other elements of the plan may also benefit fish, depending on how the Bureau of Reclamation and other water managers operate storage and delivery facilities.

Successfully resolving the following issues will affect how well the plan supports restoration of salmon, steelhead, and the ecosystems they depend on:

1. <u>Instream Flows.</u> The plan should clarify that managing instream flows is part of the plan itself. The current draft document describes high priority target flows in Instream Needs (Section 2), and describes Expected Outcomes (Section 4), including increased flows. However, it is unclear in the plan (Section 3) if or how flows will be managed to achieve find

the expected outcomes. For example, the Structural and Operational Changes Element (3.1.2) does not identify actual operational changes.

In-stream flow management is the single largest limiting factor for steelhead in the Yakima Basin. Making substantial improvements in the instream flow regime in the basin will make the difference between an Integrated Plan that has some fish benefits and an Integrated Plan that makes large strides toward restoring anadromous fish in the basin. Without a clear commitment that the Bureau of Reclamation will change instream flow management and how instream needs will be balanced with other needs, there is little to support the expectation that the flows described in Section 4 will be achieved. Our recollection from the planning process is that the instream flows described in the Expected Outcomes are based on an assumption that once 70% proratable agricultural supplies are met, additional water will be used to meet the In-stream needs. However, this is not well articulated in the plan.

Appropriate language has already been agreed to by the work group and is captured in the Instream Flow Management Framework in Section 5.2. However, this should be moved to Section 3 so that it is explicitly part of the plan, because managing instream flows is not just an implementation issue; it is what makes this an integrated plan.

The plan should clearly state that:

- Managing in-stream flows to achieve ecological goals is integral to the plan.
- Many of the capital projects included in the plan will allow for operational flexibility that will be used to meet instream flow needs.
- Meeting (or making improvement towards) the instream flow objectives requires managing instream flows for multiple reaches over different time scales, rather than managing only for the Title XII flow target at Parker and Spring Chinook spawning in the Upper Yakima arm.
- The 2002 Interim Comprehensive Basin Operating Plan will be modified based on the Instream Flow Needs identified in the development of the Integrated Plan and outlined in the Instream Flow Management Framework (Section 5.2).
- 2. <u>Interim.</u> Full implementation of the plan will take two decades at a minimum and it is unlikely that every project in every element will be fully implemented. Therefore, the EIS should consider how existing resources and authorities can be used to make progress towards meeting the plan's goals in the interim before the plan is fully implemented and under a scenario in which the plan is only partially implemented.
- 3. <u>Habitat Enhancement Program.</u> NMFS supports the notion that the approach to implementation would be tailored to utilize existing organizations to review process and

plans, as applicable. There are several existing organizations and processes in the Basin that could be used or modified for this purpose.

The habitat enhancement program will be most effective if it has specific goals and priorities, supports other restoration efforts in the basin, and has a competitive process open to all sponsors that ensures accountability and that projects are consistent with identified priorities. NMFS believes that the best model in the basin to achieve the most cost-effective restoration is the process currently used for Salmon Recovery Funding Board grant review, which relies on a Technical Advisory Group convened by the Yakima Basin Fish & Wildlife Recovery Board to review and rank project proposals.

- 4. <u>Wymer Pump Station Location.</u> The PR/PEIS should thoroughly compare the benefits to anadromous fish of siting the Wymer pump station at Thorp versus Roza. Current water management in the Upper Yakima arm results in low winter and spring flows and high summer flows. A Roza pump station would allow spring and winter flows to remain instream for approximately 40 more miles than would a Thorp pump station. This would have meaningful benefits to anadromous fish, as the affected reach is heavily used by salmon and steelhead. A Thorp pump station may allow artificially high summer flows to be reduced along this same reach from July through September if the KRD canal was improved to allow Wymer filling and irrigation deliveries simultaneously. However, NMFS expects that this is of far less benefit than the Roza alternative.
- 5. <u>Schedule.</u> Per the preliminary implementation schedule, almost all elements of the plan will commence immediately following authorization. However, feasibility studies for fish passage at three major reservoirs will be inexplicably delayed for three years after authorization, although passage at these reservoirs is an acknowledged need for restoring fish populations in the basin. In contrast, further study of a Columbia River pump exchange would commence immediately, even though the need for such a project will remain in considerable doubt for years pending the results of future efforts to study, design, and construct the other large storage projects in the plan. Therefore, the preliminary schedule should be modified such that feasibility studies for fish passage at Keechelus, Tieton, and Kachess commence immediately after authorization.

The following should be considered in the PR/PEIS to better explain the rationale, intent, and expected effects of the Integrated Plan:

6. <u>Out of Stream Needs.</u> The work group created this plan under the assumption that 70% of the prorated entitlement is the required out of stream need for agriculture. Although NMFS has supported the planning effort, we are unaware of any empirical evidence or

analysis that demonstrates that that 70% is the best number for planning. We encourage a more thorough explanation of the need and how much it varies across different years, cropping patterns, and irrigation districts.

- 7. <u>Capacity of Existing Infrastructure to Meet Flow Objectives.</u> The plan includes significant capital improvements for water storage and delivery infrastructure. Many of these improvements are premised in part on the idea that these projects will allow the operational flexibility to meet instream flow objectives that were developed as part of the plan. During the planning process, models were used to estimate how these new or modified structures could be used to meet (or make progress towards meeting) the newly identified instream flow objectives. However, the work group did not adequately consider how existing infrastructure could be operated to better meet the flow objectives. Recent historical flows do not offer an adequate comparison because the water system has not been operated with these new instream flow objectives in mind. Therefore, in order to clarify if all of the identified capital projects are necessary, we recommend that the PR/PEIS fully consider if the existing infrastructure could be operated to meet or make progress toward meeting the new flow objectives.
- 8. <u>Funding</u>. The PR/PEIS should describe assumptions about how various elements of the project will be funded and clarify if funding for plan elements would reduce existing funding streams for water conservation, fish habitat restoration, etc.
- 9. <u>Effects to Steelhead.</u> The PR/PEIS should describe impacts and benefits to steelhead populations in terms of goals set forth in the steelhead recovery plan. On the whole, the plan has the potential to contribute to recovery of ESA-listed steelhead in the basin. If the plan and Instream Flow Management Framework were fully implemented, we would expect meaningful progress toward meeting steelhead recovery and delisting goals; this would be a significant benefit to the basin because it would greatly advance recovery without major adverse impacts to stakeholders.

Steelhead recovery and delisting from the ESA will require both more steelhead and increased spatial distribution of steelhead populations in the Yakima Basin. Just having more fish will not be enough. The restoration actions in the plan and operational improvements described in the Instream Flow Management Framework are expected to increase steelhead abundance, and higher abundance generally results in a wider distribution. Fish passage into and through the storage reservoirs will also increase steelhead abundance and contribute significantly to the spatial distribution of accessible steelhead habitat. More detail on spatial distribution and abundance requirements can be found in the 2009 Yakima Steelhead Recovery Plan.

Similarly, the benefits and impacts of the plan for bull trout should be considered in the context of the bull trout recovery plan under development by USFWS.

- 10. <u>Flood Benefits.</u> The plan should identify flood protection as one of the benefits of the habitat enhancement program. Setting back dikes and levees will reduce flooding in some areas. This is a key benefit for communities in the planning area and should be described and quantified if possible. Benefits would presumably include reduced risk to life and property and reduced costs to fight and recover from flooding and erosion. Presumably, the storage and structural elements in the plan could also reduce flood risk, depending on how they are operated.
- 11. <u>Watershed Protection</u>. The EIS should thoroughly describe the benefits of the three targeted acquisitions. Because these tracts were identified late in the planning process, the effects associated with their preservation were not fully explored. The analysis should consider both the threats to these tracts of future development and their importance to anadromous fish, snow storage, and other water resources. For example, preservation of the Teanaway tract would ameliorate the likely threat of development in a watershed that is critical to steelhead.

Thank you for considering and addressing our comments. If you have any questions, please contact Sean Gross of the Washington State Habitat Office at (509) 962-8911 x225 or electronic mail at sean.gross@noaa.gov.

Sincerely,

F. Dale Bambrick Chief, Eastern Washington Habitat Branch

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STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE P.O. Box 42560 • Olympia, Washington 98504-2560 • (360) 902-1800

June 13, 2011

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

RE: Comments of Draft Yakima River Basin Integrated Water Resource Management Plan

Dear Ms. McKinley:

The Washington State Department of Agriculture wishes to express its appreciation in being allowed to comment on the above referenced document. As the state agency designated to both protect and regulate commercial agriculture, we will focus our comments as they pertain to potential impacts to the agricultural industry.

Section 2.1.1.: The assumption made in the fifth paragraph regarding a continuation of current cropping patterns should be viewed with some degree of skepticism. Over the past decade we have seen significant changes in orchard lands moving to vineyards and therefore decreasing the overall irrigation water needed (on an acre for acre basis). Additionally, for crops other than orchards and vineyards, regional and market conditions will dictate the crops grown and may therefore significantly impact the demand for irrigation water. We suggest that caveats be placed on the assumptions made in this paragraph.

Section 2.3.1.: A significant amount of groundwater supplied to domestic wells is the result of excess irrigation water moving past the root zone. This is especially true on the Northern flanks of ridges within the lower Yakima Valley. Do the figures presented in this section account for the declines in groundwater levels as a result of increased conservation and improved irrigation techniques? Do the estimates consider the necessary shift from shallow groundwater to surface or deeper groundwater to address the expected increases in municipal and domestic water needs? This situation may significantly modify estimates of consumptive and non-consumptive use.

Given recent federal and state emphasis regarding the preservation of farmland there is a danger in overestimating the conversion of cropland to non-crop uses. Over the past 40 years there has not been a significant shift in land conversion as one sees in Western Washington. Therefore estimates based on the assumption that significant land use changes will occur may not be warranted.

Section 2.4 : One of the major issues for Washington agriculture and climate change is the effect climate change will have beyond a sub-regional level. Predicted climate changes on a regional and global level are likely to have significant impacts on agriculture in Washington due to the level of national and international food demands. It is predicted that the Pacific Northwest may emerge as an increased supplier of food for areas of the world that will see significant declines in the ability to produce to meet population demands. This being the case, those pressures will influence what is grown, how much is grown, and at what compromise. To assume that Washington agricultural conditions will be dictated by current water allocations given potential global effects of climate change may be short-sighted. Consider inclusion of some caveats that allow for unforeseen effects of climate change.

Section 3.1.2. *Kittitas Reclamation District Canal Modifications and Wapatox Canal Improvements:* WSDA is very supportive of structural modifications that limit water conveyance losses due to leakage or evaporation. As started earlier however, the current losses are likely to be contributing to maintaining the local unconfined aquifer system. Removal of that recharge source will impact current agricultural and domestic water users. What elements of the Plan consider these potential consequences?

Section 3.1.3. Surface Water Storage *Study of Columbia River Pump Exchange with Yakima Storage*: WSDA is aware of the sensitivities regarding inter-basin transfer of Columbia River water into the Yakima Basin, and believes that all current water management efforts should be directed to activities within the Basin. However, previous comments recognize that future conditions may warrant a re-visitation of this current position. WSDA supports language that does not rule out future consideration of inter-basin transfer of Columbia River water into the Yakima Basin to meet as of yet unanticipated future needs. WSDA would suggest as an additional item in step 1 of a feasibility study, an analysis of the potential impacts to cultural resources from moving water from the Columbia to the Yakima.

Section 3.1.4 *Groundwater Storage*: The document alludes to the fact that timing will be of upmost importance to the success of a SAR project. In order to recognize "same season" benefits of a SAR project the pilot study will have to determine if hydrogeologic conditions are satisfactory to realize the benefits to domestic water users and in stream flow objectives. Depending upon the results, the planners should be willing to accept results that may not allow for same season benefits. It is quite acceptable to realize benefits that may be realized in two to three seasons depending upon the travel times from the point of infiltration to point of beneficial use.

Section 3.1.6 *Enhanced Water Conservation-Agricultural Conservation*: The issue of water conservation related to agriculture has been the subject of several evaluations related to overall water supply outlooks in the development and implementation of climate change adaptation strategies. In reviewing the technical memorandum pertaining to agricultural water conservation we noted many similarities to previous recommendations and noted some differences. We suggest that a review of the 2009 document *Leading the Way: Preparing for the Impacts of Climate Change in Washington, Recommendations of the Preparation and Adaptation*

Working Groups may be in order. Numerous recommendations related to water conservation and efficiency measures were made, many of which pertain to the Yakima River. Additional measures related to on-farm elements not found in the technical memorandum are made in the climate document that is not necessarily solely based on climate change.

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Additionally, cost estimates are made regarded the listing of conservation measures put forth in the Plan. These appear to be specifically off-farm elements. An estimate of costs associated with the implementation of on-farm conservation measures would be helpful to develop a complete cost (both on and off farm) of implementation of conservation measures in the basin. These estimates could be obtained from NRCS, or FSA since these agencies have been funding irrigation improvements from such programs as EQIP for several decades.

Section 3.1.7. Market Reallocation: The development of water markets holds some degree of promise as a tool to direct water to key needs. However, these markets pose a potential danger to the agricultural community in that letting the market allocate water resources will channel water to those that can pay the greatest for the resource. In most cases municipal and industrial users will have the ability to pay significantly more for water than will the agricultural sector. As such, too much reliance on a market based system for water allocation will over time significantly reduce water available to agriculture for growing food. Any market based system must have "side-boards" that insure an adequate supply of water continues to flow to agricultural interests. If these protections are not part of a statewide or even regional market, agriculture will decline and with it the capacity of Yakima Basin to generate a viable economy; without sufficient water, the Yakima Basin will not be able to meet both the national and international demand for high quality specialty crops.

Section 4.6 Water Supply Outcomes under Climate Change: WSDA is somewhat surprised by the data contained in Table 4.4 related to precipitation predictions. These values appear to be somewhat larger than those recently published by the University of Washington-Climate Impacts Group. Given state government (including the Department of Ecology) is relying upon them for data on which to base an overarching climate adaptation strategy, WSDA would hope that there would be more uniformity in modeled results. WSDA does acknowledge that precipitation predictions are much more problematic than temperature predictions especially moving out to 2040.

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Section 4.8 Summary of Integrated Plan Benefits: Table 4-10 does an excellent job of highlighting the need for increased storage capacity. WSDA fully supports a focus on the development and implementation of new and improved storage facilities on the Yakima River. The scale to which these facilities appear to have been considered seems appropriate given the predicted impacts of increased efficiency of water delivery systems, increased utilization of on-farm irrigation methods and the development of in-basin groundwater storage. The Plan takes no detour from the fact that an increase in storage capacity is key to addressing the water resource issues within the Yakima River Basin.

4.9 Economic Outcomes: The benefits noted to irrigated agriculture are assumed to be based upon current cropping patterns. Changes in patterns have been realized especially in the last ten years and have moved to higher value crops. The financial estimates on impacts may be underestimated given this change. It is likely that a shift from lower value to higher value crops will continue in the future making economic estimates of impact significantly below that which is reality. In conclusion, the Washington State Department of Agriculture would like to be on record stating the importance of moving this process forward. While the draft document is not perfect, it maintains the parameters of the seven agreed-upon elements of the integrated plan sufficiently; WSDA believes it is critical to keep working towards a successful outcome. We appreciate the effort made in the latest draft to address the Columbia River pump exchange concept and breaking out the feasibility study into two steps. It is important to allow for alternative sources of storage if Wymer, Kachess or Bumping don't work out.

Sincerely,

Kirk V. Cook. LG, LHG NRAS-Directors Office Washington Department of Agriculture

Dan Newhouse Tom Davis Jaclyn Ford

cc:



June 14, 2011

Re: Yakima Basin Enhancement Project Scoping Comments

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

Sent via email: yrbwep@usbr.gov

Dear Ms. McKinley:

The proposal for Yakima Basin Enhancement Project has worthy goals of providing fish passage at dams, additional flows for fish and agricultural uses, and enhancement of the watershed. It will be a challenge to achieve these within constraints of budget and impacts to other resources, but we must try.

A full and detailed analysis of benefits, costs and environmental impacts of each of the proposed elements and their relationship to one another will be essential to result in a package of elements that has the broad support needed to implement such a basinwide proposal. Both SEPA and NEPA require a good look at alternatives to meet the stated objectives. This is an opportunity for the agencies to look at various combinations of projects that provide the benefits being sought while minimizing and offsetting the impacts of different projects.

It will be imperative that the final package be assured of funding and authorization for all the elements that are included.

We will focus our comments on the elements that are related to lands and habitat.

We encourage Bureau of Reclamation and Washington Department of Ecology to carefully study elements that conserve and enhance forests and watersheds. For project elements that involve construction of dams and associated structures, a full analysis of impacts both direct and indirect must be done, and mitigation proposed for those impacts that cannot be avoided.

Yakima Canyon Scenic Byway

The Yakima River Canyon Scenic Byway is a world-class travel-way for visitors and residents of Washington State. It embodies the Central Washington experience from its scenic shrubsteppe vistas to its diverse recreational opportunities, and rich geological, natural, and cultural heritage. The Byway enhances communities and places of interest along and nearby the corridor, increases tourism, and adds to the local culture and economic base. The impacts of the proposal on the Byway must be considered as part of the EIS. The YRCSB is widely accessed by both community members and visitors. Locals use the drive between Ellensburg and Selah as a relaxing and beautiful way to commute north and south, to experience the stark beauty of the shrub-steppe habitat, and share wildlife viewing and other recreational pursuits with friends and family who are visiting the area. The Canyon is also popular with the cycling community, despite the narrow shoulders. With several fly-fishing companies taking advantage of the blue-ribbon trout fishery, multiple camping grounds, and several float-boat operators/rental companies, thousands of tourists and recreationalists use the YRCSB throughout the year.

Tourism and Economic Development

Recreation-based tourism is a huge part of Kittitas and Yakima Counties' economies. The revitalization of the Yakima River Canyon Scenic Byway will draw in tourists and new residents to our area, which bring with them support for our tax bases and economic growth opportunities. The Yakima River's Blue Ribbon Trout Fishery and the abundant river floating access attract people from all over the country. The byway serves as a physical link between communities and is also a vital economic highway representing significant tourism dollars and connecting visitors to the businesses at both ends of the byway and every point in between.

Recreation and Natural Resources

Access to recreational opportunities is paramount to public use of the Yakima River Canyon Scenic Byway. The byway, located centrally in the state, is well positioned to be a recreational hub that several communities can enjoy and benefit from. In addition to the economic incentives, the enhancement of recreation along the byway will provide visitors, community members and tourists alike, with more opportunities to enjoy and connect with the local landscape and wildlife. Increasing tourism and recreation opportunities will also necessitate increasing and improving the tourist-related infrastructure within the scenic byway corridor in order to meet current and future recreational demands. The Yakima River Canyon is rich in natural resources. Visitors to the byway have the opportunity to appreciate its abundant wildlife, spectacular wildflower blooms, endangered shrub-steppe habitat, the volcanic basalt cliffs left in the wake of Mt. Mazama, and the wondering curves of a river teaming with wild salmon. The Partnership is also committed to conservation and restoration of shrub-steppe and riparian habitats that will further enhance the traveler's byway experience and improve and protect our critical natural resources.

Cultural and Historic Resources

The canyon is also an incredible cultural resource due to its long history of importance to human communities. Evidence of a civilization dating back to 3000 BCE was found within the canyon, and although not fully documented, evidence suggests multiple European settlements from the 1800's are present. Unfortunately, many traveling and recreating along the byway are unaware of the bounty of cultural history that surrounds them. The heritage of the area is too remarkable not to be shared. Increased and updated interpretative signing along the byway, in addition to the proposed Yakima River Canyon Scenic Byway Interpretative Center at Helen McCabe Park, will provide much needed educational opportunities.

Transportation

One of the primary goals of the original 1968 Yakima River Canyon Scenic Byway Corridor

Management Plan was to create safe driving conditions along the byway. A fundamental element of the YRCSB vision is to identify and improve transportation safety in the corridor. In addition, a multi-modal focus, which provides hikers and bikers with safer routes along the roadway, is now likely to be a larger priority than it was in the past.

Wymer Dam

The Wymer Dam project would have a significant impact on the Yakima Canyon and one of the few tributary drainages in the canyon. This project would also have a significant effect on a century old farming and ranching operation, and the family that has deep roots in this valley.

The EIS must also evaluate the potential for recreation use on the reservoir- both for its opportunities, and for its impacts. These would include effects on the adjacent private lands, the Yakima River Canyon Scenic Byway, the security of the Yakima Firing Center and I-82, and the shrub-steppe habitat. Various scenarios should be evaluated to fully understand how various types of uses will affect these values.

Teanaway River Valley

A key element in restoring and enhancing the watershed of the Upper Yakima River is conservation of the forests of the Teanaway River Valley and the associated public access and recreation lands that are important to Kittitas County's economy. While we are encouraged that the YBEP is considering the Teanaway for conservation, the EIS needs to explore ways in which the project can support and accelerate this watershed enhancement measure.

Little Naches & Manastash Ridge

These areas have significant habitat values that will require additional conservation measures to ensure they are maintained into the future. It is encouraging that the YBEP is looking at acquisition of private lands to restore and maintain late-successional forest and salmon habitat in this area. There are small amounts of old-growth forests and spotted owl habitat on private lands in the basin. Conserving these will assist with recovery of this species.

I-90 Corridor

Cascade Land Conservancy has been deeply involved in the I-90 Wildlife Corridor effort coordinated by a large coalition of state and federal agencies and private non-profit groups. WSDOT is implementing an innovative reconstruction project on the highway that is a model for ecological connectivity. The wildlife bridges connect habitat on both sides of the highway. Conserving that habitat is a major goal of the corridor project. CLC has had a great deal of success securing land for habitat conservation using Federal Endangered Species Conservation funding. We believe we can continue to build on this approach and would like the EIS for YBEP to consider methods to partner on such work as part of basin mitigation and enhancement measures.

K-K Pipe

The Keechelus-Kachess pipeline is an intriguing opportunity to improve the flow characteristics in the upper Yakima during summer. The project should coordinate with the construction of I-90 and its wildlife crossing structures and wetland restoration efforts. Routing must be carefully evaluated to minimize impacts on the forest and wetlands in the vicinity, including

Swamp Lake which was purchased for permanent conservation several years ago. CLC has been involved in acquiring and conserving substantial property in that area to protect wildlife habitat and connectivity, and such a major project could seriously impact those efforts. Carefully designed and mitigated, the pipeline may have a net benefit on the terrestrial as well as aquatic habitat.

Bumping Lake

As is well documented, expanding Bumping Lake would result in the loss of late-successional forest, spotted owl habitat, wetlands, trails, and recreation cabins. These are significant impacts. The EIS must objectively assess these impacts and potential mitigation measures.

Thank you for this opportunity to comment during the scoping phase of your environmental review. Please keep Cascade Land Conservancy informed of activities related to this proposal. We look forward to working with the agencies to develop a package that will conserve and enhance our water, habitat, economy of this valley and of our region and state as a whole.

Sincerely,

Jill Arango Conservation Department Managing Director

American Rivers * Conservation Northwest * National Wildlife Federation * Trout Unlimited * Trust for Public Land * The Wilderness Society

June 15, 2011

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

Sent via email: yrbwep@usbr.gov

Dear Ms. McKinley:

Thank you for the opportunity to comment on the scoping of the federal and state programmatic environmental analysis for the Yakima Basin Integrated Plan. The undersigned organizations believe that the Integrated Plan has considerable potential to serve as a model for water management and ecosystem protection and restoration in the 21st century, and the NEPA/SEPA process should allow the U.S. Bureau of Reclamation (BOR) and Washington State Department of Ecology (Ecology) to address the outstanding questions regarding the plan's substance, sequencing, and financing. In that spirit, we offer the following comments and suggestions.

Our comments on much of the plan echo the comments of American Rivers and National Wildlife Federation during the Yakima River Basin Water Enhancement Program (YRBWEP) Workgroup process over the last two years. Since our comments are consistent with what we have already communicated to BOR and Ecology, some of these comments are relatively brief. On the other hand, the lands and rivers protection and acquisition component of the habitat enhancement element of the plan was introduced late in the Workgroup process. Accordingly, our comments are more detailed on that aspect of the plan.

A. General Comments

1. Prepare the NEPA/SEPA document so the BOR is able to evaluate the Integrated Plan under both the existing 1983 version of the Principles and Guidelines for Water and Land Related Resources Implementation Studies (P&G) as well as the revisions to those standards that are now being finalized.

Because the existing P&G were implicitly acknowledged to be deficient by Congress in the Water Resources and Development Act of 2007, Section 2031, when it ordered that they be revised, every effort should be made to create the basis upon which the Integrated Plan can be evaluated using the new criteria Congress established. Those criteria were:

(1) seeking to maximize sustainable economic development;

(2) seeking to avoid the unwise use of floodplains and flood-prone areas and minimizing adverse impacts and vulnerabilities in any case in which a floodplain or flood-prone area must be used; and
(3) protecting and restoring the functions of natural systems and mitigating any unavoidable damage to natural systems.

CONSIDERATIONS.—In developing revisions to the principles and guidelines under paragraph (2), the Secretary shall evaluate the consistency of the principles and guidelines with, and ensure that the principles and guidelines address, the following:

- (A) The use of best available economic principles and analytical techniques, including techniques in risk and uncertainty analysis.
- (B) The assessment and incorporation of public safety in the formulation of alternatives and recommended plans.
- (C) Assessment methods that reflect the value of projects for low-income communities and projects that use nonstructural approaches to water resources development and management.
- (D) The assessment and evaluation of the interaction of a project with other water resources projects and programs within a region or watershed.
- (E) The use of contemporary water resources paradigms, including integrated water resources management and adaptive management.
- (F) Evaluation methods that ensure that water resources projects are justified by public benefits.

It is our understanding that the Council on Environmental Quality expects to have President Obama formally adopt the first section of the revised P&G in June 2011, with detailed guidance to follow later this year. We request that the Bureau of Reclamation guide scoping of the NEPA/SEPA document using its best understanding of the requirements and approach of the revised P&G, with refinement when the document is executed.

Each significant element of the Integrated Plan should be analyzed to determine the ratio of cost to public benefit.

We understand that the revised P&G will use as its fundamental decision standard that "costs are justified by public benefits." This differs from the current P&G, which calls for assessment that the benefits exceed the financial costs and that the project maximizes National Economic Development. In order to meet this new standard the costs and "public benefit" of the project should be evaluated, using the best contemporary economic approaches for non-monetary values. In addition, the Integrated Plan will be too expensive to implement all at once, so the project will inevitably be phased. We request that each major element within the plan be separately evaluated for contribution to both cost and "public benefit" in order to best assemble cost-effective and public benefit maximizing approaches.

Specifically, we request formal independent evaluation of the plans largest and most costly projects, including expansion of Bumping Reservoir, construction of the Wymer Reservoir, improvements to the KRD canal, construction of the Thorp pumping station, creation of the Kachess lake tap with associated Keechelus-to-Kachess pipeline, and the fish passage elements.

In addition, it would be helpful to develop a tool that allowed not just scoring projects individually, but also in combination with other elements of the Integrated Plan – for instance how effective would fish passage be at restoring salmon if done alone versus if it is accompanied by other tools included in the draft Integrated Plan, such as additional storage releases, subordination of power at Roza and Chandler, and/or pre-storage control groundwater storage?

3. Test each of the major water supply elements independently and in all the possible combinations for performance under projections of climate change.

The analysis of water supply reliability performed during the stakeholder process looked at the entire package and the package with selected single water storage projects removed. This did not allow an accurate assessment of how each plan element and major projects within those elements contributes to water supply reliability and fish recovery, or how various combinations of elements and projects might contribute to those goals. We request that the programmatic NEPA/SEPA document include that analysis. Such an analysis is necessary to reasonably evaluate both the need for and public benefit of each element and major project, how different permutations of the plan will perform in future climate conditions, and to suggest beneficial ways to stage and sequence projects within each element of the plan.

4. The new P&G will require development of a primarily non-structural alternative. Aggressive water marketing, crop substitutions, dry-year options, other demand management arrangements, and habitat enhancements, should be the primary means of addressing water supply in that alternative.

During the stakeholder process, water marketing was generally characterized as having limited potential for reallocation during water short years. However, economic analysis performed during the stakeholder process suggested that much of the agricultural productivity supported by more reliable water supplies had an economic value well below the proportional cost of the water supply improvements being proposed. In other words, it appears that the more reliable water supplies will cost far more than the water users can afford to pay. That suggests that reallocating water during times of shortage from lower valued crops to higher valued crops would have economic and fiscal advantages from taxpayer perspective (if taxpayers are expected to make up the difference) and/or a local water user perspective (if irrigators are expected to pay hundreds of dollars per acre foot). The NEPA/SEPA analysis must set forth a realistic and comprehensive view of means to accomplish reallocation and demand management, including water marketing, crop substitutions, dry year options, and habitat enhancements than the stakeholder process allowed, especially given the likely cost of the water supply infrastructure proposal. The analysis should also examine what a more robust

water market might mean for instream flows and salmon and steelhead survival, whether that market would serve as a complement to new surface storage or as a substitute for some of it.

Specific water market components that should be carefully examined as an addition or substitute for at least certain components of other water supply elements include:

- Alternatives to traditional transfers of water rights such as rotational fallowing;
- Examination of the legal and institutional barriers to transferring water rights and provide options to make transfers easier;
- Examination of options for tax incentives for encouraging water right holders to use water banks and water markets;
- Water transfers can potentially have high transactions costs; the EIS needs to look at mechanisms for lowering costs and simplifying transfers;
- Examination of incentives to ditch/irrigation companies who could potentially apply changes in use that could serve to open up new water in markets;
- Examination of ways to upgrade irrigation infrastructure to open up new marketable water supplies (e.g. conveyance upgrades that can operate efficiently with smaller diversions) and benefit instream flows; and
- Examination of options for funding a water bank or water markets

5. The out-of-stream water needs assessment in the Integrated Plan is weak; it should be reanalyzed with price as an essential component. How much will water users pay for increased reliability and supplies from Integrated Plan?

The out-of-stream water needs assessment in the draft Integrated Plan essentially rests on the irrigation districts' assertion of what they need to be economically viable. The out-of-stream needs assessment must have a strong analytic basis that is largely lacking from the draft Integrated Plan in order to withstand legal and political challenge as the project goes forward. A major flaw is that the price of increased water supply reliability is not considered. What price are the proratable irrigators willing to pay for 70% dry year reliability? What price are they not willing to pay? If the Plan is founded on an unrealistic or unclear assessment of the value of a more certain water supply and the capacity of irrigators to pay for it, it will be vulnerable fiscally, politically, and legally.

6. Better define standards for accessing new municipal, industrial, and domestic water supplies.

With respect to the municipal, industrial, and domestic supply component of the out-of-stream assessment, more definition of the type of conservation practices that communities will need to have in place to access new storage water is needed. While the Integrated Plan expects a new, multi-stakeholder decision-making body to set detailed standards, some general guidance

is needed up front on best management practices for municipal, domestic, and industrial water conservation and efficiency.

7. Consider and model water quality effects of the Integrated Plan in the NEPA/SEPA analysis.

The stakeholder process did not significantly consider water quality, except insofar as flows can sometimes serve as a surrogate for water temperature. Water quality effects of the Integrated Plan, especially with respect to various ways to manage the system maximize the cold water needed by salmonids, should be considered and modeled in the NEPA/SEPA analysis. The new storage proposed under the Integrated Plan could be an important tool in cold water conservation and management, especially as air temperatures rise and snowpacks shrink and melt off earlier in the year. The water quality and nutrient supply impacts of the increased salmon returns should also be examined. Because the nutrient loads likely will have significant beneficial impacts on upper basin ecological productivity, both aquatic and terrestrial, this may affect the public benefit analysis of the project. At the same time, BOR and Ecology should determine whether and to what extent those same nutrients may have deleterious effects downstream where excess nutrients are already present due to agricultural practices. The NEPA/SEPA analysis should also examine the water quality benefits of floodplain restoration and other habitat protection and restoration projects.

8. The NEPA/SEPA document should evaluate how salmon will fare in the basin with climate change both with various permutations of the Integrated Plan improvements and with the No Action alternative.

Based on the economic analysis conducted as part of the Basin Study/YRBWEP Workgroup process, this project depends on salmon restoration for the bulk of public benefits. The NEPA/SEPA document must analyze the effect of the proposed projects on the likelihood of salmon remaining viable in the basin under conditions of climate change. The relative benefit of various projects to providing resilient habitat for salmon, steelhead, bull trout, and other species in the face of climate change should be a significant factor in determining their phasing and sequencing.

The NEPA/SEPA document must lay out the proposed sequencing and staging of the elements.

Evaluation of the project as a whole is needed, but the project will not be implemented as a whole – as mentioned above, it will inevitably be staged and sequenced. That sequencing must be explicit for the EIS to fairly evaluate the project.

- 10. Flood management opportunities are largely missing from the Integrated Plan; the NEPA/SEPA document should fully evaluate the linkages between floodplain restoration and flood management, as well as the opportunities to use new storage for that purpose.
- 11. Analysis of the Integrated Plan during the stakeholder process suggested that in average or better water years, total water supplies would increase. What proportion of that water will be dedicated to improving flows for salmon and steelhead?

The EIS should specify alternatives for how that water can be allocated and used to benefit flows for outmigrating and returning salmon and steelhead. This is important in analyzing whether the new water storage has significant fish restoration and climate resilience benefits along with benefits for out-of-stream water uses, and if so, which projects deliver the greatest value alone or in combination with the other elements of the Integrated Plan.

12. The NEPA/SEPA document should specify how reservoirs will be managed when sockeye are reintroduced and the fish passage facilities are in place.

Building on the previous paragraph, to what extent will the fishery be a factor in reservoir operations during low water years when consideration of the fishery is most critical and most in conflict with water supply operations? How will the system be operated to maximize good outmigration survival in wetter years? How might additional storage serve to retain better inriver conditions in the face of climate change and facilitate late season upriver migration of sockeye and summer chinook? What would be the effects of more fish-friendly reservoir operations on irrigation and other out-of-stream water supplies? These questions were skirted in the YRBWEP workgroup, but must be analyzed to ensure that the EIS is based on a broad and comprehensive analysis of alternatives, some of which are likely to prove compatible with a significantly more reliable out of stream water supply.

13. The NEPA/SEPA document should more carefully analyze the expected fish restoration benefits of the Integrated Plan

The qualitative and quantitative benefits of the Integrated Plan, especially for sockeye, summer and fall chinook, and bull trout, are vague (though very promising at least for sockeye). The EIS is an opportunity to provide more information on expected benefits for existing and reintroduced fish populations, and to identify potential barriers to success (e.g., warm water in the lower river in the summertime) and ways to overcome those barriers.

14. The NEPA/SEPA document should evaluate the power consumption and generation ramifications of the proposed project and identify solutions to concerns about subordination of power at Roza and Chandler.

How significant are the power needs for pumping? Where are there generation opportunities? We support consideration of hydropower generation in the Keechelus-to-Kachess pipeline and as part of the Wymer conveyance and outlet facilities.

In addition, the NEPA/SEPA process should be used to at least set the stage for successfully addressing concerns the Bonneville Power Administration may have with subordination of power at Roza and Chandler power plants, as this is a critical element of the Integrated Plan that must move forward.

15. The impacts (positive and negative) of the proposed project on recreational fishing, especially in the blue-ribbon trout fishery sections of the Yakima River should be evaluated, and any actions necessary to protect the trout fishery consistent with the other goals of the Integrated Plan should be identified and incorporated into the alternatives.

The Integrated Plan will clearly improve the overall health of the river system, which will presumably benefit resident trout populations. The EIS should spell out the benefits to resident trout from habitat improvements and restored salmon and steelhead populations, as well as any negative impacts. In particular, any avoidable or unavoidable impacts on the Yakima Canyon trout fishery of altered irrigation water conveyance systems and operation of new or expanded reservoirs (especially Wymer given its direct effect on flows in at least the lower Yakima Canyon) should be analyzed.

16. Conduct scientifically-rigorous wildlife surveys to establish presence or absence, and disclose findings in NEPA/SEPA documents along with the direct, indirect, and cumulative effects (positive and/or negative) to species and their habitat resulting from proposed actions in the Integrated Plan.

Once surveys have been completed according to authorized protocols, the survey results and historic records of species presence or use of the area affected by proposed actions must be disclosed in NEPA/SEPA documents, including:

- presence and population size of state and federal species classified as threatened, endangered, or candidate species;
- presence and population size of federal "survey and manage" species;
- presence and population size of federal "sensitive" species; and
- presence and population size of state "priority" species;

The NEPA/SEPA analysis of proposed actions in the Integrated Plan must disclose existing conditions and evaluate direct, indirect, and cumulative impacts (positive and/or negative) to species and their terrestrial and aquatic habitat, including impacts from new or expanded reservoirs as well as terrestrial and aquatic habitat that is protected and/or restored under the proposed actions. The NEPA/SEPA analysis must quantify the acres of terrestrial and aquatic habitat impacted, evaluate impacts and mitigation measures, and disclose the location of habitat by legible map, including:

- old-growth forest (over 150 years of age);
- mature forest (80-150 years of age);
- suitable habitat for the northern spotted owl habitat;
- designated critical habitat for the northern spotted owl;
- habitat for other state and federal species classified threatened, endangered, or candidate (e.g., bull trout, steelhead, wolf, sage grouse, etc.);
- designated critical habitat for federal species classified as threatened or endangered;
- habitat for state "priority" species (e.g. sharp tailed grouse); and
- state "priority habitat" (e.g. old-growth, wetlands, riparian, shrub-steppe).

In addition to assessing impacts to species and habitat, the NEPA/SEPA analysis must evaluate and disclose impacts of the proposed action to wildlife habitat connectivity (www.waconnected.org). The NEPA/SEPA must also evaluate and disclose the role of the proposed action on state and federal species recovery plans.

Due to the overlap of this project with federal lands on the Okanogan-Wenatchee National Forest in several proposed actions, the analysis must comply with all policies and guidelines applicable to these lands including those described in the Okanogan-Wenatchee Land and Resource Management Plan as amended by the Northwest Forest Plan.

B. Habitat Enhancement Element – Land Protection Component

The land protection and acquisition component of the Integrated Plan's habitat protection and enhancement element is discussed at length below, as it is new to the Plan and these comments provide a good opportunity to set out a more detailed vision for further development and analysis of land protection and acquisition.

1. Land protection and acquisition components are fundamental to the Integrated Plan and must be part of the stated Purpose and Need

The watershed, water supply, and ecological restoration goals of the Integrated Plan will be furthered through the protection and restoration of key landscapes. The primary lands that enhance other components of the Integrated Plan are large tracts in the Yakima/Naches watershed that provide high ecosystem and species conservation and restoration potential both within and outside of the immediate riparian corridor. The three areas described below as land acquisition projects linking the upper and lower watershed include the Teanaway watershed, Yakima Canyon, and Little Naches, Manastash, and Taneum Headwaters. These lands complement the overall goals of the Integrated Plan by helping to maintain or improve water supply and quality, protecting sources of cold water and cold water habitat, providing (or providing linkages to) bull trout and/or salmon and steelhead habitat and spawning grounds, and providing additional floodplain restoration opportunities. These lands also enhance the ecological protection and restoration purposes of the Integrated Plan by protecting old growth (late succession) stands, protecting shrub-steppe/sage grouse habitat, providing connectivity/wildlife corridors, and connecting lower and higher elevation habitats. Furthermore, these lands improve the local economy and quality of life by providing recreation, hunting, and community forestry opportunities), and providing regional continuity in public lands. Some may also contribute to mitigation efforts needed for implementation of other components of the Integrated Plan. Also included below are additional federal land designations (including National Recreation Areas, National Conservation Areas, and Wilderness Areas) and Wild and Scenic River designations consistent with values and objectives of the Integrated Plan.

The land protection components in the habitat enhancement element are fundamental to the overall success of the Integrated Plan from an environmental and water supply standpoint. We note that the scoping materials mention that these components would be "encouraged"; encouragement is not sufficient to ensure critical ecological safeguards represented by these protections will be realized. As such, significant permanent federal designations of lands and waters, and significant private lands protections in critical areas must be included in the Purpose and Need of the Integrated Plan NEPA and SEPA documents.

The YRBWEP Workgroup approved including the lands and waters in the attached map as the basis for the land protection component. This approval acknowledges the fundamental importance of these protections. The specific lands identified are based on the ecological needs and opportunities that exist within the Yakima Basin geography.

a. Private Land Protection

i. Teanaway

The 46,000-acre Teanaway landscape is located approximately five miles to the north and east of Cle Elum. It is currently owned by the American Forest Land Company. This landscape is highly vulnerable to development, particularly along the mainstem river and its tributaries. The area is comprised of mid- to high elevation mixed conifer forest, lower level dry grand fir/ponderosa pine forest types, and contains the mid to lower portions of the Teanaway River basin, including the mainstem, and the west, middle, and north forks of the Teanaway River which flows into the Yakima and provides fish passage and connectivity to high elevation colder water.

Protecting this area will provide major ecosystem, water quality/quantity, and species benefits that will complement the habitats and species protected by the Plum Creek Central Cascades HCP, directly adjacent to the western portion of the area. The ponderosa pine forests are particularly significant due to their limited range and vulnerability to climate change. The land is important for maintaining high water quality, instream flow protection (in an area that absent protection would be subject to impaired flows), protecting salmon and steelhead spawning grounds, and potential bull trout restoration. The Teanaway watershed represents what is likely the best single tributary system for restoration of salmon and steelhead within the Yakima Basin beyond the habitat above the headwaters reservoirs. Because a large acreage of private timber lands are for sale, the threat of development in this critical part of the middle and lower Teanaway watershed has prevented tribal and federal entities from investing in aquatic restoration of the watershed as a whole, but the long-term restoration potential for those lands and the aquatic conditions they support is unmatched in the Yakima basin. In addition, conservation of the private lands within the Teanaway landscape fits well into the overall strategy of acquiring and protecting non-federal lands to ensure successful landscapescale linkages envisioned by the Integrated Plan. The Teanaway landscape also provides significant recreational opportunities for a variety of users – these activities would be protected and enhanced through inclusion in the Integrated Plan.

Securing the long-term ability to protect and restore the Teanaway watershed is a top priority for private land protection in the Basin.

ii. Yakima Canyon

This area covers approximately 15,000 acres currently owned mostly by the Eaton family. The area has moderate to high vulnerability to development and includes the valley bottom and eastern slopes, from the Yakima River to Interstate 82. It is composed primarily of basalt cliffs, grasslands, and shrub- steppe vegetation, a critical habitat type. Eaton Ranch from Lmuma Creek up to the ridge to I-82 (~13,000 acres) is adjacent to the site of proposed Wymer Dam and provides an opportunity to protect a large swath of shrub-steppe habitat, consistent with mitigation needs of the dam construction. In addition, the Yakima Canyon riparian area

provides salmon, steelhead, and resident rainbow trout habitat, and contains high recreation values for hunting, fishing, boating and other types of recreation. These lands can only be included in the private lands protections of the Integrated Plan if the landowners are willing to participate. If they are not, shrub-steppe habitat of equal size and quality must be identified for protection within the basin.

iii. Little Naches, Taneum, and Manastash Headwaters

This area includes 10,000 acres at the headwaters of the Little Naches River currently owned by Plum Creek Timber Company. Plum Creek's lands in the upper Naches watershed are intermingled with national forest land in a checkerboard pattern. This is primarily mid- to upper-elevation conifer forest, contiguous with land near Bumping Lake. Most has been logged and replanted, but some areas of old-growth forest remain. The upper reaches of the Little Naches are important for water quality and maintaining cool temperatures for bull trout protection and restoration. They also provide salmon and steelhead spawning grounds, as well as a substantial amount of recreational use, including segments of the Pacific Crest National Scenic Trail. Similar checkerboard habitat in the upper Manastash and Taneum creek watersheds could also be acquired through the Integrated Plan and would serve similar fisheries and forest restoration and protection goals.

b. Federal Land and Water Designations

i. Protecting Forest Service roadless lands with designations

The lands identified in the attached map as "potential federal designation" are almost entirely roadless lands identified as "Potential Wilderness Areas" by the Okanogan-Wenatchee National Forest (OWNF). The only lands that differ are some of the lands immediately adjacent to the projected new shoreline of the expanded Bumping Reservoir. Because of the high ecological value of the hundreds of acres of spotted owl, bull trout, and old-growth habitat that would be impacted by the expansion, the proposal calls for all lands surrounding the Bumping Reservoir to be designated as federal wilderness additions to the existing William O. Douglas Wilderness. The boundaries of this wilderness expansion should be established to accommodate existing road access needs to Bumping Lake.

Potential Wilderness Areas are those National Forest lands that the OWNF has inventoried and identified as roadless and meeting the requirements to qualify as wilderness. These lands comprise over 150,000 acres as identified in the attached map and include the Teanaway, Alpine Lakes Adjacent (Kachess additions), Thorp, Taneum, Quartz, and Manastash Inventoried Roadless Areas. Designation would protect the outstanding wildlife, ecological, scenic, and recreational values of these special places. We propose that an open public process be implemented to discuss the specifics of enhanced federal protections for these lands, which should include National Recreation Areas and National Conservation Areas with embedded Wilderness Areas (see below for more background on each designation). Current uses on some

of these lands (including snowmobiling, off-road vehicles, and mountain bikes) are not allowed in designated Wilderness Areas. As such, a public process is necessary to discuss and inform which federal land protections to use in which sections of these identified lands.

ii. Protecting wild and scenic river values

The waters identified for Wild and Scenic designation include several that have been analyzed and recommended by the Forest Service for this designation. The American (22 miles, from the headwaters to the confluence with the Bumping River), Cle Elum (24.5 miles, from the headwaters to Cle Elum Lake), and the Waptus River (13 miles, headwaters to confluence with Cle Elum River) are in this category. We suggest that the following additional rivers meet the requirements for Wild and Scenic Designation as well: Stafford Creek (entire length – 3.8 miles), Teanaway River (West, Middle and North Forks – approximately 50 miles) and the entire length of the Cooper River (about 11 miles). Designation would protect free-flowing cold water habitat, spawning and rearing grounds and migration corridors for salmon, steelhead, and bull trout, and would help protect important natural sources of water supply consistent with the objectives of the Integrated Plan. It would also protect access to designated rivers and protect existing uses of the rivers such as fishing, boating, and the benefits those and other recreational activities provide local economies.

2. An open public process must be used to craft the details of the public land and waters protection to meet conservation and community needs.

The federal lands and waters that will receive federal protective designations under the Integrated Plan currently have many users. An open public process must be established to craft the details of how to distribute the designations as well as determine the management provisions within them. This process must involve the recreation community (including snowmobilers, off-road vehicle users, mountain bikers, hunters, anglers, horse riders and packers, hikers, backpackers, picnickers, kayakers, rafters, etc.); the conservation community; the business community; and other key local, regional, and national stakeholders. This process must begin early in the NEPA/SEPA analysis so that its results can be incorporated into Draft Environmental Impact Statement. The land protection component must be represented in every EIS alternative with the exception of the No Action alternative.

A broad suite of protection tools for both private and public land components must be considered.

a. Private Lands Protection

The enhanced protection and ecological conditions for the private lands described can be secured through several tools, including fee-simple acquisition and conservation easements. The Teanaway lands in particular may accommodate a private and public land conservation solution that includes community forestry and production of a sustainable timber product compatible with the aquatic restoration needs of the watershed.

b. Federal Land and River Protection

The federal land designation options considered should include National Recreation Area (NRA), National Conservation Area (NCA), and Wilderness designations. It must be clear that only Congress can create these designations.

i. National Conservation Area

The purpose of National Conservation Areas (NCAs) is to "conserve, protect, enhance, and manage public lands for the benefit and enjoyment of present and future generations." The lands protected under this designation have "exceptional scientific, cultural, ecological, historical and recreational values."¹

Most NCAs share similar overarching management guidelines, including:

- A strong Purpose clause focused on protecting the specific ecological, scenic, wildlife, riparian recreation, cultural, biological, educational, paleontological, archaeological, scientific, wilderness, rangeland, endangered species, recreational or historical resources of the particular NCA;
- The development of a management plan designed to ensure protection of the resources and values of the NCA;
- A "Uses Clause" that ensures permitted uses of the NCA are consistent with the purposes for which it was established;
- Language restricting off-road vehicles to designated routes;
- The continuation of existing grazing; and
- Mineral and disposal withdrawal.

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ii. National Recreation Area

National Recreation Areas (NRAs) focus on recreational values and opportunities. Direction for NRAs includes consideration of:

- Investment in outdoor recreation that is more clearly responsive to recreational demand than other investments based primarily upon considerations of preserving unique natural or historical resources, the need to develop and conserve public lands and forests, or the requirements of major water resource development undertakings;
- Natural endowments that are well above the ordinary in quality and appeal, affording an exceptional recreational experience not normally associated with other state or local public lands;

¹ U.S. Department of the Interior, BLM. "National Conservation Areas and Similarly Designated Lands," http://www.blm.gov/wo/st/en/prog/blm_special_areas/NLCS/National_Conservation_Areas.html

- Consistency with federal programs relating to national parks, national forests, public lands, fish and wildlife, water resource development, grants for urban open space, recreation programs on private agricultural lands, and programs for financial assistance to States in providing recreation opportunity; and
- Preservation of hunting and fishing opportunities.²

iii. Wilderness Areas

Wilderness Areas are governed by the 1964 Wilderness Act and are "administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness." The Wilderness Act defines wilderness as an "area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value." Designated Wilderness Areas offer a multitude of first-class recreational opportunities including: hunting, fishing, hiking, snowshoeing, skiing, backpacking, camping, picnicking, swimming, rafting, kayaking, bird watching, wildlife viewing, and plant identification. Sections 4(c) and (d) outline which uses are prohibited in wilderness, including commercial activity (except those which are necessary to realize the recreation and other purposes of wilderness), roads, motorized equipment or mechanical forms of transport. Grazing and associated support infrastructure is allowed within wilderness, as are mining claims prior to 1984, and reasonable access to private inholdings.³

iv. Wild and Scenic Rivers

The Wild and Scenic Rivers Act is intended to meet diverse river conservation needs. The idea behind Wild and Scenic designation is not to halt use of a river; the goal is to preserve a river's character. Uses compatible with the management goals of a particular river are allowed.

² Recreation Advisory Council. "Policy on the Establishment and Administration of Recreation Areas: Federal Executive Branch Policy Governing the Selection, Establishment, and Administration of National Recreation Areas" Circular No. 1, National Park Service Handbook of Administrative Policies for Recreation Areas, 1968, 69-72. <u>http://www.nps.gov/history/history/online_books/anps/anps_5g.htm</u>

³ Additional details on the Wilderness Act are available at : http://wilderness.org/files/Wilderness-Act-Handbook-2004-complete.pdf)

However, any development must ensure the river's free flow and protect its "outstandingly remarkable resources." Wild and Scenic designation:

- Protects a river's "outstandingly remarkable" values and free-flowing character
- Protects existing uses of the river
- Prohibits federally-licensed dams, and any other federally-assisted water resource project if the project would negatively impact the river's outstanding values
- Establishes a quarter-mile protected corridor on both sides of the river
- Requires the creation of a cooperative river management plan that addresses resource protection, development of lands and facilities, user capacities, etc.

Thank you for considering our input on the scoping of the federal and state programmatic environmental impact statement for the Yakima Basin Integrated Plan, and please feel free to contact us if you have questions about our comments.

Sincerely,

Michael Garrity Washington State Conservation Director American Rivers

Steve Malloch Senior Water Program Manager National Wildlife Federation

Mike Deller Washington State Director Trust for Public Land Mitch Friedman Executive Director Conservation Northwest

Lisa Pelly Director, Washington Water Project Trout Unlimited

Peter Dykstra Pacific Northwest Regional Director The Wilderness Society

Thomas O'Keefe, PhD Pacific Northwest Stewardship Director 3537 NE 87th St. Seattle, WA 98115 okeefe@americanwhitewater.org

June 15th, 2011

Bureau of Reclamation, Columbia-Cascades Area Office Attention: Candace McKinley, Environmental Program Manager 1917 Marsh Road Yakima, WA 98901 Email: <u>yrbwep@usbr.gov</u>.

RE: Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project.

Dear Candace McKinley:

Thank you for the opportunity to provide comment on the Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6000 members and 100 local-based affiliate clubs, representing whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the Yakima River and tributaries that support whitewater recreation including Box Canyon Creek, Cle Elum, Cooper, Waptus, Teanaway, North Fork Teanaway, Naches, Little Naches, Bumping, Rattlesnake Creek, Tieton, and South Fork Tieton. A significant percentage of American Whitewater members reside in Washington State—a short driving distance from these rivers for recreation.

The assessment of instream flow needs addresses fishery resources but does not consider recreation. Elements of the plan appear to support instream flows that benefit river-based recreation but this is not explicitly evaluated in the Management Plan. The finding that a high priority was not assigned to changing the operations of Rimrock Reservoir and reducing flow in the Tieton and Naches rivers during flip-flop is of interest to our members. While we recognize potential impacts of high flows late in the season on the Tieton, they do provide a significant and popular recreational opportunity with significant benefits for the local economy.

American Whitewater has initial concerns with proposals to expand Bumping Reservoir and develop new storage at Wymer given anticipated impacts to terrestrial resources. We are intrigued however by possibilities for habitat protection and enhancement as mitigation. Specifically the potential removal of Roza Dam would reconnect the Yakima River within the Yakima River Canyon in a manner that would provide significant fishery and recreational benefits. Measures to protect 46,000 acres in the middle and lower Teanaway River Basin would provide significant recreational benefits by protecting instream flows on one of the few unregulated river segments in the basin providing outstanding whitewater recreation during spring snow melt. Protection of a 15,000 acre tract in the Yakima River canyon is of interest to our members given the high scenic attributes of the recreational experience for those floating this reach.

The Management Plan states that Wild and Scenic River designation for selected segments is "consistent with values and objectives of the Integrated Plan." We are not clear on the meaning of this statement and the degree of certainty it implies especially in light of the qualification that "designation should be sought." We would regard long-term conservation of free-flowing segments of the American River, Upper Cle Elum, Waptus and other eligible segments as inseparable from any effort to develop additional storage within the basin.

We are confused by the statement that for "land protection projects, impacts may be primarily in loss of certain recreational activities." From our perspective the land protection measures will protect and enhance recreational opportunities in the basin.

Thank you for the opportunity to comment at this scoping phase. Please include us on the mailing list for this project and keep us informed of future opportunities to comment.

Sincerely,

whoil

Thomas O'Keefe, PhD Pacific Northwest Stewardship Director

From:	Walt Butcher
То:	BOR YRBWEP, sha-UCA
Subject:	suggestions for Yakima River Basin Integrated EIS
Date:	Wednesday, June 15, 2011 8:34:10 PM

Bureau of Reclamation, Columbia-Cascades Area Office 1917 Marsh Road Yakima WA 98901

Attention: Candace McKinley, Environmental Program Manager

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement

Comments by Walter Butcher, 1305 NW Douglas Dr., Pullman, WA 99163

A comprehensive integrated water resource management plan for the Yakima River Basin can be very useful for the Basin, given the complex complementary and competing needs and the wide variety of potential programs and projects being considered for the area. The draft report of Tier I planning presents findings for one configuration of projects, actions, and water allocations. It is noted that specific, detailed, Tier II studies will be required before specific projects can be implemented.

The reports released to date have serious gaps in economic analysis and content, gaps that should be filled in the final report, before moving on to Tier II studies:

- 1. The economic value of agricultural and fish economic benefits in the March 2011 Economic Effects Report appear to be significantly overestimated. The agriculture benefits are calculated on the basis of increased production of high value crops such as fruits and hops rather than on the basis of "general crops" as is required in the Principles and Guidelines. The high estimates of fish benefits appears to be based on the assumption of a particularly good year repeated for each of 100 years rather than on a probabilistic approach. These should be reviewed and revised.
- 2. Estimates need to be made of how much specific projects could be expected to contribute to the increase in agricultural production and fish numbers. For example, there needs to be an estimate of how much total benefits in the basin would increase if Wymer Dam was added to a system that had been optimally designed without Wymer Dam. Tier II studies should not be funded for projects where prefeasibility project-specific benefits do not exceed costs.
- 3. A Maximum Net Economic Development Benefits Alternatives needs to be presented as is required in the Planning Principles of the 1983 Principles and Guidelines. Total net benefits could be increased if some of the more expensive components in the system could be dropped from the Plan, reducing costs by more than benefits. Another way to increase net benefits would be to shift some of the supply of available water from agriculture, where it has relatively low return, to fish, where the return per acre foot of water can be quite high.
- 4. An Alternative emphasizing non-structural measures such as water acquisition and water markets needs to be formulated.

Walter Butcher 1305 NW Douglas Dr. Pullman, WA 99163 509 332-1755 I have the following comments on the scope of IWRMP EIS.

- I believe that the proposed Bumping Lake Expansion should be linked to the proposed consolidation of the Selah-Naches, Wapatox, City of Yakima, and Gleed irrigation diversions. If Bumping is expanded, all of these districts could be served by the expanded Bumping at the existing Naches-Selah diversion. This would eliminate the need for a pumping plant under the current scenario, which is necessary to supply the demands for irrigation during summer low flow through fall (i.e. the supply would come from Rimrock, not the mainstem Naches).
- 2) The Sunnyside Valley Irrigation District is considering replacing the Mabton Trestle. The IWRMP should include analysis of this project as a water conservation measure. This trestle/pipe crosses the Yakima River and provides approximately 12,000 acres on the south side of the river with irrigation water. The pipe flows at about 150 cfs throughout the summer. Replacement of this trestle with a pumping plant would result in the addition of 150 cfs over the Parker gage and in the upper Wapato Reach, which would be a flow increase of about 1/3 in normal years, and ½ in drought years, this flow-limited reach.
- 3) The EIS needs to define a broad rule set for future operation of the project or IWRMP sponsored facilities. As Yakima County has stated before, the IWRMP is hampered by a lack of clarity on the objectives of the plan, and the "business rules" that will be used to manage the water resources of the basin into the future if elements of the plan, especially new storage, are implemented. As yet, there have been no new business rules defined, no redefinition of TWSA or WSAI, or how the project will be operated during very good water years such as we are now experiencing.

4)

Joel Freudenthal Fish and Wildlife Biologist Yakima County Public Services Surface Water Management Division 128 N. 2nd St, Yakima, WA 98901 509-574-2322

Herke Ranch 19190 Ahtanum Rd. Yakima, Wa. 98903

To: Committee for Yakima River Basin Water Enhancement

Date: June 19, 2011

The purpose of this letter is to submit comments on the proposed plan.

My family farms and ranches in the Ahtanum Valley. My family has been living and farming the same ground since 1871.

We have seen many changes over the years but there has always been one constant. That constant is one of a divergence of water needs and water availability. Nearly without exception, every year the Ahtanum valley suffers either a minor or major flood event and then a water shortage during the growing season.

I challenge anyone to put forth an example of another valley that has a water duty of a mere .01 cfs!

If that weren't enough, the Northside users have water until only the 10th of July and sometimes not even that long.

Besides being short on irrigation water during the later part of the irrigation season and in dry years short the entire season, Ahtanum Creek is designated as a Salmon stream and also for Bull Trout.

In short, the Ahtanum Valley (IE the Pine Hollow Reservoir proposal) has all the elements in place for inclusion in this proposed plan and even has some elements that the proposals that are already in the plan don't have, namely the credentials.

I am referring to "credentials" as being detailed studies already completed or started, well under way and then frozen to await future developments.

Now, it's a given that the Nation has not signed off on the Pine Hollow plan, but I seriously doubt that any of the current plan has been endorsed yet.

I find it interesting that the Wymer proposal is on the table and the Pine Hollow project does not even garner "honorable mention"? I question the geological soundness of a dam at Wymer and I really question the soundness of an idea to add 15,000 to

17,000 acres to the State inventory of real property at a time when Washington State is BROKE!

You would be taking productive grazing lands (farm lands as well?) off the tax rolls only to add it to the weedy inventory belonging to Washington Department of Fish and Wildlife?

If the Wymer project is geologically and economically sound Then I'd support it but only for the foot print of the reservoir.

I DO NOT support needless landgrabs to satisfy the INSATIABLE appetite of environmentalists to gobble up every last inch of rural America.

I request that the committee add the Pine Hollow proposal to the draft. It's further along than most elements in the current draft and deserves inclusion.

Mark Herke

Herke Ranch

Johncox Ditch 19201 Ahtanum Rd. Yakima, Wa. 98903

To: Yakima River Basin Integrated Water Resource Committee

Purpose: Comments on the current plan

Date: June 19, 2011

The purpose of this letter is to comment on the current Yakima River Basin Integrated Water plan.

After reviewing the draft plan, I was struck by what was NOT included, namely the proposed Pine Hollow Reservoir.

I was shocked!

Obviously, the Ahtanum Valley is a part of the Yakima River Basin. The Ahtanum Valley is desperately short on water during lean years. The Ahtanum Valley has three creeks running for portions of it's length and one, the Ahtanum Creek running from the mountains to where it discharges into the Yakima River is designated as a Salmon and Bull Trout stream and thus qualifies for fish enhancement.

But there is no mention in this plan ----- Why? Are the citizens of the Ahtanum Valley "second class?

The Ahtanum Irrigation District (AID) has worked TIRELESSLY to forward the proposal of an "Off Stream" storage project in Pine Hollow. Irrigation District timber sales proceeds and a tidy sum of State monies has paid for all the studies required to date.

If this plan is only for "Federal" projects IE. Only those projects that the Federal agencies can control then I ask "Where does the Pine Hollow project get recognized?"

Or is the operative question: "Does Pine Hollow ever have a forum?"

While it is currently true that the Yakama Nation has not endorsed the Pine Hollow proposal I seriously doubt that any of the major sections of this proposed Federal/State plan has been signed off by the Tribe yet.
It is interesting that the Dept. of Ecology is partnered with the BuRec.

I think THAT makes this plan NOT just for Federally controlled waters but allows ANY viable project a place at the table!

I believe that the corresponding stakeholders of the outstanding and here to for ignored private water projects be included in this process and make this plan a true whole package.

Mark Herke President, Johncox Ditch

From:	Joel and Lynne Thomas
To:	BOR YRBWEP, sha-UCA
Subject:	Kachess/Keechelus Pipeline and Homeowners Association
Date:	Tuesday, June 28, 2011 2:29:47 PM

Hello,

My name is Lynne Thomas. I am a resident living on Kachess Lake Road and on the board for the Kachess Ridge Maintenance Association. We represent the property owners in the Kachess Ridge development which runs along both sides of Kachess Lake Rd and Via Kachess Road.

It was brought to our attention that there is a plan for a pipeline to connect Lakes Kachess and Keechelus, and that the pipeline would run under Kachess Lake Road. We want to make sure that you are aware of our association and the fact that we have some restrictive covenants. One of the covenants restricts removal of vegetation within 50 feet of any road.

"3. Lot Area, Width, Setback Lines, Driveways. Lot area, width, setback lines, driveway and driveway apron design shall be in accordance with the requirements of the applicable Kittitas County zoning and land use regulations, except that no structure or building except gates shall be placed nor shall any recreational vehicle or mobile home be parked within 50 feet from any lot line bordering an existing county road as set forth in the plat of the Property described in Section 1. Unless otherwise required by applicable law, no physical change, other than replacement or enlargement of existing nativevegetation or replacement of diseased or dangerous vegetation, shall be made to any portion of any lot or parcel within 50 feet of any existing county road as set forth in the plat of the Property described in Section 1; provided, however, that no more than two driveway access roads, each no more than 16 feet in width, separated from each other by no less than 150 feet, shall be permitted on each lot. In the event additional roads are platted beyond those shown in the plat of the Property described in Section 1, the 50 feet setback and restriction on physical changes within the 50 foot set back set forth above shall not apply to those portions of any lot fronting on such additional roads. This Section 3 shall not prevent the installation and maintenance of utilities in the front five feet of each lot;provided that any vegetation removed in connection with such installation or maintenance shall be replanted with vegetation native to the region of the Property."

At this time, we wanted to bring this to your attention, ask that you take this into account in your planning and please keep us informed of the project as it pertains to property owners along Kachess Lake Road.

Thanks.

Lynne Thomas Kachess Ridge Maintenance Association 509-674-5231

From:	DMandCH@aol.com
To:	BOR YRBWEP, sha-UCA
Subject:	EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin
Date:	Wednesday, May 18, 2011 9:05:40 PM

TO: Bureau of Reclamation

RE: EIS Scoping - Integrated Water Resource Management Plan, Yakima River Basin

Please include these comments as part of the environmental impact statement scoping process for the Yakima River Basin Integrated Water Resource Management Plan. I am opposed to the construction of an enlarged Bumping Lake dam within the Wenatchee National Forest, a new Wymer dam, and pumping water out of the Columbia River into the Yakima Basin. The proposed dam projects would flood endangered species habitat, and pumping water from the Columbia River would also adversely impact existing salmon runs.

Instead of spending federal tax payer dollars on more dams, the Bureau of Reclamation should focus on water conservation and water marketing to meet irrigation demands in drought years.





Derek Sandison, 509-457-7120

Agenda - Scoping Meeting

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 3, 2011, Ellensburg, Washington

Open House/Scoping Meeting From 1:30 to 3:30 p.m.

Displays and videos, handouts, staff available for questions and answers Receive written public comments and/or oral comments transcribed by court reporter

Introductions/Presentation At 2 p.m. and 3 p.m.

NEPA and SEPA Environmental Review Process Description of Proposed Integrated Water Resource Management Plan

Open House/Scoping Meeting From 5 to 7 p.m.

Displays and videos, handouts, staff available for questions and answers Receive written public comments and/or oral comments transcribed by court reporter

Introductions/Presentation At 5:30 p.m. and 6:30 p.m.

NEPA and SEPA Environmental Review Process Description of Proposed Integrated Water Resource Management Plan





Derek Sandison, 509-457-7120

Agenda - Scoping Meeting

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA EIS

May 5, 2011, Yakima, Washington

Open House/Scoping Meeting From 1:30 to 3:30 p.m.

Displays and video, handouts, staff available for questions and answers Receive written public comments and/or oral comments transcribed by court reporter

Introductions/Presentation At 2 p.m. and 3 p.m.

NEPA and SEPA Environmental Review Process Description of Proposed Integrated Water Resource Management Plan

Open House/Scoping Meeting From 5 to 7 p.m.

Displays and video, handouts, staff available for questions and answers Receive written public comments and/or oral comments transcribed by court reporter

Introductions/Presentation At 5:30 p.m. and 6:30 p.m.

NEPA and SEPA Environmental Review Process Description of Proposed Integrated Water Resource Management Plan





Derek Sandison, 509-457-7120

Structural and Operational Changes Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011

This element identifies activities at existing Yakima Project facilities contained in the System Modifications component of the proposed Integrated Plan.

Cle Elum Dam Pool Raise

The proposed Cle Elum Pool Raise project consists of raising the maximum water level of Cle Elum Lake 3 feet from a current maximum elevation of 2,240 feet to 2,243 feet. The Pool Raise would increase the volume of available storage in Cle Elum Lake by approximately 14,600 acre-feet. Modifications would include radial gate improvements, shoreline protection, and mitigation of upstream inundation and recreation.

Kittitas Reclamation District (KRD) Canal Modifications

The proposed KRD Main Canal and South Branch Canal Modifications project would improve KRD laterals along those canals designed to reduce seepage losses and allow greater flexibility in KRD supply management. The water saved or transferred would be used to enhance instream flows in tributaries to the Yakima River, including Taneum Creek, Manastash Creek, Big Creek, and Little Creek. Specific actions would include:

- Piping of irrigation laterals along the KRD Main Canal and South Branch Canal;
- Construction of a reregulation reservoir to capture KRD operational spills at Manastash Creek; and
- Construction of a pump station on the Yakima River to deliver flows to Manastash Creek water users.

Tributary flow improvements will be coordinated with habitat enhancement actions targeting improving fish passage at KRD canal crossings.

Keechelus-to-Kachess (K-to-K) Pipeline

The purpose of the K-to-K pipeline is to convey water from Lake Keechelus to Lake Kachess to reduce flows and improve habitat conditions during high-flow releases below Keechelus, and provide more water storage in Lake Kachess for downstream needs.

This project would include modifying the existing Lake Keechelus outlet tunnel, installing nearly 5 miles of large-diameter pipe, and installing a new control structure and outfall into Lake Kachess. An evaluation of a new power generation facility at the outfall is also included.

Every effort would be made to coordinate construction of the K-to-K pipeline with ongoing construction on Interstate-90, particularly on the Lake Keechelus end of the pipeline.

Reduce Diversions Devoted to Power Generation

This change would further subordinate water diversions for power generation at Roza Dam and Chandler Power Plant to support outmigration of steelhead, Chinook, sockeye and coho juveniles, recognizing power is already greatly subordinated below what was originally intended when the dams were built. Subordination would be pursued subject to the condition that acceptable mitigation for the loss of generating capacity is agreed upon and approved by Reclamation, Bonneville Power Administration, and either Roza or Kennewick Irrigation District, as applicable.

Wapatox Canal Improvements

The purpose of this project is to reduce or eliminate the carriage water diverted into the canal for Wapatox Ditch Company water users. This includes piping and/or replacing the lining along portions of the existing Wapatox Canal. It would include installing new canal lining from the fish screen midway down the canal and replacing the existing canal from that point downstream with a pipeline, or replacing the entire length of existing canal downstream of the fish screen with a pipeline. This project could consolidate other diversions into the Wapatox Canal such as the Naches-Selah Irrigation District, the City of Yakima Water Treatment Plant, and the Gleed Ditch. However, the benefits of consolidating those diversions may not be sufficient when compared to the cost, and those water users may choose not to participate in the project.





Derek Sandison, 509-457-7120

Fish Passage Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011

This is the second of two elements contained in the Habitat component of the Integrated Plan. It focuses on restoring anadromous salmonid access to habitat above the five existing large storage reservoirs and providing upstream and downstream passage for bull trout and other resident fish. Providing unimpeded fish migration past the existing storage dams in the Yakima Basin would increase species distribution, allow reintroduction of sockeye runs and expanded migrations, and provide for genetic interchange for listed bull trout and other native fish. Fish passage also provides a means for fish to respond to potential future climate change impacts by providing access to high-quality habitat at higher elevations if lower elevation habitat becomes unsuitable for supporting fish life stages at certain times of year.

Downstream juvenile passage facilities would be installed at Cle Elum Dam and a fish ladder and collection facility would be built to capture and transport fish upstream by tanker truck. At Bumping Dam, upstream and downstream fish passage would be installed as part of the proposed Bumping Lake Enlargement Project, or at the existing dam if the enlargement is not authorized. Upstream and downstream fish passage would also be installed at Tieton, Keechelus, and Kachess Dams, subject to further evaluation to determine the most feasible approach.

In addition, the existing upstream passage facilities would be replaced at Clear Lake Dam and effective passage for pre-spawn adult bull trout would be ensured at Box Canyon Creek (Kachess Lake tributary).

http://www.usbr.gov/pn/programs/yrbwep/index.html





Derek Sandison, 509-457-7120

Enhanced Water Conservation Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011

This is the second of four elements contained in the Water Supply component of the proposed Integrated Plan.

Agricultural Conservation

The Enhanced Water Conservation element includes implementing an approximate \$423-million agricultural water conservation program designed to conserve up to 170,000 acre-feet of water in good water years. The agricultural water conservation program includes measures beyond those likely to be implemented in the existing Yakima River Basin Water Enhancement Project (YRBWEP) Phase II conservation program. Agricultural water conservation activities that could be implemented under this program include:

- Lining or piping existing canals or laterals;
- Constructing reregulation reservoirs on irrigation canals;
- Installing gates and automation on irrigation canals;
- Improving water measurement and accounting systems;
- Installing higher efficiency sprinkler systems; and
- Implementing irrigation water management practices and other measures to reduce seepage, evaporation, and operational spills.

This element does not identify specific project activities for implementation. Projects to be implemented would be selected through detailed feasibility studies and evaluation by the existing YRBWEP Conservation Advisory Group. Irrigation districts eligible for project funding include both federally- and nonfederally-served irrigation districts, private irrigation entities, and individual landowners.

Municipal and Domestic Conservation

Municipal and domestic water usage includes water delivered by public water systems regulated by the Washington State Department of Health, water used by individual homeowners served by permitexempt wells, water used by commercial or industrial facilities, and water delivered by irrigation entities for purposes of outdoor landscape irrigation in developed areas of the Yakima basin. It includes residential, commercial, industrial, and urban recreational uses of water such as parks, ball fields, and golf courses. This activity would create a \$30-million fund to promote water use efficiency basinwide using voluntary, incentive-based programs. The program would focus on outdoor uses as top priority.

An advisory committee including local and environmental stakeholders would be convened to organize outreach regarding municipal and domestic water conservation to local elected officials and provide liaison with Reclamation, Ecology, and Washington Department of Health. The advisory committee would focus particular attention on:

- Providing education, incentives, and other measures to encourage residential and commercial users to improve efficiency of landscape irrigation where the source of supply is agricultural irrigation canals or ditches;
- Improving the efficiency of consumptive uses;
- Establishing best practice standards for accessing the new supply developed through the Integrated Plan and dedicated to municipal use and municipal/domestic mitigation. The standards will be based on review of evolving practices in similar communities and similar climate zones of the Western United States; and
- Determining appropriate conditions for accessing the new supply that would apply to homeowners or developers seeking mitigation water for homes supplied by individual household wells.





Derek Sandison, 509-457-7120

Habitat Protection and Enhancement Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011

This is the first of two elements contained in the Habitat component of the proposed Integrated Plan.

Targeted Watershed Protections and Enhancements

This element furthers watershed, water supply, and ecological restoration goals of the Integrated Plan through the protection and restoration of key land types. The lands where environmental benefits would be greatest are large tracts in the Yakima and Naches watersheds that provide high potential for ecosystem and species conservation and restoration both within and outside the riparian corridor. These lands complement the overall goals of the Integrated Plan by helping to maintain or improve water supply and quality, protecting sources of cold water and cold-water habitat, providing (or providing connectivity to) bull trout and/or salmon and steelhead habitat and spawning grounds, and providing additional floodplain restoration opportunities.

The targeted acquisitions include:

- 46,000-acre tract in the middle and lower Teanaway River Basin comprised of mid- to highelevation mixed conifer forest and lower elevation grand fir and ponderosa pine;
- 15,000-acre tract in the Yakima River Canyon from the Yakima River to Interstate-82, including the valley bottom and eastern slopes; and
- 10,000 acres at the headwaters of the Little Naches River and lands surrounding the headwaters of Taneum and Manastash Creeks.

If these preferred areas and acreages cannot be acquired, a combination of alternative areas of similar conservation value may be identified for protection that collectively approximate the following orders of magnitude:

- High-elevation watershed enhancement: 45,000 acres;
- Shrub-steppe habitat enhancement: 15,000 acres; and
- Forest habitat enhancement: 10,000 acres.

Additional lands are potentially eligible and/or have already been recommended for Federal Wilderness and Wild and Scenic River designation through other processes. In addition to the conservation targets provided above, protection of the following lands is consistent with values and objectives of the Integrated Plan:

- Wilderness designation would be encouraged for the land around Bumping Lake not inundated by the reservoir expansion.
- Wilderness or other appropriate designation would be encouraged for roadless areas in the Teanaway, in the area between Kachess and Cle Elum Lakes, and in the upper reaches of Manastash and Taneum Creeks in order to preserve headwaters, streams, and forests in their natural condition.
- Wild and Scenic River designation would be encouraged for the American, upper Cle Elum, and Waptus rivers. Other rivers determined eligible and recommended for designation in future forest plans also would be considered.

Fish Habitat Enhancement

The Integrated Plan includes an approximate \$460-million habitat enhancement program to address floodplain restoration priorities and restore fish access to key tributaries through flow restoration, fish barrier removal, and screening diversions. These actions would significantly improve prospects for recovering fish populations to levels that are resilient to catastrophic events and the potential impacts of climate change by accelerating ongoing efforts to protect existing high-value habitats, improve fish passage, enhance flows, improve habitat complexity, and reconnect side channels and off-channel habitat to stream channels.

Fish habitat enhancement actions would help create improved spawning/incubation, rearing, and migration conditions for all salmonid species in the Yakima basin, implement key strategies described in the *Yakima Subbasin Plan*, and complete most of the actions described in the *Yakima Steelhead Recovery Plan*. Early mainstem floodplain improvements could include channel and habitat restoration in the Yakima River near Ellensburg and between Selah and Union Gap, and on the Naches River. Early tributary program actions could include completing screening and passage at diversions in the Yakima basin, completing bull trout habitat improvements and management actions, and implementing the Toppenish Creek Corridor Program.

The implementation approach would be tailored to utilize existing organizations, review processes, and plans, as applicable. Reclamation and Ecology may establish an advisory group similar to the Yakima River Basin Water Enhancement Project Conservation Advisory Group to help develop a more detailed approach for how and when projects would be funded.





Derek Sandison, 509-457-7120

Market Reallocation Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011

This is the first of four elements contained in the Water Supply component of the proposed Integrated Plan. Market Reallocation activities would reallocate water resources through a water market and/or water bank to improve water supply in the Yakima River basin. This element consists of recommendations for legislative changes and funding requests to improve the efficiency and flexibility of water transfers. The proposal includes two phases—a near-term effort to build on the existing water market programs and a longer-term effort that requires more substantial changes to existing laws and policies.

The near-term program would continue existing water marketing and banking programs in the basin, but take additional steps to reduce barriers to water transfers.

The long-term program would focus on facilitating water transfers between irrigation districts. This would allow an irrigation district to fallow land within the district and lease water rights for that land outside the district.

To facilitate this process, Agricultural Conservation Program funding would be made available to non-Federal irrigation entities to upgrade conveyance infrastructure in a manner that improves these entities' operational flexibility and ability to lease water to other irrigation districts, including federally-served districts.





Derek Sandison, 509-457-7120

Surface Water Storage Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011

This is the third of four elements contained in the Water Supply component of the proposed Integrated Plan. Additional water supply development would be pursued through the following storage activities. Storage enhancements would provide supply for instream flow needs and out-of-stream needs, including municipal and domestic uses. Power generation opportunities at each of these projects would also be evaluated and implemented, if feasible.

The first three surface water storage projects listed below (Wymer Dam, Kachess Inactive Storage, and Bumping Lake Enlargement) reflect the Yakima River Water Enhancement Project (YRBWEP) Workgroup's intent to focus on inbasin solutions to address water supply and aquatic resource problems in the Yakima River basin. Collectively, these projects represent just over 450,000 acre-feet of additional water supply for instream and out-of-stream uses in the basin. If, after concerted effort by the Workgroup to advance these projects, one or more of the three projects fails to receive necessary permits and approvals for implementation, the Workgroup will select a replacement project (or projects) that will supply at least an equivalent quantity of water.

Wymer Dam

Wymer Dam would be located as an off-channel storage facility on Lmuma Creek, approximately 8 miles upstream of Roza Diversion Dam. The storage capacity of the reservoir would be approximately 162,500 acre-feet, with 82,500 acre-feet reserved for a summer water exchange with Keechelus and Cle Elum reservoirs for the benefit of anadromous and resident fishes. From October to May, additional water would be released from Cle Elum and Keechelus Reservoirs to improve winter flow conditions for anadromous salmonid egg incubation and overwintering juveniles in the Keechelus-Easton reach and lower Cle Elum River and pumped into Wymer reservoir. In exchange, that water would be released from Wymer in July and August. This process would result in a reduction in artificially high summer flows in the upper Yakima River, which would benefit anadromous and resident juvenile rearing salmonids.

Two pump station options are being considered on this dam. Option 1 includes a new pump station at Thorp, a new water transmission main from the pump station to an upgraded Kittitas Reclamation District (KRD) North Branch Canal system, and a new tunnel to deliver water to Wymer. Option 2 is a 400-cfs pump station on the Yakima River just upstream of Lmuma Creek with water conveyance to Wymer through a new water transmission main.

Wymer Reservoir releases would pass through tunnels, a siphon, and a hydroelectric powerhouse to the Roza Canal at the existing Roza Canal intake structure. The feasibility of removing Roza Dam would be evaluated as part of implementing this project. The downstream conveyance alignment provides for connection with future potential storage sites within the Burbank and Selah drainages.

Kachess Reservoir Inactive Storage

The Lake Kachess Inactive Storage Project is located just east of Interstate 90 near Easton, Washington. The project involves a lake tap in Lake Kachess that would allow the lake to be drawn down approximately 80 feet lower than the current outlet. The lake tap would provide the ability to withdraw another 200,000 acre-feet of water from the lake when needed for downstream uses during drought conditions. Water would be conveyed either through a pump station and outlet just downstream of the Lake Kachess Dam or through a tunnel outlet to the Yakima River approximately 4.8 miles southeast of the dam.

Bumping Lake Enlargement

The proposed damsite is about 40 miles northwest of Yakima, Washington, on the Bumping River about 4,500 feet downstream of the existing Bumping Lake Dam. The dam would impound approximately 198,000 acre-feet at elevation 3,490 feet with a surface area of 4,120 acres (compared to the present reservoir capacity of 33,700 acre-feet at elevation 3,425 feet with a surface area of 1,300 acres). The existing dam would be breached following construction of the new dam to allow full use of the existing pool. The new dam and reservoir would provide carryover storage against possible shortages of irrigation water for federally-served irrigable lands; it would also provide instream flow and incidental flood-control benefits.

Columbia River Pump Exchange with Yakima Storage

If implementation of the three surface storage projects described above proceeds, appraisal- and feasibility-level work would commence on other water supply enhancements, including the potential for an interbasin transfer from the Columbia River. As inbasin actions are developed and implemented, supply improvements would be measured at least every 5 years as part of a rolling needs assessment against the identified 70-percent proratable supply need for irrigation and other out-of-stream needs, and instream flow objectives. Need for additional water supply enhancements will depend on the effectiveness of projects that are implemented as part of the Integrated Plan, how the basin economy develops over time, as well as the timing of and manner in which climate change affects water supply availability.

An appraisal study for a Columbia River-to-Yakima-basin transfer would be conducted. This would involve the following:

- A detailed analysis of the physical and legal availability of water for diversion from the Columbia River;
- An assessment of alternatives for configuration of pumping, routing, and storing Columbia River water in the Yakima basin as well as options for instream and out-of-stream uses of that water;
- Estimates of capital and operation and maintenance costs for each alternative; and
- An evaluation of allocation of costs for each alternative.





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Groundwater Storage Element

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

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This is the fourth of the four elements contained in the Water Supply component of the proposed Integrated Plan.

Shallow Aquifer Recharge

The objective of groundwater infiltration is to divert water prior to storage control into designed infiltration systems (ponds or canals), and allow withdrawal of the infiltrated water during storage control in lieu of reservoir releases. The timing and scale of surface water diversions would be designed to allow continuation of natural high-flow events that create and sustain aquatic habitat.

There are two phases to the groundwater infiltration program—pilot-scale infiltration testing in two study areas, followed by full-scale implementation. Initially, a limited pilot study would be conducted to verify the feasibility and general design features of groundwater infiltration systems. Pilot testing would take place in two study areas—the Kittitas Reclamation District (KRD) and the Wapato Irrigation Project (WIP). In each study area, two pilot-scale infiltration systems would be constructed, each between 1 and 2 acres in size. The pilot tests would result in recommendations for implementation.

At full-scale implementation, it is anticipated that between 160 and 500 acres of infiltration area would be necessary to achieve a total infiltration capacity of at least 100,000 acre-feet. Total infiltration volumes may vary from year to year, depending on snowpack conditions and reservoir refill requirements. Full-scale infiltration on the KRD system would be dependent on construction of the Thorp Pump Station (part of the proposed Wymer Dam project). During the pilot phase, policy and legal protocols will be developed to ensure water stored through infiltration is not captured by unauthorized users.

Aquifer Storage and Recovery

Aquifer Storage and Recovery involves diverting surface waters during high-flow periods and storing the water in underground aquifers for use during low-flow periods. The timing and scale of surface water diversions would be designed to allow continuation of natural high-flow events that create and sustain aquatic habitat.

The City of Yakima would divert water from the Naches River and treat it at the City's existing water treatment plant. It would then be injected into wells and later pumped out for use by the City's residents and businesses. Aquifer storage and recovery may also be viable for other cities in the Yakima basin.





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Why Are We Proposing the Integrated Plan?

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

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In an environmental impact statement, the **need** for and **purpose** of the proposal are critical in identifying alternatives and helping to ensure that the proposed action has the best chance of achieving its objectives.

The Need for a Comprehensive Approach to Water Supply Management:

To advance a more reliable* and sustainable water supply in the Yakima River Basin for irrigated agriculture, municipal and domestic needs, power generation, and instream flows that anticipates increased demand, variability of supply and uncertainty related to climate change.

^{*}Reliable irrigation water supply during drought years is considered to be a minimum of 70 percent of proratable supply for participating irrigation districts.

The Purposes of the Integrated Water Resource Management Plan:

- 1. Identify a comprehensive program of water resource and habitat improvements in response to existing and forecast needs of the Yakima River Basin;
- 2. Develop an adaptive approach for implementing these initiatives and for long-term management of basin water supplies that contributes to the vitality of the regional economy and sustains the health of the riverine environment.

Plan Objectives:

- Improve water supply reliability during drought years to 70 percent of proratable supply for participating irrigation districts;
- Improve the ability of water managers to respond and adapt to potential effects of climate change;
- Provide opportunities for comprehensive ecological restoration and enhancement addressing in-stream flows, aquatic habitat, and fish passage;
- Provide economic stimulus to the Yakima River Basin that will benefit the larger Central Washington area; and
- Develop a comprehensive approach for efficient management of water supplies for irrigated agriculture, municipal and domestic uses, and power generation.

http://www.usbr.gov/pn/programs/yrbwep/index.html





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What is a Programmatic Environmental Impact Statement?

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

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There are two types of environmental impact statements—"programmatic" and "site-specific." These are also sometimes referred to as "planning-level" and "project-level" based on differences in their focus and level of detail. The EIS being prepared for the proposed integrated water resource management plan will be a programmatic EIS (PEIS). A PEIS evaluates the effects of broad proposals or planning-level decisions that may include any or all of the following:

- A wide range of individual projects;
- Implementation over a long timeframe; and/or
- Implementation across a large geographic area.

The level of detail in a PEIS is sufficient to allow informed choice among alternatives and to develop broad mitigation strategies. Collaboration among Federal, State, and local agencies and Tribes is especially important in a PEIS process, as jurisdictional boundary issues are more common in programmatic than in site-specific analyses.

The PEIS does not evaluate site-specific issues such as precise project footprints or specific design details that are not yet ready for decision at the planning level. Instead, a PEIS is an excellent means for examining the interaction among proposed projects or plan elements, and for assessing cumulative effects. Like a site-specific EIS, a PEIS also includes a "no action alternative." The PEIS should explain where and when deferred issues that were raised by the public and/or regulatory agencies will be addressed, and describe the proposed temporal and spatial scales that will be used when analyzing those issues.

Typically, a PEIS will require subsequent project-level, or site-specific, environmental reviews in the form of an EIS, Environmental Assessment, or Categorical Exclusion Checklist, for specific components of the project. When a second-level environmental review is undertaken for a specific component, the stepwise approach to analyses and decisionmaking is called "tiering."

Tiering of environmental impact statements refers to the process of addressing a broad, general program, policy, or proposal in an initial PEIS, and analyzing a narrower site-specific proposal related to the initial program, plan, or policy in a subsequent EIS.

The intent of the tiering concept is to encourage elimination of repetitive discussions and to focus on the actual issues ready for decisions at each level of environmental review. Tiering expedites the resolution of big-picture issues so that subsequent studies can focus solely on project-specific impacts and issues. Those big-picture issues and analyses do not have to be repeated in subsequent tiered environmental reviews, but can simply be referenced from the programmatic document.

Tiering expands the opportunities for public and agency input by breaking the environmental analyses into two levels. Individuals with a strong interest in the overarching big-picture questions can participate extensively at the programmatic level (Tier 1), and those who are more interested in localized impact and mitigation issues can focus their efforts on the specific site-specific (Tier 2) project or projects.

Tiering also allows environmental analyses for each Tier 2 project to be conducted closer in time to the actual construction phase, or as funds become available for construction, thereby improving the usefulness of the studies and reducing the chance that a supplemental EIS would be necessary.





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How Can I Provide Input?

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

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The scoping period for the Yakima River Basin Integrated Water Resource Management Plan PR/PEIS began on April 4, 2011, and will continue through May 19, 2011. As part of the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA), scoping is conducted to receive public and agency comments on the scope of an upcoming EIS, and may include comments on:

- ✓ **Purpose of and Need for** an Integrated Water Resource Management Plan
- ✓ Recommendations concerning the **proposed plan**, **program elements**, and **alternatives**
- ✓ **Substantial issues and concerns** that should be addressed in the PR/PEIS
- ✓ **Potential impacts** (beneficial and adverse, direct, indirect, and cumulative) and **mitigation**
- ✓ Other major actions in the Yakima basin and regulatory requirements of Federal, State, and local agencies
- ✓ Scope of **program-level environmental studies** to be conducted

We would like your help! There are a variety of ways for you to participate in this process:

- ✓ Attend one of four scoping meetings (court reporter will be present to transcribe your comments):
 - Ellensburg May 3, 2011, 1:30-3:30 p.m., and 5-7 p.m. at Hal Holmes Center
 - Yakima May 5, 2011, 1:30-3:30 p.m., and 5-7 p.m. at Yakima Arboretum
- ✓ Mail written scoping comments, requests to be added to the mailing list, and/or requests for a scoping document to:

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

- ✓ E-mail comments to <u>yrbwep@usbr.gov</u>; fax to 509-454-5650
- ✓ **Telephone** comments to be recorded at (509) 575-5848, ext. 613

Then What Happens?

- ✓ A Scoping Summary Document will address all scoping comments submitted through May 19, 2011. The Scoping Summary Document will be made available to those providing comments by the due date, and others may request a copy by one of the means described above.
- ✓ A Draft PR/PEIS will be released, followed by a 45-day public and agency review and comment period. Notice of the availability of the Draft PR/PEIS and the public and agency comment period will be published in the Federal Register and local newspapers prior to release of the document, which is anticipated for the fall of 2011.





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NEPA/SEPA Process

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011



http://www.usbr.gov/pn/programs/yrbwep/index.html





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Cle Elum Dam Fish Passage – Right Bank Juvenile Passage with Right Bank Adult Passage without Barrier Dam

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

May 2011



Alternative 3 involves the construction of both downstream juvenile and upstream adult fish passage facilities. All passage facilities would be located on the right bank. Since the intake structure for the downstream juvenile passage would be located against the right bank, it could be accessed from shore. The 7-foot-diameter, 1,520-foot-long concrete juvenile bypass conduit would be located adjacent to the spillway on the right bank.

Locating the adult collection facility and fish ladder on the right bank places the ladder entrance in an area of calm water at the base of the spillway. The combination of the flow from the downstream juvenile passage conduit and the pumped auxiliary attraction flow would provide adequate flows for adult fish to find the ladder entrance. The upstream adult passage would include a trap-and-haul facility leading to a collection facility. The fish would then be hauled in a fish transport truck for release in the Cle Elum Reservoir or upstream tributaries.

Total contract construction cost for Alternative 3 is estimated at \$84 million (2008 dollars). Construction would require Federal funding authorization.





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Bumping Lake Enlargement Q&As

Yakima River Basin Integrated Water Resource Management Plan Planning Report/Programmatic Environmental Impact Statement (PR/PEIS)

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Background – Yakima River Basin Integrated Water Resource Management Plan

The existing water supply in the Yakima River basin and the limited storage capability does not meet the water supply demands in all years, which results in adverse impacts to the basin's economy and aquatic resources - specifically, anadromous fish and irrigation. Drought conditions have occurred every 4 years, on average, over the last 20 years. Climate change is expected to increase the drought frequency and further reduce water supply.

A Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup composed of representatives of the Yakama Nation; Federal, State, county, and city governments; environmental organizations; and irrigation districts was convened by Bureau of Reclamation (Reclamation) and Washington State Department of Ecology (Ecology) to develop the Integrated Water Resource Management Plan proposal. A large part of the Integrated Plan includes developing additional water supply through a host of actions, one of which is Bumping Lake Enlargement.

Following are some common questions and answers about the Bumping Lake Enlargement proposal.

Question: What is the history of Bumping Lake Dam and Reservoir?

Answer: Bumping Lake Dam was built in 1910 and is one of five major storage reservoirs operated by Reclamation to store water for the Federal Yakima Project. Its storage capacity is approximately 35,000 acre-feet, and its surface area when full is approximately 1,400 acres. Under this proposal, Bumping Lake would be expanded from its current size to 190,000 acre-feet. This size would minimize impacts on prime bull trout spawning areas.

Question: Who owns and operates the Dam and Reservoir?

Answer: The Bureau of Reclamation owns the dam and reservoir. The lands around the reservoir have mutual jurisdiction by Reclamation and the US Forest Service. Reclamation holds the land around the reservoir as "withdrawn land," and it is represented as a strip of land which surrounds the lake 1 mile in width from the normal high water line. The lands around the lake are jointly managed by both agencies, with Reclamation's Yakima Field Office operating the dam and reservoir and the Forest Service managing the recreation and land use around the reservoir.

Question: What is the Yakima Project?

Answer: The Yakima Project was authorized by Congress in 1905 and provides water to approximately 465,000 irrigated acres. The Project's five major reservoirs (Bumping, Kachess, Keechelus, Rimrock, and Cle Elum) have a total capacity of approximately 1,065,000 acre-feet, or approximately 30 percent of the annual basin runoff. The Yakima Project annual total irrigation needs are approximately 2,500,000 acre-feet. These are met by storage releases and streamflows.

Question: How is Bumping Lake a factor in the Yakima River Basin Study?

Answer: As noted above, the Basin Study process is anticipated to result in an Integrated Water Resource Management Plan proposal that would involve at least seven elements—reservoir fish passage; structural and operational changes; surface storage (of which Bumping Lake enlargement is one option); groundwater storage; fish habitat enhancement; enhanced water conservation; and market-based reallocation of water. The proposal will be considered in the next phase.

Question: What happens next?

Answer: Reclamation and the State intend to move the analysis and recommendations of the proposal forward with preparation of a final planning report and concurrent Federal and State environmental reviews. This process will begin this spring and will include public scoping meetings. One of the alternatives to be considered will be the proposed Integrated Water Resource Management Plan. The public will have the opportunity to comment on the proposed alternatives and provide other suggestions for resolving the basin's water resources problems.

The final planning report and associated environmental review documents are intended to be used as a basis of support for Federal and State authorizing legislation leading to implementation of basin solutions.

Question: If Congress authorizes something like the proposed Integrated Water Resource Management Plan, when would the Bumping Lake Enlargement happen?

Answer: If a decision is made to construct, Congress would have to both authorize and appropriate funds for this effort to move forward. The schedule for implementation of elements of the proposed integrated plan shows construction commencing on the Enlargement of Bumping Lake 3 years after congressional appropriation. During the 3-year period, designs would be finalized, permits would be processed, and additional detailed environmental reviews would be conducted to address site-specific environmental impacts and needed mitigation related to the new dam and enlarged reservoir. It is during these reviews that specific effects to recreational access, campground use, marina use, summer housing use, cultural resources, fish and wildlife habitat, land and shoreline use, transportation, etc., would be identified, evaluated, and appropriate mitigation measures defined for implementation prior, during, and after construction.

Question: What specifically is proposed for the expansion of Bumping Lake?

Answer: The proposed integrated water resource management plan identifies expanded reservoir storage of approximately 190,000 acre-feet impounded by a new dam located approximately 4,500 feet downstream from the existing dam. The maximum reservoir elevation would be at 3,490-feet, and the reservoir would have a maximum surface area of approximately 4,100 acres. The existing dam would be breached. A terrain map showing the outline of the proposed reservoir is attached.

Question: What would be the expected impacts to recreation at Bumping Lake?

Answer: Some of the existing recreational facilities would be impacted and potentially relocated or eliminated. All of the lakeshore access and associated facilities, such as boat launches and parking, several campsites, vacation rentals, trails, trailheads, access roads, and other recreational facilities would be inundated. New recreational facilities would likely be constructed after the reservoir expansion has been completed.

Question: What kind of land acquisition would be required and how would residences be affected?

Answer: The Bumping Lake inundation area is owned by Reclamation; no land would need to be purchased. Many of the recreational facilities would likely be unavailable during the construction years and possibly a year or two after construction completion. Privately-owned facilities would have to be acquired or relocated.

Question: What role will the Forest Service have in any decisions that have the potential to affect lands they manage?

Answer: The Forest Service will be invited to participate as a cooperating agency in the upcoming planning report and programmatic environmental review processes. In the 3-year period prior to the start of construction mentioned above, site-specific and detailed environment review processes would be conducted. The Forest Service would be involved with these activities.

Question: How much land would be affected by any type of reservoir enlargement in the Bumping?

Answer: The current reservoir covers approximately 1,400 acres, and the proposed enlarged reservoir would cover approximately 4,100 acres when full. Thus, the proposed reservoir would inundate approximately 2,700 additional acres.

Question: Would there still be access or new access to Granite Lake and other areas such as Lily Lake, Fish Lake Way, the Bumping campgrounds, and trailheads such as Twin Sisters and Mt. Aix?

Answer: Upper and lower Bumping Lake campgrounds along with the boat launch and day use site would be inundated by the enlargement. The access road to trailheads above the reservoir would also be inundated. These impacts would require appropriate mitigation. Mitigation for specific impacts, such as access restrictions, would be addressed by the site-specific and more detailed environmental analysis that would occur before a decision is made to begin construction.

Question: Would this have any effect on Copper City?

The historical remains of Copper City would not be inundated.

Question: Deep Creek and the upper Bumping drainage are two of the few remaining areas that have truly significant old growth. What would happen to these monarchs; would they be harvested?

Answer: The mouth of Deep Creek would be inundated with the enlargement and subject to fluctuations. The old growth trees would be harvested in areas where they would be inundated by water

or conflict with the location of the new dam and related features. Mitigation measures would be needed. (NOTE: Though portions of Deep Creek would be inundated, there would be continued access to the reservoir for bull trout.)

Question: What would happen to the summer homes on Bumping Lake? What about Bumping Lake Marina?

Answer: Summer homes would be subject to in-kind exchange or an offer of a similar lot elsewhere. The marina would be inundated and potentially relocated.

Question: If the lake is enlarged, what impact would it have on the Wilderness Area boundary accessibility to the public?

Answer: The enlarged reservoir level would remain outside the Wilderness Area boundary would not be adjacent to the expanded reservoir and would not be affected. However, some access points to the Wilderness Area might be affected, and this could be mitigated by providing replacement access. Such impacts would be identified and evaluated during the site-specific and more detailed environmental reviews that would occur before a decision is made to begin construction of a new dam.

Question: The Bumping watershed is an extremely popular hunting area. If the lake is enlarged, what effect would this have on hunters accessing areas to hunt and what effect would it have on wildlife populations?

Answer: Wildlife habitat would be lost due to the additional inundation and potential loss of hunting access may need to be mitigated. Such impacts would be identified and evaluated during the site-specific and more detailed environmental reviews that would occur before a decision is made to begin construction of a new dam.

Question: Where would the materials for building a new dam come from?

Answer: It is expected that such materials would come from within the area to be inundated by the new dam and existing quarry sites.

Question: If there is a decision to build or expand the dam, what effect would this have on local recreational activities and traffic along SR-410, Chinook Pass? Would construction crews be working during the winter and, if so, what would this do to winter recreation in the area?

Answer: Construction of the new dam would cause increased traffic on roadways with worker traffic and equipment material hauling, which could have minor, short-term impacts on SR-410 and National Forest Development Road 1800. Construction activities would likely proceed, but at a lower level, during the winter. Traffic would increase on Highway 12. Effects on local recreation, including winter recreation and use of campgrounds along area roads, would be determined and appropriate mitigation measures identified during the site-specific and more detailed environmental analysis conducted before the start of construction. The construction contract would include any identified mitigation measures that may be related to daily construction activities.

Question: What would become of cultural and historical sites?

Answer: Reclamation would comply with Section 106 of the National Historic Preservation Act.

SCOPING COMMENT FORM

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA PR/PEIS

Yakima Project, Washington

Name (please print legibly):	
Organization:	
Mailing Address:	
City, State, and Zip Code:	
Telephone:	E-mail:

Request to be placed on the mailing list and/or receive a copy of the Scoping Document:

- ____ I would like to receive a copy of the Scoping Document.
- ____ I want to receive email updates and information on the Environmental Impact Statement (EIS).
- ____ I want my name included on the mailing list to receive information on the EIS.
- ____ I want my name removed from the ____ email list and/or ____mailing list (please check one or both).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

My comments on the Yakima River Basin Integrated Water Resource Management Plan EIS are:

(Use back of sheet or additional sheets as necessary)

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>yrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.



U.S. Department of the Interior Bureau of Reclamation



Comments (continued)		

You may leave your comments in the box provided or mail, fax, email, or call in your comments by May 19, 2011, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email <u>yrbwep@usbr.gov</u>; phone (509) 575-5848, ext. 613.