



November 21, 2009

To: Ben Floyd, Facilitator
Yakima River Basin Water Enhancement Project Work Group
2805 St. Andrews Loop, Suite A
Pasco, WA 99301-6121

Re: Comments of the Endangered Species Coalition on Work Group Draft Integrated Plan

Dear Mr. Floyd:

The Endangered Species Coalition (ESC) is a national conservation organization dedicated to protecting and recovering imperiled species of plants and animals in North America, with a primary focus on the United States. Our 431 member groups include large organizations such as the Natural Resources Defense Council, Humane Society of the United States, The Wilderness Society, and Defenders of Wildlife; regional organizations such as Conservation Northwest, based in Bellingham and Spokane; and local groups, also in Washington, such as North Central Washington Audubon and Seattle Audubon Society, among others.

Ever since our founding in 1982, the ESC has participated in the decision-making process re just about every federal (and many state) government undertakings or proposals which appear to have an effect, positive or negative, on the fates and future of species in trouble in our country.

It is in this institutional context and also within the context of our long history regarding species' protection issues that we have examined the Work Group's "Discussion Draft Integrated Package," prepared this year. While the entire document contains a number of aspects and potential projects which seem to have an impact on various species of plants and animals, we are limiting our comments herein to just one of them: the proposal in the Discussion Draft to include an enlarged Bumping Lake Dam.

I myself, a former long-time resident of Washington State, am personally very familiar with the specific area(s) in question, having not only spent much time in and immediately around the William O. Douglas Wilderness, but also have specifically hiked around and through, and camped in, the areas which would be flooded out if such an expansion were to ever take place.

All the above leads us to conclude, and express in the strongest possible terms, our complete opposition to any enlargement of Bumping Lake, via this or any other project. The areas which would be flooded out, thus lost irretrievably for all time, particularly on the northern and eastern sides of the lake, now harbor some of the most spectacular ancient forests to be found in such profusion, elevation, and on level ground (that fact alone being a rather rare occurrence!) anywhere in the Cascade Mountains of our state. These forests include both west side species, such as Douglas fir, and east side natives, such as Ponderosa Pine, each either mixed in with or in near-proximity with numerous other species.

We all know that the still-standing examples of intact ancient forests of huge trees such as these, and their associated plants and animals, are now, after 150 years of logging and flooding, one of the rarest ecotypes in the US. There is likely well over 1,000 acres of ancient forest, still standing,

still uncut, within the high water boundaries of the proposed expanded reservoir. Splendid forests, which in our view should long ago have been added to the adjacent Wilderness.

Even more importantly, from the ESC's point of view, is the fact that the habitats to be destroyed by the proposed (sixfold!) reservoir enlargement will drastically eliminate and/or otherwise damage both the forest habitat for the listed northern spotted owl and spawning habitat for the also-listed bull trout, both species now protected under the mandates of the Endangered Species Act.

We further understand that the Bureau of Reclamation did not carry forward any Bumping Lake expansion alternative as a part of the Yakima River Basin Water Storage Feasibility Study planning report/EIS, completed in early 2009. And we have learned that no recent benefit/cost analysis has been prepared for this proposed project.

These facts alone tell us that there are much more suitable places to increase water storage in the Yakima Basin, if that is deemed necessary -- places that simply would not have the enormous adverse environmental impact of any new flooding at Bumping Lake. They also give us the hope that when such a cost/benefit analysis is finally completed, its authors will take into full account the huge, (and growing, as so much of it becomes ever-scarcer) habitat, recreational, and spiritual values which would be lost and buried under the waters of the proposed storage Project.

While more water would be 'stored,' practically everything else *now there* -- the very qualities which make this area so unique -- will be *gone*, just gone. And forever.

We have studied and worked on this matter before, in the 1980s, when many of the same concerns and values were raised and discussed. And we had thought, thanks to the understanding of all sides of the issue by, and to the hard work of, then Congressman Sid Morrison, that the matter had been decided -- and that the Bumping Lake forests, and the creatures they sheltered in this spectacular and unusual part of our state, would be allowed to continue their existence.

It is very disappointing to learn that this same proposal has come forward once again. We respectfully request that our comments be included in the record of the proceedings of the Work Group.

Sincerely,



Brock Evans
President
Endangered Species Coalition
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cc:

Washington Governor Christine Gregoire
Senator Maria Cantwell
Senator Patty Murray