Yakima River Basin Integrated Water Resource Management Plan

Final Programmatic Environmental Impact Statement

BENTON, KITTITAS, KLICKITAT AND YAKIMA COUNTIES

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

State of Washington
Department of Ecology
Central Regional Office
Yakima, Washington

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March 2012

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.

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To: Interested Individuals, Organizations, and Agencies

Subject: Yakima River Basin Integrated Water Resource Management Plan Final Programmatic Environmental Impact Statement, Benton, Kittitas, Klickitat, and Yakima Counties, Washington

Dear Interested Parties:

Enclosed is the Final Programmatic Environmental Impact Statement (FPEIS) for the Yakima River Basin Integrated Water Resource Management Plan, prepared jointly by the Bureau of Reclamation and Washington State Department of Ecology (Ecology). This FPEIS evaluates two alternatives to meet the water supply and ecosystem restoration needs in the Yakima River basin—the No Action Alternative and the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) Alternative.

Reclamation and Ecology, working with the 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), developed the proposed Integrated Plan as a comprehensive approach to address a variety of water resource and ecosystem problems affecting fish passage and habitat and agricultural, municipal, and domestic water supplies in the Yakima River basin. The Integrated Plan includes seven elements: reservoir fish passage, structural and operational changes to existing facilities, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market reallocation. The environmental impacts of the Integrated Plan are evaluated at a programmatic level in this document.

This FPEIS was prepared in compliance with the National Environmental Policy Act (NEPA), Public Law 91-190, and the State of Washington Environmental Policy Act (SEPA), Chapter 43.21C RCW, and the SEPA Rules (Chapter 197-11 WAC). Reclamation and Ecology have selected the Integrated Plan Alternative as the Preferred Alternative of this FPEIS. Both the No Action Alternative and the Integrated Plan Alternative would result in adverse environmental impacts, but only the Integrated Plan would meet the Purpose and Need described in the FPEIS. Additionally, the overall effect of the Integrated Plan is expected to be beneficial to water supply for agriculture, municipal and domestic uses and for resident and anadromous fish.

Reclamation and Ecology held a joint scoping process from April 2, 2011, to June 15, 2011. A Draft Programmatic Environmental Impact Statement (DPEIS) was issued on November 16, 2011, and comments were accepted for inclusion in the FPEIS if postmarked or transmitted by January 3, 2012. A total of 2,285 comment letters were received. Public meetings were held in Cle Elum, Ellensburg, and Yakima to receive comments on the DPEIS. Two meetings were held each day on December 5, 6, and 14 respectively. Four people provided oral comments to the court reporter at the meetings.

For further information regarding this document or to obtain additional copies, please contact:

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The FPEIS is available for viewing on the Internet at http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html.

Sincerely,

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Enclosure

Final Programmatic Environmental Impact Statement
Yakima River Basin Integrated Water Resource Management Plan
Benton, Kittitas, Klickitat, and Yakima Counties, Washington

Joint Lead Agencies:

U.S. Department of the Interior
Bureau of Reclamation

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Cooperating Agencies:

U.S. Department of Agriculture, U.S. Forest Service
U.S. Department of Energy, Bonneville Power Administration

This Final Programmatic Environmental Impact Statement (FPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) was prepared jointly by the Bureau of Reclamation and Washington State Department of Ecology. This FPEIS evaluates two alternatives to meet the water supply and ecosystem restoration needs in the Yakima River basin—the No Action Alternative and the Yakima River Basin Integrated Water Resource Management Plan Alternative. Reclamation and Ecology have identified the Integrated Plan Alternative as the Preferred Alternative because it provides the greatest benefits to agricultural, municipal and domestic water supply, as well as resident and anadromous fish. The environmental impacts of the Integrated Plan have been evaluated at a programmatic level in this document.

This FPEIS was prepared in compliance with the National Environmental Policy Act (NEPA), Public Law 91-190, and the State of Washington Environmental Policy Act (SEPA), Chapter 43.21C RCW, and the SEPA Rules (Chapter 197-11 WAC).

SEPA FACT SHEET

Brief Description of Proposal:

The Bureau of Reclamation (Reclamation) and the Washington State Department of Ecology (Ecology) have jointly prepared this Final Programmatic Environmental Impact Statement (FPEIS) on the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). This document was prepared in compliance with the National Environmental Policy Act (NEPA) and Washington State Environmental Policy Act (SEPA). Ecology is the SEPA lead agency for the proposal.

The Integrated Plan identifies a comprehensive approach to water resources and ecosystem restoration improvements in the Yakima River basin. The Integrated Plan includes seven elements: reservoir fish passage, structural and operational changes to existing facilities, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market reallocation. The Integrated Plan was developed to address a variety of water resource and ecosystem problems affecting fish passage, fish habitat, and water supplies for agriculture, municipalities, and domestic uses.

Proponents and Contacts:

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Permits, Licenses, and Approvals Required for Proposal:

To implement any component of the action alternative, the lead agency would need to apply for any required permits and comply with various laws, regulations, and Executive Orders. The following are examples of those that may apply:

- National Environmental Policy Act
- Endangered Species Act
- Secretary's Native American Trust Responsibilities
- National Historic Preservation Act
- Executive Order 11988: Floodplain Management
- Executive Order 11990: Protection of Wetlands
- Executive Order 12898: Environmental Justice
- Executive Order 13007: Indian Sacred Sites
- Section 401 Certification, Clean Water Act
- Section 402 Permit, Clean Water Act
- Section 404 Permit, Clean Water Act
- State Environmental Policy Act
- Washington Department of Natural Resources Permit
- Additional Points of Diversion Authorization
- State Trust Water Rights Program Participation
- Water Use Permit/Certificate Of Water Right
- Reservoir Permit/Aquifer Storage And Recovery
- Dam Safety Permit
- Shoreline Conditional Use Permit Or Variance
- Water System Plan Approval
- Hydraulic Project Approval
- Critical Areas Permit Or Approval
- Floodplain Development Permit

Authors and Contributors:

A list of authors and contributors is provided in a section that follows Chapter 6 and the Comment and Response Section.

Date of Issue:

March 2, 2012

Public Comment on the Draft Programmatic Environmental Impact Statement:

In accordance with WAC 197-11-455, Ecology and Reclamation conducted a public comment period from November 16, 2011 to January 3, 2011. A total of 2,285 comment letters were received from agencies and individuals.

Timing of Additional Environmental Review:

The analysis in this FPEIS is programmatic in nature and has been prepared to address probable significant adverse impacts associated with the Integrated Plan. Any individual projects that are carried forward will require additional, more detailed project-level environmental review prior to implementation. These projects and actions may require SEPA compliance, NEPA compliance, or both, depending on the implementing agency, source of funding, and/or types of permits required. If a decision is made to implement the Integrated Plan, some projects and actions could be advanced and ready for additional environmental review early in 2012; others could require several years before they would be advanced for implementation.

Document Availability:

The FPEIS for the Integrated Plan can be viewed online at: http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html. The document may be obtained in hard copy or CD by written request to the SEPA Responsible Official listed above, or by calling 509-457-7120. To ask about the availability of this document in a format for the visually impaired, call the Office of Columbia River at 509-662-0516. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Location of Background Materials:

Background materials used in the preparation of this FPEIS are available online at:

Yakima River Basin Water Enhancement Project

http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html.

Yakima River Basin Integrated Water Resource Management Plan

Structural & Operational Changes

1. Raise the Cle Elum Pool by three feet to add 14,600 ac-ft in storage capacity.
2. Modify Kittitas Reclamation District canals to provide efficiency savings.
3. Construct a pipeline from Lake Keechelus to Lake Kachess to reduce flows and improve habitat conditions during high flow releases below Keechelus and to provide more water storage in Lake Kachess for downstream needs.
4. Decrease power generation at Roza Dam and Chandler power plant to support outmigration of juvenile fish.
5. Make efficiency improvements to the Wapatox Canal.

Enhanced Water Conservation

1. Implement an agricultural water conservation program designed to conserve up to 170,000 acre-feet of water in good water years.
2. Create a fund to promote water use efficiency basin-wide using voluntary, incentive-based programs. Focus on outdoor uses as top priority.

Habitat/Watershed Protection & Enhancement

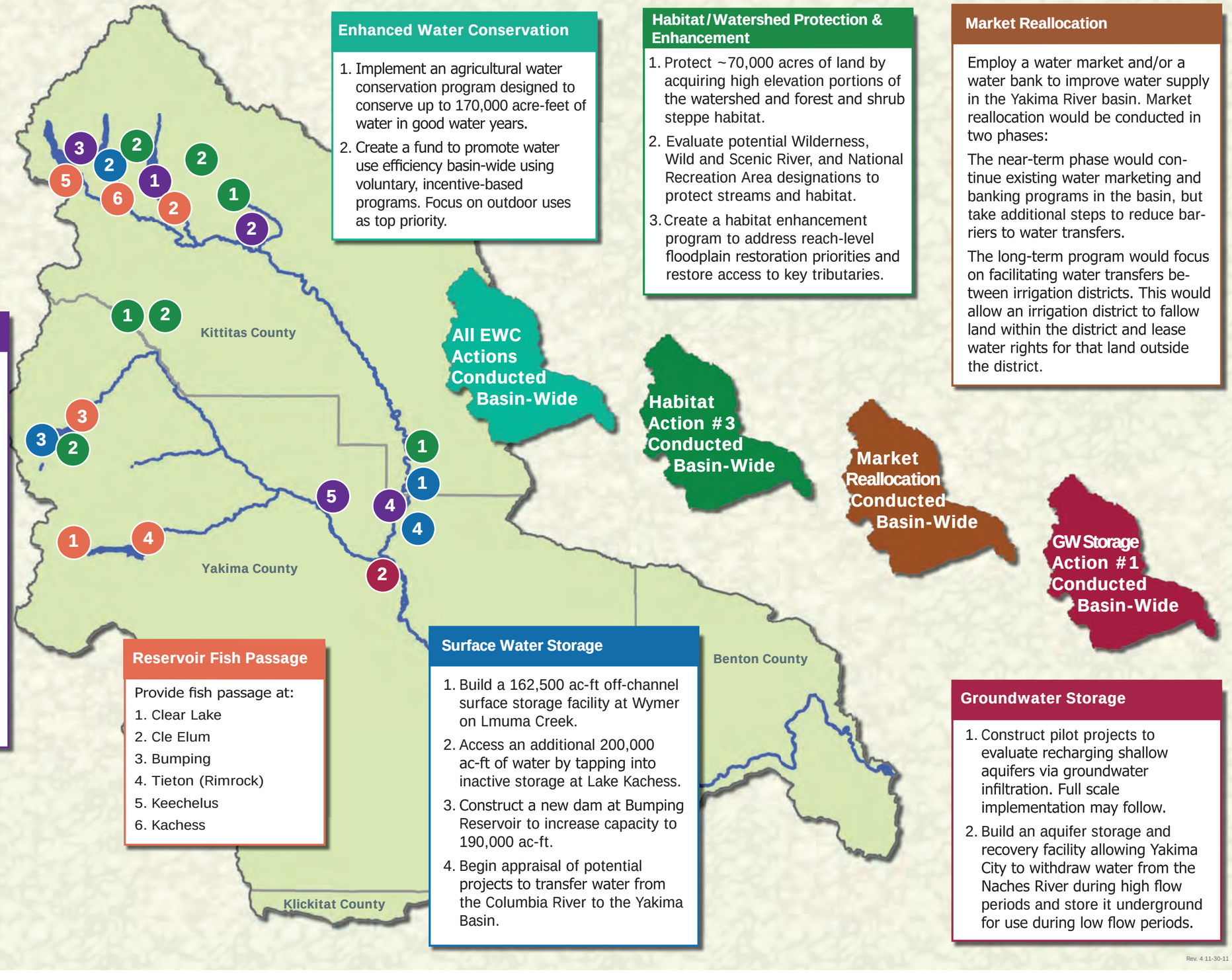
1. Protect ~70,000 acres of land by acquiring high elevation portions of the watershed and forest and shrub steppe habitat.
2. Evaluate potential Wilderness, Wild and Scenic River, and National Recreation Area designations to protect streams and habitat.
3. Create a habitat enhancement program to address reach-level floodplain restoration priorities and restore access to key tributaries.

Market Reallocation

Employ a water market and/or a water bank to improve water supply in the Yakima River basin. Market reallocation would be conducted in two phases:

The near-term phase 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.



Reservoir Fish Passage

Provide fish passage at:

1. Clear Lake
2. Cle Elum
3. Bumping
4. Tieton (Rimrock)
5. Keechelus
6. Kachess

Surface Water Storage

1. Build a 162,500 ac-ft off-channel surface storage facility at Wymer on Lmuma Creek.
2. Access an additional 200,000 ac-ft of water by tapping into inactive storage at Lake Kachess.
3. Construct a new dam at Bumping Reservoir to increase capacity to 190,000 ac-ft.
4. Begin appraisal of potential projects to transfer water from the Columbia River to the Yakima Basin.

Groundwater Storage

1. Construct pilot projects to evaluate recharging shallow aquifers via groundwater infiltration. Full scale implementation may follow.
2. Build an aquifer storage and recovery facility allowing Yakima City to withdraw water from the Naches River during high flow periods and store it underground for use during low flow periods.

Rev. 4 11-30-11

ACRONYMS AND ABBREVIATIONS

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ACHP	Advisory Council on Historic Preservation
AHA	All H Analyzer
AID	Ahtanum Irrigation District
ALE Reserve	Arid Lands Ecology Reserve
APE	Area of Potential Effects
ASR	aquifer storage and recovery
ATVs	all-terrain vehicles
BCAA	Benton County Air Authority
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
BMPs	best management practices
BNSF	Burlington Northern Santa Fe
BPA	Bonneville Power Administration
CAG	Conservation Advisory Group
CAR	Coordination Act Report
CBSP	Columbia Basin System Planning
CEQ	Council on Environmental Quality
CFHMP	Comprehensive Flood Hazard Management Plan
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGCM3.1	“less adverse” climate change model scenario
CHU	critical habitat unit
CIG	Climate Impact Group
Corps	U.S. Army Corps of Engineers
CPOM	coarse particulate organic matter
CRBG	Columbia River Basalt Group
CRMP	Cultural Resource Management Plan
CSA	Conservation Support Area

CTUIR	Confederated Tribes of the Umatilla Indian Reservation
CWA	Clean Water Act
DAHP	Department of Archaeology and Historic Preservation
DART	Data Access in Real Time
dB	decibels
dBA	A-weighted decibels
DDD	dichlorodiphenyl-dichloroethane
DDE	dichlorodiphenyl-dichloroethylene
DDT	dichlorodiphenyl-trichloroethane
DEIS	Draft Environmental Impact Statement
District	Yakima County Flood Control Zone District
DNR	Department of Natural Resources
DOI	Department of the Interior
DPEIS	Draft Programmatic Environmental Impact Statement
DPS	distinct population segment
DS	Determination of Significance
EA	Environmental Assessment
Ecology	Washington State Department of Ecology
EDNA	Environmental Designation for Noise Abatement
EDT	Ecosystem Diagnosis and Treatment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
ESU	Evolutionarily Significant Unit
ET	evapotranspiration
EWC	Enhanced Water Conservation
FEIS	Final Environmental Impact Statement
FERC	Federal Energy Regulatory Commission
FHA	Federal Highway Administration

FOIA	Freedom of Information Act
FPEIS	Final Programmatic Environmental Impact Statement
FR	Forest Road
ft	feet
FWCA	Fish and Wildlife Coordination Act
FWIP	Future without Integrated Plan
gpm	gallons per minute
GW	groundwater
HADCM	"moderately adverse" climate change model scenario
HADGEM1	"more adverse" climate change model scenario
HCP	Habitat Conservation Program
I-82	Interstate 82
I-90	Interstate 90
Integrated Plan	Yakima River Basin Integrated Water Resource Management Plan
IOP	Interim Comprehensive Basin Operating Plan for the Yakima Project
ITA	Indian Trust Asset
KAF	thousand acre-feet
KCCD	Kittitas County Conservation District
KRD	Kittitas Reclamation District
L_{dn}	day-night noise level
L_{eq}	hourly-equivalent sound pressure levels
L_{max}	average maximum noise level
LWD	large woody debris
maf	million acre-feet
MCR	Middle Columbia River
mg/L	milligrams per liter
MOA	Memorandum of Agreement
MOCA	Managed Owl Conservation Area
mph	miles per hour
MW	megawatts

MWH	megawatt hours
NA	not applicable
NAAQS	National Ambient Air Quality Standards
NED	National Economic Development
NEPA	National Environmental Policy Act
NF	North Fork
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPCC	Northwest Power and Conservation Council
NRA	National Recreation Area
NRHP	National Register of Historic Places
NRNI	"No Regulation No Irrigation" climate change model scenario
NSO	northern spotted owl
OHWM	ordinary high water mark
OWNF	Okanogan-Wenatchee National Forest
PARW	USGS gage at Parker
PCB	polychlorinated biphenyl
PCE	Primary Constituent Element
PEIS	Programmatic Environmental Impact Statement
PHS	Priority Habitats and Species
PIA	practicably irrigable acres
PM_{10}	particulate matter 10 microns or less
PMOA	Programmatic Memorandum of Agreement
PR/EIS	Planning Report/Environmental Impact Statement
PUD	Public Utility District
RCW	Revised Code of Washington
Reclamation	Bureau of Reclamation
RM	river mile

RMJOC	River Management Joint Operating Committee
ROD	Record of Decision
SAAQS	State Ambient Air Quality Standards
SAR	Smolt-to-Adult Returns
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
Service	U.S. Fish and Wildlife Service
SF	South Fork
SHC	Strategic Habitat Conservation
SHPO	State Historic Preservation Office
SIL	Scenic Integrity Level
SIP	State Implementation Plan
SM	Stream Mile
SMA	Shoreline Management Act
SMP	Shoreline Master Program
SMS	Scenery Management Sytem
SOAC	System Operations Advisory Committee
SR	State Route
SRFB	Salmon Recovery Funding Board
ST-1	Scenic Travel 1 Visual Quality Objective
Storage Study	Yakima River Basin Water Storage Feasibility Study
TCPs	traditional cultural properties
TMDL	total maximum daily load
TSC	Technical Service Center
TWSA	total water supply available
USC	U.S. Code
USDA	U.S. Department of Agriculture
USFS	U.S. Forest Service
USGS	U.S. Geological Survey
VQO	Visual Quality Objective

VRI	Visual Resource Inventory
VRM	Visual Resource Management
WAC	Washington Administrative Code
Watershed Council	Yakima River Watershed Council
WDFW	Washington Department of Fish and Wildlife
WDNR	Washington Department of Natural Resources
WEC	Washington Environmental Council
WIP	Wapato Irrigation Project
Workgroup	YRBWEP Workgroup
WSDOT	Washington State Department of Transportation
WY	Water Year
Yak-RW	Yakima Project RiverWare
YBFWRB	Yakima Basin Fish and Wildlife Recovery Board
YBJB	Yakima Basin Joint Board
YFO	Yakima Field Office
YKFP	Yakima/Klickitat Fisheries Project
YRBWEP	Yakima River Basin Water Enhancement Project
YTAHP	Yakima Tributary Access and Habitat Program
YTC	Yakima Training Center

EXECUTIVE SUMMARY

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Introduction

The Bureau of Reclamation (Reclamation) and the Washington Department of Ecology (Ecology) have prepared a Final Programmatic Environmental Impact Statement (FPEIS) on the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). The U.S. Forest Service (USFS) and Bonneville Power Administration (BPA) are cooperating agencies in the development of the PEIS. The Integrated Plan identifies a comprehensive approach to water resources and ecosystem restoration improvements in the Yakima River basin. The Integrated Plan includes seven elements: reservoir fish passage, structural and operational changes to existing facilities, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market reallocation. The Integrated Plan was developed to address a variety of water resource and ecosystem problems affecting fish passage and habitat and agricultural, municipal, and domestic water supplies.

Purpose and Need for the Action

The current water resources infrastructure, programs, and policies in the Yakima River basin have not been capable of consistently meeting aquatic resource demands for fish and wildlife habitat, dry-year irrigation demands, and municipal water supply demands. Specific problems that the Integrated Plan is proposed to address include:

- Anadromous and resident fish populations are seriously depleted from historic levels and some species have been eliminated from the basin or listed as threatened under the Endangered Species Act (ESA) due to the following major factors:
    - Dams, dewatering, 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; and
    - Irrigation operations have altered streamflows, 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 for all life history stages and outmigration flows.
- Demand for irrigation water by existing users significantly exceeds supply in dry and drought years, leading to severe prorationing[1] for proratable, or junior, water rights holders. Economic impacts to existing users could be substantially reduced by improving water supplies to 70 percent of proratable water rights.

[1] Prorationing refers to the process of equally reducing the amount of water delivered to junior ("proratable") water right holders in water-deficient years based on total water supply available (TWSA).

- A water supply of 70 percent of proratable water rights during a drought year would provide a minimally acceptable supply to prevent severe economic losses to farmers. This number was reached following extensive discussions with stakeholders regarding the lowest level of water supply that could be accommodated without catastrophic losses to crops, assuming aggressive water management techniques were employed. This 70 percent threshold is similar to the State of Washington's definition of a drought condition contained in RCW 43.83B.400, which recognizes a drought when water supply for a significant portion of a geographic area falls below 75 percent of normal and is likely to cause undue hardship for various water uses and users. Demand for existing and future municipal and domestic water supplies is difficult to meet because of the following factors:

    - Water rights in the basin are fully appropriated, making it difficult to acquire water rights to meet future municipal and domestic water demand; and
    - Pumping groundwater for irrigation and municipal uses has been shown to reduce surface water flows in some locations, which may affect existing water rights.

- Climate change projections indicate that there will be changes in runoff and streamflow patterns, which would increase the need for prorationing and reduce flows for fish. These changes include:

    - Decreased snowpack;
    - Decreased spring and summer runoff;
    - Increased crop and municipal water demand;
    - Increased frequency of drought conditions; and
    - Increased impacts to fish from decreased flows, increased air and water temperature, and changes in timing of streamflows affecting fish migration.

The previously-identified problems have created a need to restore ecological functions in the Yakima River system and to provide more reliable and sustainable water resources for the health of the riverine environment, and for agricultural, municipal, and domestic needs. These problems should be addressed in a way that anticipates increased water demands and changes in water supply related to climate change. In developing the Integrated Plan, Reclamation, Ecology, and the Yakima River Basin Watershed Enhancement Project (YRBWEP) Workgroup identified specific needs for resident and anadromous fish, irrigation water supply, municipal and domestic water supply, and anticipated changes in water supply related to climate change.

The specific needs for the Yakima River basin include:

- Resident and anadromous fish:
    - Improved mainstem and tributary habitat, including habitat protection and enhancement, flow restoration, fish barrier removal, and screening diversions; and
    - Access to habitat above major reservoirs, including both upstream and downstream passage.
- Irrigation water supply:
    - Improved agricultural conservation , including reduction of seepage and evaporation from canals; and
    - Providing a water supply of 70 percent of proratable water rights during drought years, which was determined to be the threshold for minimally acceptable supply.
- Municipal and domestic water supply:
    - Improved water supply from both surface and groundwater to meet current and future municipal and domestic needs;
    - Improved conservation and more efficient use of the water supply; and
    - Improved mechanisms such as water marketing to help domestic users meet the “water budget neutral” requirement for new groundwater use.
- Climate change:
    - Increased flexibility in the water supply to adapt to changes, including increased crop demand, increased municipal and domestic demand, earlier runoff, and more frequent droughts; and
    - Improved streamflows and habitat conditions to help resident and anadromous fish withstand climate change.

The purposes of the Integrated Plan 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
- 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.

Alternatives

Development and Analysis of Alternatives

The Integrated Plan presented in this FPEIS is the result of years of study and proposals to improve water supply and fish habitat in the Yakima basin, including elements and projects identified in Reclamation's Yakima River Basin Water Storage Feasibility Study Planning Report/EIS (Storage Study) (Reclamation, 2008f) and Ecology's Final EIS on Yakima River Basin Integrated Water Resource Management Alternative (Ecology, 2009). Reclamation and Ecology worked collaboratively with the YRBWEP Workgroup to identify the water needs for habitat and agriculture, municipal, and domestic uses. Ecology's Integrated Water Resource Management Alternative was refined to create the Integrated Plan, containing a combination of projects, programs, and resource allocations that could feasibly meet the identified water and habitat needs. The intention of all the parties involved has been that the Integrated Plan would be implemented in a coordinated manner, incorporating all elements of the proposed plan.

Reclamation and Ecology worked closely with the Workgroup to identify projects and programs for each element of the Integrated Plan intended to meet the identified needs. Those projects were extensively modeled and analyzed as part of the Yakima River Basin Study (Reclamation and Ecology, 2011w). The modeling determined that none of the elements on their own could meet the identified instream flow and water needs, and that a combined or integrated approach is essential to meeting all of the identified needs. For example, the Integrated Plan without the Water Storage Element falls short of achieving the 70-percent prorationing level, and also cannot achieve the desired instream flow enhancements.

After working collaboratively with basin stakeholders to develop the Integrated Plan, and reviewing NEPA and SEPA requirements, Reclamation and Ecology have concluded that the Integrated Plan is the only reasonable alternative for improving water supply for irrigation, domestic and municipal needs, and enhancing fish habitat. The Integrated Plan is a comprehensive, adaptive approach to resolving water issues. Because of the multipurpose needs for water in the basin and the importance of an integrated approach, alternatives that were understood to have a single purpose were not considered reasonable or viable.

The Integrated Plan includes an Adaptive Approach to evaluate the effectiveness of projects included in the plan. During implementation, individual components may be modified as new information becomes available or conditions change. Should these modifications result in substantial changes to the components, supplemental programmatic environmental evaluations will be conducted. Additional information may also become available during project-level review for individual components. Any new information that could result in substantial reshaping of the program or project under consideration would be subject to additional environmental review.

Preferred Alternative

Reclamation and Ecology have selected the Integrated Water Resource Management Plan Alternative as the Preferred Alternative. It is the only alternative that meets the Purpose and Need for the Proposed Action. The Integrated Plan would address ecosystem restoration, watershed enhancement, water supply, and climate change flexibility issues in the basin by implementing a comprehensive package of actions. Both the No Action Alternative and the Integrated Plan Alternative would result in adverse environmental impacts, but the overall effect of the Integrated Plan is expected to be beneficial to water supply for agriculture, municipal and domestic uses and for resident and anadromous fish. Current negative trends impacting habitat and water supply would continue under the No Action Alternative, which would not meet the Purpose and Need.

No Action Alternative

The No Action Alternative is intended to represent the most likely future expected in the absence of implementing the proposed action. Under the No Action Alternative, Reclamation and Ecology would not carry out the Integrated Plan Alternative. Although Reclamation and Ecology would not implement an integrated approach to improve water resources and fish habitat in the basin, current management activities and ongoing projects in the basin would continue. In the absence of an integrated approach, it is unlikely that Reclamation and Ecology would be able to procure funding to develop large-scale water storage or fish passage and habitat improvement projects.

The No Action Alternative forms the baseline against which the potential impacts of the Integrated Plan Alternative are compared. As described above, the No Action Alternative reflects continued reliance on individual actions by various agencies and other entities to improve water resources in the basin. Existing funding sources would be used to continue ongoing programs and those projects already funded.

For the purposes of this FPEIS, Reclamation and Ecology consider the No Action Alternative to include projects that:

- Have been planned and designed through processes outside the Integrated Plan;
- Are authorized and have identified funding for implementation; and
- Are scheduled for implementation.

Several entities in the Yakima River basin, including the Yakama Nation, Reclamation, BPA, U.S. Fish and Wildlife Service (Service), National Marine Fisheries Service (NMFS), Ecology, Washington Department of Fish and Wildlife (WDFW), county and municipal governments, local conservation districts, non-profit organizations, and other landowners and managers throughout the basin have been actively involved in storage modification, supplementation, and fish enhancement projects for the past 30 years. Projects, actions, and policies developed by these entities that meet the three implementation criteria described above are considered part of the No Action Alternative.

Reclamation and Ecology expect to complete project-level reviews as appropriate under NEPA and SEPA for ongoing projects those agencies would implement under the No

Action Alternative. Reclamation and Ecology would not be responsible for project-level NEPA and SEPA reviews of ongoing projects implemented by other agencies and entities. These ongoing projects, actions, and policies are described below.

In addition to their involvement with ongoing projects, Reclamation and Ecology would continue their agency management activities to manage water resources in the Yakima River Basin. Reclamation would continue to study fish passage options at its major reservoirs in accordance with its Mitigation Agreement with WDFW and its Settlement Agreement with the Yakama Nation, but would not have funding to carry out the projects. While Reclamation and Ecology would continue to explore other opportunities for funding and implementing water resource and habitat improvement projects, no large-scale or integrated actions or projects are likely to occur under the No Action Alternative in the absence of the Integrated Plan. Under the No Action Alternative, progress towards achieving the goal of restoring ecological functions in the basin would likely proceed more slowly and in a more limited way without a comprehensive program and the funding anticipated if the Integrated Plan were implemented.

Integrated Water Resource Management Plan Alternative (Preferred Alternative)

The Integrated Water Resource Management Plan Alternative (Integrated Plan) represents a comprehensive approach to water management in the Yakima River basin. It is intended to meet the need to restore ecological functions in the Yakima River system and to provide more reliable and sustainable water resources for the health of the riverine environment and for agriculture and municipal and domestic needs. The Integrated Plan is also intended to provide the flexibility and adaptability to address potential climate changes and other factors that may affect the basin's water resources in the future. The Integrated Plan includes three components of water management in the Yakima basin—Habitat, Systems Modification, and Water Supply. The intent of the Integrated Plan is to implement a comprehensive program that will incorporate all three components using seven elements to improve water resources in the basin:

- Reservoir Fish Passage Element (Habitat Component);
    - Provide fish passage at the five major Yakima River basin dams – Cle Elum, Bumping Lake, Tieton, Keechelus, and Kachess – as well as Clear Lake Dam.
- Structural and Operational Changes Element (Systems Modification Component);
    - Cle Elum Pool Raise,
    - Kittitas Reclamation District Canal Modifications,
    - Keechelus-to-Kachess Pipeline,
    - Subordinate Power at Roza Dam and Chandler Powerplants, and
    - Wapatox Canal Improvements.
- Surface Water Storage Element (Water Supply Component);

    - Wymer Dam and Pump Station,
    - Kachess Reservoir Inactive Storage,
    - Bumping Lake Reservoir Enlargement, and
    - Study of Columbia River Pump Exchange with Yakima Storage.
- Groundwater Storage Element (Water Supply Component);
    - Shallow Aquifer Recharge, and
    - Aquifer Storage and Recovery.
- Habitat/Watershed Protection and Enhancement Element (Habitat Component);
    - Targeted Watershed Protections and Enhancements, and
    - Mainstem Floodplain and Tributary Enhancement Program.
- Enhanced Water Conservation Element (Water Supply Component);
    - Agricultural Conservation, and
    - Municipal and Domestic Conservation Program.
- Market Reallocation Element (Water Supply Component).

Reclamation and Ecology worked with the YRBWEP Workgroup to develop a package of projects to meet the goals of the Integrated Plan. These projects are described individually; however, Reclamation, Ecology and the YRBWEP Workgroup intend that the Integrated Plan would be implemented in a comprehensive manner, incorporating all elements of the proposed plan. Implementing the different elements of the Integrated Plan as a total package is intended to result in greater benefits than implementing any of the seven elements independently.

Resource Analysis

Following is a narrative summary of the environmental elements most likely to be impacted based on current evaluations. Table ES-1 at the end of this Executive Summary presents a summary of impacts on all resources evaluated in this FPEIS.

Earth

No Action Alternative

Erosion and sediment delivery to streams likely would continue to occur at about the same rates as under existing conditions or could increase in the future, as past trends have indicated. Construction activities associated with actions by various entities and agencies have the potential to disturb the ground and increase the potential for erosion and delivery of sediments to the Yakima River system. Ongoing habitat improvements would potentially reduce bank erosion and sedimentation to streams.

Integrated Plan Alternative

Short-term impacts to Earth would be related to construction activities that may result in erosion and sedimentation. Long-term impacts would include a combination of effects, including loss of earth-related resources, permanent landscape modifications, new roads, and changes in stream channel and floodplain conditions. Implementation of the Surface Water Storage Element of the Integrated Plan would result in increased disruption of the natural sedimentation process downstream of new storage facilities, as the reservoirs trap and hold sediments. Implementation of the Integrated Plan would also likely result in a decrease in erosion potential as floodplains are reconnected, channel scouring is reduced, and as the Targeted Watershed Protection and Enhancement program is implemented and lands are protected to benefit the watershed as a whole.

Surface Water Resources

No Action Alternative

The No Action Alternative includes agricultural conservation measures through YRBWEP and other programs that may impact surface water. These impacts could include a slight increase in total water supply available (TWSA) and improve streamflow in various Yakima River reaches and tributaries. It is likely that the current conditions and trends related to the reservoir storage and refill and to the timing and/or quantity of streamflows in the mainstem Yakima River and its tributaries would continue. During drought years, water supplies for proratable irrigators would continue to be inadequate to avoid economic losses.

Integrated Plan Alternative

The Integrated Plan Alternative would benefit instream flows and improve the reliability of water supply for agriculture and municipal and domestic uses. Construction activities could cause temporary disruptions in water deliveries to water users, alter the timing and quantity of streamflows , or TWSA. These disruptions would be coordinated to minimize impacts to water users and streamflows. Surface water bodies could be temporarily diverted from their typical locations. Long-term improvements in water supply would be reflected in increases in TWSA, end-of-season reservoir storage, and improved streamflows for fish. The reliability of water supply for irrigators would be improved to minimize economic losses during drought years. Water supply improvements would provide flexibility to adapt to climate change.

Groundwater

No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Overall, existing groundwater levels would likely continue to decline under the No Action Alternative. Deficiencies in water availability from surface water sources may increase demand on groundwater. In general,

groundwater recharge from irrigation is expected to decrease, and this would result in lowered water tables, reduced water levels in area wells, and reduced discharges to rivers, creeks and wetlands. There could be a limit to this groundwater use if temporary moratoriums on new groundwater wells are established to address depleted groundwater, similar to the current moratorium in upper Kittitas County.

Integrated Plan Alternative

Short-term impacts of groundwater are limited to potential reduced usability of wells in the immediate vicinity of construction sites caused by dewatering during construction. Impacts would be temporary and are likely to be minor. Long-term groundwater levels and quantity are expected to increase through additional recharge from irrigation deliveries made from storage facilities, groundwater recharge enhancement, and riparian and floodplain enhancements. The increased groundwater levels would benefit well users and improve riparian habitat. Decreases in recharge are expected from enhanced conservation (improving conveyance facilities and increasing application efficiencies). These declines are expected to be minor, but could cause localized declines in water levels in wells. No impacts to groundwater quality are anticipated.

Water Quality

No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Construction, operation, and maintenance associated with water conservation projects, habitat improvements, and other ongoing projects could have impacts to water quality, including increased sedimentation from construction activities. Ongoing projects would provide some benefits to water quality by improving riparian areas and floodplain habitat in certain areas, but would likely provide only minor overall benefits to the basin. Ongoing programs to improve fish habitat could result in a beneficial increase in nutrient concentrations in those streams if fish populations increase. In the absence of surface water storage projects and large-scale floodplain restoration projects, current trends related to increased stream temperature conditions on a seasonal basis could continue.

Integrated Plan Alternative

The Integrated Plan is designed to provide an overall net benefit to water quality conditions by improving streamflow conditions, riparian areas, and floodplain habitat in the basin. Existing reservoir releases would continue to provide cool water to downstream surface waters. New reservoirs may have the potential to increase temperatures of water released from the dams to downstream surface waters at certain times of the year (late summer/early fall); however, the reservoirs will be operated to minimize and mitigate temperature impacts. There is potential for existing contamination of soils in some locations to affect water quality if floodplain restoration projects are carried out in those areas, but contaminated soils would be identified and removed to prevent contamination. Preserving watersheds through land acquisition, public land

designations, and river corridor designations would protect water quality, contribute to cooler water temperatures, and reduce sedimentation.

Fish

No Action Alternative

Various agencies and other entities would likely continue to undertake individual actions to accomplish fish-orientated water resource improvements. These actions could include small water storage projects, fish reintroduction and supplementation programs, fish passage, habitat improvements, water conservation, and water quality improvements. These actions, although beneficial, would provide slow and partial progress in addressing the fish resource problems of the basin. With the No Action Alternative, existing problems with water availability and habitat quality would likely worsen with current land use activities, increased population and climate change. Anadromous fish would continue to have no access to headwater streams because no fish passage facilities would be provided at major reservoirs. Streamflow conditions would continue to be unfavorable to enhancing fish populations.

Integrated Plan Alternative

Overall the Integrated Plan is expected to provide benefits to resident and anadromous fish by improving habitat conditions throughout the basin. Streamflow conditions would be improved through water storage projects which will allow alterations to reservoir operations. Fish passage facilities would remove barriers allowing fish access to historic headwater habitat. Fish passage at major dams would also allow the reintroduction of sockeye salmon which were extirpated from the basin by blocked passage. Water conservation, groundwater storage, and market reallocation would provide localized improvements in streamflow and reduce high water temperatures. Targeted watershed protections and habitat enhancement projects (including land acquisition, public land and river corridor designations and floodplain restoration) would preserve watersheds and help maintain aquatic habitat complexity. All of these Integrated Plan elements will provide improved habitat conditions that will benefit fish and help meet fish production and survival targets. These improvements may help fish withstand the impacts of climate change.

The expansion of Bumping Lake Reservoir would inundate areas of bull trout habitat and spawning grounds. The proposed reservoir has been designed to minimize those impacts; however, impacts to bull trout could be substantial. Overall the Integrated Plan is expected to provide improved conditions for bull trout in the Yakima basin over the No Action Alternative.

Vegetation

No Action Alternative

Some of the individual actions proposed under the No Action Alternative, such as the habitat enhancement projects, involve improvement of vegetation communities such as riparian areas or wetlands. The projects would likely include removal of nonnative vegetation and planting with native plants. Construction activities could cause the temporary or permanent removal of vegetation. Some projects, such as expanded residential or other development, could reduce the amount of shrub-steppe vegetation. There would be continued logging of intact forested habitat, shrub-steppe habitat loss, and other vegetation impacts on private lands associated with current land use activities.

Integrated Plan Alternative

Under the Surface Storage Element of the Integrated Plan, large areas of shrub-steppe habitat and old-growth forest would be inundated at Wymer Dam and the Bumping Lake Reservoir expansion, respectively. Mitigation for the loss of these vegetation types is difficult or impossible. Reclamation and Ecology recognize the significant impacts of these projects.

Overall the Integrated Plan is expected to have positive impacts for native vegetation communities. Degraded habitat would be restored under the Habitat/Watershed Protection and Enhancement Element and intact vegetation communities would be protected. Protected areas would include acquisition of threatened shrub-steppe habitat and mature forests. The integrated implementation of watershed protection and enhancement activities along with streamflow improvements provided by structural and operational changes, increased surface water storage, and new groundwater storage would provide greater benefits to riparian and wetland vegetation in comparison to a program that implements the elements separately. The integrated approach is more likely to achieve systemwide benefits for vegetation.

Wildlife

No Action Alternative

Some of the individual actions proposed under the No Action Alternative involve riparian vegetation improvement or alteration of wildlife habitats and species using those habitats. The habitat enhancement projects would likely include removal of nonnative vegetation and planting with native plants. Improved riparian vegetation would result in increased habitat for terrestrial wildlife species. Some projects, such as expanded residential development, could reduce the amount of shrub-steppe vegetation. There would be continued and likely increased loss of high-quality habitats, including intact forested habitat, shrub-steppe habitat, and other vegetation communities on private lands associated with current land use activities. Degradation of these habitats would affect wildlife species that are dependent upon them. Although the No Action Alternative would improve some habitat areas, overall conditions for wildlife are expected to decline.

Integrated Plan Alternative

The overall impact of the Integrated Plan is expected to be positive for wildlife. There would be negative impacts to wildlife habitat caused by the inundation of shrub-steppe and old-growth forest at Wymer Dam and the Bumping Lake Reservoir expansion respectively. These projects would cause substantial impacts to wildlife, including some threatened and endangered species as discussed below. The combined effects of the proposed elements in the Integrated Plan are expected to result in improved fish and wildlife habitat over time. Many of the proposed structural and operational changes would not impact habitat because they would be located in previously disturbed areas and would provide flow benefits to fish and other aquatic species. Fish passage facilities would reopen historic territory for anadromous fish and help restore ecosystems upstream of the dams. The Habitat/Watershed Protection and Enhancement Element would improve degraded habitat and protect large areas of intact habitat, including declining shrub-steppe habitat surrounding the Wymer Reservoir site and mature forests threatened with development.

Threatened and Endangered Species

No Action Alternative

Some of the individual actions proposed under the No Action Alternative involve riparian vegetation improvement or alteration of wildlife habitats and species using those habitats. This includes projects for water conservation, fish supplementation programs, and habitat improvements. These projects would provide small-scale improvements for steelhead and bull trout. The projects would likely include removal of nonnative vegetation and planting with native plants. Improved riparian vegetation would result in increased habitat for terrestrial wildlife species. Projects such as residential development could reduce the amount of shrub-steppe vegetation and impact listed species. The No Action Alternative would provide incremental improvements in habitat for listed species, but overall conditions are expected to continue.

Integrated Plan Alternative

Construction associated with structural and operational changes to existing facilities and water conservation projects is not expected to result in impacts because it would occur in previously disturbed areas or built environments with minimal habitat for listed species. In addition, the projects would provide flow benefits to Middle Columbia River (MCR) steelhead, bull trout and other aquatic species. Fish passage facilities would reopen historic territory for MCR steelhead, help restore ecosystem help upstream of the dams, allow reintroduction of extirpated species, and allow isolated bull trout populations to be connected. The Habitat/Watershed Protection and Enhancement Element of the Integrated Plan would result in a net improvement in conditions for greater sage-grouse, northern spotted owl, MCR steelhead, bull trout, and other wildlife species by protecting and enhancing existing high value habitat areas within the Yakima basin. Further, additional surface storage in the basin would provide positive impacts through increased flows for anadromous and resident fish passage and survival during drought years. The

integrated implementation of fish habitat enhancement projects and the streamflow improvements provided by structural and operational changes, increased surface water storage, new groundwater storage, and watershed protection and enhancement activities would provide greater benefits to listed fish and wildlife species in comparison to a program that implements the elements separately.

Wymer Dam and the expansion of Bumping Lake Reservoir would negatively impact listed fish and wildlife. Wymer Dam would inundated a large area of shrub-steppe habitat used by the greater sage-grouse, a Federal candidate species. The Bumping Lake Reservoir expansion would inundate spawning areas used by bull trout, especially on Deep Creek and large areas of old-growth forest used by the northern spotted owl. Reclamation and Ecology acknowledge the potential significant impacts to these species and will coordinate with NMFS, the Service, and WDFW to minimize those impacts and develop mitigation strategies.

Climate Change

No Action Alternative

Changes in precipitation, snowmelt, and runoff that may occur as a result of climate change could affect river operations as well as projects included in the No Action Alternative. There may be changes in water availability for irrigation, fish, and municipal uses. Without a comprehensive, integrated management program, projects would be completed in a piecemeal fashion, reducing the potential for coordination and increased efficiencies in implementation. An uncoordinated approach may reduce the potential to adapt water management strategies and adjust to changing climatic conditions. Depending on its severity, climate change could cause existing water supply shortages and adverse effects on streamflows and fish in the basin to become significantly worse under the No Action Alternative. Because of predicted increased temperatures and decreased summer streamflow, adverse effects on water quality due to climate change are also likely under the No Action Alternative.

Integrated Plan Alternative

As an integrated package, this alternative would provide multiple benefits to water supply, agriculture, and fish while improving the ability of water managers to adapt to future climate changes. Approaching management on a basinwide level could provide additional consistency in water management across agencies and jurisdictions. Additional water storage and improved irrigation operations would provide a more reliable water supply for agriculture during dry periods. Improved streamflows and fish habitat, along with access to upper river tributaries, would produce enhanced fish populations that would be better able to withstand habitat changes caused by climate change. As climate change places new stresses on water resources and aquatic habitats in the future, the Yakima River basin's upper watersheds will become even more vital to ecosystem health and water supply. Reopening historic fish habitat through fish passage facilities will improve conditions for anadromous fish. Acquisition of a 46,000-acre tract in the middle and lower Teanaway River basin including ponderosa pine forest would be

particularly significant due the limited range and vulnerability to climate change of this forest type.

Recreation

No Action Alternative

The No Action Alternative would not result in long-term impacts to recreation in the Yakima River basin and existing activities, programs, and trends in the Yakima River basin would continue. Many of the ongoing projects would improve riparian and fish habitat. This would have a beneficial impact on recreation by improving fishing and wildlife viewing opportunities.

Integrated Plan Alternative

Implementation of most of the projects and elements of the Integrated Plan would result in short-term disruptions to facilities due to access limitations during construction; however, most of these impacts would be temporary and disruptions would cease following completion of construction. Long-term impacts to recreational resources could occur associated with land acquisition, which could limit some recreational uses and improve others. Designation of areas as Wilderness could limit some recreational uses such as motorized vehicles or mountain biking. Proposed National Recreation Areas, Wild and Scenic Rivers, and other watershed protection actions would enhance recreation opportunities. Acquisition of private lands could allow increased recreational activities on lands currently closed by private ownership.

Recreational facilities at Bumping Lake Reservoir would be significantly impacted by eliminating shoreline recreational facilities and access to trails. It is anticipated that some of the recreational facilities that would be eliminated could be replaced over time. However, it may not be possible to replace all impacted facilities at or near Bumping Lake Reservoir. Reclamation would coordinate with the USFS to determine appropriate mitigation for displaced recreational facilities. Many of the proposed projects in the Integrated Plan would improve riparian and fish habitat. This would have a beneficial impact on recreation by improving fishing and wildlife viewing opportunities.

Land and Shoreline Use

No Action Alternative

The No Action Alternative could result in minor long-term land use impacts in the Yakima River basin in cases where projects require property acquisition. This alternative includes water conservation, fish supplementation, and fish enhancement projects that would be implemented by other agencies and entities. The No Action Alternative could also result in long-term land use changes as a result of reduced water reliability. Without the increased reliability of irrigation supplies as provided under the Integrated Plan Alternative, there could be reduced viability of some existing agricultural operations.

This reduced viability would increase the potential for conversion of agricultural land to other land uses.

Integrated Plan Alternative

The Cle Elum Dam pool raise, Keechelus-to-Kachess pipeline, Bumping Lake enlargement, and Kachess Reservoir inactive storage projects would require acquisition of land or easements, but are not anticipated to have a significant impact on land use. Approximately 4,000 acres of private land would need to be purchased for the Wymer Dam project and changed from forest and rangeland uses to water storage, which would be a significant change in land use. Habitat enhancement projects could require acquisition of property or easements, but they would be located on property owned by willing participants and would be compatible with existing land uses.

Watershed protection and enhancement activities are likely to cause land use impacts when properties or conservation easements are acquired for protection; however, all properties would be acquired from willing sellers. Logging or other relatively high intensity activities would likely be curtailed on these acquired properties, although the intent is to maintain historic uses to the extent that they are compatible with habitat protection goals. The types and intensities of recreation on the acquired properties could change depending on how the land is managed. Wilderness or Wild and Scenic River designations could also place restrictions on existing land uses. The Market Reallocation Element could result in changes in land use as water rights are transferred from one area and land use to another.

Cultural Resources

No Action Alternative

Under the No Action Alternative, ongoing projects have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities. These impacts could be substantial where habitat improvements projects are located in areas with a high likelihood for significant Native American cultural resources. Long-term impacts to cultural resources under the No Action Alternative could include ground-disturbing activities, erosion of cultural deposits, and increased vandalism of cultural resources. The net impact to cultural resources is expected to be substantially lower under the No Action Alternative because fewer large-scale projects are likely to be constructed.

Integrated Plan Alternative

Projects undertaken as part of the Integrated Plan have the potential to cause long-term impacts to cultural resources located within the footprint of any new ground-disturbing construction activities. Construction impacts would include access and staging areas as well as any off-site mitigation areas. The main non-construction long-term impact for most elements would be erosion of cultural resources. Potential impacts to cultural resources would be evaluated through site-specific studies and consultation with the

Washington State Department of Archaeology and Historic Preservation and affected Tribes to develop appropriate mitigation measures.

Cumulative Impacts

The Integrated Plan has been developed with the intention of addressing some of the cumulative impacts associated with past projects in the Yakima River basin, including past impacts caused by dam construction, land use actions, inefficiencies in irrigation systems, and other impacts. There are other cumulative impacts associated with implementation of the Integrated Plan that could increase. Cumulative construction impacts could occur if projects within the basin are constructed concurrently, including impacts to water quality, vegetation, and local transportation and access. These cumulative construction-related impacts would be further compounded if other present and reasonably foreseeable projects such as wind power development, potential hydropower at existing dams, and areawide ongoing developments are constructed concurrently with Integrated Plan projects.

Expanding existing reservoirs or building new water storage facilities would add to existing impacts on fisheries in a river basin that has already been extensively dammed, and has been impacted by development, climate change, and other modifications to the system. Additional storage facilities could exacerbate the impacts of existing facilities, including the potential to create additional impediments to fish passage, increased migration times, and impaired downstream water quality. However, these storage projects will also contribute to improving instream flows. Hydropower facilities could be expanded in the future by utilities as well as private developers, resulting in water quality impacts, altered reservoir operations, and other detrimental effects that could affect fisheries. The Integrated Plan has been developed in a comprehensive manner to offset these cumulative impacts, by including new fish passage, and retrofitting existing reservoirs with improved fish passage, and by including measures to enhance habitat, maintain flows, reduce water temperatures, and offset climate change-induced impacts.

Land acquisition and recommended Wilderness, Wild and Scenic River, and National Recreation Area designations associated with habitat/watershed protection and enhancement have the potential to affect and/or be affected by historic USFS management of National Forest System lands.

There are projects and programs outside the Yakima River basin that could potentially affect or be affected by the Integrated Plan, including the Odessa Subarea Special Study, Lake Roosevelt Incremental Storage Releases, Walla Walla Pump Exchange, Sullivan Lake Water Supply Project, Umatilla Aquifer Recharge Project in Oregon, and potential renegotiation or termination of the U.S.-Canada Columbia River Treaty, among others. Some of these projects would improve streamflows, most represent increased demand for water in the Columbia River.

Environmental Commitments

The project proponent has the primary responsibility to ensure that environmental commitments are met if any action is implemented. Because this a programmatic environmental review of the Integrated Plan elements, specific mitigation measures have not been developed for specific project actions at this time. Specific mitigation measures and environmental commitments would be developed during project-specific review for each project action carried forward.

Public Involvement

Scoping

On April 5, 2011, Reclamation published a Notice of Intent (NOI) in the *Federal Register* to prepare a Draft Programmatic EIS (DPEIS). Reclamation and Ecology issued a joint press release to local media on April 6, 2011, announcing the scoping meetings. In addition, a meeting notice was mailed to interested individuals, Tribes, groups, and governmental agencies which described the proposed action, requested comments, and provided information about the public scoping meetings and described the process for public and agency involvement. On May 3, 2011, Reclamation and Ecology held two 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 Purpose and Need for the proposal, the proposed action and potential alternatives, the National Environmental Policy Act (NEPA)/State Environmental Policy Act (SEPA) process, and resources being evaluated in the DPEIS.

Reclamation and Ecology received 79 written comments during the scoping period which were used in the preparation of the DPEIS. The *Scoping Summary Report* (Reclamation and Ecology, 2011m) is available upon request or can be accessed from the YRBWEP 2010 Integrated Plan Web Site: http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html.

Comments on the DPEIS

Reclamation and Ecology held a 49-day comment period on the DPEIS from November 16, 2011 to January 3, 2012. Public meetings were held in Cle Elum on December 5, 2011; Ellensburg on December 6, 2011; and Yakima on December 14, 2011. A total of 64 people attended the meetings and four people provided comments to the court reporter. A total of 2,285 written comment letters were received from agencies and individuals. All of the individual comment letters received are included in the Comments and Responses section at the end of this FPEIS. Responses to the comments are provided.

Consultation and Coordination

Reclamation has conferred with the Service and NMFS and the agencies have reached agreement that Reclamation will not conduct consultation on the proposed Integrated Plan under Section 7 of the ESA at this time. Reclamation will carry out compliance in accordance with the ESA, National Historic Preservation Act (NHPA) of 1966, and Clean Water Act for individual projects and actions that are carried forward under the Integrated Plan in the future. Reclamation will initiate Government-to-Government consultation with the Confederated Tribes of the Yakama Nation and the Confederated Tribes of the Umatilla Indian Reservation, and will consult with the Bureau of Indian Affairs regarding cultural resources, Indian trust assets, and Indian sacred sites. This consultation will take place when individual projects proposed under the Integrated Plan are carried forward to implementation.

Reclamation and Ecology were responsible as joint lead agencies for developing this joint NEPA/SEPA PEIS. The BPA and USFS are cooperating agencies for the PEIS.

Changes to the Draft EIS

For this FPEIS, the DPEIS has been amended to reflect responses to comments and newly available information on the project and to more clearly describe the proposal and impacts.

The major changes made to the Draft EIS include:

- The Integrated Plan has been selected as the Preferred Alternative.
- The Purpose and Need statement in Section 1.3 has been revised for added clarity and detail.
- The Yakima River Basin Location and Setting description in Section 1.6.1 has been expanded to include detail about crops and land ownership and a new Figure 1-2 showing land ownership has been included.
- Sections have been added in Section 1.6.4 to describe other legal actions related to water rights.
- The description of the No Action Alternative has been revised in Section 2.3 for added clarity and detail. Similar revisions have been made to the description of impacts from the No Action Alternative throughout Chapters 4 and 5.
- The descriptions of several Integrated Plan elements in Section 2.4 have been revised for added clarity and detail. Figures 2-6 through 2-10 have been added, showing detail on the Groundwater Storage and Habitat/Watershed Protection and Enhancement Elements.
- The description of the Targeted Watershed Protections and Enhancements project in Section 2.4.7.1 has been updated to reflect the *Watershed Land Conservation Subcommittee Proposal* of January 2012 (Reclamation and Ecology, 2012), including added recommendations for National Recreation Area designations and the additional rivers recommended for Wild and Scenic River designation.

Impacts of these additions have been revised throughout Chapters 4 and 5 to reflect the updates in the *Proposal* and to add clarity and detail about the benefits of the proposed project.

- Section 2.5.1 has been revised to explain how Columbia River pump exchange alternatives have been evaluated, but eliminated from further detailed analysis.
- Section 2.5.4, Reliance on Conservation and Water Marketing, has been revised to explain how Reclamation and Ecology considered relying on conservation and water marketing alone, but eliminated the alternative from further detailed analysis.
- Table 2-2 Comparison of Impacts for Alternatives has been revised to reflect edits made to impact descriptions in Chapters 4 and 5.
- Information on fish, vegetation, and wildlife in Chapter 3 has been edited for added clarity and detail.
- A discussion of National Recreation Areas has been added to Section 3.16.1.1, Regulation of Federal Lands.
- Details about construction impacts applicable to all projects, such as staging areas and access roads, has been added to Section 4.1
- Additional details have been added to the impact discussions in Chapters 4 and 5 where appropriate to respond to comments.
- Additional information has been added to Section 5.10 Threatened and Endangered Species, for consistency with the Coordination Act Report prepared by the Service.
- A section on the DPEIS Comment Period has been added to Chapter 6 as Section 6.1.2. Comment letters received and responses to them have been added as a Comments and Responses section after Chapter 6.
- Additional references have been added to the References section.
- The Executive Summary has been revised to reflect changes made throughout the rest of the document.

Summary of Impacts

Table ES-1 summarizes impacts associated with the No Action and Integrated Plan Alternatives.

Table ES-1. Comparison of Impacts for Alternatives

Resource	No Action Alternative	Integrated Plan Alternative
Earth	Short-term: Construction-related erosion and sedimentation from ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Erosion and sediment delivery would continue or increase.	Short-term: Construction-related erosion and sedimentation. Long-term: Loss of some earth-related resources, permanent landscape modifications, and changes in stream channel and floodplain conditions. Disruption of sedimentation downstream of storage facilities. Decrease in erosion potential in conservation areas.

Resource	No Action Alternative	Integrated Plan Alternative
Surface Water Resources	Short-term: Potential disruption during construction. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects could result in a slight increase in water supply and increases in streamflows in various reaches and tributaries. Despite these ongoing actions, current conditions and trends related to the timing and/or quantity of streamflows in the mainstem Yakima River and its tributaries, reservoir storage and refill, and deliveries to water users would continue. Overall goals and objectives of the Integrated Plan would not be achieved. There would be continued inability to meet water demand and reduced ability to respond to changes in water supply conditions.	Short-term: Potential disruption during construction. Long-term: Increased TWSA, end-of-season reservoir storage, annual diversions, and improved streamflow.
Groundwater	Short-term: Potential dewatering impacts during construction of ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Groundwater recharge is expected to decrease with conservation projects while demand on groundwater is expected to increase. Overall, groundwater levels would likely continue to decline.	Short-term: Temporary reduction of usability of wells in the immediate vicinity of construction sites. Long-term: Groundwater levels and quantities would increase with potential decreases near canal lining sites.
Water Quality	Short-term: Construction of ongoing projects could result in temporary water quality impacts. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Localized benefits from ongoing habitat improvements. Net benefits to water quality unlikely to occur. Current trends related to increased stream temperature conditions on a seasonal basis would likely continue.	Short-term: Risk of erosion and contaminants from construction. Long-term: Net benefit to water quality by improving streamflow conditions, riparian areas, and floodplain habitat. New reservoirs have potential to increase temperatures of water released from the dams in downstream surface waters at certain times of the year (late summer/early fall); however, the reservoirs will be operated to minimize and mitigate temperature impacts. Preserving watersheds through land acquisition, public land designations, and river corridor designations would protect water quality, contribute to cooler water temperatures, and reduce sedimentation.

Resource	No Action Alternative	Integrated Plan Alternative
Hydropower	Short-term: No impact. Long-term: Hydroelectric generation would continue to operate as under current patterns and trends.	Short-term: No impact. Long-term: Reduction of hydroelectric generation at Roza and Chandler Powerplants and the Drop 2 and Drop 3 powerplants in the Wapato Irrigation Project.
Fish	Short-term: Temporary habitat disturbance, construction-related impacts. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects could produce localized improvements, but basin-wide benefits are unlikely to occur. Current trends would continue with existing threats to resident and anadromous fish related to water availability and habitat quality likely worsening with increased population and climate change.	Short-term: Temporary habitat disturbance, construction-related impacts. Long-term: Overall benefits from fish passage facilities, improved streamflows and habitat/watershed protection and enhancement projects. Combined elements would contribute to flow conditions resembling natural flows and improve fish passage and habitat throughout historic ranges.
Vegetation	Short-term: Some vegetation removal from construction of ongoing projects, including shrub-steppe vegetation. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Minor, localized improvements from piecemeal implementation of ongoing projects. Fewer benefits to riparian and wetland vegetation when compared to a program that implements the projects as part of an integrated program. Current patterns and trends, including logging of intact forested habitat, shrub-steppe habitat loss, and other vegetation impacts on certain private lands, would likely continue into the foreseeable future.	Short-term: Temporary disruption of vegetation, including shrub-steppe and mature forest vegetation Long-term: Negative impacts, including habitat loss, from expanded reservoirs, but an overall positive impact due to habitat/watershed protection and enhancement. Permanent removal of some areas of shrub-steppe and mature forest vegetation.
Wildlife	Short-term: Temporary dislocations of wildlife and temporary disruption of habitat during construction of ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Minor improvements to habitat from ongoing projects. Fewer benefits to habitat when compared to a program that implements the projects as part of an integrated program. Current patterns and trends, including increased loss of high-quality	Short-term: Temporary disruption of habitat during construction. Substantial habitat impact could occur if replacement habitat is unavailable. Short term impacts for some species could be substantial at Wymer Dam and expansion of Bumping Lake Reservoir. Long-term: Negative impacts to habitat from new or expanded reservoirs. Overall positive impact for wildlife from habitat/watershed protection and enhancement. Permanent impact on shrub-steppe and mature forest vegetation.

Resource	No Action Alternative	Integrated Plan Alternative
	habitats on certain private lands, would likely continue into the foreseeable future.	
Threatened and Endangered Species	Short-term: Some ongoing projects could result in temporary displacements of listed species due to noise and disturbance during construction. Long-term: Minor improvements to habitat may provide limited benefits to listed species. Overall, ongoing projects to restore habitat are likely not sufficient to overcome the problems of depleted streamflow conditions needed to support the enhancement of listed fish populations and healthy, functional ecosystems in the Yakima River basin. Without a comprehensive, coordinated management program, ongoing projects to restore fish passage and provide habitat protection and restoration would be completed in a piecemeal fashion, reducing the potential for positive synergistic effects. There would be continued and likely increased impacts to high-quality habitat on some private lands supporting threatened shrub-steppe habitat and mature forests critical for greater sage-grouse and northern spotted-owl, respectively. In general, current fish population trends would continue under the No Action Alternative with existing problems with water availability and habitat quality likely worsening with increased population and climate change. As a result, the No Action Alternative would have the most impacts to threatened and endangered species.	Short-term: Temporary disruption of habitat during construction. Removal of some areas of shrub-steppe and mature forest habitat. Long-term: Negative impacts to species that may be displaced from the area of a new or expanded reservoir. Overall positive impacts from fish passage facilities, improved streamflows, and habitat/watershed protection and enhancement projects. Permanent impact on shrub-steppe and mature forest vegetation; however, land acquisition and habitat enhancement components are intended to result in a net improvement in conditions for listed fish and wildlife species

Resource	No Action Alternative	Integrated Plan Alternative
Visual Resources	Short-term: Presence of construction equipment and activities during construction of ongoing projects would generally create an unattractive visual setting during the construction period. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects would have varying levels of local scale visual impacts. Impacts would likely be minor because of the small scale of ongoing projects. There would be continued and likely increased changes to the visual appearance of some private lands that would have otherwise been acquired and protected under the Integrated Plan Alternative. In some cases, natural or nearly natural appearing lands could change to a logged or developed condition.	Short-term: Presence of construction equipment and activities during construction would generally create an unattractive visual setting during the construction period. Long-term: Visual impacts would be primarily of local scale and are not expected to be significant with the potential exception of new and expanded reservoirs.
Air Quality	Short-term: Construction of ongoing projects would likely cause minor increases in fugitive dust and vehicle emissions. Long-term: Ongoing projects may cause long-term impacts from emissions if they include stationary pollutant sources such as pumping equipment driven by diesel, natural gas, or other fossil fuels.	Short-term: Minor dust and emissions associated with construction and traffic. Long-term: Some projects may cause long term impacts from emissions associated with stationary pollutant sources, although impacts are not expected to be significant.
Climate Change	Short-term: Minor amounts of greenhouse gas emissions during construction of ongoing projects. Long-term: Water supply shortages and adverse effects on streamflows and fish could become significantly worse. Limited ability to respond to climate change-induced impacts.	Short-term: Increases in greenhouse gas emissions associated with construction of individual projects. Long-term: Multiple benefits to water supply, agriculture, and fish, improving the ability of water and fisheries managers to adapt to future climate change.
Noise	Short-term: Increased noise from construction equipment and activities. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Individual projects have the potential to generate noise during long-term operation.	Short-term: Increased noise from construction equipment and activities, including blasting associated with certain individual projects. Long-term: Some equipment or vehicles may be audible in the vicinity of projects.

Resource	No Action Alternative	Integrated Plan Alternative
Recreation	Short-term: Temporary access restrictions and nuisance dust and noise during construction of ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects would not result in long-term negative impacts on recreation in the Yakima River basin. Current patterns and trends impacting recreation facilities would likely continue into the foreseeable future.	Short-term: Temporary access restrictions or nuisance dust and noise. Long-term: Some recreational facilities and resources at Bumping Lake Reservoir would be eliminated and it may not be possible to relocate. Many projects would improve fishing and wildlife viewing opportunities. Motorized vehicle use would be restricted in designated Wilderness. Proposed National Recreation Areas and other watershed protection actions would enhance recreational opportunities.
Land and Shoreline Use	Short-term: Temporary access restrictions during construction of ongoing projects. Long-term: Ongoing projects could result in long-term land use impacts from property or easement acquisitions. Current patterns and trends impacting land use would likely continue into the foreseeable future.	Short-term: Temporary access restrictions caused by construction. Property or conservation easement acquisitions of private property. Long-term: Property and easement acquisitions, shift from forest and rangeland to water storage in Wymer Reservoir area, potential land use changes due to market reallocation. Potential decreased tax base with the conversion of private lands to public ownership.
Utilities	Short-term: Potential temporary disruptions during construction of ongoing projects. Long-term: Ongoing conservation-oriented water supply system improvements, including pumping plants and pipelines, would have no substantial impact on the supply of electric power.	Short-term: Potential temporary disruption during construction. Long-term: Reduced supply of electricity due to power subordination and increased demand from new equipment.
Transportation	Short-term: Potential temporary traffic delays and possible detours associated with ongoing projects. Long-term: Long term transportation not likely to be affected.	Short-term: Temporary traffic delays and possible detours, in some cases for up to 3 to 5 years for major projects. Long-term: Bumping Lake Enlargement would eliminate some Forest Roads and reduce access to some National Forest areas.

Resource	No Action Alternative	Integrated Plan Alternative
Cultural Resources	Short-term: Potential impacts on historic structures, traditional cultural properties, or sacred sites from increased dust, vibration, noise, or construction activity. Long-term: Ongoing projects have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities. These impacts could be substantial where habitat improvements projects are located in areas with a high likelihood for significant Native American cultural resources. The potential impacts on cultural resources would likely be substantially lower under the No Action Alternative compared to the Integrated Plan Alternative because fewer large-scale projects are likely to be constructed. Ground disturbance, erosion, and increased vandalism of cultural resources. Potential impacts to historic structures.	Short-term: Potential impacts on historic structures, traditional cultural properties, or sacred sites from increased dust, vibration, noise, or construction activity. Construction could cause permanent impacts to cultural resources. Long-term: Projects have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities. These impacts could be substantial where habitat improvements projects are located in areas with a high likelihood for significant Native American cultural resources. The potential impacts on cultural resources would likely be higher than under the No Action Alternative because of the large-scale projects that are likely to be constructed. Ground disturbance, erosion, and increased vandalism of cultural resources. Potential impacts to historic structures.
Socioeconomics	Short-term: The ongoing projects would not likely have a discernible short-term effect on socioeconomic conditions in the basin. Long-term: Current economic patterns and trends would likely continue into the foreseeable future. Climate change and population increases would impact the relation between natural resources and the economy in the basin.	Short-term: Project-related funding would likely have short-term positive impacts on jobs and incomes and reduced uncertainty and risk. Long-term: Potential increase in the value of goods and services derived from the basin's water and related resources in the long term. Reduction in uncertainty and risk.
Environmental Justice	Most projects would not be expected to cause disproportionate impacts to environmental justice communities.	Most projects are not expected to cause disproportionate impacts to environmental justice communities. Additional environmental justice analysis would be required during project-level analysis.

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Chapter 1

INTRODUCTION AND BACKGROUND

CHAPTER 1.0 INTRODUCTION AND BACKGROUND

1.1 Introduction

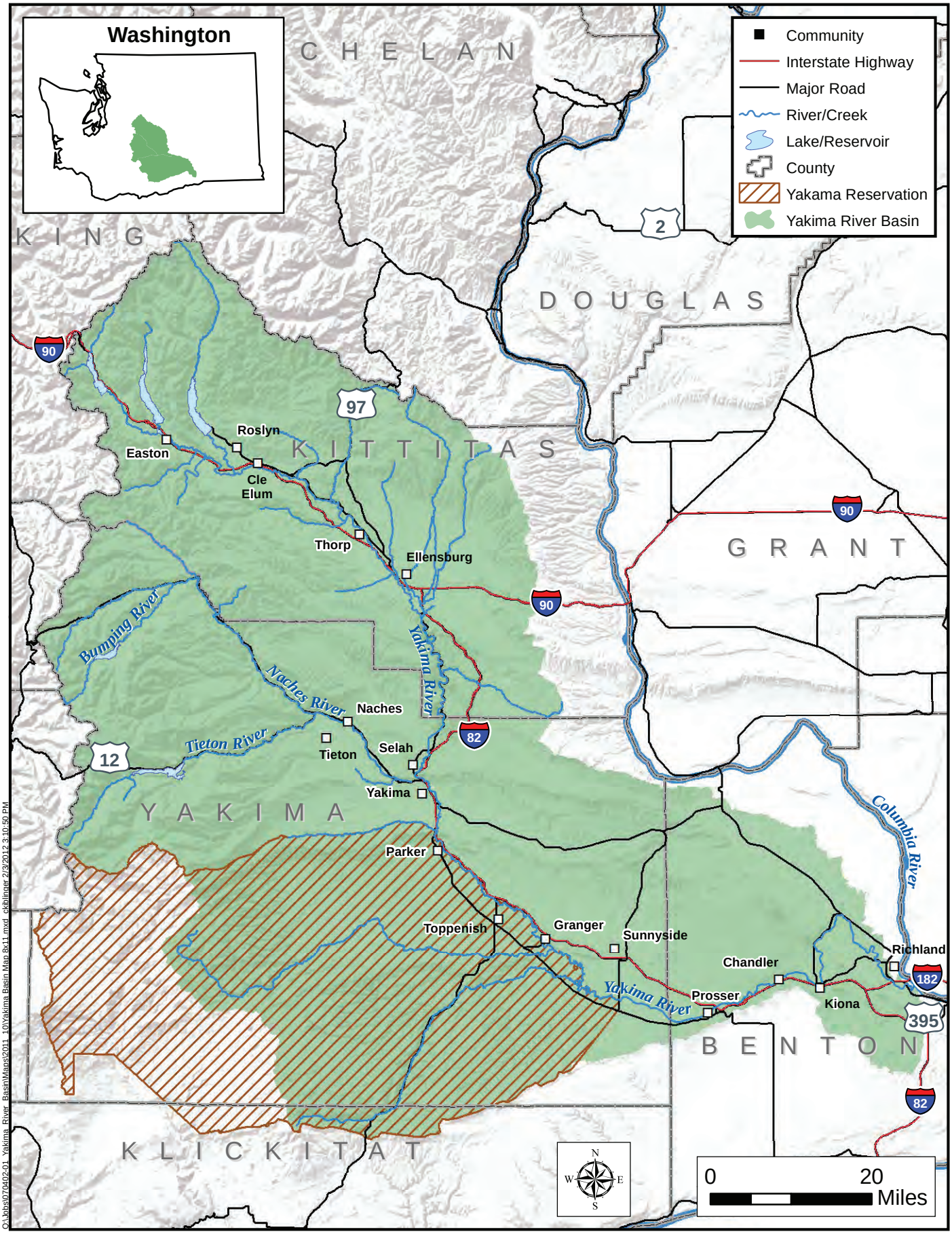
The Bureau of Reclamation (Reclamation) and the Washington Department of Ecology (Ecology) have prepared this Final Programmatic Environmental Impact Statement (FPEIS) on the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). This FPEIS is a combined National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) EIS. It meets the requirements of both NEPA and SEPA with Reclamation and Ecology as joint leads in its preparation. The Bonneville Power Administration (BPA) and the U.S. Forest Service (USFS) are cooperating agencies in the preparation of the FPEIS.

The proposed Integrated Plan represents a comprehensive approach to water management and habitat enhancement in the Yakima River basin (Figure 1-1). It is intended to restore ecological functions in the Yakima River system and to provide more reliable and sustainable water resources for the health of the riverine environment, as well as agriculture, municipal and domestic water users. The Integrated Plan offers a package of projects to meet these needs while anticipating changing water uses and effects of predicted climate change on water resources in the basin.

The Integrated Plan includes seven elements: reservoir fish passage, structural and operational changes to existing facilities, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market reallocation. The locations of Integrated Plan elements are shown on the Frontispiece at the beginning of this document.

The goals of the Integrated Plan are to:

- Provide opportunities for comprehensive watershed protection, ecological restoration and enhancement addressing instream flows, aquatic habitat, and fish passage;
- Improve water supply reliability during drought years for agricultural and municipal needs;
- Develop a comprehensive approach for efficient management of water supplies for irrigated agriculture, municipal and domestic uses, and power generation;
- Improve the ability of water managers to respond and adapt to potential effects of climate change; and
- Contribute to the vitality of the regional economy and sustain the riverine environment.



O:\kbhs\070402-01 Yakima River Basin\Maps\2011 10\Yakima Basin Map 8x11.mxd ckblinger 2/3/2012 3:10:50 PM

Figure 1-1. Yakima River Basin

The Integrated Plan was developed collaboratively with the Yakima River Basin Watershed Enhancement Project (YRBWEP) Workgroup (composed of the Yakama Nation, Yakima Project irrigators, and basin stakeholders) using information from past studies and environmental analyses conducted by Reclamation and Ecology. The Workgroup evaluated and recommended potential actions to address these goals, which resulted in the Integrated Plan that is evaluated in this FPEIS.

This FPEIS evaluates the potential impacts and benefits of the Integrated Plan in order to seek congressional authorization to implement the plan and authorization for funding[1]. For some projects, such as fish passage, the current Title XII authorization under the YRBWEP Phase II legislation provides insufficient authorization for implementation. For other projects, there is no current authorization for implementation or funding.

The sections in this chapter include descriptions of:

- The NEPA and SEPA environmental analysis;
- The Purpose and Need for the proposed action;
- Federal and State authority for the Integrated Plan;
- Background on ecological and water resources issues in the Yakima basin;
- The location, setting, and history of the Yakima basin;
- Prior investigations, activities, and fish recovery efforts, in the basin;
- Recent activities that led to development of the Integrated Plan;
- Related permits, actions, and laws;
- Public involvement;
- Documents that have been adopted under SEPA; and
- A guide on how to read this document.

1.2 National and State Environmental Policy Act Review Process

This FPEIS is a combined NEPA and SEPA Programmatic EIS. It meets the requirements of both NEPA and SEPA with Reclamation and Ecology serving as joint leads in its preparation.

This FPEIS is prepared at a programmatic level. The proposed action is a plan that contains a large number of interrelated projects and actions intended to operate in concert with each another. The projects and actions are not yet at a project level of definition or design. A programmatic EIS and planning level of analysis are appropriate at this stage

[1] Congressional authorization of a project includes two steps. The first step authorizes the agency to proceed with a project. Funding for a project is provided through a separate authorization.

in the decision making process because they enable evaluation of the effects of a broad proposal or planning-level decision that includes 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 programmatic EIS 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. Typically, a programmatic EIS will be followed by subsequent project-level, or site-specific, environmental reviews. This stepwise approach to analysis 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 programmatic EIS, and analyzing a more precisely defined site-specific proposal related to the initial program, plan, or policy when that proposal is ready to be carried forward.

1.2.1 Next Steps in the Environmental Review Process

If Reclamation and Ecology receive authorization and funding to carry the Integrated Plan forward, the first steps in the process would be to undertake additional project definition, design, modeling, geotechnical review and other appropriate technical analyses for proposed projects. Once the projects and actions have received adequate definition and design, they would undergo project-level environmental review. The project-level review would include, as appropriate:

- Project-level NEPA and/or SEPA review, which could include a combination of EISs or supplemental EISs, environmental assessments, categorical exclusion checklists, and environmental checklists, depending on the lead agency and funding source;
- Reclamation's Planning Report feasibility analysis, including benefit-cost analysis and other environmental analyses;
- Cultural resource surveys and other cultural and Tribal consultations;
- Endangered Species Act compliance; and
- Completion of other Federal and State regulatory requirements and permitting.

The Federal lead agency for NEPA environmental reviews would likely be Reclamation potentially working with a cooperating agency, depending upon the nature of the project. Proposed designations of Wilderness, Wild and Scenic Rivers, or National Recreation Areas would likely undergo additional NEPA analysis as part of the Congressional designation process.

The State lead agency would likely be Ecology, potentially working in cooperation with a Federal agency. The project-level evaluations would include detailed analysis of impacts

and development of project-specific mitigation, including an assessment of the anticipated effectiveness of mitigation measures to avoid or attenuate impacts. Minor proposals and actions could be evaluated in a SEPA environmental checklist. Other proposals could receive combined NEPA/SEPA review such as done for the current EIS. Projects carried forward would comply with permit requirements as described in Section 1.10.

It is anticipated that the USFS may play an important role in several of the future environmental reviews where projects are located within or substantially affect the National Forest.

1.2.2 Framework for Implementation

In summer 2012, Reclamation and Ecology expect to release the Framework for Implementation on the Integrated Plan. The Framework will include information such as refined cost estimates, preliminary benefit-cost analysis following the *Principles and Guidelines*, and preliminary cost allocations. It will also include a preliminary schedule and plan for implementing the Integrated Plan. The Framework will be available on Reclamation's website for the Integrated Plan.

1.3 Purpose and Need for the Action

The current water resources infrastructure, programs and policies in the Yakima River basin have not been capable of consistently meeting aquatic resource demands for fish and wildlife habitat, dry-year irrigation demands, and municipal water supply demands.

Specific problems that the Integrated Plan is proposed to address include:

- Anadromous and resident fish populations are seriously depleted from historic levels and some species have been eliminated from the basin or listed as threatened on the Endangered Species Act (ESA) due to the following major factors:
    - Dams, dewatering, 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; and
    - Irrigation operations have altered streamflows, 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 for all life history stages and outmigration flows.
- Demand for irrigation water by existing users significantly exceeds supply in dry and drought years, leading to severe prorationing[2] for proratable, or junior, water

[2] Prorationing refers to the process of equally reducing the amount of water delivered to junior ("proratable") water right holders in water-deficient years based on Total Water Supply Available (TWSA).

rights holders. Economic impacts to existing users could be substantially reduced by improving water supplies to 70 percent of proratable water rights.

- A water supply of 70 percent of proratable water rights during a drought year would provide a minimally acceptable supply to prevent severe economic losses to farmers. This number was reached following extensive discussions with stakeholders regarding the lowest level of water supply that could be accommodated without catastrophic losses to crops, assuming aggressive water management techniques were employed. This 70 percent threshold is similar to the State of Washington's definition of a drought condition contained in RCW 43.83B.400, which recognizes a drought when water supply for a significant portion of a geographic area falls below 75 percent of normal and is likely to cause undue hardship for various water uses and users. Demand for existing and future municipal and domestic water supplies is difficult to meet because of the following factors:
    - Water rights in the basin are fully appropriated, making it difficult to acquire water rights to meet future municipal and domestic water demand; and
    - Pumping groundwater for irrigation and municipal uses has been shown to reduce surface water flows in some locations, which may affect existing water rights.
- Climate change projections indicate that there will be changes in runoff and streamflow patterns, which would increase the need for prorationing and reduce flows for fish. These changes include:
    - Decreased snowpack;
    - Decreased spring and summer runoff;
    - Increased crop and municipal water demand;
    - Increased frequency of drought conditions; and
    - Increased impacts to fish from decreased flows, increased air and water temperature, and changes in timing of streamflows affecting fish migration.

The previously-identified problems have created a need to restore ecological functions in the Yakima River system and to provide more reliable and sustainable water resources for the health of the riverine environment, and for agricultural, municipal, and domestic needs. These problems should be addressed in a way that anticipates increased water demands and changes in water supply related to climate change. In developing the Integrated Plan, Reclamation, Ecology and the YRBWEP Workgroup identified some specific needs regarding resident and anadromous fish, irrigation water supply, municipal and domestic water supply, and anticipated changes in water supply related to climate change.

The specific needs for the Yakima River basin include:

- Resident and anadromous fish:
    - Improved mainstem and tributary habitat, including habitat protection and enhancement, flow restoration, fish barrier removal, and screening diversions; and
    - Access to habitat above major reservoirs, including both upstream and downstream passage.
- Irrigation water supply:
    - Improved agricultural conservation , including reduction of seepage and evaporation from canals; and
    - Providing a water supply of 70 percent of proratable water rights during drought years, which was determined to be the threshold for minimally acceptable supply.
- Municipal and domestic water supply:
    - Improved water supply from both surface and groundwater to meet current and future municipal and domestic needs;
    - Improved conservation and more efficient use of the water supply; and
    - Improved mechanisms such as water marketing to help domestic users meet the "water budget neutral" requirement for new groundwater use.
- Climate change:
    - Increased flexibility in the water supply to adapt to changes, including increased crop demand, increased municipal and domestic demand, earlier runoff, and more frequent droughts; and
    - Improved streamflows and habitat conditions to help resident and anadromous fish withstand climate change.

The purposes of the Integrated Plan 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
- 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.

1.4 Integrated Plan Authority

Reclamation and Ecology share authority for developing the Integrated Plan and preparing this FPEIS. Federal authority is through the YRBWEP legislation and State

authority is through the Columbia River Water Supply legislation and State Capital Budget as discussed below.

1.4.1 Federal Authority

Congress authorized Reclamation to conduct a feasibility study to address the water resource needs of the Yakima River basin in the Act of December 28, 1979 (93 Stat. 1241, Public Law 96-162, Feasibility Study - Yakima River Basin Water Enhancement Project).

Other authorities relevant to the YRBWEP are:

- Hoover Power Plant Act of 1984, which authorizes Reclamation to install fish passage facilities on Reclamation dams; and
- Yakima River Basin Water Enhancement Project Act of 1994, described in Section 1.7.2.

1.4.2 1987 Master Interagency Agreement with the Forest Service

Reclamation and the USFS cooperatively manage lands in the Yakima Project under several agreements, but mainly the *1987 Master Interagency Agreement* (Master Agreement). This Federal agreement covers all U.S. public lands within the National Forest System and all Reclamation lands in the West.

The Master Agreement establishes procedures for planning, developing, operating, and maintaining Reclamation water programs within or affecting lands within the National Forest System, including facilitating coordination and cooperation with the Forest Service regarding areas of mutual interest and/or responsibility.

Project supplemental agreements were executed for each specific Yakima Project reservoir on Forest Service lands signed prior to the 1987 Master Agreement. These agreements subsequently required development or update. These local agreements identify what areas of land within the National Forest boundary will be under the primary jurisdiction of Reclamation. These are usually lands surrounding the perimeter of Reclamation's reservoirs. Where Reclamation has primary jurisdiction, it retains control for construction, operation, maintenance, and protection of the project as identified in the project supplemental agreement.

For those lands where Reclamation has primary jurisdiction, Reclamation would be the lead Federal agency and the USFS would be a cooperating agency. This lead agency or cooperating agency relationship would also likely apply to any subsequent project level NEPA on the proposed projects at Reclamation's Bumping Lake, Keechelus, Kachess, Rimrock, Clear Lake, and Cle Elum reservoirs being considered in the Integrated Plan. For affected lands outside of an existing Reclamation project area where the Forest Service has primary jurisdiction, the Forest Service and Reclamation would be a joint lead agencies in the planning process.

1.4.3 Washington State Authority

Authority for the State of Washington is provided by Chapter 90.90 RCW, the Columbia River Basin Water Supply legislation approved by the Washington State Legislature in 2006, which states:

> *(1) The legislature finds that a key priority of water resource management in the Columbia river basin is the development of new water supplies that includes storage and conservation in order to meet the economic and community development needs of people and the instream flow needs of fish.*
>
> *(2) The legislature therefore declares that a Columbia river basin water supply development program is needed, and directs the department of ecology to aggressively pursue the development of water supplies to benefit both instream and out-of-stream uses.*

In 90.90.010 RCW, the legislature created the Columbia River basin water supply development account in the state treasury. The account may be used to:

> *Assess, plan and develop new storage, improve or alter operations of existing storage facilities, implement conservation projects, or any other actions designed to provide access to new water supplies within the Columbia river basin for instream and out-of-stream uses.*

Additional authority for the State of Washington is contained in the 2011 to 2013 Capital Budget, *Yakima Basin Integrated Water Management Plan Implementation (30000278) C 49, L 11, E1, Sec 3033.* Under this provision, funding is provided to implement the Integrated Water Resource Management Plan identified as a result of the Yakima River Basin Study. Projects proposed for inclusion with this first phase address storage, including the Wymer Reservoir and Bumping Lake expansion projects, and fish passage at Cle Elum Dam.

1.5 Basis for an Integrated Approach

This section provides background information about the need to develop the Integrated Plan. It also briefly describes major ecological and water resource issues in the basin.

1.5.1 Basin Fisheries

The Yakima River historically supported large runs of anadromous salmonids, with estimated runs of 300,000 to 960,000 fish per year in the 1880s (Natural Resource Law Center, 1996). These numbers have declined drastically, and native populations of three salmon species have been extirpated (eliminated) from the basin – sockeye, summer Chinook, and coho. Steelhead and bull trout are listed as threatened under the Federal Endangered Species Act.

Pre-European settlement estimates of returning steelhead salmon alone (a subset of the total basin fish population) range from 20,800 to 100,000 (YBFWRB, 2009). Between

1981 and 1990, the average annual return of all anadromous salmonids to the Yakima River was only 8,000. For the period from 2001 to 2010, the following counts were recorded:

- Combined Chinook past Prosser Dam: 5,425 to 25,783[3];
- Coho: 818 to 9,091; and
- Steelhead: 1,537 to 6,793 (YKFP, 2011; Columbia River DART, 2011).

Native summer Chinook and coho salmon and sockeye were extirpated from the Yakima basin (reintroduction of coho began in the mid-1980s; sockeye reintroduction in Cle Elum Reservoir began in 2009; and summer Chinook reintroduction is currently being undertaken). The numbers of spring and fall Chinook and summer steelhead have been seriously reduced. In response to declining numbers, steelhead were listed as threatened under the ESA in 1999.

The causes for the declines and extirpations are many, including the following:

- In the 1900s, privately-constructed crib dams on the four natural glacial lakes (Cle Elum, Kachess, Keechelus, and Bumping) contributed to the extirpation of sockeye;
- Construction of Reclamation's five storage dams eliminated access to previously productive spawning and rearing habitat for sockeye, spring Chinook, coho, and steelhead salmon;
- Irrigation operations have altered streamflows, 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. This problem is worse during drought years;
- Land development, including road construction, diking, gravel mining, agriculture, railroad construction, and forest practices including splash damming and log rafting, has degraded riparian habitat and increased sediment in streams and rivers;
- Irrigation diversions have reduced flows and created fish passage barriers in tributary streams; and
- Conditions outside the Yakima River basin also affected Yakima River anadromous fish populations, including Columbia River dams and historic overfishing in the Columbia River and Pacific Ocean.

The adverse conditions for anadromous species described above also affect bull trout populations and habitat, and bull trout were listed as threatened in 1998. The historic abundance of bull trout in the basin is not well defined, but its historic distribution was likely broader with many distinct populations. The basin was recently designated as critical bull trout habitat, and there is a need to reinstitute year-round connectivity of bull

[3] Counts are past Prosser and do not represent a total count for fall Chinook, which would be higher.

trout habitat between lakes and reservoirs and mainstem rivers, including the Yakima River.

While still well below historic levels, anadromous fish populations have improved in recent years through a combination of fisheries management, habitat and facility improvements, hatchery supplementation, and reintroduction efforts. Habitat conditions are improving for steelhead. Reintroduction efforts by the Yakama Nation, beginning in the 1980s, used hatchery fish to reestablish naturally reproducing populations of coho salmon. The Yakama Nation and Washington Department of Fish and Wildlife (WDFW) have begun reintroduction of sockeye and summer Chinook salmon. While progress has been made, substantial additional effort is needed to improve habitat conditions and provide fish passage to provide for sustainable fisheries in the basin. Improvements needed include fish passage at major reservoirs, removal of passage barriers in tributaries, restoration of riparian and floodplain conditions, and improvements in streamflows and water quality.

1.5.2 Irrigation Water Supply

Approximately 450,000 acres are currently irrigated from the Yakima Project. This irrigation has enabled the production of high-value orchard crops, wine grapes, and hops in addition to grains, vegetables, and dairy products. Irrigation has created a strong agricultural economy in the basin which has been called "one of the most productive agricultural areas in the West" (Natural Resources Law Center, 1996).

The Yakima Project's surface water supply comes from the Yakima River and its tributaries, irrigation return flows, and releases of stored water from the five major reservoirs in the basin. (See Section 1.6 for additional information on the Yakima Project.) Only 30 percent of the average annual runoff can be stored in the storage system. The Yakima Project depends heavily on the timing of spring and summer runoff from snowmelt and rainfall. The spring and early summer runoff flows supply most river basin demands through June in an average year. The majority of spring and summer runoff is from snowmelt; as a result, the snowpack is often considered a "sixth reservoir." In most years, the five major reservoirs are operated to maximize storage in June, which typically coincides with the end of the major runoff. The reservoirs have a combined storage capacity of about 1.07 million acre-feet (maf).

Demand for water from the Yakima River cannot always be met in years with below-average runoff. Though all of the entitlement holders do not call on their full entitlement volume every year, the existing surface water supply does not presently meet all existing water needs in dry years. A dry year results in prorationing during the irrigation season. In addition, reduced summer and early fall streamflows may affect migrating, spawning, and rearing conditions for anadromous fish.

1.5.3 Municipal and Domestic Water Supply

Residential development and population have been increasing in the Yakima River basin in the last two decades. Resort and second-home developments have also increased, particularly in the areas around Cle Elum and Roslyn. Because surface water rights are

fully appropriated, at least seasonally, in the Yakima basin, acquiring year-round water rights for growing municipalities and for housing developments is difficult. Many of the housing developments rely on permit-exempt wells for domestic water supplies.

Groundwater and surface water in the Yakima River basin are interconnected. Groundwater pumping can diminish streamflows, affect nonproratable (senior) surface water rights, and reduce the amount of water available for maintaining legally required flows for fish. In 2007, water rights holders in Kittitas County petitioned Ecology to place a temporary moratorium on new groundwater wells. In response, Ecology issued a series of Emergency Rules to manage groundwater in Kittitas County. In December 2010, Ecology issued a Ground Water Rule (Chapter 173 -539A WAC) that withdraws from appropriation all groundwater in upper Kittitas County with the exception of uses for structures for which a building permit was granted and vested prior to July 16, 2009, and uses determined to be "water budget neutral." To assist homeowners and developers in acquiring water rights to meet the water budget neutral determination, Ecology has established the Kittitas Water Exchange to help water users sell or locate water available to buy.

Although the Ground Water Rule only affects Kittitas County, there is a potential for similar problems in other parts of the Yakima River basin. This creates a need for improving the water supply for municipal and domestic water users in the basin.

1.5.4 Effects of Climate Change

Climate change studies for the Yakima River basin include those conducted by the Climate Impacts Group (CIG) at the University of Washington, working with the U.S. Fish and Wildlife Service (Service) and other Federal agencies. For development of the Integrated Plan, climate change effects were modeled using the Yakima Project RiverWare model. Additional information on climate change in the basin can be found in Section 3.13 of this FPEIS.

Changes in runoff in the Yakima River basin caused by climate change are projected to be significant. Generally, the projected increased air temperatures would cause some precipitation to fall as rain instead of snow, which would increase winter and early spring runoff and reduce the volume of runoff from snowpack that occurs in the late spring and early summer. Additionally, projected higher air temperatures would cause runoff from snowpack to begin earlier, shifting the peak runoff period earlier in the season. Spring and summer runoff is projected to decrease (ranging from 12 to 71 percent of existing runoff) and fall and winter runoff is projected to increase (ranging from an increase of 4 to 74 percent of existing runoff). Fall and winter inflow to reservoirs would increase, and the reservoir system may not be able to capture and hold the increased flow for release during the high-demand period (spring and summer). Additionally, a decrease in spring and summer supply would cause water stored in reservoirs to be depleted at a faster rate to meet demand. The combined effects would likely cause a decrease in overall supply during the high-demand period.

Climate change is expected to result in a decline in the quantity of freshwater habitat for salmonid populations across Washington State (Mantua et al., 2010). The Yakima River basin is a transient watershed, one that is dominated by a mix of direct runoff from fall rain and spring snowmelt. Simulations predict that this type of watershed would be most affected by climate change, with accompanying impacts to fisheries. Specific impacts to fish are expected to include:

- Increased air temperature would increase water temperature, negatively impacting fish habitat;
- Elevated stream temperatures would increase thermal barriers to migration;
- Increased winter flood frequency and intensity would cause a negative effect on juvenile coho, Chinook, and steelhead survival and reduction of survival rates for incubating eggs and rearing parr;
- Reduced spring snowmelt and summer and fall streamflows would impact summer-run steelhead, sockeye, and summer Chinook migrations; and
- Diminished flows in combination with increased water temperatures would increase pre-spawn mortality for summer-run and stream-type salmonids.

1.6 Yakima River Basin Background and History

1.6.1 Location and Setting

The Yakima River basin is located in south-central Washington, bounded on the west by the Cascade Range, on the north by the Wenatchee Mountains, on the east by the Columbia River drainage, and on the south by the Horse Heaven Hills. The Yakima River originates in the Cascade Mountains near Snoqualmie Pass and flows southeasterly for about 215 miles to its confluence with the Columbia River near Richland, Washington. The Yakima River basin encompasses about 6,155 square miles and includes portions of Benton, Kittitas, Klickitat, and Yakima Counties (Figure 1-1).[4]

The basin varies considerably from the typically moist higher mountain altitudes (elevation 8,184 feet in the Cascades) to the semiarid lower Yakima Valley (elevation 340 feet at the Yakima River confluence with the Columbia River). The western and northern mountains receive about 140 inches of precipitation annually. The lower valley often receives less than 10 inches of precipitation per year, meaning that irrigation is required to grow crops. The higher elevation, western and northern areas are mostly forested and used for timber harvest, cattle grazing, fish and wildlife habitat, and recreation. About one-fourth of this area is designated as Wilderness. The middle elevations are primarily used for dry-land and irrigated agriculture, cattle grazing, wildlife habitat, and military training. The lower elevations in the eastern and southern

[4] The Yakama Nation disagrees with the depiction of the southwest boundary of the Yakama Nation Reservation.

portions of the basin are primarily used for irrigated agriculture. Agriculture is the main economy of the basin.

Major crops in the Yakima basin, listed in descending order by irrigated water demand, include: apples, alfalfa hay, pasture, hops, mint, tree crops other than apples, hay, grapes (both wine and table). In addition, vegetables such as green beans, peas, and corn are grown in the lower valley.

Land use in the Yakima River basin is diverse, ranging from designated Wilderness to intensive agriculture to areas of urban development. Private ownership totals 36 percent of the basin or over 1.4 million acres. However, the single largest landowner is the Federal Government. Most of the Federal land is within the Okanogan-Wenatchee National Forest in the upper portion of the basin, on the eastern slopes of the North Cascade Range. The National Forest is managed for multiple uses, including water, wildlife, recreation, and commercial timber production. The USFS holds 24 percent of the basin (over 900,000 acres). Other large Federal land holdings include the U.S. Army Yakima Training Center (YTC) (6 percent, or over 200,000 acres), the Bureau of Land Management (1 percent or over 45,000 acres), and US Fish and Wildlife Service (2 percent, or over 80,000 acres). Other public ownership (State, county, and local governments) totals over 400,000 acres. The Yakama Nation encompasses 23 percent (890,000 acres) of the basin. Figure 1-2 shows a map of land holdings and Figure 1-3 shows the ownership percent distribution within the basin.

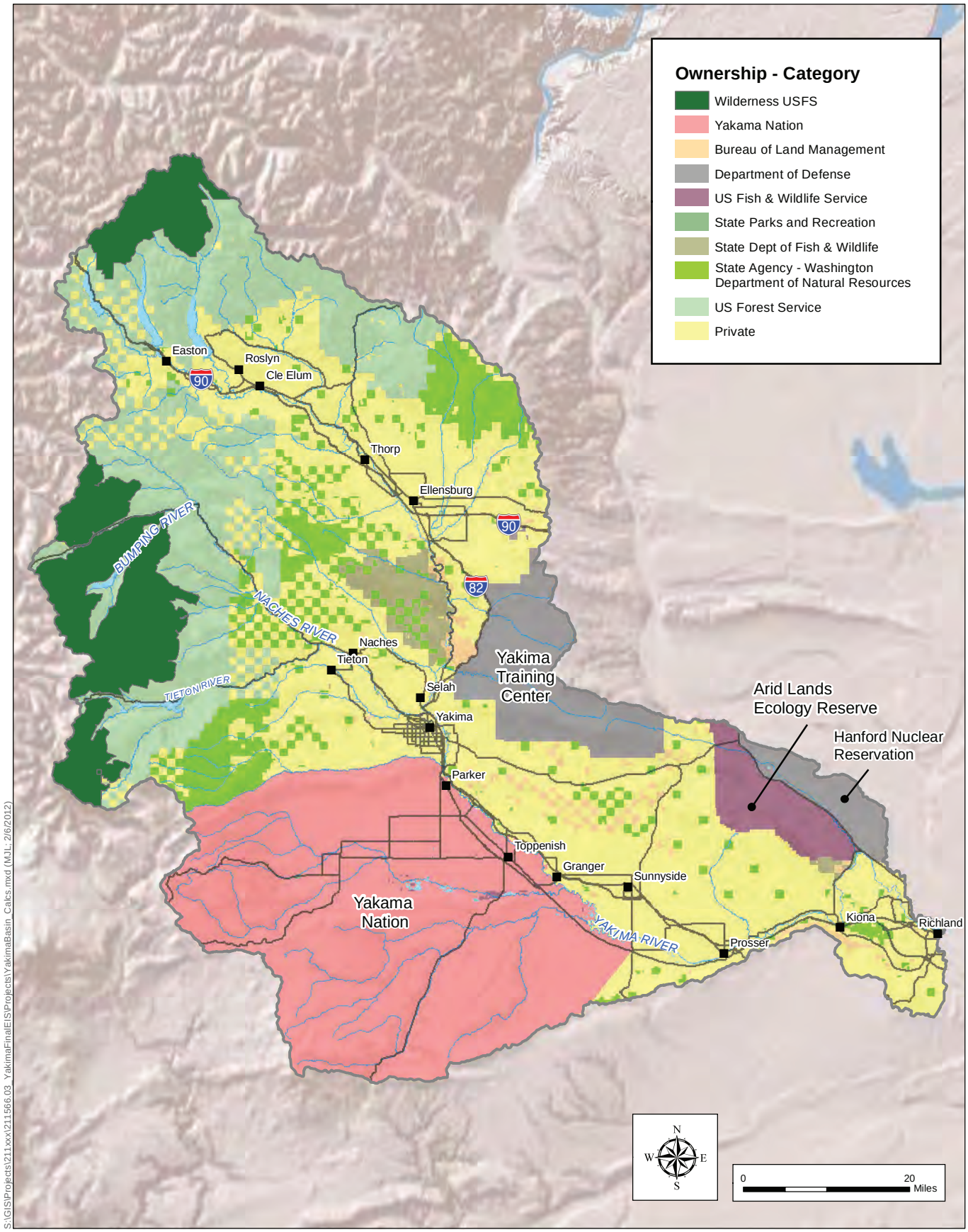


Figure 1-2. Land Holdings in the Yakima River Basin

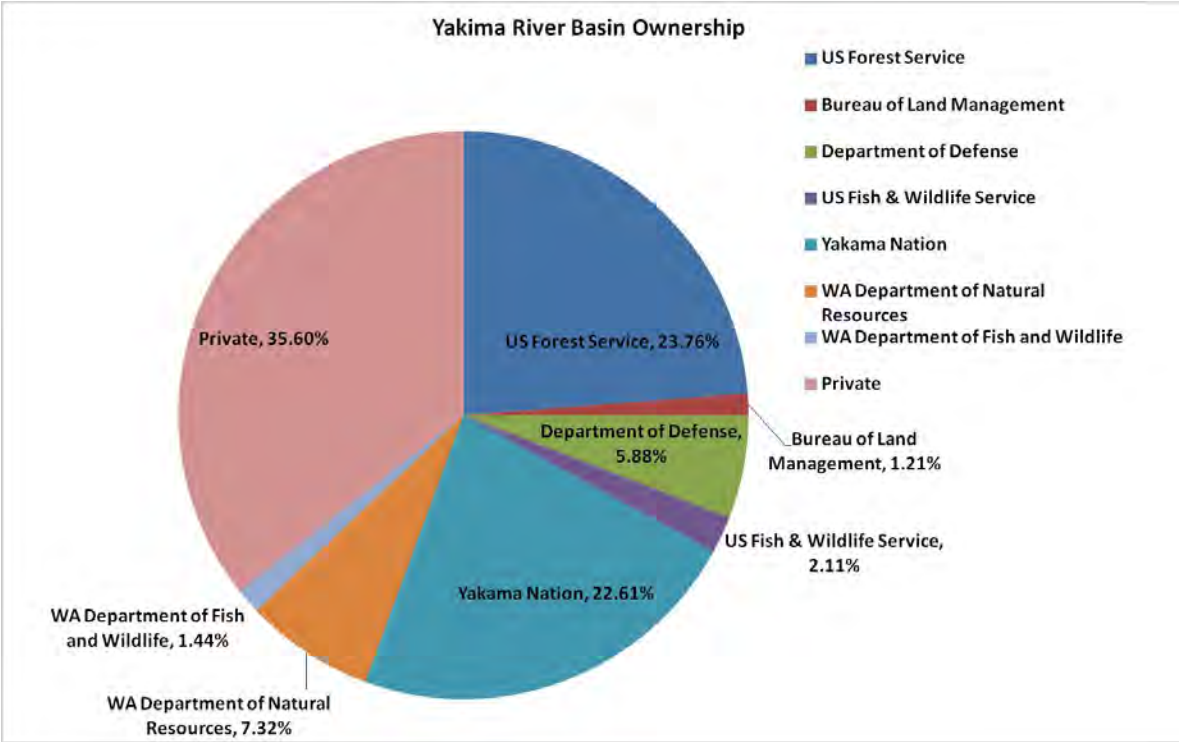


Figure 1-3 Land ownership and percent distribution within the project area[5]

The Yakima River and its tributaries are the primary sources for surface water in the basin. Major tributaries include the Kachess, Cle Elum, Teanaway, and Naches Rivers. The Naches River, which joins the Yakima River at the city of Yakima, has several tributaries, including the American, Bumping, and Tieton Rivers.

1.6.2 Yakima Project

The Yakima Project was authorized in 1905, directing the Bureau of Reclamation to develop irrigation facilities in the Yakima basin. The Yakima Project is composed of seven divisions: six irrigation divisions (Kittitas, Roza, Tieton, Wapato, Sunnyside, and Kennewick) (Figure 1-4), and a storage division. The six irrigation divisions provide water to about 450,000 irrigated acres of the Yakima Project and represent about 70 percent of the total diversions of major entities in the Yakima River basin. The remaining 30 percent are made up of other irrigation entities which are mainly nonproratable water right holders. The storage division is composed of the five major reservoirs with a total capacity of about 1,065,400 acre-feet. Another reservoir, Clear Lake, is located above Rimrock Reservoir and has a capacity of 5,300 acre-feet, and is used primarily for recreational purposes.

The five major reservoirs—Bumping, Kachess, Keechelus, Rimrock (Tieton Dam), and Cle Elum Lakes—store and release water to meet irrigation demands, flood control

[5] Amount of land owned by Reclamation is too small to be shown.

needs, and instream flow requirements. Other project features include 5 diversion dams, 420 miles of canals, 1,697 miles of laterals, 30 pumping plants, 144 miles of drains, 2 Federally owned powerplants, plus fish passage and protection facilities constructed throughout the project (Reclamation, 2002).

The Kittitas, Roza, Tieton, and Kennewick Divisions each contain a single irrigation district that is responsible for the operation and maintenance of the facilities within its division. The Wapato Division is located within the exterior boundary of the Yakama Nation Reservation and is operated by the Bureau of Indian Affairs (BIA) in consultation with the Yakama Nation and the Wapato Irrigation Project. The Sunnyside Division contains four irrigation districts in addition to two ditch companies and three cities. The Sunnyside Division Board of Control has responsibility for operating and maintaining the joint facilities of the Sunnyside Division (primarily the Sunnyside Main Canal), with Sunnyside Valley Irrigation District operating these facilities on behalf of the Board of Control.

Reclamation operates the six dams and reservoirs of the Storage Division as well as the Roza Powerplant (part of the Roza Division) and the Chandler Pumping and Generating Plant (part of the Kennewick Division). The five major reservoirs are operated as a pooled system with no reservoir or storage space designated for a specific area, division, or entity. Stored water that is not used is carried over to the next year for the potential benefit of water users.

Table 1-1 provides information on the six irrigation divisions and the physical sources of the stored water supply.

Table 1-1 Yakima Project Irrigation Divisions and Stored Water Sources

Division	Location (subarea)	Diversion river mile	Stored water source	Operating entity
Kittitas	Upper Yakima	Yakima River RM 202.5	Keechelus and Kachess Reservoirs	Kittitas Reclamation District
Roza	Middle Yakima	Yakima River RM 127.9	Keechelus, Kachess, and Cle Elum Reservoirs	Roza Irrigation District
Tieton	Naches	Naches River RM 14.2	Rimrock Reservoir	Yakima-Tieton Irrigation District
Wapato	Middle Yakima	Yakima River RM 106.7	All reservoirs	BIA and Wapato Irrigation Project
Sunnyside	Middle Yakima	Yakima River RM 103.8	All reservoirs	Sunnyside Division Board of Control
Kennewick	Lower Yakima	Yakima River RM 47.1	Unregulated and return flows	Kennewick Irrigation District

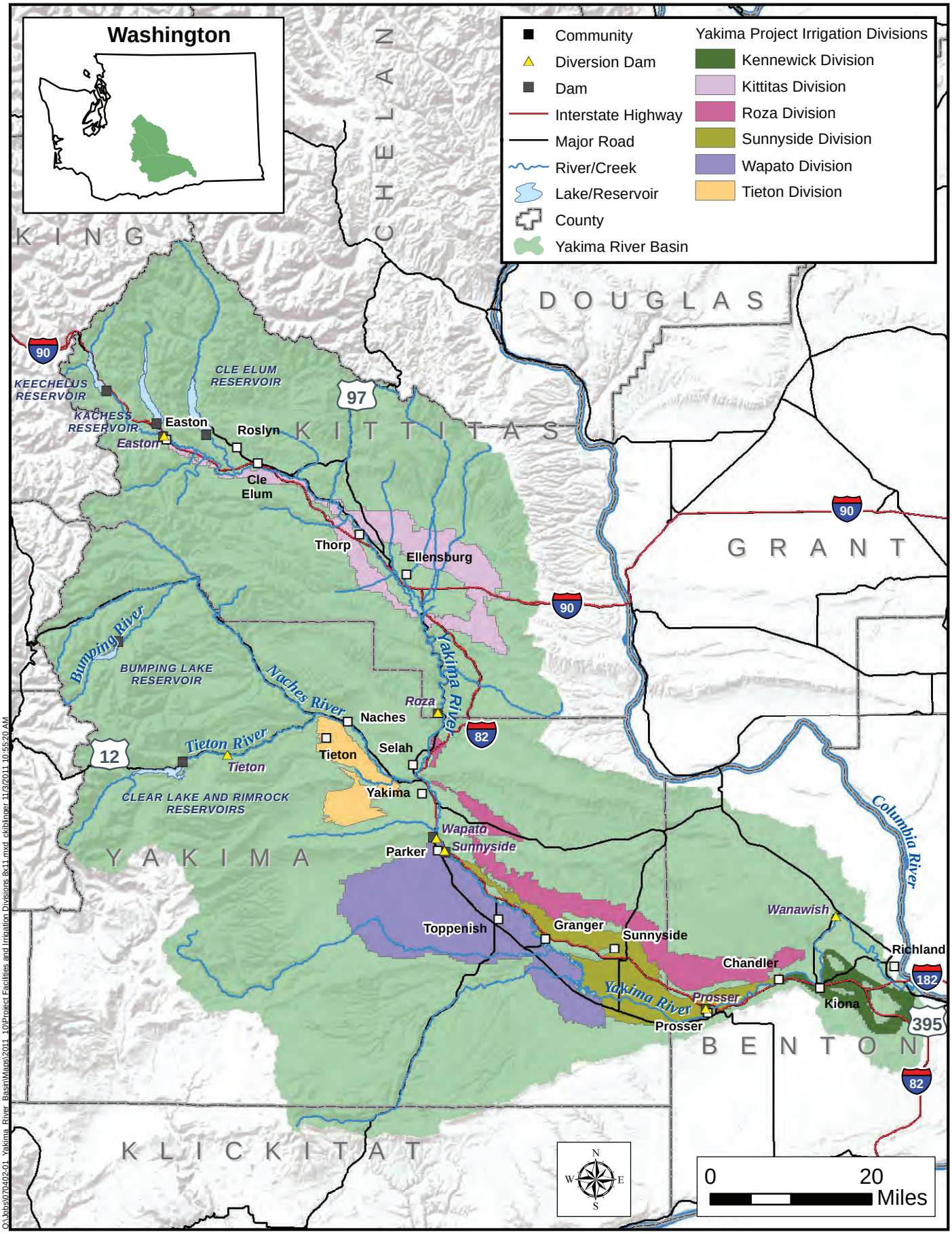


Figure 1-4. Yakima Project Irrigation Divisions

1.6.3 History of Water Management in the Yakima River Basin

Development of irrigation in the Yakima River basin began as early as the 1850s. By 1902, an estimated 122,000 irrigated acres were served by natural flows in the rivers and tributaries. However, even at that time, the natural flow was inadequate to assure a dependable water supply. A petition dated January 28, 1903, from citizens of Yakima County to the Secretary of the U.S. Department of the Interior, requested United States involvement in irrigation. Further irrigation development was not possible unless two things occurred: (1) existing water users had to agree to limit their water use during the low-flow periods of late summer and early fall; and (2) water storage was necessary to capture early season runoff for supplying irrigation water throughout the growing season.

The limitation on water use was accomplished by "limiting agreements" with more than 50 appropriators on the Yakima and Naches Rivers.[6] The development of storage was made possible by the Washington Legislature in March 4, 1905, by granting to the United States the right to exercise eminent domain in acquiring lands, water, and property for reservoirs and other irrigation works. Under this law, a withdrawal of the unappropriated waters of the Yakima River and its principal tributaries was filed by the United States on May 10, 1905. These actions led to the authorization of the Yakima Project on December 12, 1905.

1.6.4 Related Legal Decisions

A number of legal decisions affect how water is allocated in the Yakima River basin. The major decisions include the following.

1.6.4.1 Statutory Constraints on the Water Supply

Reclamation operates the Yakima Project to achieve specific purposes: irrigation water supply; flood control; power generation; and instream flows for fish, wildlife, and recreation. Irrigation operations and flood control management have been historical priorities for reservoir operations. The Yakima Project's authorization and water rights, issued under Washington State water law, and the *1945 Consent Decree* (Section 1.6.4.4) are statutory constraints for water resources. Reclamation must operate the Yakima Project divisions and storage facilities in a manner that avoids injury to water users within this framework.

Project operators use a number of control points to monitor the river system. The primary control point for operation of the upper Yakima Project is the Yakima River near the Parker stream gage. Legislation in 1994 provided that an additional purpose of the Yakima Project shall be for fish, wildlife, and recreation, but that this additional purpose "shall not impair the operation of the Yakima Project to provide water for irrigation purposes nor impact existing contracts." Since April 1995, the Yakima Project has been

[6] Not all appropriators signed "limiting agreements," and some appropriators' water claims were modified as "heretofore recognized rights."

operated as required by the 1994 legislation to maintain target streamflows downstream from Sunnyside Diversion Dam, as measured at the Yakima River near the Parker stream gage. These flows, based on the estimated water available, range from 300 to 600 cubic feet per second (cfs) between April 1 and October 31.

Reclamation's *Yakima River Basin Water Enhancement Project, Washington, Final Programmatic Environmental Impact Statement* (Reclamation, 1999) presents a more complete description of statutory constraints for managing water resources in the Yakima Project.

1.6.4.2 Tribal Water Rights

Tribal water rights are primarily based on the *Winters* Doctrine (*Winters v. United States,* 207 U.S. 564 (1908)). The two main principles of this doctrine are that: (1) when the United States creates reservations, it implicitly includes a reservation of water in an amount necessary to fulfill the purposes of the reservation; and (2) the priority date of the water right is the date the reservation was created. Courts have generally held that Tribal reservations created in the nineteenth century were primarily intended to give the Tribes an agricultural base. Creation of a Tribal reservation may also imply the use of water for long-established aboriginal uses such as fishing and hunting. The priority date for water for such aboriginal uses is time immemorial.

Federal Tribal reserved water rights are not subject to relinquishment or abandonment for nonuse. The reserved rights are for potential future use as well as historic use. The future water right for agriculture is defined by the practicably irrigable acres (PIA) standard—those areas susceptible to sustained irrigation at a reasonable cost. The number of acres included within PIA is the number currently under irrigation plus those susceptible to irrigation but not yet developed.

The Yakama Nation's Treaty water rights have a priority date of 1855 when the reservation was established. The Yakama Nation also has instream flow rights with a priority date of time immemorial. These rights are senior to all water rights referenced in the *1945 Consent Decree* and limited in *Ecology v. Acquavella* (1996). The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) may also have instream flow rights in the Yakima River.

1.6.4.3 May 10, 1905, Withdrawal

Using the provisions of Chapter 90.40 RCW, the Secretary of the Interior withdrew all the unappropriated waters of the Yakima River and tributaries for benefit of the proposed Yakima Reclamation Project. The withdrawal was effective from its May 10, 1905, initiation to its December 31, 1951, expiration. In that span of 45 years, water rights were established under Washington law for the developed project facilities.

1.6.4.4 1945 Consent Decree

Disputes over water use from the Yakima River during years of low runoff resulted in litigation in the Federal court. In 1945, the District Court of Eastern Washington issued a

decree under Civil Action No. 21 called the *1945 Consent Decree*. The *1945 Consent Decree* is a legal document pertaining to water distribution and water rights in the basin. It established the rules under which Reclamation should operate the Yakima Project system to meet the water needs of the irrigation districts that predated the Yakima Project, as well as the rights of divisions formed in association with the Yakima Project.

The *1945 Consent Decree* determined water delivery entitlements for all major irrigation systems in the Yakima River basin, except for lower reaches of the Yakima River near the confluence with the Columbia River. The *1945 Consent Decree* states the quantities of water to which all water users are entitled (maximum monthly and annual diversion limits) and defines a method of prioritization to be placed in effect during water-deficient years. The water entitlements are divided into two classes—nonproratable and proratable. Nonproratable entitlements are generally held by preproject water users, and these entitlements are to be served first from the total water supply available (TWSA). The *1945 Consent Decree* also spelled out the concept of TWSA, which is defined as: "That amount of water available in any year from natural flow of the Yakima River, and its tributaries, from storage in the various Government reservoirs on the Yakima River watershed and from other sources, to supply the contract obligations of the United States to the Yakima River and its tributaries, heretofore recognized by the United States." The TWSA estimate has an important role in determining operations of the Yakima Project and is estimated using forecasted runoff, forecasted return flows, and storage contents.

All other Yakima Project water rights are proratable, which means they are of equal priority. Any shortages that may occur are shared equally by the proratable water users.

The Federal projects within the basin were constructed to manage water supplies to serve the proratable water users in the basin. The contractors for this water supply repay the Yakima Project storage construction costs and the annual operation and maintenance costs allocated to the irrigation purpose. However, nonproratable entitlements are met first from the TWSA, which includes stored water.

1.6.4.5 Quackenbush Decision

In 1980, spring Chinook spawned in the upper portions of the Yakima River between the mouth of the Cle Elum River and the mouth of the Teanaway River during the period that reservoir releases were being made to meet downstream irrigation demands. When the irrigation season drew to a close and reservoir releases were being curtailed, about 60 redds (fish nests), a portion of which were dewatered by the reduced releases, were identified in the Yakima River reach between the mouth of the Cle Elum River and the mouth of the Teanaway River. In October 1980, Judge Justin Quackenbush of the Federal District Court directed Reclamation, acting through the Yakima Field Office Manager, to release water from Yakima Project reservoirs to keep the redds covered with water. In November 1980, the Court directed the Water Master to work with fishery biologists and report back prior to the 1981 irrigation season:

> *. . . on means by which the needs of the Yakima Project water users can be met through more efficient or less extensive use of Project waters or by modification of Project operations or facilities so as to have less impact*

> *on the fisheries resource, including the possibility of management of the various Project reservoirs and releases of water so as to provide for appropriate water flows during the spawning and hatching periods that may be practicable while at the same time providing water for irrigation purposes for users within the Project.*

As a result, the "flip-flop" operation was conceived and initiated in 1981, and has since been a part of the Yakima Project operation. Flip-flop refers to seasonal in reservoir operations in which the upper Yakima River reservoirs are used to meet demands below the confluence of the Yakima and Naches Rivers through the first week of September while water is retained in the Naches River reservoirs. After the first week of September, the operations flip and water needs downstream of the confluence are met from the Naches River reservoirs and flows from the upper Yakima River reservoirs are reduced. This operation reduces flows in the upper Yakima River at the time that fish spawn, forcing the fish to build redds at a lower elevation in the stream channel. As a result, less water is needed to be released during the winter to keep the redds under water and maintain the fish eggs.

The System Operations Advisory Group (SOAC) was formed in 1981, in response to the Quackenbush decision. SOAC is an advisory board to Reclamation consisting of fishery biologists representing the U.S. Fish and Wildlife Service (Service), the Yakama Nation, the WDFW, and irrigation entities represented by the Yakima Basin Joint Board (YBJB). The group's first product was the development of the flip-flop concept, in conjunction with Reclamation. SOAC provides information, advice, and assistance to Reclamation on fish-related issues associated with the operations of the Yakima Project.

1.6.4.6 Water Right Adjudication

The *1945 Consent Decree* controlled distribution of Yakima Project water in the Yakima River basin between 1945 and 1977. In the spring of 1977, with a drought imminent, Reclamation predicted the proratable water users would receive only 15 percent of their normal water supply. Some proratable water users brought action in the U.S. District Court for the Eastern District of Washington to modify the *1945 Consent Decree* and make all water right holders proratable. The Yakama Nation sought to intervene and also filed a separate action in U.S. District Court to have its treaty-reserved water rights determined. In light of this dilemma, United States District Judge Marshall Neill suggested a State court general adjudication to finally determine water rights in the Yakima River basin.

On October 12, 1977, Ecology filed an adjudication of the Yakima River system in the Superior Court of Yakima County naming the United States and all persons claiming the right to use the surface waters of the Yakima River system as defendants. The purpose of this adjudication was to determine all existing surface water rights within the basin, and to correlate each right in terms of priority with all other rights. The adjudication is still in progress.

1.6.4.7 February 17, 1981 Withdrawal

In a February 13, 1981, letter to Ecology, referenced *Withdrawal of Waters for Yakima River Basin Water Enhancement Study*, Reclamation filed notice that it ". . . intends to make examinations and surveys for the utilization of the unappropriated waters of the Yakima River and its tributaries for multipurpose use under the Federal Reclamation laws."

Reclamation certified on January 16, 1982, that the project was feasible and that investigations would be made in detail. Pursuant to RCW 90.40.030, this certification of feasibility continued the withdrawal until January 18, 1985. Reclamation has continuously renewed this withdrawal, and it remains active.

The current withdrawal of Yakima River basin unappropriated surface water is for benefit of YRBWEP.

1.7 Prior Investigations and Activities in the Yakima Basin

This section highlights the more recent investigations and activities to develop additional water supplies in the Yakima River basin, beginning with the 1976 *Bumping Lake Enlargement—Joint Feasibility Report* (Reclamation and Service, 1976).

1.7.1 Bumping Lake Enlargement

The *Bumping Lake Enlargement Joint Feasibility Report* was prepared in 1976 by Reclamation and the Service. The purpose of this feasibility study, authorized by the Act of September 7, 1966 (Public Law 89–56), and the Fish and Wildlife Coordination Act (FWCA), was to address the water-related problems and needs of the Yakima River basin. A preliminary feasibility report was completed in March 1968 on construction of a new dam about 1 mile downstream from the existing Bumping Lake Dam on the Bumping River, a tributary in the Naches River drainage.[7] The report was forwarded to the Secretary of the Interior for consideration. During this process, the compatibility of recreation development with the Cougar Mountain (William O. Douglas) Wilderness then under consideration became a concern. It was determined that the recommended plan should be reevaluated and modified.

Following appropriations for the reevaluation work in 1974, the revised feasibility report was resubmitted to the Commissioner of Reclamation and the Director, U.S. Fish and Wildlife Service, in 1976. It was approved by the Secretary of the Interior in 1979. Reclamation filed a Final Environmental Impact Statement for the proposed Bumping Lake Enlargement with the Council on Environmental Quality on August 23, 1979 (Reclamation, 1979). Bills were introduced in Congress in 1979, 1981, and 1985 to

[7] The proposed capacity of the enlarged Bumping Lake was about 458,000 acre-feet, including the existing 33,700 acre-feet of the existing reservoir, which would be inundated.

authorize construction of the Bumping Lake enlargement, but Congress did not take action.

1.7.2 Yakima River Basin Water Enhancement Project

The 1977 drought in the Yakima River basin prompted legislative action for additional water supply. In 1979, the Washington Legislature provided $500,000 for ". . . preparation of feasibility studies related to a comprehensive water supply project designed to alleviate water shortage in the Yakima River basin." Also in 1979, Congress authorized, provided funds for, and directed the U.S. Department of the Interior to ". . . conduct a feasibility study of the Yakima River Basin Water Enhancement Project in cooperation with the State" (Act of December 28, 1979, Public Law 96–162).

Under the YRBWEP legislation, some 35 potential storage sites have been evaluated since the 1980s. Two sites, Bumping Lake enlargement[8] and Wymer dam and reservoir[9], emerged as the preferable storage sites. The enlarged Bumping Lake Reservoir had previously been studied at the feasibility level. Wymer reservoir was brought to a feasibility level of evaluation in 1985.

As planning was underway for YRBWEP, some early implementation actions were identified. These actions resulted in a cooperative Federal, State, Tribal, and local undertaking to construct "state-of-the-art" fish ladders and fish screens at water diversion points throughout the Yakima River basin. This is commonly referred to as Phase I of the YRBWEP and was initiated in the early 1980s. Fish ladders and fish screens have been completed at diversions on the Yakima and Naches Rivers and at tributary diversions.

In 1987 and 1988, considerable effort was made by the Washington congressional delegation to structure a comprehensive solution to the water needs of the Yakima River basin in lieu of continuing with the adjudication. The impetus for this effort was the desire to reach a mutual water right settlement by means of Federal-State comprehensive legislation providing for further development of water resource facilities and stipulating the Yakima River basin's surface water rights among the parties. However, in the fall of 1988, this effort was abandoned with the decision of some of the off-reservation irrigators to pursue the adjudication process rather than a stipulated settlement.

Subsequently, in the early 1990s, there was renewed interest in continuing the YRBWEP study process. As a result, Title XII of the Yakima River Basin Watershed Enhancement Project Act of October 31, 1994, Public Law 103–434 (commonly referred to as Phase II of the YRBWEP), was enacted. This legislation authorized implementation and study of

[8] Bumping Lake Reservoir enlargement capacities considered were 250,000, 400,000, and 458,000 acre-feet (including the existing 33,700-acre-foot capacity).

[9] The Wymer Dam and Reservoir Alternative is an off-channel site adjacent to the Yakima River, about 6 miles upstream of Roza Diversion Dam. The Wymer Reservoir capacity was about 142,000 acre-feet.

primarily nonstorage components for YRBWEP. The study and implementation results were to be the basis for future YRBWEP Phase III legislation which was expected to include elements such as construction of water storage features that would be needed for a complete YRBWEP plan to meet habitat, agricultural, municipal, and industrial needs of the basin. The actions that evolved from Title XII are discussed below.

1.7.2.1 Yakima River Basin Water Conservation Program

The Yakima River Basin Water Conservation Program (the centerpiece of the Title XII legislation) is a voluntary program structured to provide economic incentives with cooperative Federal, State, and local funding to stimulate the identification and implementation of structural and nonstructural agricultural water conservation measures in the Yakima River basin. Improvements in the efficiency of water delivery and use will result in improved, reach-specific streamflows for aquatic resources and improve the reliability of water supplies for irrigation.

The *Basin Conservation Plan*, prepared by the Yakima River Basin Conservation Advisory Group (1998)[10], was submitted to the Secretary of the Interior in 1998 and published and distributed in October 1999. The *Basin Conservation Plan* sets forth the mechanism for implementing water conservation measures, including eligibility requirements for Federal- and State-sponsored grants, standards for the scope and content of water conservation plans, criteria for evaluating and prioritizing conservation measures for implementation, and administrative procedures. Since the *Basin Conservation Plan* was completed, conservation measures have led to an annual diversion reduction. In 2011 the diversion reduction from YRBWEP Conservation actions was 21,116 acre-feet, which increased flows by 59 cfs.

1.7.2.2 Yakima River Basin Water Enhancement Project, Washington, Final Programmatic Environmental Impact Statement

In January 1999, Reclamation prepared the *Yakima River Basin Water Enhancement Project, Washington, Final Programmatic Environmental Impact Statement* (Reclamation, 1999). A Record of Decision was signed in 1999. As specific actions authorized by Title XII are pursued, NEPA compliance was and will continue to be developed as appropriate and to a great extent will be "tiered" from the 1999 EIS.

1.7.2.3 Report on Biologically Based Flows

As described above the SOAC consists of Yakima River basin biologists representing Federal, State, Tribal, and irrigation agencies and entities. The SOAC provides information, advice, and assistance to Reclamation on aquatic-related issues concerning operation of the Yakima Project. Pursuant to Title XII, SOAC was directed to assess the

[10] Chartered under the Federal Advisory Committee Act and appointed by the Secretary of the Interior.

target flows included therein "for the purpose of making a report with recommendations to the Secretary and the Congress evaluating what is necessary to have biologically based flows." This report was provided to the Secretary of the Interior in May 1999 (System Operation Advisory Committee, 1999).

The purpose of the SOAC report was to review the factors affecting anadromous fish resources in the Yakima River basin and to recommend processes and procedures required to determine biologically based flows for increasing the abundance of salmon and steelhead. The SOAC suggested that river management should embrace the concept of a normative flow regime and that effects of flow management could be evaluated with such indicators as anadromous fish early life stage survival, smolt production, and habitat quality indices.[11] The SOAC provided nine recommendations as a part of a comprehensive program designed to recover the aquatic ecosystem and the anadromous salmonid populations that depend on it.

1.7.2.4 The Reaches Project: Ecological and Geomorphic Studies Supporting Normative Flows in the Yakima River Basin

The SOAC report recommended a comprehensive review and synthesis of available data on Yakima River flow management, water quality, habitat condition, land use activities, and biological communities. The purpose was to identify areas in the watershed where changes in water management or Yakima Project operations offer the greatest potential to recover the aquatic ecosystem. This activity was led by Jack Stanford of the University of Montana's Flathead Lake Biological Station in conjunction with Reclamation and the Yakama Nation. Results are documented in *The Reaches Project: Ecological and Geomorphic Studies Supporting Normative Flows in the Yakima River Basin, Washington* (Stanford et al., 2002).

The report studied the five major floodplain reaches of the Yakima River basin system: the Cle Elum Reach, the Kittitas Reach, the Union Gap Reach, the Wapato Reach, and the Naches Reach. The report concludes that the distribution and concentration of algae, macro-invertebrates, and fish on the five reaches clearly demonstrate the importance of off-channel habitat and indicates these floodplains have significant potential for restoration. It also suggests the Yakima River system could be restored to a normative condition and that the floodplain reaches retain some ecological integrity but are substantially degraded. Because of this degradation, these reaches cannot sustain enhanced runs of salmon and steelhead without restoration of more normative flows throughout the mainstem Yakima and Naches Rivers.

[11] The SOAC defined a normative flow regime as one that represents historic flow conditions to the greatest extent possible given the cultural, legal, and operational constraints associated with river basin development.

1.7.2.5 Interim Comprehensive Basin Operating Plan for the Yakima Project

The *Interim Comprehensive Basin Operating Plan for the Yakima Project* (*IOP*) was completed by Reclamation in 2002. The preparation of the IOP was mandated by Title XII to provide a general framework within which the Yakima Project is operated. The IOP presents a historical context of the Yakima Project and its current operation. It describes the Yakima Project's legal and institutional aspects, articulates the impacts of Yakima Project operation on the natural resources of the basin, analyzes various operational alternatives, and recommends strategies and operational changes to address the goals of Title XII.

1.7.3 Yakima River Watershed Council

The Yakima River Watershed Council (Watershed Council) was formed in March 1994 as a nonprofit organization. Its membership included more than 800 individuals representing water-based interests in the Yakima River basin. A primary objective of the Watershed Council was to develop strategies and a plan to provide consistent and adequate water to meet the economic, cultural, and natural environmental needs in the Yakima River basin.

The first activity of the Watershed Council toward developing a plan was to issue a report in July 1996, called the *State of the Water Resources of the Yakima River Basin.* This was an assessment of problems and needs from the perspective of water supply, water quality, and water management.

Following development of planning goals, the Watershed Council prepared the draft plan, *A 20/20 Vision for a Viable Future of the Water Resource of the Yakima River Basin* (1997). A review and comment period followed, and the council issued a revised plan dated June 9, 1998. This included a critique of the storage sites considered in the YRBWEP investigations.

During this same timeframe, the Tri-County Water Resources Agency was formed (1995), and the Washington Legislature enacted the State of Washington Watershed Management Act (1997). Subsequently, the Tri-County Water Resources Agency received a Washington State planning grant for Yakima River basin watershed planning. Due to these actions, the Yakima River Watershed Council terminated its activities in July 1998 and did not finalize the draft report.

1.7.4 Watershed Assessment and Watershed Management Plan, Yakima River Basin

The Yakima River Basin Watershed Planning Unit was formed in 1998 to develop a comprehensive watershed management plan for the Yakima River basin. The Yakima River Basin Watershed Planning Unit represented local governments, citizens and landowners, irrigation districts, conservation districts, State agencies, and others. With the assistance of the Tri-County Water Resources Agency (currently known as the Yakima Basin Water Resources Agency), a *Watershed Assessment, Yakima River Basin*

(Yakima River Basin Watershed Planning Unit and Tri-County Water Resources Agency, 2001) and *Watershed Management Plan, Yakima River Basin* (Yakima River Basin Watershed Planning Unit and Tri-County Water Resources Agency, 2003) were completed. The *Watershed Management Plan, Yakima River Basin* covers the entire Yakima River basin with the exception of the Yakama Nation Reservation. The Yakama Nation and other entities discontinued participation in developing the Watershed Management Plan.

The *Watershed Management Plan, Yakima River Basin* provides a "road map" for maintaining and improving the Yakima River basin's economic base, planning responsibility for expected growth in population, managing water resources for the long-term, and protecting the basin's natural resources and fish runs. Seven goals for a balanced management of water resources were addressed. The following four goals are directly related to the management of surface water:

- Improve the reliability of surface water supply for irrigation use;
- Provide for growth in municipal, rural, domestic, and industrial demand;
- Improve instream flows for all uses with emphasis on improving fish habitat; and
- Maintain economic prosperity by providing an adequate water supply for all uses.

The Plan included evaluations of water resource needs and supplies. Alternatives for improving water supplies for aquatic resources and future municipal needs and to meet dry-year irrigation deficiencies were identified and evaluated.

1.7.5 Yakima Subbasin Plan

The Yakima Subbasin Fish and Wildlife Planning Board (renamed the Yakima Basin Fish and Wildlife Recovery Board [http://www.YBFWRB.org]) completed a draft *Yakima Subbasin Plan* in May 2004. This plan was part of the Northwest Power and Conservation Council's (NPCC) process to guide the selection of projects funded by the Bonneville Power Administration (BPA) for the protection, restoration, and enhancement of fish and wildlife affected by the Federal hydropower system. Further clarification of the draft *Yakima Subbasin Plan* was requested by NPCC before consideration for adoption into its Fish and Wildlife Program. The *Supplement*, dated November 26, 2004, was then prepared.

The *Supplement* identifies the key factors limiting the biological potential of representative ("focal") species, the biological objectives to address each limiting factor, and management strategies to achieve success for each objective. The *Yakima Subbasin Plan and Supplement* was adopted by NPCC into its Fish and Wildlife Program.

1.7.6 Yakima Steelhead Recovery Plan

In 1999, NMFS classified Middle Columbia River steelhead as a threatened species under the Endangered Species Act. In 2006, NMFS revised its listing to apply only to the anadromous (ocean-going) form of *Onchorynchus mykiss*, commonly known as

steelhead. This listing applies to steelhead that spawn in a large portion of central and eastern Washington and Oregon. The Yakima Basin Fish and Wildlife Recovery Board, a locally based organization governed by representatives of Yakima, Benton, and Kittitas Counties, the Yakama Nation, and cities in the basin, prepared the 2007 *Yakima Steelhead Recovery Plan* for those listed Middle Columbia River steelhead that spawn in the Yakima River basin.

The 2007 *Yakima Steelhead Recovery Plan* was incorporated into the NMFS *Columbia Steelhead Recovery Plan*, which was released in draft form on September 24, 2008, and released in final in September 2009.

1.8 Fish Recovery Efforts

A number of Federal, State, local, and private efforts have been working to improve fish habitat and fish populations in the Yakima River basin. The major fish recovery efforts are summarized in this section. Many other efforts in the basin, such as the YRBWEP Phase II conservation program described above, support fish recovery efforts.

1.8.1 Reclamation Improvements to Existing Facilities

Reclamation plans and constructs improvements to existing facilities when funding and priorities under existing programs allow. These projects benefit both water supply and fish passage. One such completed project was the Roza Dam roller gate improvements. Roza Dam was built with two 110-foot-wide roller gates that allow for the passage of Yakima River flow in excess of Roza Canal diversion requirements. During normal operation, the roller gates lift up to discharge water underneath the gates. Instead of opening a gate to let excess water flow underneath the gate, the roller gate can be lowered beyond the closed position to allow water to spill over the top of the gate. This process of lowering the roller gates past the closed position is known as "tucking." The roller gates currently hinder smolt outmigration unless "tucked" periodically to allow surface spill. When no surface spill occurs at Roza Dam, downstream migrating fish must either navigate through the fish screen bypass which is located in slackwater with poor attraction flows, or swim deep and encounter high pressures and velocities to pass through a small slot near the bottom of the dam structure. The passage obstacle at Roza Dam increases overall travel time for migrants, prolongs exposure to predation in the dam pool, and may physically harm passing fish. Reclamation modified the spill gates to allow some surface spill to be maintained under all conditions.

1.8.2 Yakima River Side Channels Project

This project was initiated in 1997 and is ongoing. It is comanaged by WDFW and the Yakama Nation under the Yakima/Klickitat Fisheries Project (YKFP). The Yakima River Side Channels Project is funded on a biennial basis through the NPCC Fish and Wildlife Program administered by BPA and has received expanded funding through the Accords Agreement between BPA and the Yakama Nation. Objectives include habitat protection and restoration in the most productive reaches of the Yakima River basin. The geographic focus includes Easton, Ellensburg, Selah, and Union Gap reaches on the

Yakima River and the Gleed reach in the lower Naches River, with some recent activities in productive tributaries, including Taneum, Reece, and Swauk Creeks. The mainstem areas were identified through the Reaches Project (Stanford et al., 2002). See Section 1.7.2.4 of this document for additional information on the Reaches Project. Active habitat restoration actions include reconnecting structurally diverse alcoves and side channels, introducing large woody debris, fencing, and revegetating riparian areas.

1.8.3 Yakima Tributary Access and Habitat Program

The Yakima Tributary Access and Habitat Program (YTAHP) is a multiparty effort to restore fish passage to Yakima River tributaries that historically supported salmon and to improve habitat in areas where fish access is restored. BPA has funded the program since 2001, with additional funding for individual projects coming from BPA and other sources, including the Salmon Recovery Funding Board (SRFB), Ecology's Water Infrastructure Program, the Community Salmon Fund, and other local, State, and Federal programs. Funded participants include Kittitas and North Yakima County Conservation Districts, WDFW, Yakama Nation, and South Central Washington Resource Conservation and Development. Other partners include the Kittitas Conservation Trust, Mid-Columbia Regional Fisheries Enhancement Group, Benton Conservation District, and Ecology. Projects funded through YTAHP are primarily fish screening and fish passage improvements, but also include riparian plantings, fencing, and irrigation system improvements that improve fish habitat conditions.

1.8.4 Yakima/Klickitat Fisheries Project

The Yakima/Klickitat Fisheries Project (YKFP) is a joint project of the Yakama Nation and WDFW, and is sponsored in large part by BPA with oversight and guidance from the NPCC. The YKFP is committed to salmon reintroduction through supplementation and habitat protection and restoration. It is designed to use artificial propagation in an attempt to maintain or increase natural production while maintaining long-term fitness of the target population and keeping ecological and genetic impacts to non-target species within specified limits. The YKFP is also designed to provide harvest opportunities. The purposes of the YKFP are to enhance existing stocks of anadromous fish in the Yakima and Klickitat River basins while maintaining genetic resources; reintroduce stocks formerly present in the basins; and apply knowledge gained about supplementation throughout the Columbia River Basin.

Species currently being enhanced by the YKFP and the Yakama Nation Fisheries Program include spring, summer and fall Chinook salmon, coho salmon, sockeye salmon, and steelhead trout. A fall Chinook salmon supplementation program began in the Yakima basin in 1983 (Yakama Nation, 2007). Spring Chinook supplementation has been occurring since 1997. Coho supplementation in the Yakima basin began in 1995 (Dunningan et al., 2002; Yakama Nation, 2004); however, the Yakama Nation has been releasing hatchery coho in the basin since the mid-1980s. The Yakama Nation has been conducting an interim fish reintroduction program since 2005 at Cle Elum Reservoir. The reintroduction includes coho salmon which started in the 1980s and sockeye salmon which started in 2009.

1.8.5 Kittitas Conservation Trust

The Kittitas Conservation Trust implements conservation actions along the mainstem Yakima River and its tributaries. Funding sources include cost share matches such as the SRFB and YTAHP. Projects funded include the Swauk Creek Water Storage Study, the Currier Creek Barrier Removal, Taneum Creek Fish Passage Improvements and Cle Elum River Engineered Log Jams.

1.8.6 Salmon Recovery Funding Board Supported Projects

In 1999, the State Legislature created the SRFB to administer State and Federal funds to protect and restore salmon habitat in Washington State. Funding comes from the sale of State general obligation bonds and the Federal Pacific Coastal Salmon Recovery Fund, and grants are awarded annually based on a public, competitive process. The YBFWRB is the lead entity responsible for coordinating SRFB grant applications in Yakima, Benton, and Kittitas Counties. Funding has been used for projects such as providing fish passage and screening at small irrigation diversions, planting riparian areas, acquiring and protecting land with high-priority fish habitat, restoring natural stream channel functions, and promoting fish-friendly agricultural practices.

1.8.7 Yakima County Comprehensive Flood Hazard Management Plans

As part of its Comprehensive Flood Hazard Management Plans, the Yakima County Flood Control Zone District (District) is currently implementing floodplain restoration projects that reduce flood risk and provide habitat restoration. These projects were identified in three Comprehensive Flood Hazard Management Plans (CFHMPs) that are adopted by the County and communities affected. The Upper Yakima CFHMP was completed in 1998 and updated in 2007. The Naches River CFHMP was completed in 2005, while the Ahtanum – Wide Hollow CFHMP was completed in 2011. The District plans to develop a CFHMP for the lower Yakima River in cooperation with the Yakama Nation.

The Upper Yakima CFHMP includes the floodplain of the Yakima River from the mouth of Yakima Canyon to Union Gap and the Naches River from its mouth to Twin Bridges. Actions currently being implemented under the CFHMP include floodplain restoration projects at several locations in the lower Naches River and in the Gap-to-Gap reach of the Yakima River through partnerships. The District brings the ability to influence infrastructure placement (bridges, levees, and diversions) and replacement in floodplains to further natural river functions. The District has provided projects at Eschbach Park, levee setback at SR24, infrastructure modifications at Ramblers Park, wrecking yard removal from the Wapato-Yakima River floodplain plus a number of actions already implemented in Ahtanum Creek and Lower Yakima River ahead of completion of the plans. In order to mitigate impacts the District is also implementing a study of stream channel functions and how infrastructure has altered the functions of the Yakima River "gaps" which are geologic control points in the river.

1.8.8 Washington State Department of Transportation Programs

The Washington State Department of Transportation (WSDOT) has various programs focused on meeting its stewardship goals of avoiding and minimizing environmental and habitat disturbance. Ongoing projects include wetlands mitigation, maintenance of habitat connectivity, and fish passage restoration. In Yakima and Kittitas Counties, WSDOT has funded over $2 million for fish passage barrier projects. The WSDOT 10-year fish passage project funding plan (2007-2019) includes funding for a project at Silver Creek, along Interstate 90 at mile post 70.9. Through its habitat connectivity and wetlands mitigation programs, WSDOT will continue to contribute funding to the Cascade Land Conservancy, the Kittitas Conservation Trust, YKFP, and other entities for land acquisition and conservation easements aimed at maintaining wildlife movement corridors and improving floodplain habitat function. WSDOT also funds restoration projects through its Chronic Environmental Deficiencies Program which identifies areas of State highways that are subject to chronic repair needs associated with impacts from stream channel erosion and flooding.

1.8.9 Conservation Projects by Private Organizations

Private conservation groups such as the Cascade Conservation Partnership, the Mountains to Sound Greenway Trust, and the Cascade Land Conservancy purchase and protect land for wildlife habitat and public benefit. Groups such as the Washington Water Trust and the Washington Water Project of Trout Unlimited have been actively purchasing or leasing water rights to improve instream flow in the Yakima River basin. These groups depend on a variety of public and private funding to acquire property, reduce development intensity, or prevent development altogether.

A recent project was the acquisition of water rights in Manastash Creek. The water rights purchase program is part of the Manastash Creek Restoration Project Instream Flow Enhancement Implementation Plan. This project is part of a Memorandum of Understanding between the Manastash Creek Irrigators, BPA, WDFW, Kittitas County Conservation District (KCCD), and Washington Environmental Council (WEC).

In fall 2008, KCCD, Washington Rivers Conservancy, and Ecology conducted a reverse auction to purchase water rights on Manastash Creek. As a result of the auction, approximately 3 cfs will be left in the stream during the first half of the irrigation season until June 30, and approximately 1.5 cfs will be left in the stream until the end of the season on October 31.

1.8.10 Yakima Storage Dam Fish Passage Study

Reclamation is leading a cooperative investigation with the Yakama Nation, State and Federal agencies, and others to study the feasibility of providing fish passage at the five large storage dams of the Yakima Project. These dams—Bumping Lake, Kachess, Keechelus, Cle Elum, and Tieton—were never equipped with fish passage facilities. Four of the five reservoirs were originally natural lakes and historically supported Native

American fisheries for sockeye salmon and other anadromous and resident fish (Reclamation, 2003).

The *Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS* was issued in April 2011 (Reclamation and Ecology, 2011c). The *Final Planning Report Cle Elum Dam Fish Passage Facilities* was also completed in April 2011 (Reclamation, 2011b). The NEPA Record of Decision (ROD) issued on August 12, 2011, recommended a preferred alternative for upstream and downstream fish passage.

1.9 Recent Activities that Led to Development of the Integrated Plan

Actions leading to development of the Integrated Plan are displayed in Figure 1-5 which illustrates the timeline of YRBWEP activities.

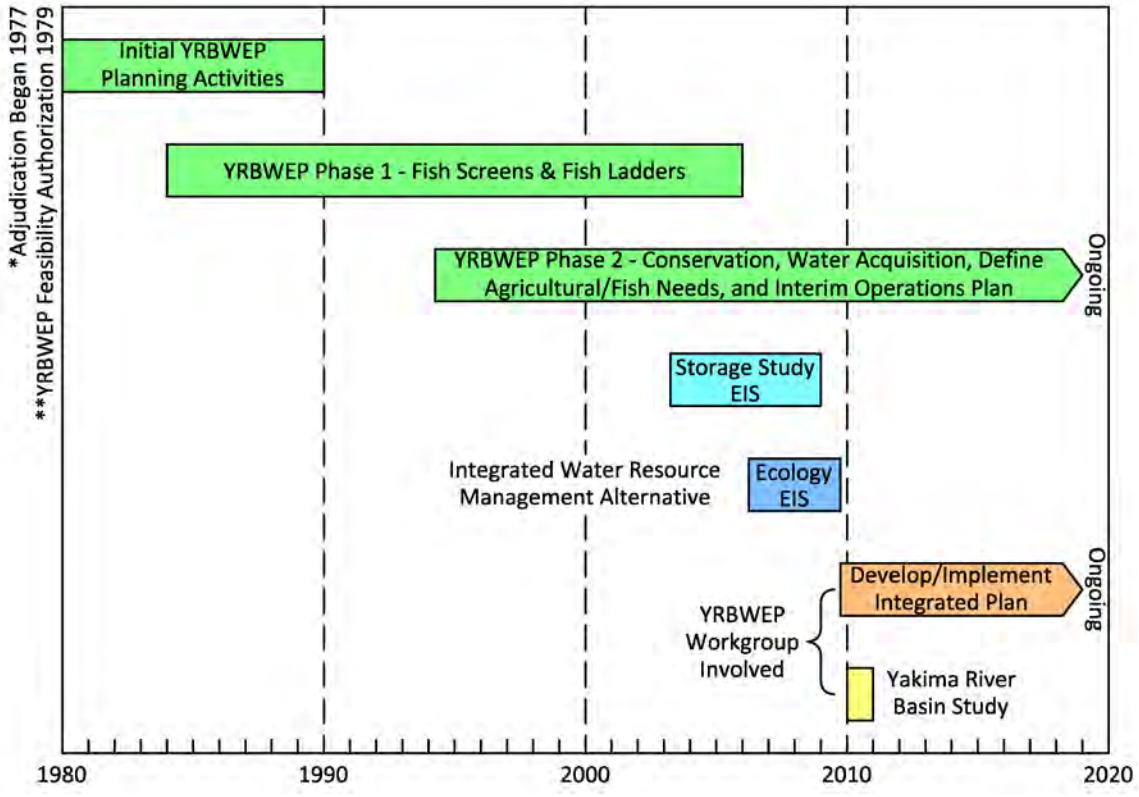


Figure 1-5 Yakima River Basin Water Enhancement Project Timeline

1.9.1 Yakima River Basin Water Storage Feasibility Study Planning Report and EIS (Storage Study)

In 2003, Congress directed Reclamation to conduct a feasibility study of options for additional water storage in the Yakima River basin. The authorization for the study is contained in Section 214 of the Act of February 20, 2003 (Public Law 108-7). The authorization states that the study will place "… emphasis on the feasibility of storage of Columbia River water in the potential Black Rock Reservoir and the benefit of additional

storage to endangered and threatened fish, irrigated agriculture, and municipal water supply."

Reclamation began the Storage Study in May 2003. The State of Washington joined Reclamation in that effort after funding was provided in the State's 2003-2005 capital budget.

In 2007, Reclamation and Ecology initiated environmental review for the Storage Study. The Draft Planning Report/Environmental Impact Statement (PR/EIS) was prepared as a combined NEPA and SEPA document, entitled the *Yakima River Basin Water Storage Feasibility Study Draft Planning Report/Environmental Impact Statement* (Reclamation and Ecology, 2008).

Reclamation understood that the congressional authorization for the 2003 Storage Study limited the range of alternatives that it could consider in the EIS to the Black Rock Reservoir and other potential storage facilities in the Yakima River basin. The alternatives considered by Reclamation were:

- No Action Alternative;
- Black Rock Reservoir Alternative;
- Wymer Dam and Reservoir Alternative; and
- Wymer Dam Plus Yakima River Pump Exchange Alternative.

These storage facilities were referred to as the "Joint Alternatives" in the January 2008 Draft PR/EIS because they were advanced jointly by Reclamation and Ecology. Under its SEPA authority, Ecology determined that both storage and nonstorage means of achieving the congressional objectives needed to be evaluated. Thus, the January 2008 Draft PR/EIS considered three "State Alternatives" in addition to the Joint Alternatives:

- Enhanced Water Conservation Alternative;
- Market-Based Reallocation of Water Resources Alternative; and
- Groundwater Storage Alternative.

Reclamation and Ecology held a public comment period on the January 2008 Draft PR/EIS from January 29 to March 31, 2008. A number of the comments received asserted that Reclamation and Ecology had failed to evaluate an adequate range of reasonable alternatives, and that the alternatives that had been evaluated were analyzed outside of the context of fish habitat and passage needs for the Yakima River basin. Ecology consulted with Reclamation concerning whether additional alternatives should be evaluated. Ecology concluded that the scope of the EIS should be expanded; however, Reclamation determined that its congressional authorization precluded it from expanding its analysis under NEPA. Therefore, Ecology decided to separate from the joint NEPA/SEPA process for the study and to pursue completion of a stand-alone SEPA Supplemental EIS (see Section 1.9.2). Ecology continued to act as a cooperating agency for Reclamation's NEPA process while Reclamation acted in a similar capacity for the

SEPA process. Reclamation pursued completion of the Final PR/EIS for the Storage Study, while Ecology prepared a SEPA Supplemental Draft EIS and a Final EIS.

Reclamation released its Final PR/EIS on December 29, 2008. The Final PR/EIS included only the storage facilities in the Joint Alternatives and responses to comments on the Joint Alternatives. The Final PR/EIS concluded that none of the storage features by themselves met Federal criteria for an economically and environmentally sound water project and recommended the No Action Alternative as the Preferred Alternative. On April 3, 2009, Reclamation, in a concluding letter, announced that it had concluded the Yakima River Basin Water Storage Feasibility Study.

A brief summary of the findings of the Final PR/EIS is presented below. The Final PR/EIS should be consulted for details on the environmental analysis.

The Final PR/EIS determined that the Black Rock Reservoir Alternative would have the following major benefits and impacts:

- Add 1.3 million acre-feet of active storage capacity to the basin;
- Meet the dry-year proratable irrigation water supply goal of a minimum of 70 percent in all years;
- Meet municipal water supply needs;
- Increase streamflows in the Yakima River in all seasons;
- Provide increased streamflows in the Yakima River which would generally benefit anadromous fish;
- Increase anadromous fish stocks by 21 to 61 percent and steelhead stocks by 51 percent;
- Cause groundwater to seep toward and through the Hanford Nuclear Reservation, increasing groundwater flow and complicating cleanup efforts at the site, although Reclamation concluded that the seepage could be intercepted;
- Have no negative impacts on water quality in the Columbia or Yakima Rivers if seepage toward the Hanford Site were intercepted;
- Inundate approximately 3,850 acres of shrub-steppe habitat and affect sage-grouse populations;
- Require the acquisition of 13,000 acres of private property and the relocation of a State highway;
- Alter habitat conditions in the Arid Lands Ecology Reserve through construction of seepage mitigation features;
- Cost $4.95 billion to $7.73 billion (2007 dollars) with annual operating costs of $60.2 million ($50 million for energy pumping); and
- Have a benefit-cost ratio of 0.13.

The Final PR/EIS determined that Wymer Dam and Reservoir Alternative would have the following major benefits and impacts:

- Add 162,500 acre-feet of active storage capacity to the basin;
- Meet the dry-year proratable irrigation water supply goal of a minimum of 70 percent in 2 of 6 years;
- Meet municipal water supply needs;
- Increase streamflows in the Yakima River, but not to the extent of Black Rock Reservoir;
- Increase anadromous fish stocks by 1 to 3 percent and steelhead stocks by 1 percent;
- Improve overwintering habitat for juvenile salmonids in the Cle Elum River, but provide no other changes in salmonid habitat;
- Provide cooling in the Yakima River downstream of the discharge point during summer and fall, but cause a slight warming during dry years;
- Adversely impact bighorn sheep wintering habitat and core habitat for mule deer;
- Require the acquisition of 4,000 acres of private property;
- Cost $867 million to $1.34 billion (2007 dollars) with annual operating costs of $3 million ($1.9 million for energy pumping); and
- Have a benefit-cost ratio of 0.31.

The Final PR/EIS determined that Wymer Dam Plus Yakima River Pump Exchange Alternative would have similar impacts to the Wymer Dam and Reservoir Alternative in addition to the following:

- Improve aquatic habitat by leaving water in the river that otherwise would have been diverted by Roza and Sunnyside Irrigation Districts;
- Increase anadromous fish stocks by 11 to 35 percent and steelhead stocks by 24 percent;
- Improve water quality in the middle and lower river because of higher summer flows;
- Require the acquisition of 110 acres of private property in addition to the 4,000 acres required for the dam and reservoir;
- Cost $4.07 billion with annual operating costs of $38 million ($20 million for energy pumping); and
- Have a benefit-cost ratio of 0.07.

1.9.2 Ecology's Yakima River Basin Water Storage Feasibility Study Supplemental SEPA Analysis

Based upon comments from the Yakama Nation and Roza Irrigation District, along with other stakeholders, Ecology determined that the alternatives in the PR/EIS were too narrowly focused. The comments recommended that Reclamation and Ecology should consider a wider range of alternatives and that the alternatives should include an integrated approach to benefit all resources including fish passage and habitat improvements in addition to improved storage. In response to those comments, Ecology prepared a separate SEPA Supplemental DEIS, released December 10, 2008, that evaluated an integrated approach to water management in the Yakima River basin. Ecology's Integrated Water Resource Management Alternative proposed seven elements for improving water supplies for agricultural and municipal needs and to improve habitat for anadromous and resident fish. The seven elements were fish passage, modifying existing structures and operations improvements, new surface storage, groundwater storage, fish habitat enhancement, enhanced water conservation, and market-based reallocation of water resources. Ecology prepared its EIS at a programmatic level. The FEIS was issued in June 2009. It presents an integrated package of opportunities to address water resource problems in the Yakima River basin.

1.9.3 YRBWEP Workgroup Process

Following completion of their separate environmental analyses, Reclamation and Ecology decided to continue the process of evaluating options to improve water resources in the Yakima Basin through the YRBWEP process. In April 2009, the two agencies initiated the YRBWEP Workgroup to help develop a proposal for an Integrated Water Resource Management Plan that incorporated studies and information developed during more than 30 years of work on water issues in the Yakima River basin. The Workgroup is composed of representatives of the Yakama Nation; Reclamation; the Service; NMFS; Ecology; WDFW; Washington Department of Agriculture; Benton, Kittitas, and Yakima Counties; City of Yakima; American Rivers; Yakima-Tieton Irrigation District; Kittitas Reclamation District; Kennewick Irrigation District; Sunnyside Valley Irrigation District; Roza Irrigation District; Yakima Basin Fish and Wildlife Recovery Board; and Yakima Basin Storage Alliance. Representatives from the Washington State congressional delegations were also invited to participate. The first meeting of the Workgroup was held in Yakima on June 30, 2009. Regular meetings have continued to the present time.

1.9.3.1 Development of Preliminary Integrated Plan

The Workgroup recommended that a proposal for a comprehensive and integrated plan should include the seven elements outlined in Ecology's FEIS. The Workgroup provided recommendations to develop a preliminary Integrated Plan. The preliminary Integrated Plan included as part of the seven elements a list of potential water supply actions for surface and groundwater, proposed modifications to existing operations, fish passage at existing reservoirs, a proposed fish habitat enhancement program, and actions related to market reallocation. Hydrologic and fish habitat benefits and funding requirements were also estimated, and a preliminary implementation approach and schedule were outlined.

The preliminary Integrated Plan is available at:
http://www.usbr.gov/pn/programs/yrbwep/reports/iwrmp/index.html

In early 2010, the Workgroup members supported further evaluation and analysis of the Integrated Plan under funding from the Department of Interior's WaterSMART Basin Study Program. The Yakima River Basin Study was jointly conducted in 2010 by Reclamation and Ecology.

Through the Basin Study and associated interaction with the Workgroup and its subcommittees, basin needs were specified in greater detail. Reclamation and Ecology further defined, evaluated, and updated actions in the Integrated Plan. Expected hydrologic, fish habitat, fisheries, and economic effects for the Integrated Plan and the Future without Integrated Plan (FWIP) were also further characterized.

Potential impacts of future climate change were evaluated and factored into the instream and out-of-stream projections for future water availability and demands. Storage and flow projections were modeled for plan elements based on accepted climate change projections.

During preparation of the preliminary Integrated Plan and the Basin Study, Workgroup subcommittees provided input on the Integrated Plan and the supporting technical work. Parallel with subcommittee efforts, potential actions for inclusion in the Integrated Plan were characterized through engineering analyses to refine available information and consider alternative project configurations. Analysis results, along with cost estimates, assessments of barriers and risks, and potential economic effects from the Integrated Plan, were presented at Workgroup meetings during the summer and fall of 2010. Work products were then updated based on Workgroup feedback. The Integrated Plan and supporting technical work are located on Reclamation's website at: http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html.

1.9.3.2 Integrated Plan Summary Support Document

An Integrated Plan summary support document was compiled for Workgroup deliberation in the fall of 2010. The summary included proposed Integrated Plan elements and actions, instream and out-of-stream water needs, water supply and fisheries benefits, and a preliminary schedule identifying plan implementation timing, implementation sequence, and triggers for adjusting the plan. It also outlined an approach for plan review and future adaptations, including principles to guide future plan adjustments.

While the Workgroup was preparing to make recommendations on the summary support document, a supplemental effort was underway to strengthen the ecosystem protection and restoration portions of the plan. A group of natural resource conservation community stakeholders developed a proposal for watershed enhancements and a broadly structured program to further enhance the plan's watershed, water supply and ecological restoration goals. The findings from this process were accepted by the Workgroup and incorporated into the Integrated Plan.

In March 2011, after 21 months of meetings, modeling, and studies, the Workgroup unanimously agreed to endorse the Integrated Plan Summary Support Document, recommending the elements and actions to include in the Integrated Plan (Reclamation and Ecology, 2011q). The Workgroup's proposal was given further consideration by Reclamation and Ecology as they proceeded with preparing this programmatic EIS under NEPA and SEPA.

1.10 Related Permits, Actions, and Laws

To implement either the No Action or Integrated Plan Alternative, the lead agency, would need to apply for and receive various permits, take certain actions, and conform to various laws, regulations, and Executive Orders. The following major permits, actions, and laws may apply to each alternative:

- National Environmental Policy Act
- Endangered Species Act
- Secretary's Native American Trust Responsibilities
- National Historic Preservation Act
- Executive Order 11988: Floodplain Management
- Executive Order 11990: Protection of Wetlands
- Executive Order 12898: Environmental Justice
- Executive Order 13007: Indian Sacred Sites
- Section 401 Certification, Clean Water Act
- Section 402 Permit, Clean Water Act
- Section 404 Permit, Clean Water Act
- Wilderness Act
- Wild and Scenic River Act
- Hoover Power Plant Act of 1984
- State Environmental Policy Act
- Washington Department of Natural Resources Permit
- Additional Points of Diversion Authorization
- State Trust Water Rights Program Participation
- Water Use Permit/Certificate Of Water Right
- Reservoir Permit/Aquifer Storage And Recovery
- Dam Safety Permit
- Shoreline Conditional Use Permit or Variance
- Water System Plan Approval

- Hydraulic Project Approval
- Critical Areas Permit or Approval
- Floodplain Development Permit

1.11 Public Involvement

Formulating alternatives to water resource issues that are responsive to the needs and desires of the American public requires planning expertise and direct public participation. Several agencies, entities, organizations, and groups participated in the YRBWEP Workgroup process. The degree of participation ranged from providing viewpoints and general observations to contributing directly to plan formulation. Chapter 6 summarizes additional public outreach efforts and public input.

1.12 Documents Adopted under SEPA

Pursuant to provisions of the SEPA Rules (WAC 197-11-630), Ecology is adopting the following documents as part of this FPEIS to meet a portion of Ecology's responsibilities under SEPA:

- Yakima River Basin Water Storage Feasibility Study Final PR/EIS (Reclamation, 2008f)
- Yakima River Basin Integrated Water Resource Management Alternative Final EIS (Ecology, 2009)
- Lake Roosevelt Incremental Storage Releases Program Final Supplemental EIS (Ecology, 2008a)
- Columbia River Water Management Program Final Programmatic EIS (Ecology, 2007b)
- Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS (Reclamation and Ecology, 2011c)

The Yakima River Basin Water Storage Feasibility Study Final PR/EIS addresses impacts associated with water storage proposals in the Yakima River basin, including Wymer Reservoir. Ecology's Yakima River Basin Integrated Water Resource Management Alternative Final EIS evaluated the impacts of an integrated approach to provide water for agriculture, municipal and domestic uses, and fish benefits which formed the basis for the Integrated Plan. The Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS evaluated the impacts of installing fish passage at the dam. These NEPA and SEPA documents are adopted and incorporated by reference to document the potential impacts of water storage, integrated water management, and fish passage facilities. The Lake Roosevelt Incremental Storage Releases Program EIS and the Columbia River Water Management Program Final Programmatic EIS are adopted to document cumulative impacts to water demand in the Columbia River Basin.

The Notice of Adoption for these documents is included as Appendix A.

1.13 How to Read this Document

This FPEIS is organized into six chapters:

- Chapter 1 provides background information on the YRBWEP Integrated Plan, the Purpose and Need for the action, study authorities, relevant background information on the study area, history of water management in the Yakima River basin, prior studies and activities dealing with basin water management issues, and a brief description of public involvement.
- Chapter 2 presents a description of the proposed No Action and Integrated Plan Alternatives. The chapter also summarizes how the alternatives were developed and describes alternatives eliminated from detailed evaluation.
- Chapter 3 describes the affected environment and existing conditions in the basin.
- Chapter 4 evaluates the potential short-term or construction impacts and proposed mitigation measures associated with the No Action and Integrated Plan Alternatives along with potential short-term cumulative impacts.
- Chapter 5 describes the potential long-term or operational impacts and proposed mitigation measures of the No Action and Integrated Plan Alternatives. In Chapter 5, the potential impacts are evaluated first for the individual elements of the Integrated Plan. This is followed by a discussion of the positive or negative impacts of implementing the elements as an integrated package and potential mitigation measures. A discussion of long-term cumulative impacts is also included in Chapter 5.
- Chapter 6 describes the public involvement, consultation and coordination, and compliance with other laws that has and will occur.
- A Comments and Responses section has been added following Chapter 6 which includes all the comments received on the DPEIS as well as responses to those comments.

The references used in the document follow Chapter 6. Appendices to accompany information presented in this FPEIS are attached at the end of the document.

Chapter 2

ALTERNATIVES

CHAPTER 2.0 ALTERNATIVES

2.1 Introduction

2.1.1 Summary of Alternatives

This FPEIS evaluates two alternatives to meet the water resource and ecological restoration needs in the Yakima River basin—the No Action Alternative and the Integrated Water Resource Management Plan (Integrated Plan) Alternative. The Integrated Plan includes a set of comprehensive elements intended to address water resource and ecosystem needs—fish passage; habitat/watershed protection; structural and operational changes; surface water storage; groundwater storage; enhanced conservation; and market reallocation. These elements are intended to improve water supply to maintain and/or enhance streamflow conditions for fish, and provide water for agriculture, municipal and domestic uses.

Reclamation and Ecology, working with the YRBWEP Workgroup, have identified a mix of projects and actions to meet the goals of the Integrated Plan. The environmental impacts of the Integrated Plan are evaluated at a programmatic level in this document. It is possible that other or additional projects would be developed during implementation of the Integrated Plan; however, those projects are not included in this FPEIS because they have not been developed. All individual projects included in the Integrated Plan would undergo project level NEPA and/or SEPA analysis, as needed, as they are carried forward to implementation (as described in Section 1.2).

This chapter describes the two alternatives and the process used to develop them. For the Integrated Plan, the projects and actions that are proposed to meet the goals of the plan are described. This chapter also includes a discussion of alternatives that were considered but eliminated from further study, as well as a summary comparison of the environmental impacts of the two alternatives.

The combination of projects and actions included within the Integrated Plan has been optimized during nearly three years of discussion with the YRBWEP Workgroup and other stakeholders to achieve the objectives outlined in the Purpose and Need statement. Extensive modeling and analyses completed during the Yakima River Basin Study (April 2011) determined that the Integrated Plan Alternative represents the only combination of programs, projects and resource allocations that could reasonably meet the objectives outlined in the Purpose and Need statement. Therefore, only one action alternative is presented in this FPEIS.

If the Integrated Plan is authorized for implementation, individual components may be modified as new information becomes available or conditions change. Should these modifications result in substantial changes to the components, supplemental programmatic environmental evaluations will be conducted. Additional information may also become available during project-level review for individual components. Any new information that could result in substantial reshaping of the program or project under

consideration would be subject to additional environmental review under NEPA and SEPA.

2.1.2 Identification of Preferred Alternative

Reclamation and Ecology have selected the Integrated Water Resource Management Plan Alternative as the Preferred Alternative. It is the only alternative that reasonably meets the Purpose and Need for the Proposed Action. The Integrated Plan would address ecosystem restoration, watershed enhancement, water supply, and climate change flexibility issues in the basin by implementing a comprehensive package of actions. Both the No Action Alternative and the Integrated Plan Alternative would result in adverse environmental impacts, but the overall effect of the Integrated Plan is expected to be beneficial to water supply for agriculture, municipal and domestic uses and for resident and anadromous fish. Current negative trends impacting habitat and water supply would continue under the No Action Alternative, which would not meet the Purpose and Need.

2.2 Alternative Development Process

The Integrated Plan presented in this FPEIS is the result of years of study and proposals to improve water supply and fish habitat in the Yakima basin, including elements and projects identified in Reclamation's Yakima River Basin Water Storage Feasibility Study Planning Report (PR)/EIS (Storage Study) (Reclamation, 2008f) and Ecology's Final EIS on Yakima River Basin Integrated Water Resource Management Alternative (Ecology, 2009). Figure 2-1 illustrates the relationship between Reclamation's Storage Study EIS, Ecology's Supplemental EIS on the Integrated Water Resource Management Alternative, and the YRBWEP Workgroup. The YRBWEP Workgroup further evaluated these elements and projects in the process described in Section 1.9 and provided recommendations to Reclamation and Ecology. The result of the Workgroup process is an Integrated Plan of actions to address water supply and fish needs in the basin. This section explains how the Integrated Plan elements and projects were selected. Figure 2-2 illustrates the planning process in developing the Integrated Plan.

The elements of the proposed Integrated Plan grew out of Reclamation's 2008 Yakima River Basin Water Storage Feasibility Study Final Planning Report/EIS (PR/EIS) and Ecology's 2009 Yakima River Basin Integrated Water Resource Management Alternative EIS (described in Sections 2.2.1 and 2.2.2 of the PEIS). Reclamation and Ecology have worked collaboratively with the Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup to develop the Integrated Plan. Through the YRBWEP Workgroup process (Section 2.2.3), the water needs for agriculture and municipal uses and habitat needs were identified, and Ecology's Integrated Water Resource Management Alternative was refined to create the Integrated Plan, containing a combination of projects, programs, and resource allocations that could feasibly meet the identified water and habitat needs. The intention of all the parties involved has been that the Integrated Plan would be implemented in a coordinated manner, incorporating all elements of the proposed plan.

Reclamation and Ecology worked closely with the Workgroup to identify projects and programs for each element of the Integrated Plan intended to meet the identified needs. Those projects were extensively modeled and analyzed as part of the Yakima River Basin Study (April 2011). The modeling determined that none of the elements on their own could meet the identified instream flow and water needs, and that a combined or integrated approach is essential to meeting all of the identified needs. For example, the Integrated Plan without the Water Storage Element falls short of achieving the 70 percent prorationing level, and also cannot achieve the desired instream flow enhancements. Section 5.3.2 describes the results of the modeling and how much water can be provided by different projects and elements.

After working collaboratively with basin stakeholders to develop the Integrated Plan, and reviewing NEPA and SEPA requirements, Reclamation and Ecology have concluded that the Integrated Plan is the only reasonable alternative for improving water supply for irrigation and domestic and municipal needs and enhancing fish habitat. The Integrated Plan is a comprehensive, adaptive approach to resolving water issues. Because of the multipurpose needs for water in the basin and the desire of stakeholders to proceed with an integrated approach, alternatives that were understood to have a single purpose were not considered reasonable or viable.

Past studies include evaluations of a number of storage options and other proposals. The FPEIS includes an evaluation of some of these past proposals in the category of alternatives considered but eliminated from detailed study in Section 2.5.

2.2.1 Reclamation's Storage Study Planning Report/EIS

As described in Section 1.9, Ecology and Reclamation originally undertook the Storage Study to evaluate alternatives that would provide benefits to irrigated agriculture, future municipal needs, and anadromous fish as part of a joint NEPA/SEPA EIS. Under Reclamation's authority for performing the Storage Study, Reclamation was limited to evaluating a proposed Black Rock Reservoir and other storage options in the Yakima River basin. The storage-only alternatives included Black Rock Reservoir and two options for a Wymer Reservoir. These storage alternatives were jointly considered by Reclamation and Ecology and were referred to as "Joint Alternatives" in the January 2008 Yakima River Basin Water Storage Feasibility Study Draft Planning Report /EIS (PR/EIS) (Reclamation and Ecology, 2008). Ecology viewed its responsibility under SEPA to evaluate reasonable alternatives as requiring it to consider alternatives in addition to storage options to meet the State's study objectives. These additional alternatives were described and evaluated separately as "State Alternatives" in the January 2008 Draft PR/EIS. The "State Alternatives" were: Enhanced Water Conservation, Market-based Reallocation of Water Resources, and Groundwater Storage.

Based on comments received on the Draft PR/EIS, Ecology began a separate SEPA evaluation of an alternative solution to the Yakima basin's water problems, including consideration of aquatic habitat and fish passage needs. Reclamation completed its NEPA evaluation of the storage alternatives, evaluating only the "Joint Alternatives," and released its Final PR/EIS in December 2008.

2.2.2 Ecology's Yakima River Basin Water Storage Feasibility Study Supplemental SEPA Analysis

Ecology released a Supplemental Draft EIS in December 2008 that evaluated an Integrated Water Resource Management Alternative. The alternative included the State Alternatives from the Draft Yakima River Basin Storage Feasibility Study PR/EIS and additional water management and habitat improvement approaches composed of seven major elements: fish passage, structural/operational changes, surface storage, groundwater storage, fish habitat enhancements, enhanced water conservation, and market-based reallocation of water resources. Ecology's Yakimna River Basin Integrated Water Resource management Alternative Final EIS was released in June 2009. The framework of the Integrated Water Resource Management Alternative provided the basis for the YRBWEP Workgroup recommendations for the Yakima River Basin Study and Integrated Plan described below.

2.2.3 YRBWEP Workgroup Process

In 2009, Reclamation and Ecology convened the YRBWEP Workgroup to more thoroughly review studies and information produced over the past 30 years, including Reclamation's Yakima River Basin Water Storage Feasibility Study Final PR/EIS and Ecology's Yakima River Basin Integrated Water Resource Management Alternative Final EIS, with the intent to formulate a comprehensive and integrated solution for the basin's water resource problems, including the basin's related ecosystem needs. The YRBWEP Workgroup is composed of representatives of the Yakama Nation, Federal and State agencies, local governments, an environmental organization, and irrigation districts. Staff representing the State's congressional delegation also attended regularly to observe Workgroup discussions. The Workgroup reached a consensus in December 2009 to move forward with finalizing a proposal for a Preliminary Integrated Plan under the Yakima River Basin Study.

The Workgroup continued in 2010 to develop recommendations for a Basin Study for the Yakima River under funding from the Department of Interior's WaterSMART Basin Study Program. The Basin Study built on the proposed Preliminary Integrated Plan and prior studies and provided additional analysis of water needs as well as a robust analysis of climate change impacts. The Integrated Plan proposal and Basin Study form the basis of the Integrated Plan Alternative evaluated in this FPEIS. Section 1.9.3 of this FPEIS provides additional information on the Workgroup's involvement in developing the alternative.

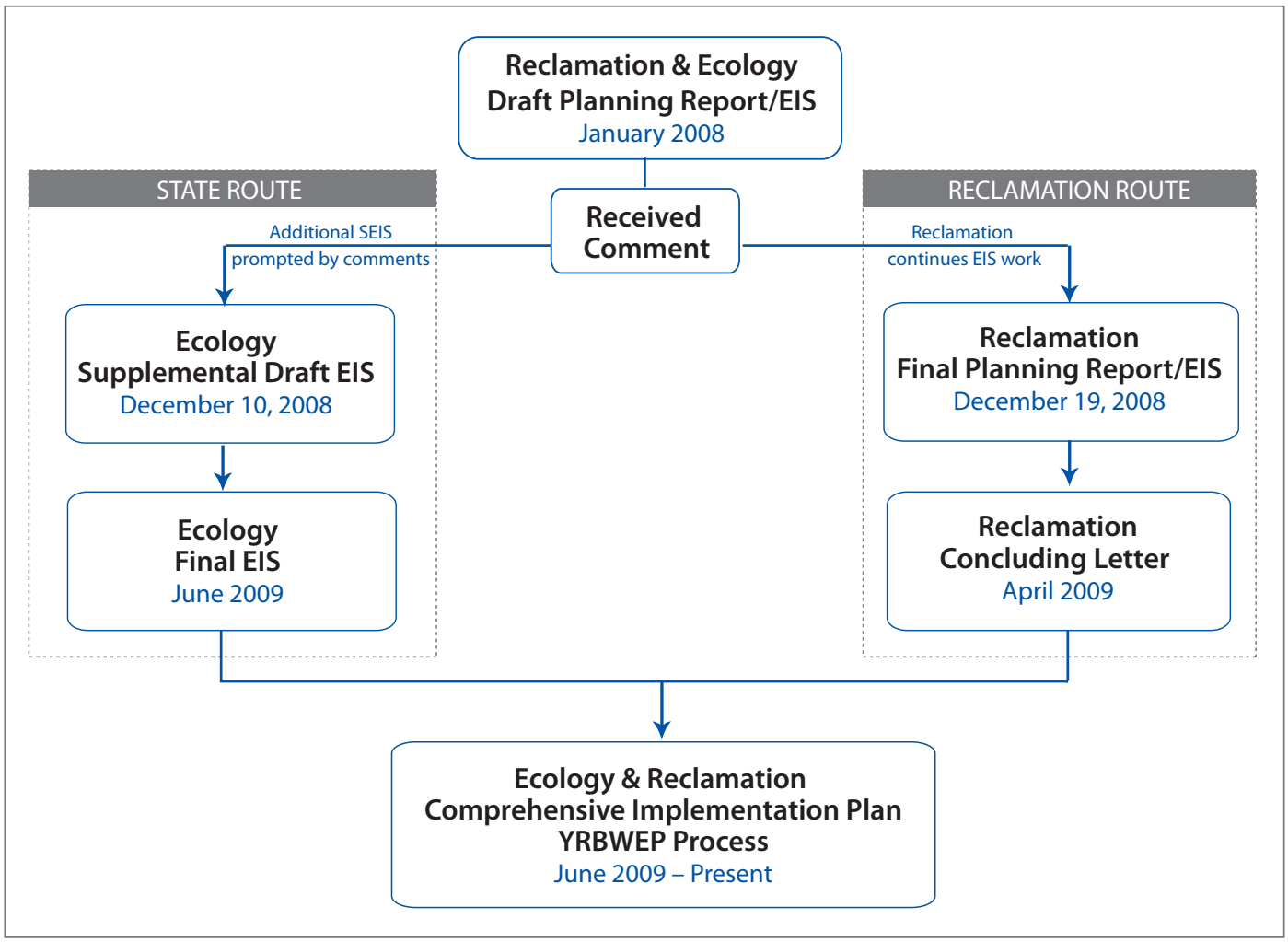


Figure 2-1. Storage Study and Integrated Water Resource Management Alternative Development Process

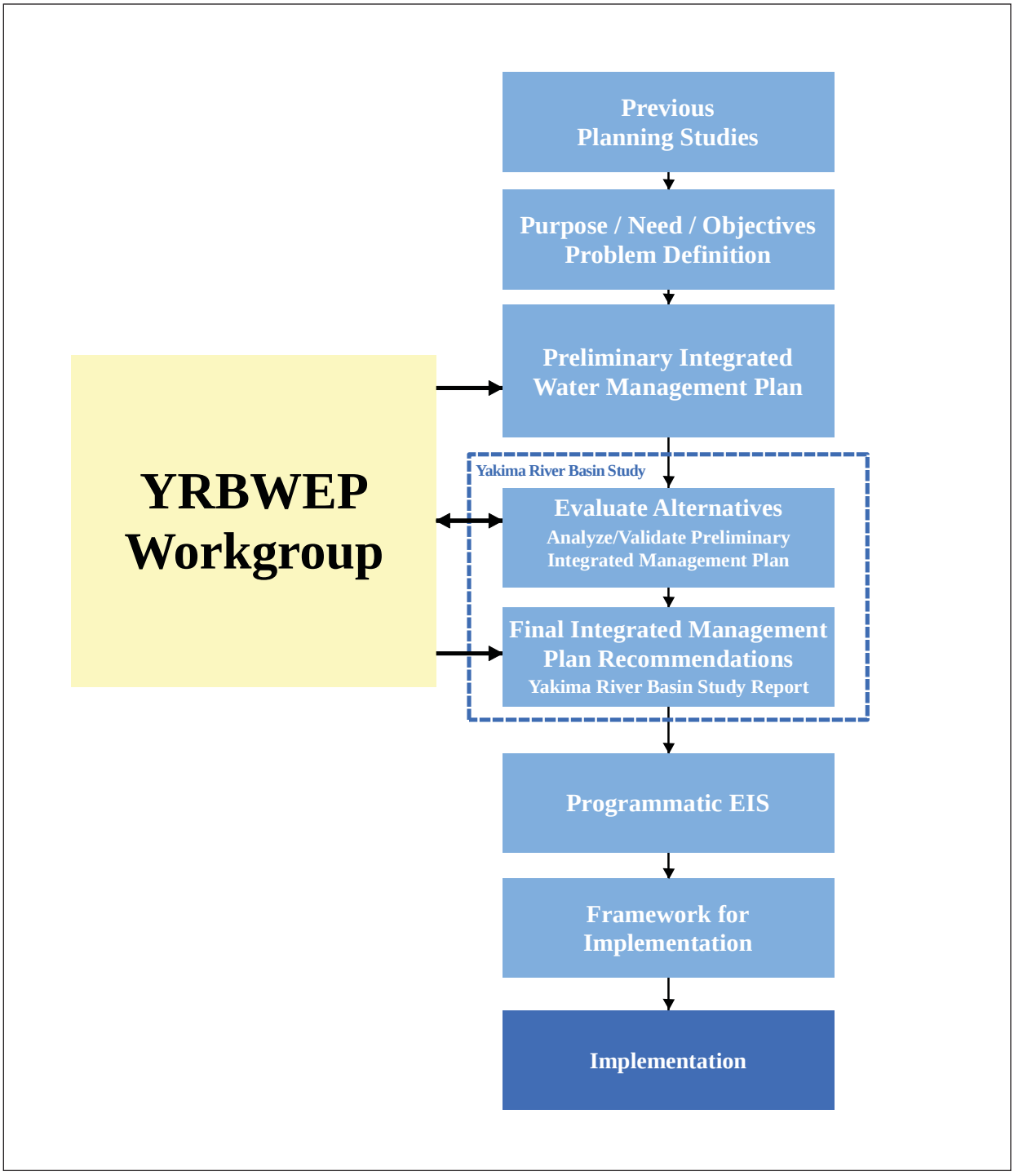


Figure 2-2. Water Resource Planning Process for the Integrated Plan

2.3 No Action Alternative

The No Action Alternative is intended to represent the most likely future expected in the absence of implementing the proposed action. Under the No Action Alternative, Reclamation and Ecology would not carry out the Integrated Plan Alternative. Although Reclamation and Ecology would not implement an integrated approach to improve water resources and fish habitat in the basin, current management activities and ongoing projects in the basin would continue. In the absence of an integrated approach, it is unlikely that Reclamation and Ecology would be able to procure funding to develop large-scale water storage or fish passage and habitat improvement projects.

The No Action Alternative forms the baseline against which the potential impacts of the Integrated Plan Alternative are compared. As described above, the No Action Alternative reflects continued reliance on individual actions by various agencies and other entities to improve water resources in the basin. Existing funding sources would be used to continue ongoing programs and those projects already funded.

For the purposes of this PEIS, Reclamation and Ecology consider the No Action Alternative to include projects that:

- Have been planned and designed through processes outside the Integrated Plan;
- Are authorized and have identified funding for implementation; and
- Are scheduled for implementation.

Some projects that have already been planned and undergone appraisal level design only are included in the Integrated Plan Alternative rather than the No Action Alternative because they do not have adequate authorization or funding for design completion, permitting, and construction. These include the Cle Elum Dam fish passage project and Cle Elum pool raise. In addition, some projects in the Mainstem Floodplain and Tributary Fish Habitat Enhancement Program that are proposed in existing fish management plans do not have funding for implementation.

The individual actions that form the No Action Alternative include the following general categories of ongoing projects and programs as described in Section 2.3.1 of this document. The sections of the PEIS where these programs are described are included parenthetically.

- Artificial fisheries supplementation programs:
    - Yakima/Klickitat Fisheries Project (Section 2.3.1.5).
- Habitat improvements:
    - Reclamation Improvements to Existing Facilities (Section 2.3.1.2);
    - Yakima River Side Channels Projects (2.3.1.3);

  - Kittitas Conservation Trust (Section 2.3.1.6);
  - Salmon Recovery Funding Board Supported Projects (Section 2.3.1.7);
  - Yakima County Comprehensive Flood Hazard Management Plans (Section 2.3.1.8); and
  - Conservation Projects by Private Organizations (Section 2.3.1.10).

- Water conservation:
  - Yakima River Basin Water Enhancement Project Phase II (Section 2.3.1.1).

- Water quality improvements
  - Salmon Recovery Funding Board Supported Projects (Section 2.3.1.7)

2.3.1 Description of Ongoing Projects

Several entities in the Yakima River basin, including the Yakama Nation, Reclamation, BPA, U.S. Fish and Wildlife Service (Service), National Marine Fisheries Service (NMFS), Ecology, WDFW, county and municipal governments, local conservation districts, non-profit organizations, and other landowners and managers throughout the basin have been actively involved in storage modification, supplementation, and fish enhancement projects.

Reclamation and Ecology expect to complete project-level environmental reviews as appropriate under NEPA and SEPA for ongoing projects the two agencies would implement under the No Action Alternative. Some of these project-level reviews would be conducted in association with cooperating agencies the U.S. Forest Service and Bonneville Power Administration. Reclamation and Ecology would not be responsible for project-level NEPA and SEPA reviews of ongoing projects implemented by other agencies and entities, but the other agencies and entities would be responsible for meeting environmental review requirements. These ongoing projects, actions, and policies are described below.

2.3.1.1 Yakima River Basin Water Enhancement Project Phase II

The Yakima River Basin Water Enhancement Project Act of 1994, commonly referred to as YRBWEP Phase II, provides for a water conservation program with joint Federal and State funding coupled with local matches. The program provides economic incentives to implement structural and nonstructural water conservation measures. As required by YRBWEP Phase II, a Conservation Advisory Group and Reclamation completed a Basin Conservation Plan in 1999, and implementation of conservation measures identified in the plan is ongoing. This No Action Alternative includes those conservation measures currently being implemented. The Basin Conservation Plan also includes limited provisions to acquire land and water rights on a permanent and temporary basis to

improve instream flows. For additional information on YRBWEP, see Section 1.7.2 of this document.

2.3.1.2 Reclamation Improvements to Existing Facilities

Reclamation is responsible for the operation and maintenance of the Yakima Project. Under this responsibility, Reclamation intermittently plans and constructs minor improvements to existing facilities when allowed by funding and priorities under existing programs. These activities sometimes benefit both irrigation supply and fish habitat including passage. Section 1.8.1 explains a recent example of an activity that provided both agricultural and fish passage benefits.

2.3.1.3 Yakima River Side Channels Project

The WDFW and the Yakama Nation are continuing to implement Yakima/Klickitat Fisheries Project (YKFP) projects with funding for the 2011-2012 biennium from BPA. See Section 1.8.2 for additional information on the program. The projects include habitat protection and restoration with a focus on the Easton, Ellensburg, Selah, and Union Gap reaches on the Yakima River and Gleed reach in the lower Naches River. Project types include reconnecting side channels, introducing large woody debris, fencing, and revegetating riparian areas.

2.3.1.4 Yakima Tributary Access and Habitat Program

The YTAHP fish screening and fish passage improvements, riparian plantings, fencing, and irrigation system improvements that improve fish habitat conditions will continue under the No Action Alternative. For additional information on YTAHP, see Section 1.8.3.

2.3.1.5 Yakima/Klickitat Fisheries Project

The Yakama Nation and WDFW are continuing salmon reintroduction efforts through YKFP including reintroductions at Cle Elum Dam as part of fish passage feasibility studies. See Section 1.8.4 for additional information on the project. The YKFP will continue as part of the No Action Alternative.

2.3.1.6 Kittitas Conservation Trust

The Kittitas Conservation Trust will continue to implement conservation actions in the Yakima River basin under the No Action Alternative. See Section 1.8.5 for more information on the projects.

2.3.1.7 Salmon Recovery Funding Board Supported Projects

Under the No Action Alternative, implementation of SRFB funded projects in the Yakima River basin will continue with the Yakima Basin Fish and Wildlife Recovery Board (YBFWRB) acting as lead entity. Funding will provide fish passage and screening at small irrigation diversions, planting of riparian areas, acquiring and protecting land

with high priority fish habitat, restoring natural stream channel functions, and promoting fish-friendly agricultural practices. Section 1.8.6 provides more information on the SRFB.

2.3.1.8 Yakima County Comprehensive Flood Hazard Management Plans

Yakima County will continue to implement floodplain restoration projects that benefit river and habitat function under the No Action Alternative as part of its Comprehensive Flood Hazard Management Plans. See Section 1.8.7 for additional information on the plans. These projects are expected to benefit fish habitat as well as provide improved flood management as they restore more natural dynamic river function.

2.3.1.9 Washington State Department of Transportation Programs

The WSDOT programs to improve fish habitat are described in Section 1.8.8. These projects, including wetland mitigation, maintenance of habitat connectivity, and fish passage restoration, will continue under the No Action Alternative.

2.3.1.10 Conservation Projects by Private Organizations

Under the No Action Alternative, private conservation groups such as the Cascade Conservation Partnership, the Mountains to Sound Greenway Trust, the Cascade Land Conservancy, the Washington Water Trust, and the Washington Water Project of Trout Unlimited are expected to continue their efforts to purchase and protect land and water rights for wildlife habitat and public benefit. Information on recent activities by these groups is located in Section 1.8.9.

2.3.2 Reclamation and Ecology Actions

In addition to their involvement with ongoing projects, Reclamation and Ecology would continue their agency management activities to manage water resources in the Yakima River basin. Reclamation would continue to study fish passage options at its major reservoirs in accordance with its Mitigation Agreement with WDFW and its Settlement Agreement with the Yakama Nation, but would not have funding to carry out the projects. While Reclamation and Ecology would continue to explore other opportunities for funding and implementing water resource and habitat improvement projects, no large-scale or integrated actions or projects are likely to occur under the No Action Alternative in the absence of the Integrated Plan.

2.3.3 Projects, Actions, and Policies under the No Action Alternative

The ongoing projects, actions, and policies that would continue under the No Action Alternative, although beneficial, would provide slow and partial progress in addressing the water resource problems of the basin. Further, these actions would occur on a project-by-project basis without the benefit of a comprehensive program to respond to existing and forecast water resources needs of the basin.

Under the No Action Alternative, Reclamation and Ecology would need to investigate other opportunities for funding to develop and implement projects to provide water resource and habitat improvements in the basin. This would potentially create substantial delays and uncertainty in implementing projects, with associated loss of forward momentum on the part of the agencies and other entities currently involved with the Integrated Plan planning process. Progress towards achieving the goal of restoring ecological functions in the basin would likely proceed more slowly and in a more limited way without a comprehensive program and the additional funding anticipated if the Integrated Plan were implemented. Given these limitations, existing problems with water availability and habitat quality would likely worsen under the No Action Alternative with increased population and climate change.

2.4 Integrated Water Resource Management Plan Alternative (Preferred Alternative)

2.4.1 Introduction

The Integrated Water Resource Management Plan Alternative (Integrated Plan) represents a comprehensive approach to water management in the Yakima River basin. It is intended to meet the need to restore ecological functions in the Yakima River system and to provide more reliable and sustainable water resources for the health of the riverine environment and for agriculture and municipal and domestic needs. The Integrated Plan is also intended to provide the flexibility and adaptability to address potential climate changes and other factors that may affect the basin's water resources in the future.

The intent of the Integrated Plan is to implement a comprehensive program that includes seven elements to improve water resources in the basin:

- Reservoir Fish Passage Element (Section 2.4.3),
- Structural and Operational Changes Element (Section 2.4.4),
- Surface Water Storage Element (Section 2.4.5),
- Groundwater Storage Element (Section 2.4.6),
- Habitat/Watershed Protection and Enhancement Element (Section 2.4.7),
- Enhanced Water Conservation Element (Section 2.4.8), and
- Market Reallocation Element (2.4.9)

The Integrated Plan can also be divided into three components of water management—Habitat (including the Reservoir Fish Passage And Habitat/Watershed Protection and Enhancement Elements), Systems Modification (including the Structural and Operational Changes Element), and Water Supply (including the Surface Water Storage, Groundwater Storage, Enhanced Water Conservation, and Market Reallocation Elements). The intent of the Integrated Plan is that every element would address the fish habitat needs described in Section 1.3, and every element with the exception of reservoir fish passage would address the water supply and climate change needs.

Reclamation and Ecology worked with the YRBWEP Workgroup to develop a package of projects to meet the goals of the Integrated Plan. These projects are described individually below for each element; however, Reclamation, Ecology and the YRBWEP Workgroup intend that the Integrated Plan would be implemented in a comprehensive manner, incorporating all elements of the proposed plan. Implementing the different elements of the Integrated Plan as a total package is intended to result in greater benefits than implementing any one element alone. Locations of the individual projects and the overall integrated approach are shown on the Frontispiece at the beginning of the document.

Reclamation and Ecology intend to use an adaptive approach to implement the Integrated Plan (Section 2.4.10). As the Integrated Plan is being implemented, projects will be monitored and studies will be undertaken to determine the need for modifying and/or adding projects to the plan. It is likely that changes to environmental conditions, status of natural resources, and/or water needs could be experienced later during the timeframe of the proposed plan. Depending on the level of potential change, new projects may be identified or existing projects modified that better meet the overall objectives of the Integrated Plan. Proposals that would substantially alter the Integrated Plan would be subject to supplemental programmatic environmental review and, as noted above, all projects would undergo project-level environmental review.

Reclamation and Ecology anticipate that the Integrated Plan would be implemented over a period of time ranging from two to 20 years. The exact timeline for implementation would be largely dependent on the availability of funding. Reclamation and Ecology would work with the Yakama Nation, other water and fish managers, and local governments in the Yakima River basin to develop a more precise timeline as funding becomes available.

Most of the adverse impacts associated with the Integrated Plan elements are construction-related and there would be few long-term adverse effects excepting habitat losses and shoreline recreational losses at the enlarged Bumping Lake Reservoir and new Wymer Reservoir. Modeling indicates that implementation of the Integrated Plan's water supply elements would benefit irrigation and municipal and domestic uses and streamflows for fish, meeting the targets for both. Fish passage and habitat/watershed enhancements would provide further benefits for fish and wildlife in the basin. The Habitat/Watershed Protection and Enhancement Element would help protect substantial areas of existing habitat from future losses due to development-related habitat impacts. The Groundwater Storage, Enhanced Conservation, and Market Reallocation Elements provide opportunities to improve the reliability of water supplies without requiring surface storage. However, additional surface storage is needed to provide adequate water to meet the long term instream and out-of-stream needs of the Yakima basin. Overall, the Integrated Plan would provide long-term benefits to water supplies for agricultural and municipal and domestic uses and improve habitat conditions for resident and anadromous fish.

2.4.2 Benefits of an Integrated Approach

Many studies have indicated that ecosystem-level resource management provides greater opportunities for efficiency, synergy, and cooperation between stakeholders which then result in greater overall benefits. For example, providing fish passage at existing reservoirs would restore access to habitat for fish, which would benefit fish populations. By also implementing fish habitat improvements and improving flows basin-wide through additional storage and other actions, fish would have improved conditions for survival generally, contributing to increased abundance and productivity. If fish habitat enhancements are implemented without providing fish passage at existing reservoirs and improving flows, the habitat enhancements would have more limited benefits to fish.

Additional storage would provide additional flows for fish and allow existing reservoir operations to be modified to benefit fish. New storage projects would also provide water to reduce irrigation supply shortages and help meet future municipal and domestic needs. Enhanced water conservation would provide opportunities to reduce water demand and improve water supply. Market reallocation would provide flexibility to meet the water needs of fish, irrigators, and especially domestic water users. These combined elements would improve the reliability of water supply in drought years and reduce the amount of new storage needed. Groundwater storage presents an opportunity to develop storage to improve water supply and flows without the traditional impacts associated with above-ground storage.

An integrated approach that includes water storage and facility improvement projects that also meet fish management needs will have the highest likelihood of being implemented and being successful over the long-term. The combined elements presented in this Integrated Plan would provide Yakima River basin water users and fish managers with the variety of tools needed to meet water supply needs and significantly improve conditions for fish.

2.4.3 Reservoir Fish Passage Element

Under this element of the Integrated Plan Alternative, fish passage would be provided at the five major Yakima River basin dams—Cle Elum, Bumping Lake, Tieton (Rimrock Reservoir), Keechelus, and Kachess. None of these dams currently have provisions for fish passage. In addition, the blockage to bull trout passage at Clear Lake Dam would be eliminated. All six dams are located on lands owned by Reclamation and adjacent to Forest Service lands. Providing fish migration past these dams would increase anadromous species abundance and spatial distribution, allow reintroduction of sockeye runs, and provide for genetic interchange for listed bull trout and other native fish. This would also help fish to cope with potential future climate change impacts by providing access to high-quality habitat at higher elevations if lower elevation habitat is no longer suitable for supporting fish life stages at certain times of year.

Reclamation studied opportunities for providing fish passage at the five Yakima River basin reservoirs in its *Yakima Dams Fish Passage Phase I Assessment Report* (Reclamation, 2005a) and in the *Draft Cle Elum and Bumping Lake Dams Fish Passage*

Facilities Planning Report (Reclamation, 2008a). These studies were undertaken as part of the 2002 Settlement Agreement with the Yakama Nation to resolve litigation between the Yakama Nation and Reclamation. The Settlement Agreement calls for Reclamation to study anadromous fish passage at Yakima Project storage dams.

Construction and operation of fish passage would be constrained by the following:

- Fish passage facilities would be designed and operated within existing operational considerations and constraints outlined in the *Interim Comprehensive Basin Operating Plan* (Reclamation 2002),
- Basin operations would continue to serve existing Reclamation contracts.
- Potential operational changes would be considered that might enhance passage without adversely impacting existing contracts or irrigation water supply.

The following sections provide a general description of proposed fish passage options at the five Yakima River basin reservoirs, based on potential fish benefits as well as engineering feasibility. Information on existing conditions at the reservoirs is provided in Chapter 3 and further evaluation of the impacts of providing fish passage is provided in Chapters 4 and 5. Designs have not been completed for the proposed fish passage facilities. The only design that has been conducted is appraisal level design work for Cle Elum Dam and Clear Lake Dam fish passage facilities.

2.4.3.1 Cle Elum Dam

Cle Elum Dam impounded and enlarged a natural lake. Lack of fish passage at the dam blocked access to the lake and upstream habitat for anadromous salmonids, eliminating one of the largest sockeye salmon runs in the Columbia River Basin from the Yakima River basin. Lack of passage also prevents fish in the reservoir such as bull trout from moving throughout the basin.

Fish passage facilities and fish reintroduction at Cle Elum Dam were evaluated by Reclamation and Ecology in the *Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project FEIS* (Reclamation and Ecology, 2011c) and *Final Planning Report Cle Elum Dam Fish Passage Facilities* (Reclamation, 2011b). Reclamation selected a preferred alternative in the FEIS and in the Record of Decision issued August 12, 2011. The environmental review for the project has been completed, but there is no authorization for additional design or construction; therefore, it is included in the Integrated Plan.

The proposed downstream fish passage facility would consist of a multilevel intake structure with gated openings that would operate at approximately reservoir elevation 2,190 feet and above[1] (from about 50 percent full to full pool) (Figure 2-3). The intake

[1] Elevations do not reflect changes in reservoir levels from the Cle Elum Pool Raise project described in Section 2.4.4.1.

structure would be located against and accessed from the right bank abutment of the existing dam (i.e., the right-hand side, to an observer facing downstream). A juvenile bypass conduit located on the right bank would be installed to carry passage flows from the upstream intake structure to discharge fish into the spillway stilling basin. For upstream passage, a trap-and-haul adult fish passage facility would be located on the right bank and would include a fish ladder and a collection facility.

2.4.3.2 Bumping Lake Dam

Construction of Bumping Lake Dam in 1910 impounded and enlarged a natural glacial lake, blocking passage to an area that historically supported anadromous Chinook, summer steelhead, coho, and sockeye salmon and bull trout (McIntosh et al., 2005; Haring, 2001). Currently, the Bumping River supports anadromous spring Chinook and steelhead below the dam, and bull trout above the dam (Haring, 2001).

Fish passage at Bumping Lake Dam would make available habitat in the reservoir as well as high-quality migration, spawning, and rearing habitat in the Bumping River and its tributaries. Upstream and downstream fish passage would be installed at Bumping Lake Dam as part of the proposed Bumping Lake Reservoir enlargement action described below as part of the Surface Water Storage Element (Section 2.4.5). Fish passage facilities at Bumping Lake Dam are expected to be similar to those proposed at Cle Elum Dam.

2.4.3.3 Tieton, Keechelus, and Kachess Dams

The Tieton, Keechelus, and Kachess dams were also constructed without fish passage, causing them to block valuable upstream habitat. Under the Integrated Plan, both upstream and downstream fish passage would be installed at the three dams. Passage facilities at these three dams have not yet been designed; therefore, limited detail is available on the proposed facilities. The facilities are likely to be similar to those proposed at Cle Elum Dam.

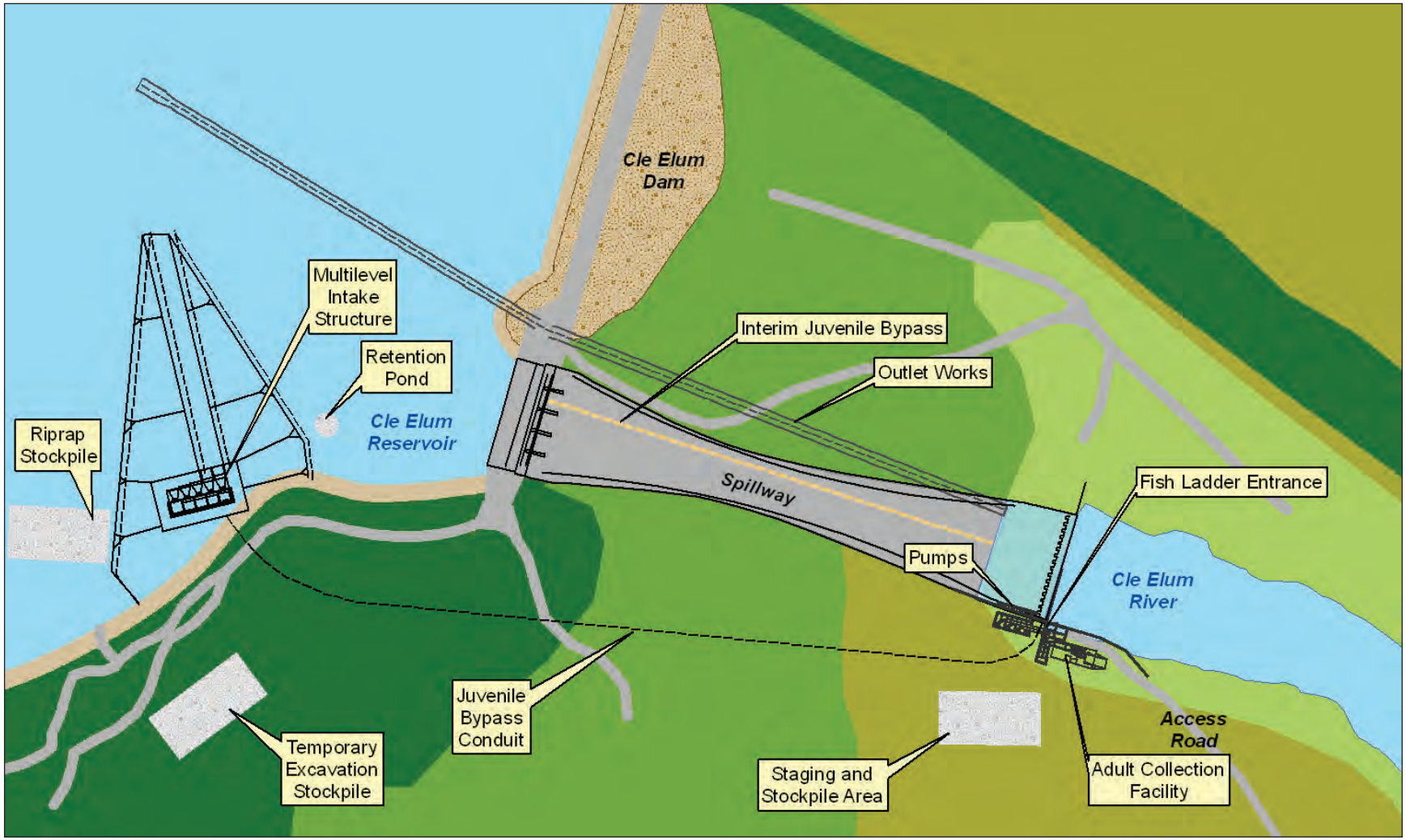


Figure 2-3. Proposed Cle Elum Dam Fish Passage Facilities

2.4.3.4 Clear Lake Dam

Clear Lake Dam is a small water storage facility located upstream from Rimrock Reservoir on the Tieton River. The dam includes a fish ladder intended to provide passage, but the location of the ladder entrance and high water temperatures at the outlet limit fish use. This limits access to areas above the dam to fish such as bull trout. Since Clear Lake Dam is upstream of Tieton Dam on one of the tributaries that drains into Rimrock Reservoir, completing this fish passage project would increase the benefits from fish passage at Tieton Dam.

Entrance to the existing fish ladder is located approximately 1,000 feet downstream from the dam outlet, in a shallow cove at the confluence of the emergency spillway and the river. During periods of low pool water levels, the fish ladder's water supply is substantially warmer than river water discharging from the dam outlet. Upstream migrating fish appear to stage where the colder water is released from the dam outlet works. Fish passage facilities proposed under the Integrated Plan would consist of a new pool/weir fish ladder located on the left abutment of the dam to provide both upstream and downstream fish passage.

2.4.4 Structural and Operational Changes Element

The structural and operational changes included in the Integrated Plan provide opportunities to benefit irrigation and municipal water supply as well as fish by improving flows in some reaches and reducing mortality of smolts at some facilities. Structural changes include increasing storage in existing reservoirs, modifying fish bypass systems and canals, and moving points of diversion to increase flows in reaches of the Yakima River. Operational changes include reducing the amount of water diverted for power generation at the Roza and Chandler Powerplants in spring to increase instream flow and improve smolt out-migration. The structural and operational changes are intended to make existing facilities more efficient, reduce impediments to fish passage, and improve water supply and flows for fish.

2.4.4.1 Cle Elum Pool Raise

Under the Integrated Plan the level of Cle Elum Lake would be raised by 3 feet (from 2,240 feet to 2,243 feet above mean sea level) to increase the volume of available storage in Cle Elum Reservoir by approximately 14,600 acre-feet. The increased storage would be used to improve streamflows for fish and increase water supply for out-of-stream needs. The 3-foot raise would be accomplished by modifying the spillway gates on the existing dam. Raising the pool level would inundate additional land around the reservoir for approximately three to ten weeks per year (average of seven weeks). The higher water levels would typically occur between April and August. The project would impact approximately 56 acres that would either be seasonally inundated or used for shoreline protection measures. This includes portions of approximately 33 privately owned parcels. The effects would occur along a relatively narrow strip of shoreline fronting each parcel. The project includes measures to protect the shoreline from potential erosion caused by higher water levels.

2.4.4.2 Kittitas Reclamation District Canal Modifications

The Kittitas Reclamation District (KRD) diverts water from the Yakima River at Lake Easton at River Mile 202.5, near the town of Easton. The KRD system delivers irrigation water to more than 59,000 acres in the Kittitas Valley. KRD currently augments flows in tributaries to the Yakima River with spills from the canal system (Spills are irrigation water that is diverted from a source but discharged intentionally without being delivered to the irrigator). KRD also conveys and discharges excess water at spill locations when requested by Reclamation, but only when excess capacity is available in the system. The KRD system includes approximately 37 open-ditch laterals that distribute irrigation water from the Main Canal and South Branch Canal to KRD water users. These laterals are located within KRD rights-of-way.

Water is currently lost through seepage from these open-ditch laterals. The Integrated Plan includes modifications to laterals of KRD's Main and South Branch Canals 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, Little Creek, Tillman Creek, Spex Arth Creek, and others that cross the KRD Main Canal. Specific actions would include:

- Replacing open-ditch laterals with pipe within the existing rights-of-way of the KRD Main, North, and South Branch Canals;
- Construction of a 15-acre-foot re-regulation reservoir (approximately 1 acre) to capture KRD operational spills at Manastash Creek; and
- Construction of a pump station on the Yakima River to deliver flows to tributaries in Kittitas County.

Tributary flow improvements would be coordinated with the actions in the Habitat/Watershed Protection and Enhancement Element (Section 2.4.7.2) to target improved fish passage at KRD canal crossings. It is estimated that these projects would reduce seepage losses by 5,300 acre-feet per year and increase flows in Manastash Creek by approximately 4,300 acre-feet per year.

2.4.4.3 Keechelus-to-Kachess Pipeline

The Keechelus-to-Kachess pipeline is proposed to transfer water directly from the Keechelus Reservoir to Kachess Reservoir. The drainage basin for the Keechelus Reservoir produces more runoff than can be contained in the reservoir, while the Kachess Reservoir can be difficult to fill in some years. The pipeline would increase the amount of water that could be stored in Kachess Reservoir in some years, increasing TWSA and improving Reclamation's flexibility in providing water for both irrigation and fish needs. The project would also allow some releases from Keechelus Reservoir to be routed through Kachess Reservoir, reducing unnaturally high flows in the Yakima River below Keechelus Reservoir, improving fish habitat conditions. The pipeline would also help

Kachess Reservoir refill after using inactive storage as proposed below in the Surface Water Storage Element (Section 2.4.5).

The pipeline between the Keechelus outlet and the existing Kachess Reservoir high-water shoreline would be approximately 5 miles long and would cross substantial areas of National Forest land. The outfall pipe would extend into Kachess Reservoir to discharge below a proposed future minimum water lake surface elevation of approximately 2,110 feet.

Efforts would be made to coordinate construction of the pipeline crossing of Interstate 90 (I-90) with the ongoing WSDOT I-90 construction project, which includes installation of wildlife crossings in the area.

2.4.4.4 Subordinate Power at Roza Dam and Chandler Powerplants

Water diversions for power generation would be further subordinated at Roza Dam and Chandler Powerplants under the Integrated Plan. Power subordination occurs when some or all of the water that could otherwise be diverted for power production is instead left in the river to provide instream flow benefits for fish. A substantial level of subordination has been undertaken for several decades. However, additional subordination at key time periods would support out-migration of steelhead, Chinook, sockeye, and coho juveniles. Subordination would be pursued subject to the development of acceptable agreements on the level and timing of subordination, mitigation for power losses, and approval by Reclamation, BPA and Roza or Kennewick Irrigation Districts, as applicable.

The Roza Powerplant is a conventional hydroelectric powerhouse with a single turbine, having a capacity of 12.9 megawatts (MW). The plant produces average annual energy of approximately 61,000 megawatt hours (MWH). The Chandler Powerplant is a 12 MW powerhouse with two turbines. The Chandler Powerplant includes two 6.0 MW, 4,160-volt hydropower generators. When water is not required for irrigation, the turbines can generate additional energy for revenue.

The intent of the Integrated Plan is that the Roza Powerplant would not be used to produce power in April and May, and the Chandler Powerplant would not be used to produce power in April, May, and June. Based on the historical data supplied by Reclamation, this would represent a power reduction of approximately 25,000 MWH annually.

2.4.4.5 Wapatox Canal Improvements

The Wapatox Canal, which is owned and operated by Reclamation, diverts water from the lower Naches River at RM 17.1, northwest of the town of Naches. The canal is more than 8 miles long and was originally constructed to deliver water to two powerplants. Reclamation purchased the water right for power production from PacifiCorp in March 2003. Reclamation discontinued operation of the powerplants with the intention of using as much of the water right as possible to increase flows in the lower Naches River. Reclamation retained responsibility under preexisting contracts for delivering

approximately 50 cfs to Wapatox Ditch Company and some individual small water users who are supplied irrigation water from the Wapatox Canal.

Reclamation has not been able to use as much of the water right to increase flows because it has had to divert as much as 130 to 140 cfs from the lower Naches River to deliver the approximately 50 cfs to water users along the Wapatox Canal. The excess water diverted (called "carriage water") is conveyed through the entire length of the canal and discharged back to the lower Naches River below the Wapatox Powerplant. The diversions have decreased in the past two years from an average of 118 cfs in 2010 to 81 cfs in 2011.

Under the Integrated Plan piping and/or replacing the lining along portions of the existing Wapatox Canal would reduce or eliminate the amount of carriage water needed to supply Wapatox Ditch Company water users. The project would include one of the following:

- Installing new canal lining from the fish screen midway down the canal and replacing the existing canal downstream from that point with a pipeline: or
- Installing pipe to replace the entire length of the existing canal downstream from the fish screen.

This project could include consolidation of other diversions into the Wapatox Canal such as the Naches-Selah Irrigation District, the City of Yakima water treatment plant, and the Gleed Ditch to provide additional fish benefits. However, the benefits of consolidating those diversions need further evaluation because they may not be sufficient compared to the cost, and those water users may choose not to participate in the project. Therefore, the effects of these proposed consolidations are not evaluated in this FPEIS.

2.4.5 Surface Water Storage Element

Reclamation, Ecology, and the YRBWEP Workgroup have determined that additional storage is needed in the Yakima River basin to meet the Purpose and Need of the project, especially to reduce the amount of prorationing and to improve streamflows for fish as well as to respond to predicted long-term changes in the climate. The proposed projects reflect a focus on in-basin solutions to address water supply and aquatic resource problems; however, study of an out-of-basin option is included in the Integrated Plan. The projects described below were included in the preliminary analysis conducted for the Basin Study. Each of the projects would require additional studies before being carried forward.

Collectively, these projects represent just over 450,000 acre-feet of additional storage for managing instream and out-of-stream uses in the basin. If one or more of the in-basin projects does not receive necessary permits and approvals for implementation, the YRBWEP Workgroup would recommend a replacement project (or projects) that would supply at least the equivalent quantity of water. Power generation opportunities would also be evaluated for these projects in the future.

Water storage projects are needed to provide adequate water to meet the needs for out-of-stream and instream needs. Surface water storage would provide water for improved streamflows for fish and allow flexibility in operating the reservoir system to benefit fish as well as providing water to improve the reliability of water supply for irrigation and municipal and domestic needs. As demonstrated in Section 5.3, without surface water storage, instream flow targets identified for fish could not be met and river operations could not be changed to benefit fish. In addition, surface water storage is needed to provide the flexibility to adapt operations in response to predicted climate change driven reductions in water supply.

A portion of the additional supply would be made available for future municipal and domestic needs. This portion of supply should be allocated, in part, to serve needs in each of the three counties of the Yakima basin. It is intended that one-half of the municipal and domestic supply would be allocated by county based on projected growth. The other half would remain unallocated and available to municipal and domestic users anywhere in the basin on a first-come, first-served basis after the allotted county portions are used.

2.4.5.1 Wymer Dam and Reservoir

Wymer Dam and Reservoir would be constructed under the Integrated Plan to create a new off-channel storage facility in the intermittent stream channel of Lmuma Creek, which enters the Yakima River approximately 8 miles upstream of the Roza Diversion Dam. The storage capacity of the reservoir would be approximately 162,500 acre-feet (Figure 2-4). The proposed reservoir site is currently under private ownership.

The dam would be a concrete-faced rockfill embankment approximately 450 feet high with a full-pool elevation of approximately 1,730 feet. An approximately 180-foot-high central core rockfill dike would be constructed in a saddle on the north side of the reservoir. Rockfill dams and dikes have the ability to safely accommodate large seismic event loadings. A spillway and stilling basin would be located on the south abutment of the dam to discharge water into Lmuma Creek. Outlet works on the south dam abutment, sized for approximately 1,600 cfs, would return flow to Lmuma Creek and the Yakima River. The reservoir would be filled by a pumping plant with a capacity of approximately 400 cfs that would withdraw water from the Yakima River. A screened intake channel, approximately 200 feet long, on the Yakima River would carry water to the pumping plant.

Water would be pumped into the reservoir from the Yakima River during winter, spring, and potentially summer, during high-flow periods and times when upstream reservoirs are releasing water specifically for filling the reservoir. The facility would allow for increases in winter flows and decreases in summer flows in the upper Yakima River to benefit fish. On average 82,500 acre-feet of the storage capacity would be used annually to improve instream flows upstream and downstream of the reservoir. The remaining storage capacity would be used for carryover or drought relief storage.

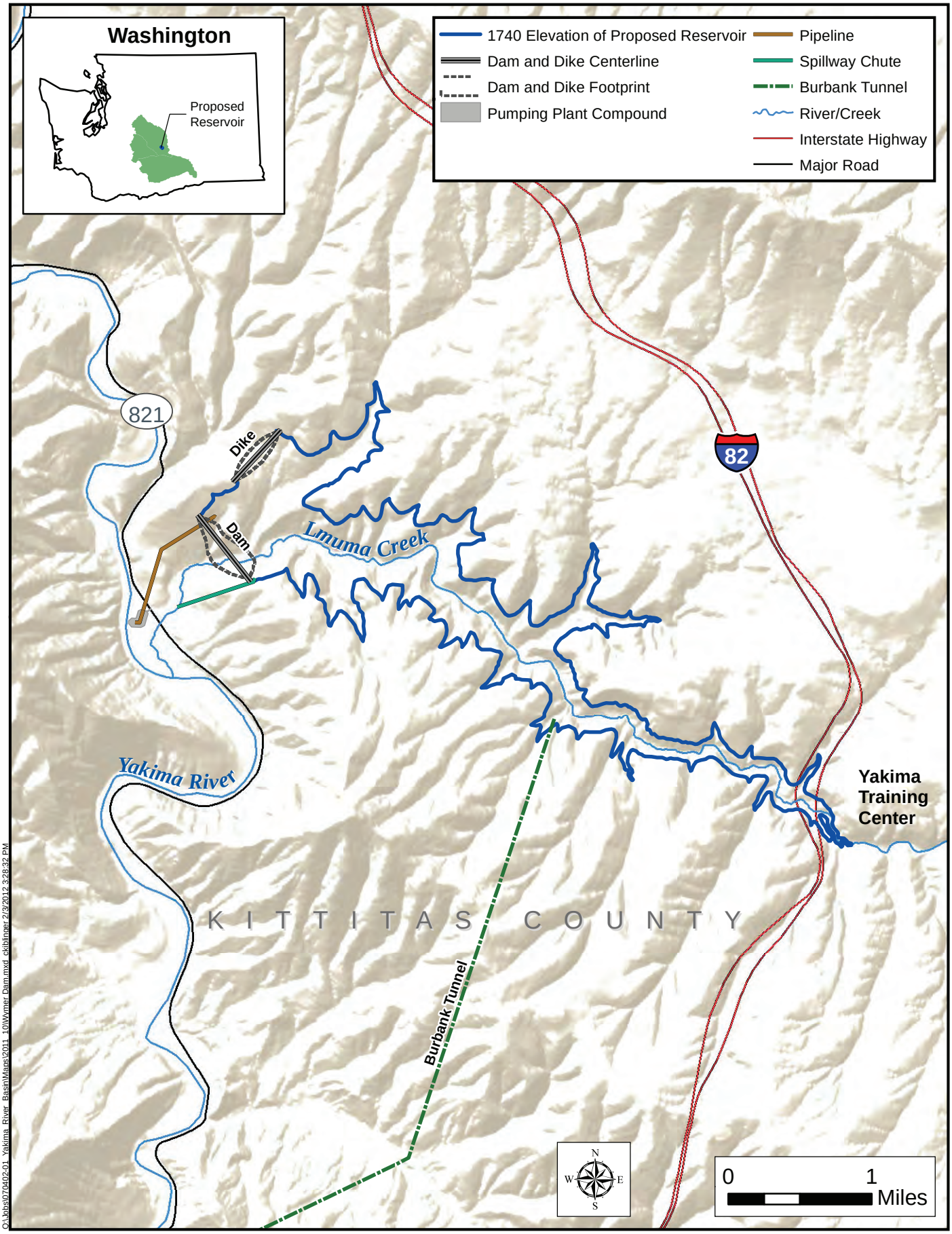


Figure 2-4. Proposed Wymer Dam and Reservoir

Two options are being evaluated for release of the water to the Yakima River. One would release the water to the river directly below the dam. The other would route the water through the Burbank Tunnel (Figure 2-4). The second option requires further engineering analysis, but if feasible, might allow the removal of the existing Roza Diversion Dam.

Wymer Reservoir can allow flows from upper Yakima reservoirs (Cle Elum, Kachess, and/or Keechelus) to be released to increase instream flow in the upper Yakima basin during the non-irrigation season without losing that water for irrigation use by capturing the water and re-releasing it during the irrigation season. Additionally, additional storage can be used to provide pulse flows downstream of Wymer in dry years to encourage anadramous fish outmigration, and to improve flows and ramping rates in average and wet water years. This additional flexibility in reservoir operations improves conditions for fish and increases water supply reliability.

2.4.5.2 Kachess Reservoir Inactive Storage

The Kachess Reservoir is located generally northeast of Interstate 90 near Easton, Washington. The project would modify the outlet to Kachess Reservoir to allow it to be drawn down approximately 80 feet lower than the current outlet. This would provide the ability to withdraw another 200,000 acre-feet of water from the lake, when needed, for downstream uses during drought conditions. The inactive storage project would provide access to additional storage without increasing the reservoir footprint and make maximum use of the water stored in the reservoir.

Two options have been identified to withdraw the additional water from Kachess Reservoir, both starting from a new lake tap outlet in the Kachess Dam about 80 feet deeper than the existing outlet at the southeast end of the lake.

Option 1 would use a gravity-flow tunnel that would discharge into the Yakima River approximately 4.6 miles southeast of the Kachess Dam. Option 2 would withdraw water from the outlet and use a pump station near the lake shoreline to pump through a pipeline to a discharge to the Kachess River just downstream of the dam. Additional design is needed to select the preferred option. Either option would include fish passage improvements at Box Canyon Creek to improve fish passage for bull trout.

2.4.5.3 Bumping Lake Reservoir Enlargement

Bumping Lake Dam is located on the Bumping River, a tributary of the Naches River, approximately 40 miles northwest of Yakima. Bumping Lake Dam was constructed in 1910 and created a reservoir with a capacity of 33,700 acre-feet at elevation 3,425 feet.

Enlargement of Bumping Lake Reservoir includes construction of a new dam and fish passage facilities about 4,500 feet downstream from the existing Bumping Lake Dam (Figure 2-5). The reservoir would be enlarged to a total active capacity of approximately 190,000 acre-feet at approximate elevation 3,490 feet. The existing dam would be breached following construction to allow full use of the existing pool.

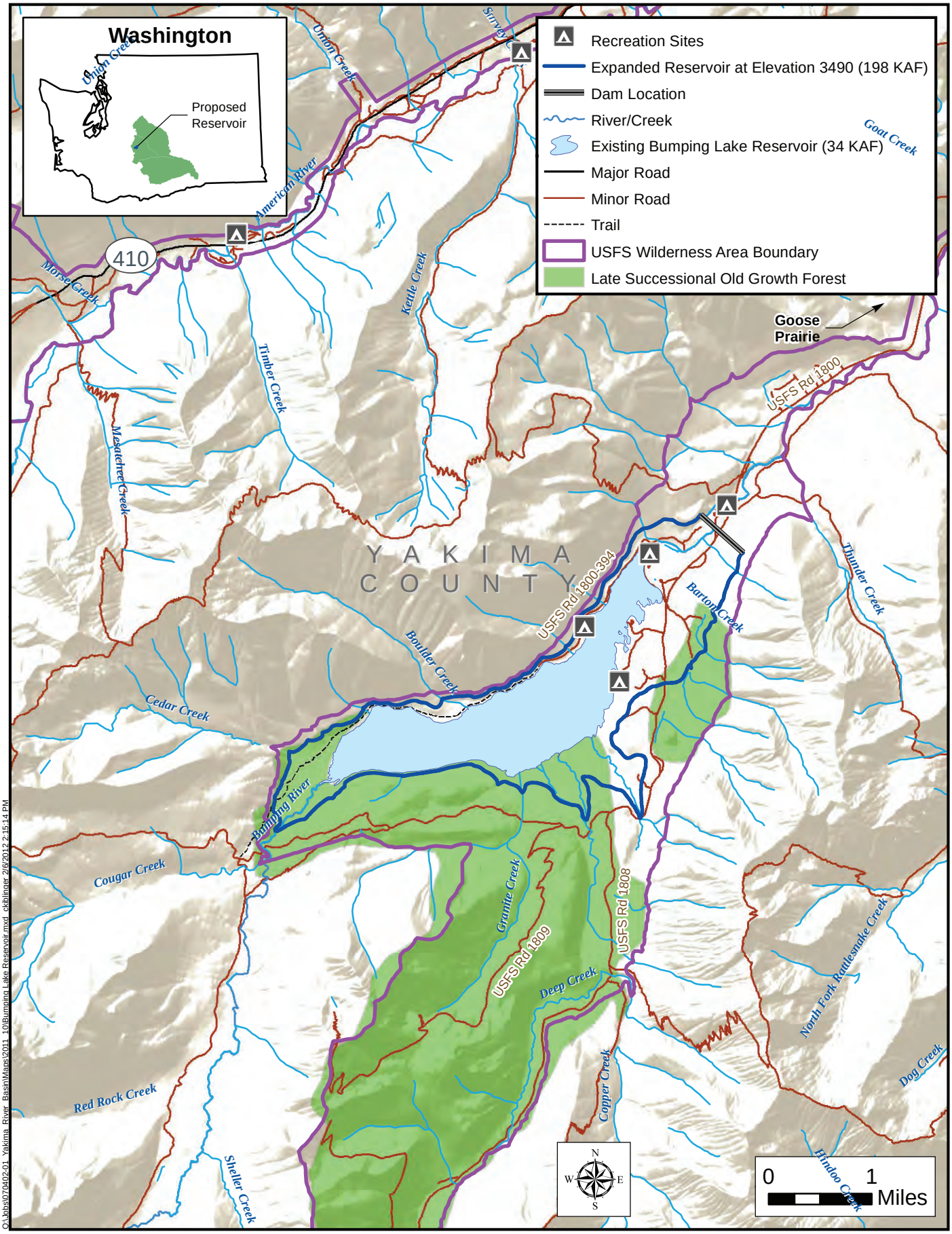


Figure 2-5. Proposed Bumping Lake Reservoir

The enlarged reservoir would inundate an additional 1,900 acres of land for a total inundation area of 3,200 acres. The reservoir would extend approximately 5 miles upstream from the dam and create approximately 3 more miles of shoreline, for a total of 15 miles. The site of the proposed new dam and the lands that would be inundated by the expanded reservoir are contained entirely within the area reserved by Reclamation for the purposes of the Yakima project. The lands are located within the Okanogan-Wenatchee National Forest, but outside William O. Douglas Wilderness and roadless areas.

The additional storage created by this project is a critical component for meeting the instream habitat and water supply goals of the Integrated Plan. Bumping Lake Reservoir's location in the basin also would allow Reclamation greater flexibility in releasing flows. The operations of Bumping Lake and Rimrock Reservoirs (also located in the Naches River basin) would be coordinated with reservoirs in the upper Yakima River basin to assist in meeting both instream flow and water supply needs.

This proposal is a modification of earlier proposals to expand Bumping Lake Reservoir. In the 1979 Proposed Bumping Lake Enlargement Supplemental Storage Division Yakima Project Final EIS (Reclamation, 1979) and the December 2008 Final PR/EIS, Reclamation evaluated an approximately 450,000 acre-foot reservoir. The 1979 proposal was not authorized by Congress. In the Final PR/EIS, Reclamation decided not to carry the proposed reservoir forward to more detailed study because of habitat impacts, proximity to the nearby William O. Douglas Wilderness, and problems with filling such a large reservoir. Ecology's 2008 EIS on the Integrated Water Resource Management Alternative evaluated both the 450,000 acre-foot proposal and a smaller 200,000 acre-foot proposal. The smaller reservoir reduced habitat impacts and allowed for filling the reservoir. The proposal in the Integrated Plan is for a reservoir of approximately 190,000 acre-feet. This reservoir is sized to reduce impacts to bull trout spawning habitat on Deep Creek and to reduce the area of inundation.

2.4.5.4 Study of Columbia River Pump Exchange with Yakima Storage

As the Integrated Plan is implemented, Reclamation and Ecology intend to conduct appraisal and, potentially, feasibility-level studies on other water supply enhancements, including the potential for an interbasin transfer from the Columbia River. Because the Columbia River Pump Exchange proposal is a study and not a proposed project at this time, it is not analyzed in this FPEIS. An EIS would be prepared if the study concludes that the pump exchange is viable and Reclamation and Ecology decide to move it forward. Congressional authorization and funding would be required to conduct design, permitting and construction related activities.

During implementation of the Integrated Plan, an adaptive approach will be used periodically to assess progress towards meeting the identified instream flow objectives, the 70 percent proratable supply goal for irrigation, and goals for other out-of-stream needs (Section 2.4.10). The need for additional water supply enhancements would depend on the effectiveness of projects that are implemented as part of the Integrated

Plan, how the Yakima basin economy develops over time, and the timing of and manner in which climate changes affect water supply availability.

The evaluation of a Columbia River Pump Exchange would involve an initial screening step (Step 1) and subsequent feasibility study (Step 2). Step 2 would be conducted only if the initial screening in Step 1 demonstrates that an interbasin transfer is viable and needed.

2.4.6 Groundwater Storage Element

The Groundwater Storage Element of the Integrated Plan would use surface water to recharge (replenish) underground rock formations that store groundwater (aquifers) and use the natural storage capacity of those aquifers to store water for later recovery and use. Typically aquifers would be recharged with surface water during high flow periods. The stored water would be used to supply out-of-stream uses, increase streamflows through increased groundwater discharge, and/or replenish depleted groundwater storage. The source water is expected to be surface water from the Yakima River or one of its tributaries. Water right permits would be required to divert, store, and use water in a reservoir, including an underground geologic formation (Revised Code of Washington (RCW) 90.03.370). New or existing infrastructure (canals or pipelines) would be used to convey water to the recharge site. The availability of water would be a function of seasonal timing and location within the Yakima River basin.

Two proposed groundwater storage actions—shallow aquifer recharge and aquifer storage and recovery (ASR)—would use surface water to recharge aquifers and store water for later withdrawal and use (Figure 2-6). Both of these actions are new concepts in the Yakima River basin and would initially be implemented as pilot studies to determine their feasibility. The water yield from a fully implemented ASR program is estimated to be 5,000 to 10,000 acre-feet per year.

2.4.6.1 Shallow Aquifer Recharge

The first groundwater storage action involves groundwater infiltration. This would be accomplished by diverting water into designed infiltration systems (ponds, canals, or spreading areas) prior to storage releases from Yakima Project reservoirs in early spring. Water users would then withdraw the infiltrated water instead of using reservoir releases early in the irrigation season, allowing water to be retained longer in reservoir storage. Infiltration systems would also be located to provide returns directly back to surface waters through passive recharge (without pumping). The timing and scale of surface water diversions would be designed to allow continuation of natural high-flow events that provide biologic and channel configuration benefits. Infiltration could also provide cooler water to the lower Yakima River in the summer when the cooler groundwater discharges to the river.

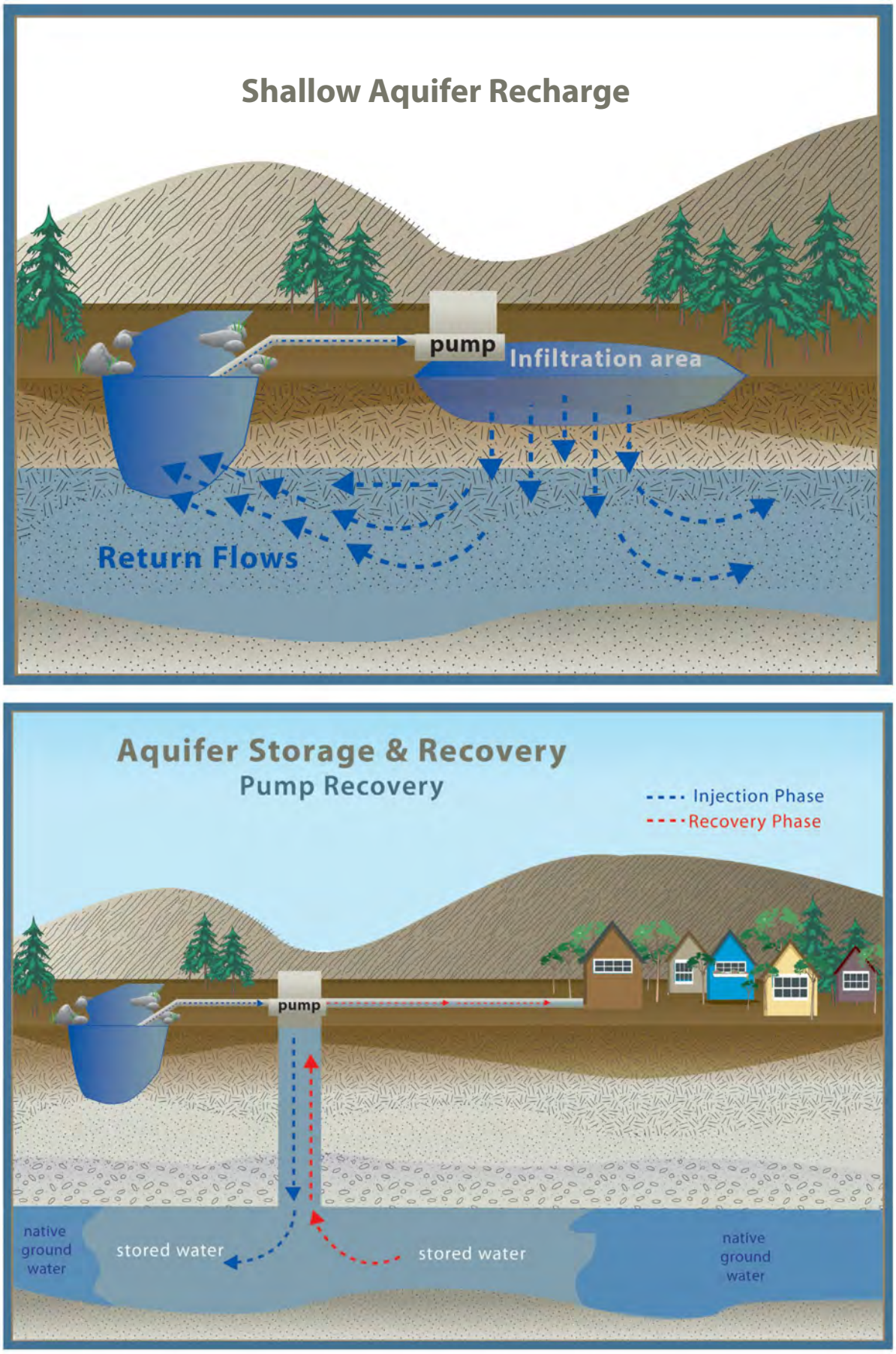


Figure 2-6. Groundwater Storage Proposals

It is anticipated that the groundwater infiltration program would be implemented in two phases:

- Pilot-scale infiltration testing in two study areas, followed by
- Full-scale implementation in the study areas and/or other locations.

Initially, a limited pilot study would be conducted to verify the scope and general design features of groundwater infiltration systems. Specific locations for the two proposed pilot studies have not been identified. Currently the plans are to locate the testing areas in the KRD in an area south of Ellensburg and in the Wapato Irrigation Project near Wapato and Toppenish. Final locations would be dependent on additional study. Two pilot-scale infiltration systems, approximately 1 to 2 acres in size, would be constructed in each study area. The pilot tests would result in recommendations for implementation at these locations or other suitable locations in the basin.

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. This volume was selected for preliminary modeling conducted as part of the Basin Study and does not necessarily reflect actual volumes that would be infiltrated. Total infiltration volumes may vary from year to year, depending on snowpack conditions and reservoir refill requirements. During the pilot phase, policy and legal protocols would be developed to ensure water stored through infiltration is not captured by unauthorized users.

2.4.6.2 Aquifer Storage and Recovery

The second groundwater storage action involves a municipal ASR system. The City of Yakima proposes to divert approximately 5,000 to 10,000 acre-feet of water from the Naches River during the winter months and treat it at the City's existing water treatment plant. It would then be injected through wells and later pumped out for use by the City's residents and businesses during summer months when demand for water is highest. The City has proposed this project and the Integrated Plan would provide funding for implementation.

ASR could also be viable for other cities in the Yakima basin in the future. These projects would require a water treatment facility, one or more wells that could hold treated water, and a pump station for retrieving stored water.

2.4.7 Habitat/Watershed Protection and Enhancement Element

This element includes projects and programs to protect and enhance habitat for anadromous and resident fish, wildlife, and critical habitats in the Yakima River basin. The element would supplement the benefits to fish provided by the improved flows and fish passage included in other Integrated Plan elements. The element includes two programs for protection and enhancement. The Targeted Watershed Protections and Enhancements program would acquire property or easements for protection of watersheds and key habitat areas and recommends designation of certain lands as Wilderness, Wild

and Scenic Rivers, and National Recreation Areas. The second program, Mainstem Floodplain and Tributary Fish Habitat Enhancement, includes projects to restore and enhance fish habitat. The program includes enhancements such as reconnecting floodplains, reestablishing side channels, and restoring natural river and riparian conditions. This program builds on the habitat enhancements identified in studies such as the Yakima Subbasin Salmon Recovery Plan (YBFWRB, 2005) and the 2009 Yakima Steelhead Recovery Plan (YBFWRB, 2009). The Integrated Plan would complete the actions identified in those plans and to provide other habitat enhancements that would improve flexibility and resilience in response to climate change.

2.4.7.1 Targeted Watershed Protections and Enhancements

The Targeted Watershed Protection and Enhancement program includes two aspects. First, under the Land Acquisition Program, key properties would be acquired to protect and enhance watersheds and critical habitat values. Second, Federal Wilderness, Wild and Scenic River, and National Recreation Area (NRA) designations are recommended for some of these lands. The Targeted Watershed Protections and Enhancements program were developed by Reclamation and Ecology working collaboratively with the YRBWEP Workgroup.

Land Acquisition Program

The Land Acquisition Program would further the watershed, water resource, and ecological restoration goals of the Integrated Plan by protecting and restoring key watersheds and forest and shrub-steppe habitat. Under the program, large tracts of privately owned land would be acquired and protected by restricting potential development. A fundamental principle of this program is that all lands would be acquired from willing sellers at fair market value. This could include fee-simple purchases or conservation easements, depending on the property. Existing and historic uses of the property would be maintained where they are compatible with watershed functions and aquatic habitat. Where possible, public access and recreational opportunities would be maintained or improved.

The conservation goals for watershed protections and enhancements include:

- 45,000 acres of high elevation watershed;
- 15,000 acres of shrub-steppe habitat; and
- 10,000 acres of forest habitat.

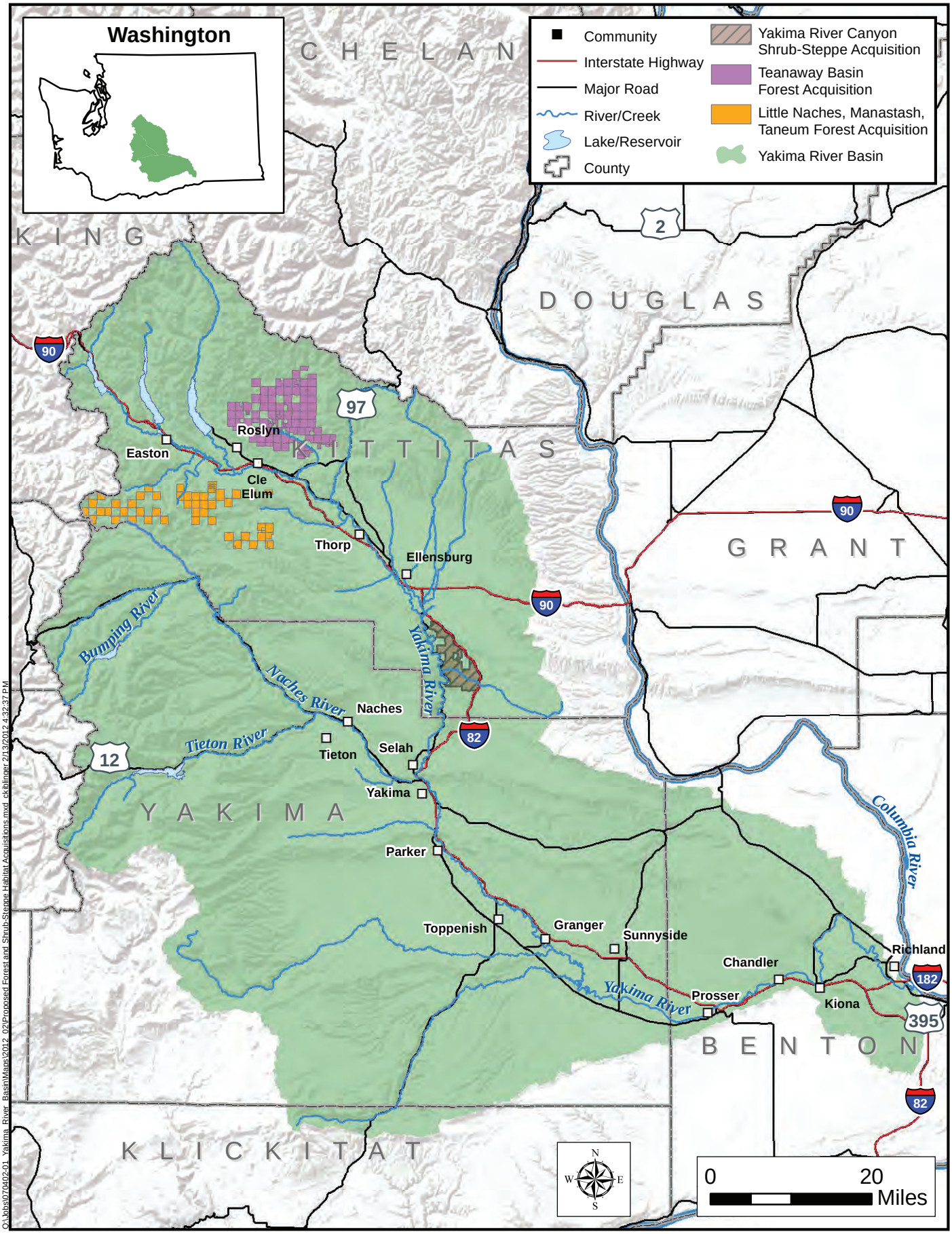
Protecting and restoring watershed functions would help maintain water supply and quality by preventing potential development that could degrade downstream waters. The acquisitions are intended to benefit bull trout, salmon, and steelhead by maintaining or improving riparian vegetation to shelter sources of cold water and cold water habitat and by protecting habitat and spawning grounds or linkages to those areas. The acquired areas would provide additional floodplain restoration opportunities. The program is also

intended to support the regional economy through protecting and expanding a wide variety of recreational opportunities.

The Integrated Plan targets three key areas in the Yakima and Naches River watersheds for land acquisition to help achieve the goals of the Integrated Plan. Protection and restoration of these areas offer ecosystem, species conservation, and restoration potential both inside and outside the immediate riparian corridor. If these three areas cannot be acquired, a combination of alternative areas of equivalent conservation value would be selected that collectively meet the target goals. The targeted acquisitions are shown on Figure 2-7 and include:

- 46,000 acres in the middle and lower Teanaway River basin composed of mid- to high-elevation mixed conifer forest and lower elevation grand fir and ponderosa pine forest. Acquiring this area would provide major ecosystem, water quality and quantity, and species benefits that would complement the habitats and species protected by the 1996 Plum Creek Timber Company Central Cascades Habitat Conservation Program, adjacent to the western portion of the proposed area. The ponderosa pine forests in this area are particularly important due to their limited range. The area provides some of the highest quality streams and cold-water fish spawning and rearing areas in the Yakima River basin (Ecology, 2011c). In addition, conservation of the Teanaway landscape fits well into an overall strategy of acquiring lands to encourage protection of landscape-scale linkages of fish habitat.
- Lands at the headwaters of the Little Naches River, in combination with adjacent lands in the Manastash and Taneum Creek basins. The private lands in these watersheds would be purchased for potential transfer into the National Forest System if they meet Forest Service criteria for inclusion. These private lands are intermingled with National Forest land, generally in a checkerboard pattern. The lands are primarily middle to upper elevation conifer forest. Most of the area has been logged and replanted, but some areas of mature forest remain. The upper reaches of the Little Naches River and Taneum and Manastash Creeks are important for water quality and maintaining cool temperatures for bull trout protection and restoration. They also protect water supply and provide current or potential salmon and steelhead spawning grounds.
- 15,000 acres in the Yakima River canyon, including the valley bottom and eastern slopes, from the Yakima River to Interstate 82 (I-82). The area is composed primarily of basalt cliffs and shrub-steppe vegetation. In addition, the Yakima Canyon riparian area provides salmon, steelhead, and resident rainbow trout habitat. The area is important because of documented sage-grouse breeding areas and golden eagle nest sites.

Additional forested and shrub-steppe properties have been identified in the event the preferred lands cannot be acquired. Properties would be acquired from willing sellers only.



O:\obhs\070402-01 Yakima River Basin\Maps\2012_02\Proposed Forest and Shrub-Steppe Habitat Acquisitions.mxd ckiblinger 2/13/2012 4:32:37 PM

Figure 2-7. Proposed Forest and Shrub-Steppe Land Acquisitions

Several options exist for ownership of the acquired lands, including:

- Private ownership, including conservation easements from an existing private landowner or outright ownership by a private, non-profit conservation organization.
- Local ownership, including ownership by a county government or a consortium of stakeholder groups.
- Public ownership by a State agency such as the Washington Department of Natural Resources (DNR) or WDFW.
- Public ownership by a Federal agency such as the Forest Service or Bureau of Land Management (BLM).
- Tribal ownership by the Yakama Nation (for any portion of the alternative lands that lie within the boundaries of the Yakama Nation Reservation).

Future ownership of the acquired lands would be assessed on a parcel basis as the lands are acquired based on the conditions of each property, proximity to other large public tracts, and funding sources used for acquisition and ability to achieve and sustain the proposed management.

Recommendations for Wilderness, Wild and Scenic River, and National Recreation Area Designations

The Integrated Plan recommends designation of some lands and rivers under Federal Wilderness, Wild and Scenic River, and National Recreation Area (NRA) (Figure 2-8). Some of these lands have already been recommended for Wilderness and/or Wild and Scenic River designation through the Northeastern Washington Forest Plan Revision process (Forest Service, 2011a, 2011b) while others have not. Management guidelines and restrictions under each of these three designations are described in Section 3.16.1.1 of this document. These designations would support the objectives of the Integrated Plan because they could help protect cold water habitat, spawning and rearing grounds and migration corridors for bull trout, salmon, and steelhead. In addition, they could offer increased protection for important natural sources of water supply.

Wilderness designation is recommended for Forest Service lands adjacent to and near the William O. Douglas Wilderness in the vicinity of Bumping Lake. The Integrated Plan also recommends that the greatest practicable extent of remaining eligible land near the reservoir be added to the Wilderness following expansion of Bumping Lake Reservoir. Additional recommendations for Wilderness designations are described under the NRA discussion below.

Recommendations for Wild and Scenic River designation include:

- The Upper Cle Elum, Waptus, and Cooper Rivers in the Cle Elum River basin, which would receive increasing numbers of salmon and steelhead as fish are reintroduced and when fish passage is provided above Cle Elum Dam.

- The North, Middle and West Forks of the Teanaway River. Designation would be linked to acquisition of the 46,000 acre Teanaway property. Designations affecting private lands would be proposed only with substantial support by the existing affected landowners on the middle and lower reaches of the Teanaway River where there is significant private ownership.

- The South Fork of the Tieton River, Indian Creek, and Rattlesnake Creek in the Tieton and Bumping River basins to protect bull trout populations.

- The Deep Creek tributary to Bumping Lake Reservoir above the elevation of the expanded reservoir, to protect one of the strongest remaining bull trout populations in the Yakima River basin.

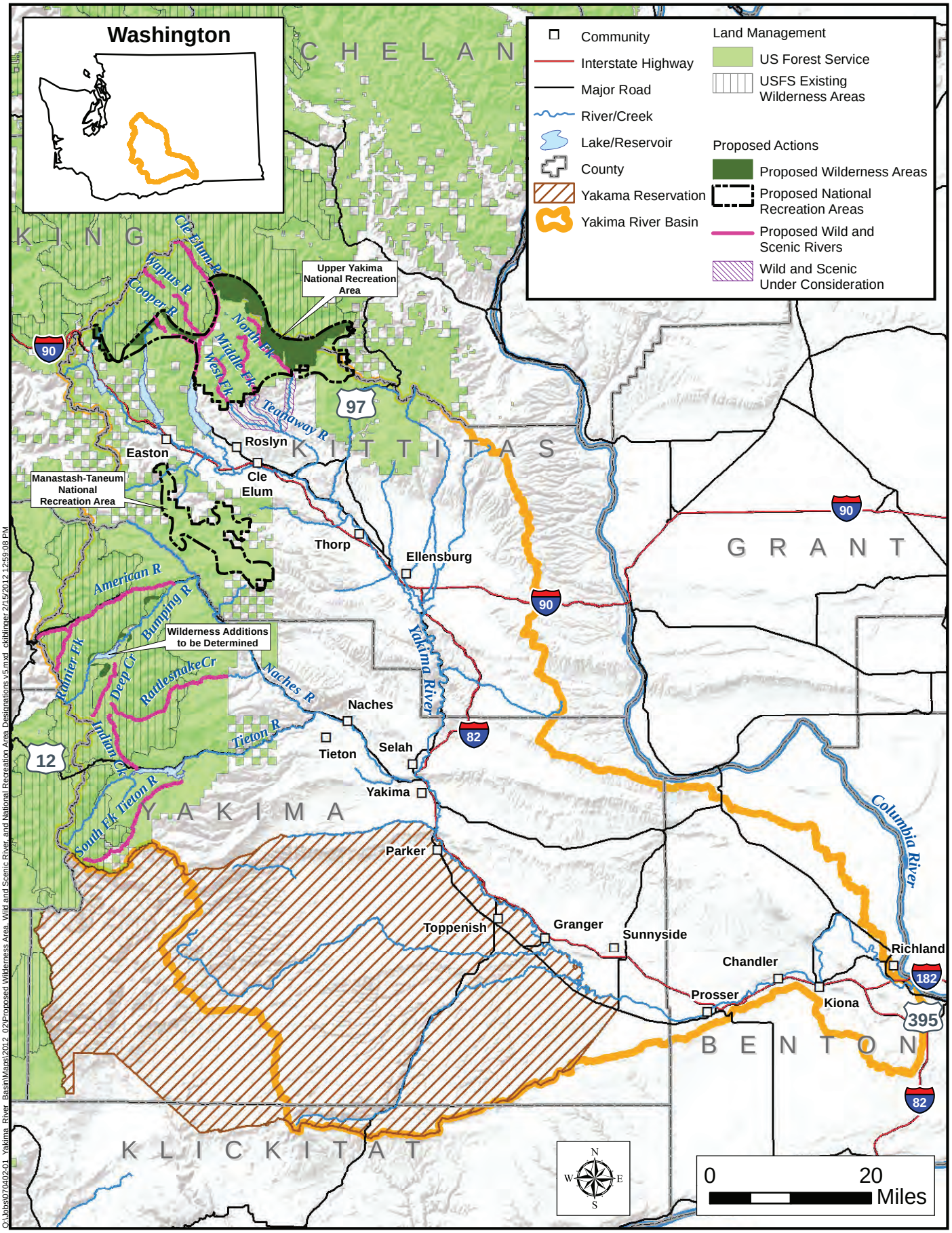
- The American River and Rainer Fork. These tributaries to the Bumping River provide steelhead, a demographically and genetically distinct stock of spring Chinook, and bull trout habitat.

Designations and management plans for Wild and Scenic Rivers would be developed in close cooperation with affected parties and the county of jurisdiction. The recommended Wild and Scenic River designations would be located primarily on National Forest lands. Many were considered in the Wenatchee National Forest 1990 Forest Plan and/or have been recognized in documents related to the ongoing Forest Plan revision (Forest Service, 1990, 2011a). New designations that include private lands would be proposed only with substantial support from existing affected landowners.

The Integrated Plan recommends the designation of two National Recreation Areas within the Okanogan-Wenatchee National Forest:

- The Upper Yakima NRA on approximately 100,000 acres of existing National Forest land. Approximately 21,000 acres of the proposed NRA would be recommended for designation as Wilderness. The recreation and resource management objectives for the remaining acres would be determined following additional study and coordination with the USFS and other interested parties.

- The Manastash-Taneum NRA on approximately 41,000 acres of existing Forest Service lands. The recreation and resource management objectives for the NRA would be determined following additional study and coordination with the USFS and other interested parties.



O:\bbs\070402-01 Yakima River Basin\Maps\2012 02\Proposed Wilderness Area, Wild and Scenic River, and National Recreation Area Designations v5.mxd ckiblinger 2/15/2012 12:59:08 PM

Figure 2-8. Proposed Wilderness, Wild and Scenic River and National Recreation Area Designations

All of these designations would require congressional action that would occur separately from the Integrated Plan. The standard congressional legislative process for Federal designations would provide the necessary public involvement and environmental review specific to each area proposed for designation.

2.4.7.2 Mainstem Floodplain and Tributary Fish Habitat Enhancement Program

The Integrated Plan includes an extensive fish habitat enhancement program that would address mainstem floodplain and tributary habitat restoration priorities through habitat enhancement, flow restoration, fish barrier removal, and screening diversions. Habitat enhancement would supplement the Integrated Plan elements that provide fish passage and improved stream flows to create comprehensive improvements for fish. These actions are intended to substantially improve prospects for recovering fish populations to levels that are resilient to catastrophic events and the potential impacts of climate change. The intent of this habitat enhancement program is to supplement and accelerate ongoing habitat enhancement efforts such as those described in Section 2.1.4.

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 (YBFWRB, 2005); and complete most of the actions described in the Yakima Steelhead Recovery Plan (YBFWRB, 2009). Mainstem floodplain improvements would include channel and habitat restoration in the Yakima River near Ellensburg and between Selah and Union Gap, and on the lower Naches River. Tributary program actions would include completing screening and passage at diversions in the middle and upper Yakima basin, bull trout habitat improvements and management actions, and implementing the Toppenish Creek Corridor restoration project. Tributary habitat enhancements would primarily occur on tributaries to the Yakima and Naches Rivers in the middle and upper parts of the basin, and on the Yakama Reservation.

The approach to implementation would be tailored to utilize existing organizations to review processes and plans, as applicable. Reclamation and Ecology may choose to establish an advisory group similar to the YRBWEP Conservation Advisory Group (see Section 1.9.3) to help develop a more detailed approach for project funding and scheduling.

2.4.8 Enhanced Water Conservation Element

The Enhanced Water Conservation Element is an aggressive program of water conservation measures that would improve basin water supply and instream flows. The element includes conservation measures for irrigation district infrastructure improvements, on-farm conservation and irrigation efficiency improvements, as well as a program for commercial, industrial, municipal and domestic conservation. The scope of this element is intended to supplement, but not duplicate the conservation activities funded under YRBWEP Phase II (Section 1.7.2). This enhanced conservation program includes agricultural conservation projects for Yakima Project irrigation districts as well

as projects outside the authority of YRBWEP Phase II, including irrigation districts outside the Yakima Project and municipal and domestic program. The conservation projects included for Yakima Project districts are projects that have not been funded under YRBWEP Phase II.

2.4.8.1 Agricultural Conservation

Agricultural water conservation measures include lining or piping existing canals, automating canals, constructing re-regulating reservoirs on irrigation canals, improving water measurement and accounting systems, installing on-farm water conservation improvements, and other measures. In order to model the conservation potential, a preliminary list of projects was developed for the Basin Study (Reclamation and Ecology, 2011l). The modeling estimated that the agricultural water conservation program would conserve approximately 170,000 acre-feet of water in good water years and substantially less in drought years.

Projects that would actually be implemented under this program would be selected through detailed feasibility studies and evaluation by the existing YRBWEP Conservation Advisory Group. Entities eligible for project funding include federally and non-federally-served irrigation districts, private irrigators, and individual landowners.

Consumptive versus Nonconsumptive Use of Water

Consumptive and nonconsumptive uses are important considerations in water conservation programs, water transfers, and water markets and banking. For a water use involving a diversion from a source, a portion of the water withdrawn is consumed or lost to further use, primarily through evaporation (Figure 2-9). Examples of consumptive use within irrigation delivery systems include evaporation from open canals and drains and evapotranspiration from vegetation growing along canal banks. For on-farm water use, consumptive use includes crop evapotranspiration (ET), evaporation of water sprayed into the air (spray evaporative loss), evaporation from the plant canopy (canopy loss), and water blown off of the irrigated property (wind drift) (Ecology, 2005a).

A nonconsumptive use is defined by Ecology regulation as water that is not diverted from a source or that is diverted and used without diminishment of the source. Examples of nonconsumptive uses include seepage and return flow from an irrigation canal and percolation from farmlands where water in excess of ET is applied to fields. An additional example of nonconsumptive use when water is not removed from the source is hydroelectric generation at a dam.

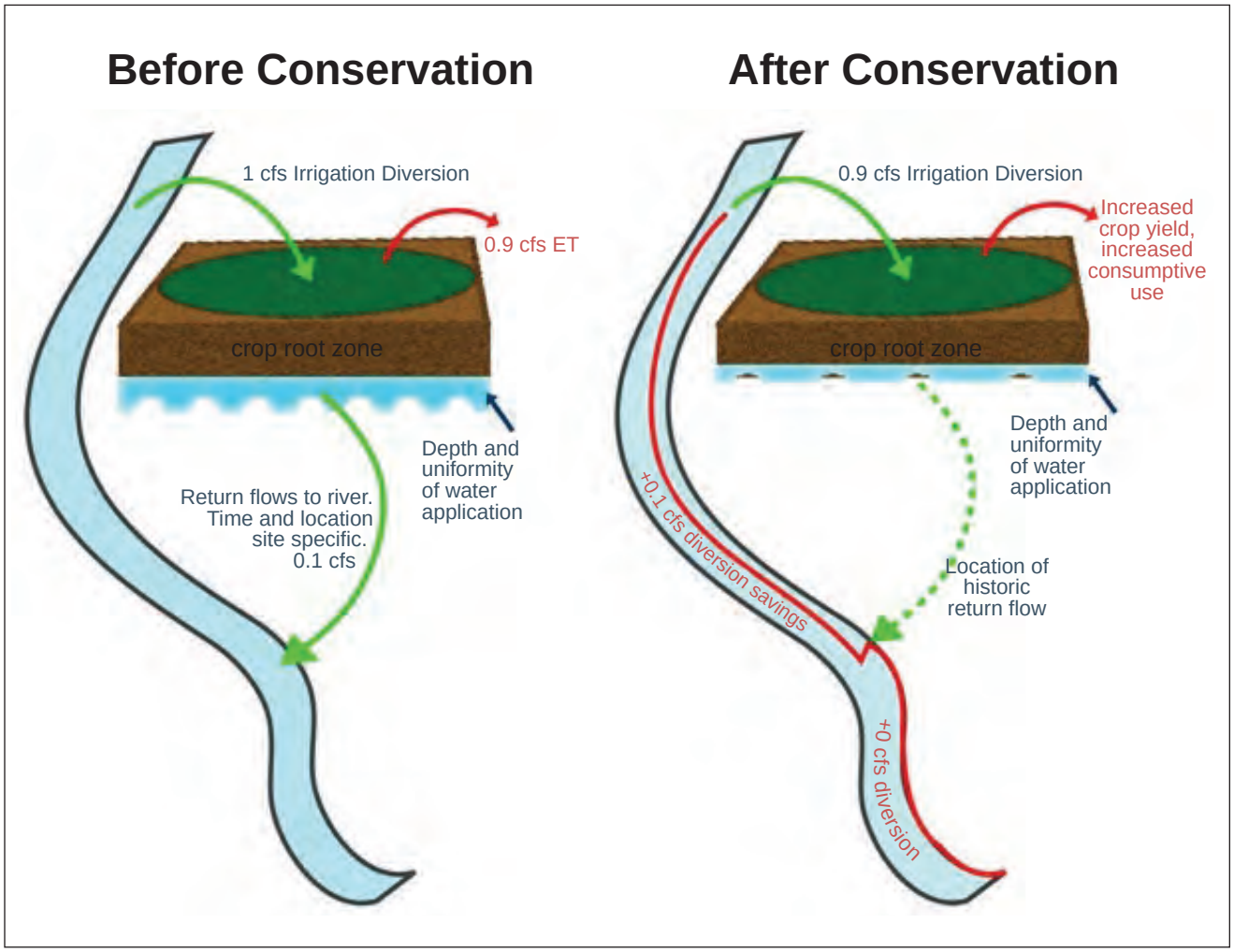


Figure 2-9. Consumptive versus Nonconsumptive Use

Water conservation actions that involve reducing nonconsumptive use, like canal piping or lining, reduce the amount of water that needs to be diverted from the stream, but they also reduce the amount of return flow that goes back to the stream by approximately the same amount. This is because the water being diverted creates the return flows so if the diversion goes down as a result of a reduction in nonconsumptive loss (e.g., seepage), so do the return flows. As a result streamflows will go up immediately below the point of diversion, since the diversion is reduced, but that benefit is lost as you move downstream since return flows to the stream are also reduced. Eventually there will be no streamflow benefit below the point where all of the return flows would have otherwise reentered the stream. In the Yakima basin, for example, no streamflow benefits would accrue in the lower Yakima River from water conservation actions that reduce nonconsumptive use in the Kittitas Valley.

Because of the relationship between diversions and return flow, conservation that reduces nonconsumptive use does not generate any "new" water that can be reallocated to other consumptive uses. If the conserved water is reallocated to consumptive use, and as a result "lost" to the basin, then streamflows downstream will actually be reduced, affecting aquatic resources in the stream and downstream water right holders.

In resolving water resource issues, two aspects of nonconsumptive water conservation must be kept in mind:

1. Nonconsumptive water conservation can improve stream flows in specific stream reaches but will not provide an overall improvement in stream flows throughout the river or stream.

2. Nonconsumptive water conservation does not create any additional water that can be made available for new consumptive uses without negatively affecting existing streamflows and water rights.

Most of the projects proposed for the Enhanced Water Conservation Element of the Integrated Plan involve reducing seepage and return flow which are nonconsumptive uses of water when viewed in terms of the entire river basin. Only a small amount of the water that will be conserved can be attributed to consumptive uses. However, the Yakima Project has some flexibility in its operation and can allow some redistribution of water within the basin. The challenge is balancing the reduced seepage and return flow from conservation projects with the potential effects on downstream water users and instream flows. The reduction in return flow will reduce the supply downstream and require water released from storage.

2.4.8.2 Municipal and Domestic Conservation Program

The Municipal and Domestic Conservation Program would promote efficient use of municipal and domestic water throughout the Yakima basin using voluntary, incentive-based actions that focus on landscape irrigation and other consumptive uses. Municipal and domestic usage includes water that is delivered by public systems regulated by the Washington State Department of Health, used by individual homeowners served by

permit exempt wells, used by commercial or industrial facilities, and delivered by irrigation entities for outdoor landscape irrigation in developed areas of the basin. It also includes residential, commercial, industrial, and urban recreational uses of water such as parks, ball fields, and golf courses.

A multi-stakeholder advisory committee on municipal and domestic water conservation (including local and environmental stakeholders) would be convened to organize outreach to local elected officials and provide liaison with Reclamation, Ecology, and the Washington State Department of Health. The advisory committee would focus on the following key efforts:

- Implementing education, incentives, and other measures to encourage residential and commercial users to improve landscape irrigation efficiency where the source of supply is agricultural irrigation canals or ditches.
- Improving the efficiency of consumptive uses (i.e., water that evaporates or is otherwise consumed and does not return to surface streams or groundwater through wastewater treatment plants, septic systems or surface infiltration).
- Establishing best practice standards for accessing the new supply developed through the Integrated Plan and dedicated to municipal use and municipal/domestic mitigation (mitigation refers to water that is used to offset the increased water usage from new housing or businesses). The standards would be based on review of evolving practices in similar communities and similar climate zones of the western United States.
- Determining conditions for accessing the new supply that would apply to homeowners or developers seeking mitigation water for consumptive water use for homes supplied by individual household wells.

2.4.9 Market Reallocation Element

Under this part of the Integrated Plan, water resources would be reallocated through a "water market" and/or "water bank," where water rights would be bought, sold, or leased on a temporary or permanent basis, to improve water supply and instream flow conditions in the Yakima basin. This effort would include recommendations to:

- Increase the overall value of the goods and services derived from the basin's water resources, by reallocating water from low-value to high-value uses;
- Reduce the delay and cost of transactions that reallocate water resources; and
- Ensure that, before transactions are completed, appropriate consideration is given to the potential impacts on third parties.

These improvements to the water transfer process are intended to facilitate transfers to improve irrigation water supply and instream flows. 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. Market

reallocation is expected to result in water exchanges in the range of 30,000 to 60,000 acre-feet (Reclamation and Ecology, 2011j).

The near-term program would continue existing water marketing and banking activities in the basin that involve water users and Ecology, 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 inside the district and lease water rights for that land outside the district (Reclamation and Ecology, 2011j).

To facilitate this process, agricultural conservation program funding (Section 2.4.8.1) would also be made available to non-Federal irrigation entities to upgrade conveyance infrastructure to improve their operational flexibility and their ability to lease water to other irrigation districts, including federally-served districts.

2.4.10 Adaptive Approach

The Integrated Plan has seven elements and some of these include multiple projects. Implementation is expected to extend over at least a 20 year period. During this time, evolving and changing conditions, including new information, may require plan adjustments. To effectively identify and make adjustments in a timely way, Reclamation and Ecology would use an adaptive approach to implementing the Integrated Plan. This would include periodic review and adaptive adjustments as described below.

2.4.10.1 Periodic Review

Reclamation and Ecology, in cooperation with the YRBWEP Workgroup and its Implementation Subcommittee, would jointly review and summarize progress on implementing the Integrated Plan. The Implementation Subcommittee currently includes representatives from the Yakama Nation, Yakima County, American Rivers, Roza Irrigation District and Ecology. This review would occur annually for the first five years and at five year intervals after that. The five year interval is consistent with Ecology's statutory requirement for preparing supply and demand forecasts for the state legislature. The review will include:

- Status of securing authorization and funding for implementation;
- Progress in establishing programmatic elements (e.g., water marketing, water conservation, habitat/watershed protection and enhancement, floodplain restoration);
- Progress in constructing structural improvements (e.g., reservoirs, canal lining, groundwater infiltration facilities, etc);
- Assessment of outcomes for water supply and fish production, including improvements in water supply, streamflow, other fish habitat conditions, and trends in salmon, steelhead and bull trout population metrics;

- Effectiveness of Reclamation's reservoir operating rules based upon identified goals for meeting instream and out-of-stream needs (including future revisions to operating rules);

- Significant changes, if any, in the underlying drivers for the Integrated Plan, such as listing status of aquatic species; changes in the basin's population and economy; changes in climate, snowpack, streamflows and seasonal timing of runoff; major shifts in cropping patterns, irrigation practices or diversions; and changes in water needs;

- Formulation of any recommendations for adjustments to the Integrated Plan or implementation schedule; and

- Progress in acquiring lands, designating lands and rivers, and establishing management programs per the watershed lands conservation program of the Integrated Plan.

2.4.10.2 Adaptive Adjustments

If the review described above indicates a need for significant changes to the Integrated Plan, the following principles would be applied:

- Adjustments made to the Integrated Plan will reflect the overarching and balanced objectives to advance both water supply improvements and ecosystem enhancements.

- If particular projects, actions, or programs encounter insurmountable obstacles to implementation or are found unable to deliver the expected benefits, substitutes for those projects should be pursued to achieve similar outcomes.

This adaptive approach would be formalized with written protocols and standards in an Adaptive Approach document, to be developed within the first three years of plan implementation.

2.5 Alternatives Eliminated from Detailed Study

Numerous additional projects were identified through the scoping process for this FPEIS. Some of the same projects were initially considered by Reclamation and Ecology for inclusion in the Integrated Plan. The projects described below were identified but not carried forward for further evaluation because they are not able to meet the Purpose and Need for the Integrated Plan. The reasons for eliminating these projects from detailed study are described below.

2.5.1 Columbia River Pump Exchange

Over the years there has been substantial community support for construction of a pump exchange project that would bring Columbia River water into the Yakima River basin to supplement existing water supplies. Reclamation and Ecology have evaluated the

potential for a Columbia River pump exchange in the past and determined that the high costs and environmental uncertainties associated with such projects did not warrant carrying a pump exchange project forward in the Integrated Plan.

Reclamation and Ecology evaluated two alternatives for a pump exchange project in the 2008 Draft PR/EIS—Black Rock Reservoir and Wymer Dam Plus Yakima River Pump Exchange. In the December 2008 Draft PR/EIS, Reclamation concluded that the benefits of the two projects, when compared to the impacts and costs, did not justify moving forward with either project (see Section 1.9.1 of this document). Ecology agreed with Reclamation's conclusions in its 2009 Final EIS and adopted the Final PR/EIS as part of its analysis of an Integrated Water Resource Management Alternative. Reclamation and Ecology believe that the environmental analysis of the Black Rock Reservoir and Wymer Dam Pump Exchange projects captured the range of potential alternatives for a Columbia River pump exchange and provided adequate information to determine that such a project should not be carried forward.

During the Workgroup process, some members proposed including a Columbia River pump exchange project in the Integrated Plan. Reclamation and Ecology, with input from the Workgroup, determined that there was no reasonable certainty that a pump exchange project was environmentally or economically feasible or needed at this time to meet the Purpose and Need. A pump exchange project would substantially increase the cost of the Integrated Plan without increasing benefits. Because conditions may change in the future, the Integrated Plan includes a study of a Columbia River Pump Exchange (Section 2.4.5.4). If conditions warrant, a pump exchange project could be further evaluated for inclusion in the Integrated Plan in the future.

2.5.2 Other Storage Projects

A number of other reservoir sites have been suggested and reviewed by Reclamation, but were not carried forward to a feasibility-level study for further analysis. A listing of those projects is provided in Table 2-1, along with Reclamation's reasons for not further studying each project (Reclamation, 1984).

Ecology also evaluated an offstream reservoir along Ahtanum Creek (Ecology, 2005b). Pine Hollow Reservoir was not carried forward in this document because its benefits would be limited primarily to the Ahtanum basin. Pine Hollow Reservoir would increase total water supply available (TWSA) by less than 0.1 percent, an amount that could not be measured by Reclamation. The Yakama Nation was a partner in the development of the Ahtanum Creek Watershed Restoration Program. The Tribe has indicated that it does not support moving the project forward at this time because of lack of consensus among the Yakama Nation, Ahtanum Irrigation District, and other Ahtanum basin stakeholders to proceed with the project.

Table 2-1 Potential Storage Sites Considered

Name	Stream	Location	Maximum Capacity (acre-feet)	Reason for Not Carrying Forward
Bakeoven	Tieton River, South Fork	1.5 miles NE of Grey Creek Campground	35,000	Cost
Casland	Teanaway River, North Fork	3 miles north of Casland	63,000	Cost
Cle Elum Lake Enlargement	Cle Elum River	Existing Cle Elum Dam	485,000 (50,000 new)	Reason not available
Cooper Lake	Cooper River	Cooper Lake outlet		Cost, wilderness impacts
Cowiche	Cowiche Creek, South Fork	6 miles west of Cowiche	16,000	Cost
Dog Lake	Clear Creek	Dog Lake outlet		Cost, limited water supply
East Selah	Yakima River	Gravel pits at Selah	3,000	Cost
Forks	Teanaway River	1 mile downstream of North and West Forks junction	390,000	Cost, geology
Hole in the Wall	Dry Creek	2 miles NW Hwy 97 crossing	25,000	Cost
Horseshoe Bend	Naches River	3 miles upstream of Tieton River	80,000	Cost, geology, block anadromous fish
Hyas Lake	Cle Elum River	Hyas Lake outlet	Not listed	Cost, limited water supply, wilderness impacts
Little Rattler	Rattlesnake Creek	1 mile upstream Naches River	112,000	Cost, inundates big game winter range and high-quality resident fishery
Lost Meadow	Little Naches River	1 mile NW Naches Pass Forest Camp	30,000	Cost
Lower Canyon	Yakima River	Mouth of Yakima Canyon	350,000	Railroad relocation cost, block anadromous fish, other adverse impacts
Manastash	Manastash Creek	7 miles west of Ellensburg	50,000	Cost
Mile Four	Rattlesnake Creek	4 miles upstream from Nile	45,000	Inundates big game winter habitat and resident fishery
Minnie Meadows	Tieton River, South Fork	1 mile SW of Grey Creek Campgrounds	35,000	Cost
Naneum	Naneum Creek	10 miles north of Ellensburg	40,000	Cost
Pleasant Valley	American River	Near Thunder Creek Campground	150,000	Block anadromous fish, impact recreation

Name	Stream	Location	Maximum Capacity (acre-feet)	Reason for Not Carrying Forward
Rattlesnake	Naches River	Immediately below Rattlesnake Creek	85,000	Block anadromous fish, social effects problem
Rimrock Lake Enlargement	Tieton River	Existing Tieton Dam	270,000 (172,000 new)	Engineering concerns
Satus	Satus Creek	8 miles west of Satus	175,000	Yakama Nation site
Simcoe	Simcoe Creek – Toppenish Creek (require other sources to fill)	4 miles west of White Swan	95,000	Yakama Nation site
Soda Springs	Bumping River	At Soda Springs Campground	360,000	Alternative to Bumping Lake enlargement, higher costs, adverse impacts
Swauk	Swauk Creek	0.5 miles upstream from Yakima River	75,000	Wildlife impacts
Tampico	Ahtanum Creek	7 miles west of Wiley City	72,000	Yakama Nation site
Toppenish	Toppenish Creek	9 miles SW of White Swan	125,000	Cost
Upper Canyon	Yakima River	0.5 miles upstream from Swauk Creek	190,000	Major barrier to anadromous fish
Wapatox	Naches River	0.5 miles below Tieton River	100,000	Block anadromous fish
Waptus Lake	Waptus River	Waptus Lake outlet	Not listed	Cost, wilderness impacts

2.5.3 Operational Changes at Existing Reservoirs

Reclamation and Ecology received several suggestions that the "flip-flop"[2] regime should be eliminated or altered to benefit fish. This option was considered during development of the Integrated Plan, but it was determined that the regime could not be eliminated because of Reclamation's obligations to provide irrigation water and meet fish target flows. However, hydrologic modeling conducted for the Basin Study found that it would be possible to modify the "flip-flop" regime to reduce the adverse impacts associated with the practice. Those modifications are included in the Integrated Plan proposal.

[2] To accommodate irrigation needs and prevent the dewatering of redds, the Yakima Field Office manages the basin using what has become known as the "flip-flop" flow regime. The strategy involves a reduction in flows in the upper Yakima throughout the spawning period (Sept.-Oct.) and a ramping up of flows in the Naches River.

2.5.4 Reliance on Conservation and Water Marketing

Reclamation and Ecology have received comments that no additional storage should be constructed in the Yakima basin and that conservation and water marketing could provide enough water to meet the needs in the basin. Reclamation and Ecology have analyzed the effects of both water conservation and water marketing and have concluded that these elements cannot meet the Purpose and Need of the Integrated Plan as stand-alone alternatives.

Most of the conservation actions available in the Yakima River basin involve reducing non-consumptive uses of water. Conservation actions that reduce non-consumptive uses can improve streamflows locally in specific stream reaches (between the point of diversion and the point of return flow), but do not provide an overall improvement in streamflows throughout the river or stream. Moreover, much of the water that could be conserved already returns to the Yakima River as return flow and is relied upon downstream by other users. Therefore, conservation actions do not make much additional water available for consumptive uses. See Section 2.4.8.1 regarding the relation of consumptive and nonconsumptive uses of water to conservation. In addition, in a drought there often is no water available to operate irrigation delivery systems for proratable water users, so conservation is of no benefit during those times.

As part of the Yakima River Basin Study (Reclamation and Ecology 2011w), Reclamation and Ecology modeled the effects of the Integrated Plan with water conservation, but without new surface water storage. Results indicated prorationing levels below 40 percent would occur under conditions similar to the dry years that occurred in 1994, 2001 and 2005. This is far below the 70 percent threshold identified in the Purpose and Need for the Integrated Plan.

Leasing of water rights has occurred under dry-year conditions since 1994. While leasing has provided marginal improvements in water supply, the amounts of water leased have been far short of that needed to meet the Purpose and Need (Reclamation and Ecology 2011j). Even with the improvements to water transfer procedures proposed in the Integrated Plan, it is unlikely that holders of nonproratable water rights would transfer enough water to those holding proratable water rights to meet the 70 percent reliability criterion specified in the Purpose and Need. Water marketing levels depend on willing participants who are influenced by a variety of factors that change from year to year, such as crop prices for both sellers and buyers of water. These factors make water markets less reliable in resolving water resource and habitat problems in the Yakima Basin, compared with solutions that include an integrated approach to water supply and habitat enhancement.

Therefore, while conservation and market reallocation are included as elements of the Integrated Plan that can help to improve outcomes, they cannot meet the Purpose and Need in the absence of increased surface water storage and other elements of the Integrated Plan.

2.6 Summary Comparison of Environmental Impacts of Alternatives

Table 2-2 compares the impacts associated with the two alternatives. The phrase "short-term" refers to impacts associated with construction activities. The phrase "long-term" refers to impacts following the construction period. Additional information on the impacts is found in Chapters 4 and 5.

Table 2-2 Comparison of Impacts for Alternatives

Resource	No Action Alternative	Integrated Plan Alternative
Earth	Short-term: Construction-related erosion and sedimentation from ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Erosion and sediment delivery would continue or increase.	Short-term: Construction-related erosion and sedimentation. Long-term: Loss of some earth-related resources, permanent landscape modifications, and changes in stream channel and floodplain conditions. Disruption of sedimentation downstream of storage facilities. Decrease in erosion potential in conservation areas.
Surface Water Resources	Short-term: Potential disruption during construction. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects could result in a slight increase in water supply and increases in streamflows in various reaches and tributaries. Despite these ongoing actions, current conditions and trends related to the timing and/or quantity of streamflows in the mainstem Yakima River and its tributaries, reservoir storage and refill, and deliveries to water users would continue. Overall goals and objectives of the Integrated Plan would not be achieved. There would be continued inability to meet water demand and reduced ability to respond to changes in water supply conditions.	Short-term: Potential disruption during construction. Long-term: Increased TWSA, end-of-season reservoir storage, annual diversions, and improved streamflow.
Groundwater	Short-term: Potential dewatering impacts during construction of ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Groundwater recharge is expected to decrease with conservation projects while demand on groundwater is expected to increase. Overall, groundwater levels would likely continue to decline.	Short-term: Temporary reduction of usability of wells in the immediate vicinity of construction sites. Long-term: Groundwater levels and quantities would increase with potential decreases near canal lining sites.

Resource	No Action Alternative	Integrated Plan Alternative
Water Quality	Short-term: Construction of ongoing projects could result in temporary water quality impacts. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Localized benefits from ongoing habitat improvements. Net benefits to water quality unlikely to occur. Current trends related to increased stream temperature conditions on a seasonal basis would likely continue.	Short-term: Risk of erosion and contaminants from construction. Long-term: Net benefit to water quality by improving streamflow conditions, riparian areas, and floodplain habitat. New reservoirs have potential to increase temperatures of water released from the dams in downstream surface waters at certain times of the year (late summer/early fall); however, the reservoirs will be operated to minimize and mitigate temperature impacts. Preserving watersheds through land acquisition, public land designations, and river corridor designations would protect water quality, contribute to cooler water temperatures, and reduce sedimentation.
Hydropower	Short-term: No impact. Long-term: Hydroelectric generation would continue to operate as under current patterns and trends.	Short-term: No impact. Long-term: Reduction of hydroelectric generation at Roza and Chandler Powerplants and the Drop 2 and Drop 3 powerplants in the Wapato Irrigation Project.
Fish	Short-term: Temporary habitat disturbance, construction-related impacts. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects could produce localized improvements, but basin-wide benefits are unlikely to occur. Current trends would continue with existing threats to resident and anadromous fish related to water availability and habitat quality likely worsening with increased population and climate change.	Short-term: Temporary habitat disturbance, construction-related impacts. Long-term: Overall benefits from fish passage facilities, improved streamflows and habitat/watershed protection and enhancement projects. Combined elements would contribute to flow conditions resembling natural flows and improve fish passage and habitat throughout historic ranges.

Resource	No Action Alternative	Integrated Plan Alternative
Vegetation	Short-term: Some vegetation removal from construction of ongoing projects, including shrub-steppe vegetation. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Minor, localized improvements from piecemeal implementation of ongoing projects. Fewer benefits to riparian and wetland vegetation when compared to a program that implements the projects as part of an integrated program. Current patterns and trends, including logging of intact forested habitat, shrub-steppe habitat loss, and other vegetation impacts on certain private lands, would likely continue into the foreseeable future.	Short-term: Temporary disruption of vegetation, including shrub-steppe and mature forest vegetation Long-term: Negative impacts, including habitat loss, from expanded reservoirs, but an overall positive impact due to habitat/watershed protection and enhancement. Permanent removal of some areas of shrub-steppe and mature forest vegetation.
Wildlife	Short-term: Temporary dislocations of wildlife and temporary disruption of habitat during construction of ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Minor improvements to habitat from ongoing projects. Fewer benefits to habitat when compared to a program that implements the projects as part of an integrated program. Current patterns and trends, including increased loss of high-quality habitats on certain private lands, would likely continue into the foreseeable future.	Short-term: Temporary disruption of habitat during construction. Substantial habitat impact could occur if replacement habitat is unavailable. Short term impacts for some species could be substantial at Wymer Dam and expansion of Bumping Lake Reservoir. Long-term: Negative impacts to habitat from new or expanded reservoirs. Overall positive impact for wildlife from habitat/watershed protection and enhancement. Permanent impact on shrub-steppe and mature forest vegetation.

Resource	No Action Alternative	Integrated Plan Alternative
Threatened and Endangered Species	Short-term: Some ongoing projects could result in temporary displacements of listed species due to noise and disturbance during construction. Long-term: Minor improvements to habitat may provide limited benefits to listed species. Overall, ongoing projects to restore habitat are likely not sufficient to overcome the problems of depleted streamflow conditions needed to support the enhancement of listed fish populations and healthy, functional ecosystems in the Yakima River basin. Without a comprehensive, coordinated management program, ongoing projects to restore fish passage and provide habitat protection and restoration would be completed in a piecemeal fashion, reducing the potential for positive synergistic effects. There would be continued and likely increased impacts to high-quality habitat on some private lands supporting threatened shrub-steppe habitat and mature forests critical for greater sage-grouse and northern spotted-owl, respectively. In general, current fish population trends would continue under the No Action Alternative with existing problems with water availability and habitat quality likely worsening with increased population and climate change. As a result, the No Action Alternative would have the most impacts to threatened and endangered species.	Short-term: Temporary disruption of habitat during construction. Removal of some areas of shrub-steppe and mature forest habitat. Long-term: Negative impacts to species that may be displaced from the area of a new or expanded reservoir. Overall positive impacts from fish passage facilities, improved streamflows, and habitat/watershed protection and enhancement projects. Permanent impact on shrub-steppe and mature forest vegetation; however, land acquisition and habitat enhancement components are intended to result in a net improvement in conditions for listed fish and wildlife species

Resource	No Action Alternative	Integrated Plan Alternative
Visual Resources	Short-term: Presence of construction equipment and activities during construction of ongoing projects would generally create an unattractive visual setting during the construction period. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects would have varying levels of local scale visual impacts. Impacts would likely be minor because of the small scale of ongoing projects. There would be continued and likely increased changes to the visual appearance of some private lands that would have otherwise been acquired and protected under the Integrated Plan Alternative. In some cases, natural or nearly natural appearing lands could change to a logged or developed condition.	Short-term: Presence of construction equipment and activities during construction would generally create an unattractive visual setting during the construction period. Long-term: Visual impacts would be primarily of local scale and are not expected to be significant with the potential exception of new and expanded reservoirs.
Air Quality	Short-term: Construction of ongoing projects would likely cause minor increases in fugitive dust and vehicle emissions. Long-term: Ongoing projects may cause long-term impacts from emissions if they include stationary pollutant sources such as pumping equipment driven by diesel, natural gas, or other fossil fuels.	Short-term: Minor dust and emissions associated with construction and traffic. Long-term: Some projects may cause long term impacts from emissions associated with stationary pollutant sources, although impacts are not expected to be significant.
Climate Change	Short-term: Minor amounts of greenhouse gas emissions during construction of ongoing projects. Long-term: Water supply shortages and adverse effects on streamflows and fish could become significantly worse. Limited ability to respond to climate change-induced impacts.	Short-term: Increases in greenhouse gas emissions associated with construction of individual projects. Long-term: Multiple benefits to water supply, agriculture, and fish, improving the ability of water and fisheries managers to adapt to future climate change.
Noise	Short-term: Increased noise from construction equipment and activities. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Individual projects have the potential to generate noise during long-term operation.	Short-term: Increased noise from construction equipment and activities, including blasting associated with certain individual projects. Long-term: Some equipment or vehicles may be audible in the vicinity of projects.

Resource	No Action Alternative	Integrated Plan Alternative
Recreation	Short-term: Temporary access restrictions and nuisance dust and noise during construction of ongoing projects. Impacts would be minor, and more limited than under the Integrated Plan. Long-term: Ongoing projects would not result in long-term negative impacts on recreation in the Yakima River basin. Current patterns and trends impacting recreation facilities would likely continue into the foreseeable future.	Short-term: Temporary access restrictions or nuisance dust and noise. Long-term: Some recreational facilities and resources at Bumping Lake Reservoir would be eliminated and it may not be possible to relocate. Many projects would improve fishing and wildlife viewing opportunities. Motorized vehicle use would be restricted in designated Wilderness. Proposed National Recreation Areas and other watershed protection actions would enhance recreational opportunities.
Land and Shoreline Use	Short-term: Temporary access restrictions during construction of ongoing projects. Long-term: Ongoing projects could result in long-term land use impacts from property or easement acquisitions. Current patterns and trends impacting land use would likely continue into the foreseeable future.	Short-term: Temporary access restrictions caused by construction. Property or conservation easement acquisitions of private property. Long-term: Property and easement acquisitions, shift from forest and rangeland to water storage in Wymer Reservoir area, potential land use changes due to market reallocation. Potential decreased tax base with the conversion of private lands to public ownership.
Utilities	Short-term: Potential temporary disruptions during construction of ongoing projects. Long-term: Ongoing conservation-oriented water supply system improvements, including pumping plants and pipelines, would have no substantial impact on the supply of electric power.	Short-term: Potential temporary disruption during construction. Long-term: Reduced supply of electricity due to power subordination and increased demand from new equipment.
Transportation	Short-term: Potential temporary traffic delays and possible detours associated with ongoing projects. Long-term: Long term transportation not likely to be affected.	Short-term: Temporary traffic delays and possible detours, in some cases for up to 3 to 5 years for major projects. Long-term: Bumping Lake Enlargement would eliminate some Forest Roads and reduce access to some National Forest areas.

Resource	No Action Alternative	Integrated Plan Alternative
Cultural Resources	Short-term: Potential impacts on historic structures, traditional cultural properties, or sacred sites from increased dust, vibration, noise, or construction activity. Long-term: Ongoing projects have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities. These impacts could be substantial where habitat improvements projects are located in areas with a high likelihood for significant Native American cultural resources. The potential impacts on cultural resources would likely be substantially lower under the No Action Alternative compared to the Integrated Plan Alternative because fewer large-scale projects are likely to be constructed. Ground disturbance, erosion, and increased vandalism of cultural resources. Potential impacts to historic structures.	Short-term: Potential impacts on historic structures, traditional cultural properties, or sacred sites from increased dust, vibration, noise, or construction activity. Construction could cause permanent impacts to cultural resources. Long-term: Projects have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities. These impacts could be substantial where habitat improvements projects are located in areas with a high likelihood for significant Native American cultural resources. The potential impacts on cultural resources would likely be higher than under the No Action Alternative because of the large-scale projects that are likely to be constructed. Ground disturbance, erosion, and increased vandalism of cultural resources. Potential impacts to historic structures.
Socioeconomics	Short-term: The ongoing projects would not likely have a discernible short-term effect on socioeconomic conditions in the basin. Long-term: Current economic patterns and trends would likely continue into the foreseeable future. Climate change and population increases would impact the relation between natural resources and the economy in the basin.	Short-term: Project-related funding would likely have short-term positive impacts on jobs and incomes and reduced uncertainty and risk. Long-term: Potential increase in the value of goods and services derived from the basin's water and related resources in the long term. Reduction in uncertainty and risk.
Environmental Justice	Most projects would not be expected to cause disproportionate impacts to environmental justice communities.	Most projects are not expected to cause disproportionate impacts to environmental justice communities. Additional environmental justice analysis would be required during project-level analysis.

Chapter 3

AFFECTED ENVIRONMENT

CHAPTER 3.0 AFFECTED ENVIRONMENT

3.1 Introduction

This chapter describes environmental resources potentially affected by implementation of the Integrated Plan. The level of detail varies; more information is provided for those resources with a potential to be affected at a more substantive level. For all of the environmental resources in this chapter, information is provided at a planning level of detail consistent with a programmatic analysis of potential effects. More detailed evaluation will be conducted during subsequent project-level NEPA and SEPA review prior to implementing specific Integrated Plan actions or projects. Descriptions of environmental resources generally do not describe the portions of the Yakima basin in Klickitat County because they are upstream of the proposed projects, are uninhabited, and would not be affected.

The project team reviewed and consulted several documents to obtain the information for the majority of this chapter. These documents include: Ecology's *Integrated Water Resources Management Alternative FEIS* (Ecology, 2009), the *Yakima River Basin Water Storage Feasibility Study Final PR/EIS* (Reclamation, 2008f), the *Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS* (Reclamation and Ecology, 2011c), the *Geologic Report for Appraisal Assessment: Wymer Dam and Reservoir* (Reclamation, 2008c) and *Habitat Limiting Factors, Yakima River Watershed* (Haring, 2001). Unless otherwise noted, these documents are the sources of information for this chapter.

3.2 Earth

This section summarizes the geologic and geomorphic setting for the Yakima River basin. The Yakima River basin, along with the entire State of Washington, was formed as a result of plate tectonics. Because of the movement of the plates, the area is considered seismically active.

The focus of the discussion is the potential for erosion and sedimentation. The Yakima River basin encompasses approximately 6,150 square miles (EES, 2003). Figure 3-1 shows the simplified geologic and structural features of the basin (USGS, 2006). Figure 3-2 shows the groundwater basins (USGS, 2006). The headwaters of the basin start in the Middle Cascades in the Cascade Mountain Range and generally flow southeast to join the Columbia River. The basin ranges in elevation from 8,200 feet in the Cascades to 350 feet at the Columbia River confluence.

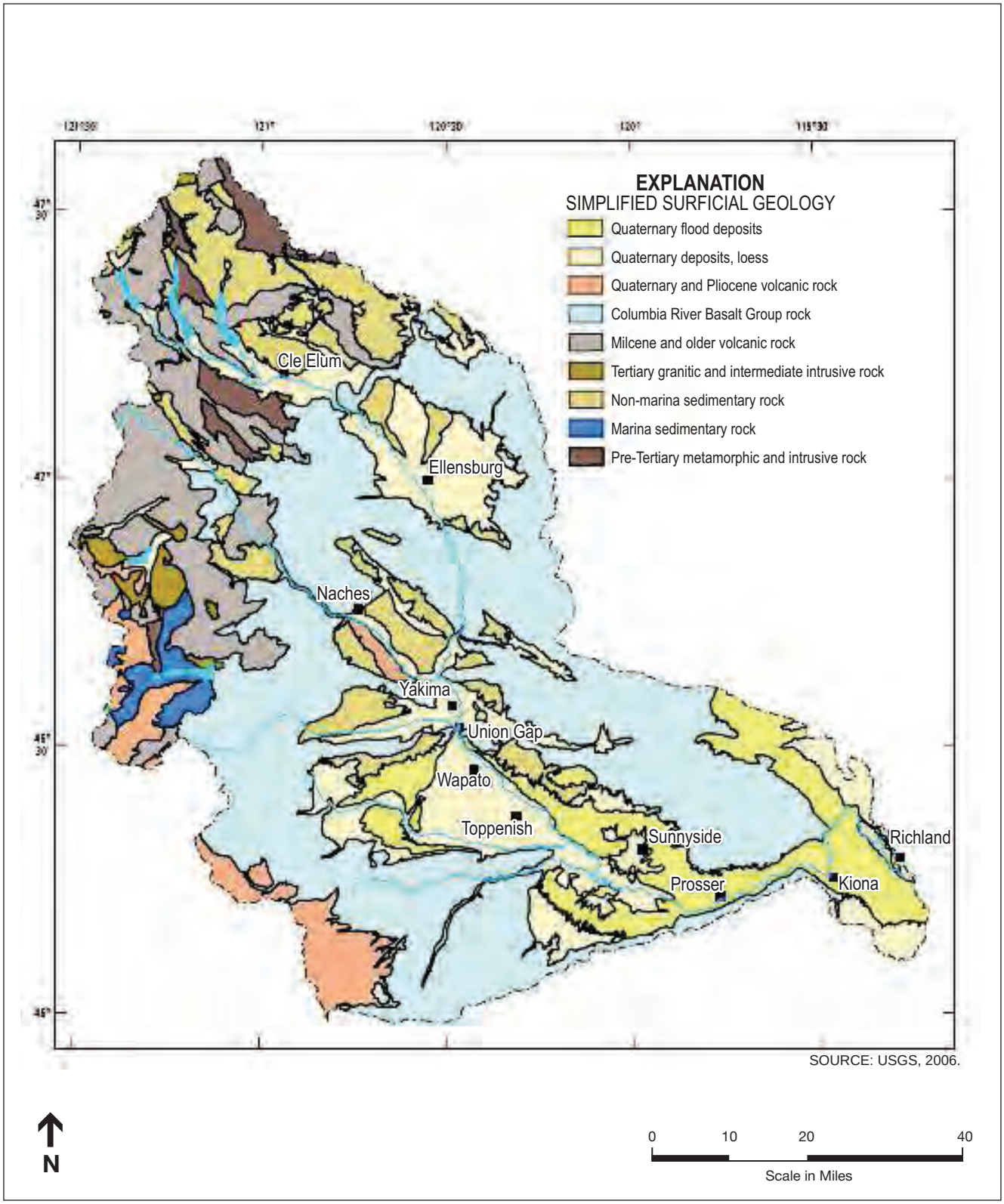


Figure 3-1. Simplified Surficial Geology

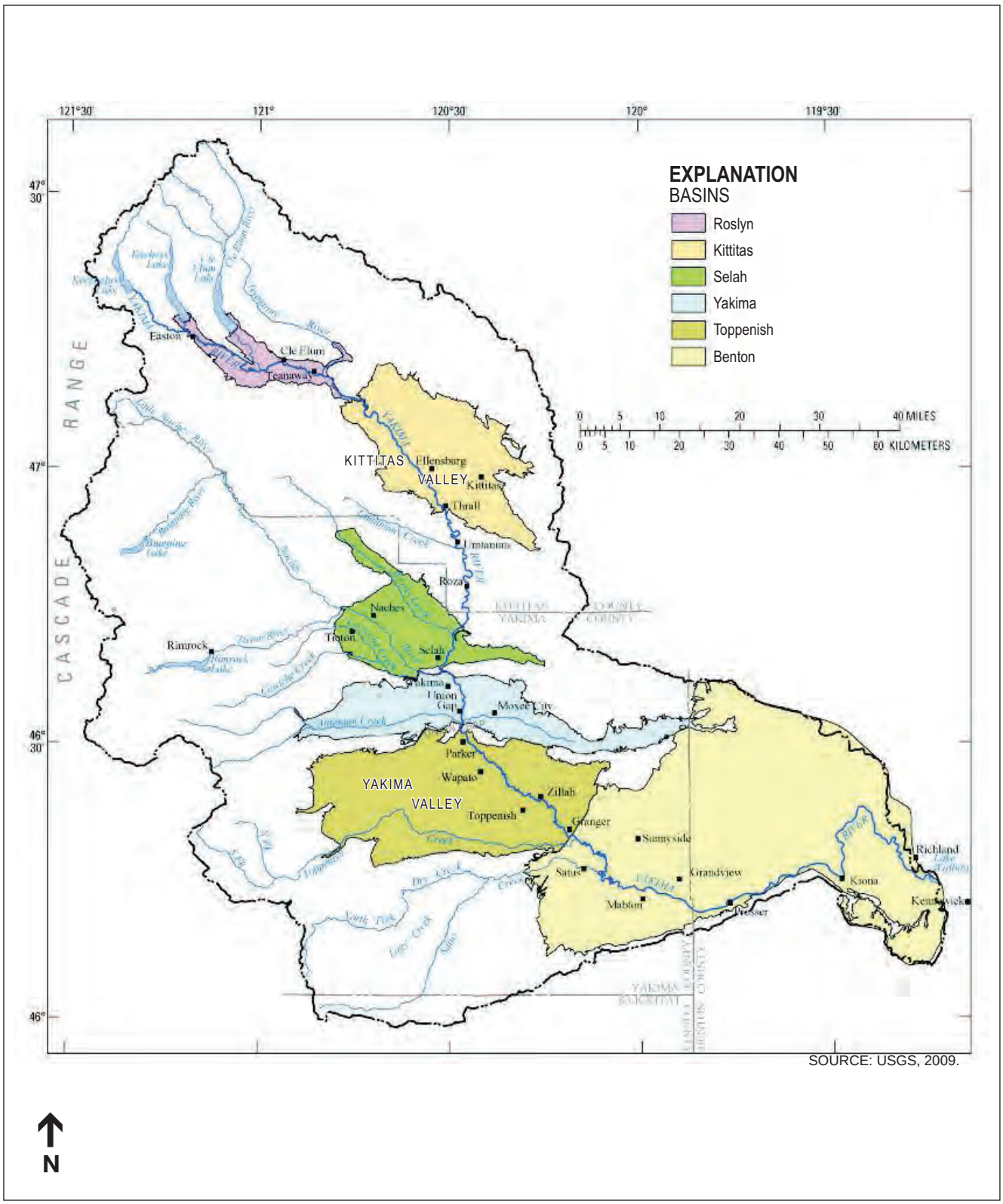


Figure 3-2. Groundwater Basins

The western half of the basin is located in the Middle Cascades and the eastern half is located within the Columbia Plateau basalt (Kinnison and Sceva, 1963). The Middle Cascades include igneous, sedimentary, and metamorphic rocks of many ages. The Columbia Plateau is primarily made of numerous Tertiary-age basalt flows. These flows in the western portion of the Plateau have created a series of southeast-trending ridges and valleys, known as the Yakima Fold Belt (Reclamation, 1979).

This type of geology has an important impact on sediment transport, as the river flows from alluvial valleys through bedrock canyons and gaps. It has been stated that the Yakima River has a low sediment discharge for a river of its size (Dunne and Leopold, 1978), which might be attributed to the lack of available sediment in the canyon reaches and bedrock control at many locations, or to the reservoirs on the river that trap incoming sediment and substantially restrict sediment availability downstream of the dams. Intensive flow regulation and levee construction have affected the transport of sediment and channel morphology since the early part of the 20th century.

Yakima River floodplains were likely historically important in providing fish habitat (Snyder and Stanford, 2001), but these areas are now degraded (Stanford et al., 2002). Historically, the erosion and deposition of sediments, channel movement, and groundwater recharge from flooding events shaped the floodplain, creating a shifting mosaic of physical channel attributes and habitats. Maintaining this shifting mosaic depends on the ability of the river to move freely over the historic floodplain, and on the balance between channel movement and sediment erosion and deposition. Native aquatic species have evolved to these ongoing changes, and their alteration is likely to impact salmonids. A sufficient supply of sediment is also needed to build new bars and islands, prevent channels from becoming incised, and maintain connections between surface water and groundwater (Stanford et al., 2002).

The geology and groundwater of the Yakima basin have been extensively documented by the U.S. Geological Survey (USGS) (Vaccaro et al., 2009) in a study undertaken as part of an agreement between Ecology, Reclamation, and the Yakama Nation. In its study, the USGS divides the Yakima River basin into groundwater basins separated from one another by anticlinal or monoclinal ridges. Refer to Section 3.4, Groundwater, for further discussion of the groundwater basins.

3.2.1 Roslyn Basin

The Roslyn basin includes the Cle Elum River and reservoir, Kachess and Keechelus Reservoirs, the Teanaway River, and Swauk Creek. It is located in the northwest portion of the Yakima River basin, in an area dominated by Mesozoic metamorphics and Tertiary volcanic deposits. In the valley floor, basin-fill deposits consist predominantly of alluvial, lacustrine, and glacial deposits.

3.2.1.1 Cle Elum Dam

Cle Elum Reservoir and Cle Elum Dam are located in a U-shaped valley formed by multiple glaciers during the Pleistocene period. A moraine deposited by the last glacial

advance blocked the valley and formed a natural dam, impounding the lake. The moraine was subsequently breached, and a deep channel was incised through the moraine and outwash deposits, forming the outlet of the glacial lake. In 1933, Reclamation completed an earthfill dam, which blocks the deep channel that had worn through the moraine materials (Kinnison and Sceva, 1963).

The glacial materials near the dam range in size from rock flour to boulders. The bedrock has not been reached during investigations at the dam. Bedrock is expected to be composed of volcanic and sedimentary units (Reclamation, 2008b).

3.2.1.2 Keechelus and Kachess Dams

Keechelus Lake was a natural lake originally created by a moraine impoundment following the last glaciations (Kinnison and Sceva, 1963). Construction of Keechelus Dam, an earthfill dam, was completed by Reclamation in 1920 (Kinnison and Sceva, 1963). Beginning in 2003, the dam was reconstructed for safety modifications. The dam provides 157,900 acre-feet of active storage over the natural lake. The surface geology near Keechelus Dam is primarily composed of glacial materials. Lacustrine deposits and peat soils have been found adjacent to the lake (WSDOT and FHA, 2005).

Lake Kachess was also originally a natural lake impounded by a glacial till moraine. The till includes a heterogeneous mix of clays, silts, sands, gravels, cobbles, and boulders. The moraine ranges in depth from 45 to 100 feet and may be up to 200 feet deep beneath the dam (Reclamation, 2008d). Bedrock in the area includes basalts, metamorphic rocks, and other formations believed to have low permeability and porosity (Kinnison and Sceva, 1963). Kachess Dam is also an earthfill dam.

3.2.2 Kittitas Basin

The Kittitas basin includes Taneum, Wilson, Naneum, and Manastash Creeks (Figure 3-2). It is located in the north-northeast part of the Yakima basin, an area of basalt terrain in the uplands and alluvial fill deposits in the lower segments of the basin.

The Teanaway River flows through Quaternary fill containing sand and coarse gravel alluvium. The southern valley slope is formed of Columbia River Basalt. The valley floor is underlain by a sand and gravel alluvium (Kinnison and Sceva, 1963).

Swauk Creek and Taneum Creek, located northwest of Thorp, flow through canyons composed of Columbia River Basalt. The canyon floors are filled with a coarse gravel alluvium of unknown depth (Kinnison and Sceva, 1963).

3.2.3 Selah Basin

The Selah basin, located in the central part of the Yakima River basin, extends to the Cascade Range Crest and headwaters of the Naches and Bumping Rivers (Figure 3-2). The basin includes the Bumping and Tieton Rivers, Bumping Lake, Rimrock Lake, and Cowiche Creek. The western portion of the basin contains Miocene volcanic rocks and Tertiary intrusives, while the middle portion contains the western margins of the

Columbia River Basalt Group. The lower portion of the basin contains alluvial basin fills.

3.2.3.1 Bumping Lake Dam

Bumping Lake Dam, an earthfill dam, is located in a deep, steep-walled canyon, formed in part by glacial activity. The canyon is formed of volcanic flow rocks and the valley is covered by glacial till and outwash overlain by mudflow materials. Outwash materials include silts, sand, gravels, cobbles, and boulders (Reclamation, 1979). Mudflow materials contain silty sand with gravels and cobbles. The material includes organic debris blended with volcanic ash (Reclamation, 2008a).

3.2.3.2 Tieton Dam

Tieton Dam is an earthfill dam set in a basin of basalt flows overlaying shale and sandstone sediments. Volcanic flows partially filled sections of the canyons with andesite. The canyons were cut by stream erosion and partially filled with Quaternary-age fills (Kinnison and Sceva, 1963). Glacial materials are present on the valley floor and occasionally on the valley walls (Reclamation, 2008c).

3.2.4 Yakima Basin

The Yakima basin is a long, narrow, east-west trending basin in the central part of the Yakima River basin (Figure 3-2). The western portion of the basin contains Miocene volcanic rocks of the Columbia River Basalt Group, while the middle and eastern portions contain Quaternary deposits (Figure 3-1).

3.2.5 Toppenish Basin

The Toppenish basin is in the south-central part of the Yakima River basin. It is underlain by Columbia River Basalt in the upland areas and alluvial basin fills in the lowland areas (Figure 3-2). The basin is bisected by the Wapato Syncline.

3.3 Surface Water Resources

This section provides information on water bodies that could be affected by the Integrated Plan. These water bodies are illustrated in Figure 3-3. They include all Yakima Project reservoirs, certain reaches of the Yakima, Kachess, Cle Elum, Naches, Tieton and Bumping Rivers, and many smaller tributaries.

Potential effects include changes in streamflow (both in quantity and in timing) in the mainstem Yakima River and its tributaries, storage capacities in reservoirs, total water supply available, and water diverted to water users. These key indicators were characterized by analyzing data and utilizing existing studies on water bodies that may be affected by the Integrated Plan.

3.3.1 Yakima River Basin Hydrology

Hydrology in the Yakima River basin is characterized by high precipitation in the Cascades and low precipitation in the lower Yakima River basin. Most of the annual precipitation occurs from October to March, and mainly falls in the form of snow during this period. During the late spring and early summer, precipitation changes to rain and temperatures increase to produce snowmelt runoff. A portion of this runoff is captured in the five major Yakima River basin reservoirs for storage and release during the summer and fall at times of higher water demand and lower natural precipitation. This operation causes streamflows that are higher than natural in the summer and fall and lower than natural in the winter and spring.

3.3.2 Yakima River Basin Reservoirs

The five main water storage facilities used to supplement the unregulated flow from the Yakima River are Keechelus, Kachess, Cle Elum, Rimrock, and Bumping Reservoirs. The five major storage reservoirs store runoff during the winter and spring/summer seasons for later release to supply irrigation demands during the summer/fall low-flow runoff periods. The total storage of the five major storage reservoirs is slightly more than 1 million acre-feet. These reservoirs are operated in a coordinated manner to supply the needs of the system as a whole. Releases from each reservoir are balanced to meet systemwide demands in conjunction with natural runoff and return flow available in the basin. No single reservoir is designated to supply the needs of one particular area, irrigation district, or division. Other water storage is provided through snowpack (often called the “sixth reservoir”) and Clear Lake Dam, a small lake above Rimrock Reservoir mostly used for recreation. These reservoirs are described in more detail in the sections below. A summary of the system storage capacity, average annual runoff, and historical storage on September 30 (end of irrigation season) for the five main Yakima Project reservoirs is presented in Table 3-1.

Table 3-1 Yakima Project System Storage Summary (Period of Record: 1920-1999)

Reservoir	Reservoir Drainage Area (square miles)	Depth (feet)	Active Storage Capacity (acre-feet)	Average Annual Runoff (acre-feet)	Ratio of Runoff to Capacity	Sept 30 Minimum Historical Storage (acre-feet)	Sept 30 Average Historical Storage (acre-feet)	Sept 30 Maximum Historical Storage (acre-feet)
Keechelus	54.7	Max- 310 Mean - 96	157,800	244,764	1.5:1	4,800	40,500	126,900
Kachess	63.6	Max - 430	239,000	213,398	0.9:1	20,100	107,200	227,200
Cle Elum	203.0	Max - 258 Mean - 109	436,900	672,200	1.5:1	12,900	118,000	359,500
Bumping	70.7	Max - 117 Mean - 45	33,700	209,492	6.2:1	2,400	7,900	24,600
Rimrock	187.0	174[a]	198,000	367,966	1.8:1	200	74,500	145,100
System Total	**579.0**		**1,065,400**	**1,707,820**	**1.6:1**	**51,700**	**357,500**	**660,200**

Source: Reclamation, 2002.

[a] FERC (1990) did not specify whether this is a maximum or mean depth.

Reclamation operates Hydromet, a hydrologic data collection system that records streamflow and reservoir levels for Reclamation projects, including the Yakima Project. Data on reservoir levels and discharge from the reservoirs are available at http://www.usbr.gov/pn/hydromet/ and will not be summarized in this document.

3.3.2.1 Snowpack ("Sixth Reservoir")

Only 30 percent of the average annual total natural runoff can be stored. Therefore, the Yakima Project depends heavily on the timing of spring/summer runoff (snowmelt and rainfall). The early spring/summer natural flow is utilized to supply most river basin demands through June in an average year. The majority of spring/summer runoff is from snowmelt; therefore, snowpack is often called the sixth reservoir. In most years, the five major reservoirs are maintained at peak storage in June (average mid-June, period of record 1940-1999), around the same time the major natural runoff ends.

3.3.2.2 Clear Lake Reservoir

Clear Lake Reservoir is a small, 5,300-acre-foot lake located above Rimrock Reservoir. Although the lake has little capacity to supplement water supply, in short water years it is possible to provide some benefit to downstream storage demands to offset minimum storage requirements in Rimrock Reservoir for irrigation and fisheries. Clear Lake Dam is an earthfill dam.

3.3.3 Yakima River and Main Tributaries

Reaches along the Yakima River and its main tributaries that are affected by the operation of the Yakima Project and which may be affected by the Integrated Plan are listed in Table 3-2. Figure 3-3 shows the location of the major reaches (Upper, Middle and Lower Yakima River) and the major tributaries.

Table 3-2 Yakima River Reaches

Reach Name*	Yakima River Mile Location	Length (miles)
Upper Yakima River	**214.5 to 127.9**	**86.6**
Yakima River from Keechelus Dam to Easton	214.5 to 202.5	12.0
Kachess River from Kachess Dam to Yakima River	*203.5*	*0.9*
Yakima River from Easton to Cle Elum River	202.5 to 185.6	16.9
Cle Elum River from Cle Elum Dam to Yakima River	*185.6*	8.2
Yakima River from Cle Elum River to Roza Dam	185.6 to 127.9	57.7
Middle Yakima River	**127.9 to 47.1**	**80.8**
Yakima River from Roza Dam to Naches River	127.9 to 116.3	11.6
Naches River (details in Table 3-3)	*116.3*	*44.6*
Yakima River from Naches River to Roza Powerplant Return	116.3 to 113.3	3.0
Yakima River from Roza Powerplant Return to Wapato Diversion Dam	113.3 to 106.7	6.6
Yakima River from Wapato Diversion Dam to Sunnyside Diversion Dam	106.7 to 103.8	2.9
Yakima River from Sunnyside Diversion Dam to Marion Drain	103.8 to 82.8	21.0
Yakima River from Marion Drain to Prosser Dam	82.8 to 47.1	35.7
Lower Yakima River	**47.1 to 0.0**	**47.1**
Yakima River from Prosser Dam to Chandler Canal Return	47.1 to 35.8	11.3
Yakima River from Chandler Canal Return to Columbia River	35.8 to 0.0	35.8

* Italicized entries are tributaries of the Yakima River

Major reaches within the Naches River basin that are currently affected by the operation of the Yakima Project and which may be affected by the Integrated Plan are listed in Table 3-3. These reaches are shown in Figure 3-3.

Table 3-3 Naches River Reaches

Reach Name	Naches River Mile Location	Length (miles)
Bumping River from Bumping Dam to Little Naches River	44.6	16.6
Upper Naches River from Bumping River to Tieton River	44.6 to 17.5	27.1
Tieton River from Tieton Dam to Naches River	17.5	21.3
Lower Naches River from Tieton River to Yakima River	17.5 to 0.0	17.5

Streamflow data for these reaches are available from Reclamation's Hydromet system at http://www.usbr.gov/pn/hydromet/ and will not be summarized in this document.

A description of the operations of the Yakima Project and its effect on existing river reaches is provided in Section 3.3.5.

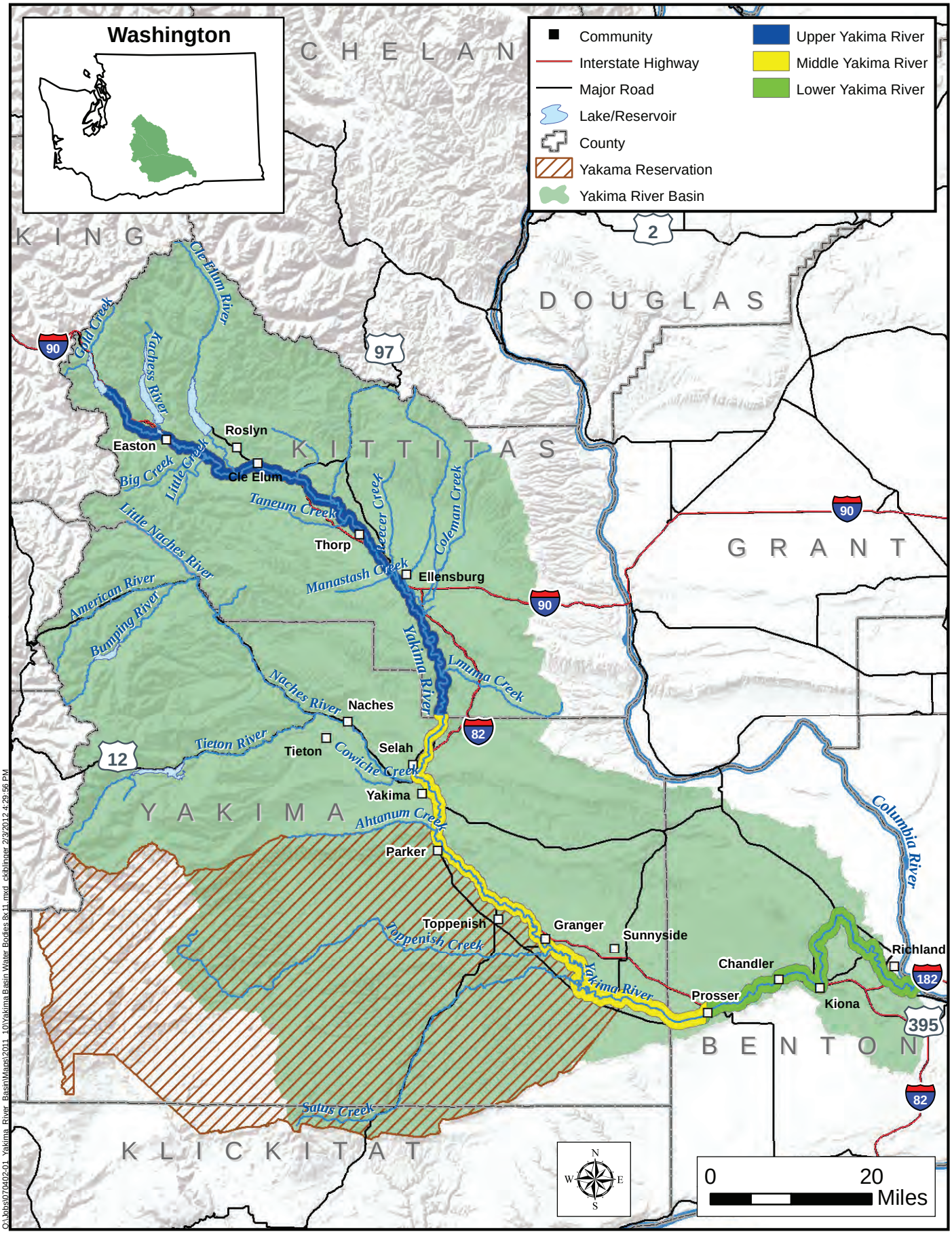


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Figure 3-3. Major Yakima River Reaches and Tributaries

3.3.4 Other River Reaches and Tributaries

The other river reaches and tributaries that may be affected by the Integrated Plan are described in the following sections.

3.3.4.1 Gold Creek above Keechelus Reservoir

Gold Creek flows into Keechelus Reservoir at the head of the Yakima River. Flows in Gold Creek have been affected by low rainfall, Gold Creek Pond, timber harvest, and road and residential developments (Haring, 2001). Keechelus Dam is currently a barrier to fish passage.

3.3.4.2 Kachess River and Box Canyon Creek above Kachess Reservoir

The Kachess River has a drainage area of 81 square miles of forested land. Streamflow above Kachess Reservoir is unregulated. Box Canyon Creek is one of the tributaries to the Kachess River. High streamflows occur through the winter, spring, and early summer, and low streamflows occur through late summer and fall (Haring, 2001). Kachess Dam is currently a barrier to fish passage.

3.3.4.3 Cle Elum River Basin above Cle Elum Reservoir

The Cle Elum River watershed has over 500 miles of streams and drains 231 square miles, with a vast majority occurring above Cle Elum Reservoir. Major rivers include the Cle Elum and Waptus Rivers, both of which are proposed for Wild and Scenic River designation. Streamflow in the Cle Elum River above Cle Elum Reservoir is unregulated (Haring, 2001). Cle Elum Dam currently presents a barrier to fish passage.

3.3.4.4 South Side Kittitas Valley Tributaries

South Side Kittitas Valley Tributaries include Big Creek, Little Creek, Tillman Creek, Spex Arth Creek, Taneum Creek, and Manastash Creek. These creeks are summarized in Table 3-4.

Table 3-4 South Side Kittitas Valley Tributaries

Creek	Surface Water Rights (acre-feet)	Flow Issues
Big	1,464[1]	Reductions due to irrigation diversions and seepage loss to groundwater[2]
Little	462[1]	Summer and early fall low flow[3]
Tillman	Not Available	Low summer and early fall flow
Spex Arth	Not Available	Low summer and early fall flow
Taneum	11,834[1]	Minimum instream flows met less than 5% of time[2]
Manastash	26,000[1]	Diversions create low flows/dewatered reaches[4]

Sources: [1] CH2M Hill, 2001 [2] Ecology, 2005b [3] Haring, 2001 [4] Yakama Nation and BPA, 2002

3.3.4.5 Teanaway River Basin

The Teanaway River has a drainage area of 244 square miles and flows into the Yakima River at river mile (RM) 176.1. Although in the past there were problems with low flows during the summer and fall in the lower mainstem and in the Middle and West Forks, flows in the lower mainstem have been addressed. Although Middle and West Fork flows are low, they do not go dry and are passable (Johnston, personal communication, 2008b). High flow variation also exists naturally and has increased due to extensive logging in the upper watershed. Water uses include diversions for seasonal irrigation, stock water, and domestic water supply. Summer flows are adequate for 15 miles of the North Fork and 9 miles of the Middle Fork of the Teanaway River (Haring, 2001). Jack Creek is a tributary to the North Fork of the Teanaway River.

Irrigation systems have been modified to reduce diversions and increase streamflow in the Teanaway River. However, residential development and drilling of permit exempt wells have increased. These wells are likely to be in continuity with the river, which may affect the instream flow improvement efforts associated with modifications to the irrigation system (Haring, 2001).

The Teanaway River has two active gages that measure streamflow as part of Reclamation's Hydromet network described in Section 3.3.2.

3.3.4.6 Swauk Creek

Swauk Creek has a drainage area of 100 square miles and flows into the Yakima River at RM 169.9. Precipitation in the basin is low, and therefore, unregulated summer flows are low. Lower Swauk Creek has naturally low streamflow during the late summer and early fall, but this is also partly caused by historic mining and channel alterations. There are also a number of diversions on Swauk Creek and its tributaries that may cause the creek to have very low or intermittent flow up to RM 6. Some diversions on Swauk and First Creeks have been dedicated to instream flow purposes through acquisition from the Suncadia Resort.

Ecology operated a stream gage on Swauk Creek at RM 5 from February 2005 to February 2009. Flow data at the mouth of Swauk Creek for July to October 2001 ranged from being dry in August and September to a flow of 3 cubic feet per second (cfs) in mid-October 2001 (Montgomery Water Group, 2002).

3.3.4.7 North Side Kittitas Valley Tributaries

North Side Kittitas Valley Tributaries include Reecer Creek and the Wilson/Naneum Creeks system.

Reecer Creek flows into the Yakima River at RM 153.7. The headwaters of Reecer Creek flow year-round, but surface flow is intermittent during the late summer from the canyon base to the Highline Canal. Dry reaches also occur downstream. Irrigation water is delivered to Reecer Creek through KRD canals, Cascade canals, Town Ditch, and Reed-Mill Ditch (Haring, 2001).

Streamflow measurements are available for July to October 2001 upstream of Dolarway Road. During that year, flow in Reecer Creek at this location ranged from 6 cfs in October to 32 cfs in August (Montgomery Water Group, 2002).

Wilson Creek has a drainage area of 408 square miles and flows into the Yakima River at RM 147. Naneum and Cherry Creeks are major tributaries to Wilson Creek, draining into Wilson Creek at RM 20 and RM 0.5, respectively. Coleman Creek is a smaller tributary of Wilson Creek. The Wilson Creek drainage area includes much of the Kittitas Valley agricultural area. The KRD irrigation system adds high amounts of flow (several hundred cfs) during the irrigation season through delivery spills, return flows, and groundwater augmentation from flood/rill irrigation. Flows in Wilson Creek and its tributaries are typically highest in April and May and lowest after the end of the irrigation season (October 15-November 15) when return flows from irrigation are reduced and prior to the onset of fall/winter storm events (Haring, 2001).

3.3.4.8 Lmuma Creek

Lmuma Creek is a small tributary to the middle Yakima River. It enters the Yakima River at RM 135 approximately 10 miles south of Kittitas. The Lmuma Creek drainage basin is approximately 104 square miles (Reclamation, 2007c).

3.3.4.9 Bumping River and Deep Creek above Bumping Lake Reservoir

Bumping River is a tributary to the Naches River. Bumping Lake Dam is currently a barrier to fish passage (Reclamation, 2005a). Deep Creek is a tributary to the Bumping River above Bumping Lake. During low water years, upstream reaches may go dry and the lower one-half mile of Deep Creek goes subsurface (Haring, 2001).

3.3.4.10 North Fork, South Fork Tieton River above Rimrock Reservoir

The North and South Forks of the Tieton River are located above Rimrock Reservoir and their confluence is inundated by the reservoir. Clear Creek and Indian Creek are tributaries of the North Fork. The North Fork, Clear Creek, and Indian Creek provide 47 percent of the total flow to the Tieton River and the South Fork provides 36 percent. Flow is largely unregulated for the Tieton River above Rimrock Reservoir. Clear Lake Dam is located on the North Fork, and creates a passage impairment although the dam is equipped with a fishway.

3.3.4.11 Other Naches River Tributaries

Other tributaries to the Naches River that may be affected by the Integrated Plan are the American River, Crow Creek, Little Naches River, Rattlesnake Creek, and Cowiche Creek.

The American River flows down the east side of the Cascade Range, through the Okanogan-Wenatchee National Forest and the William O. Douglas Wilderness. It flows

into the Bumping River at RM 3.5. The American River has a drainage area of 78.9 square miles. A USGS stream gage on the river has recorded a long-term average flow of 233 cfs.

Crow Creek is a small tributary that flows into the Little Naches River at RM 3.2. Rattlesnake Creek flows into the Naches River at RM 27.8. It has a drainage area of 134 square miles.

Cowiche Creek enters the lower Naches River at RM 2.7. It has a drainage area of 120 square miles. The South Fork Reynolds Creek and the mainstem portions of Cowiche Creek are suitable for salmonid rearing, even with irrigation withdrawals that occur. The North Fork of Cowiche Creek is intermittent between the mouth and the town of Cowiche except during spring runoff and operational spills from French Canyon Dam (Haring, 2001; Tayer, 2009).

3.3.4.12 Ahtanum Creek

Ahtanum Creek has a drainage area of 181 square miles and enters the Yakima River at RM 106.9. The headwaters of Ahtanum Creek and its tributaries are located in the Wenatchee National Forest and Yakima Reservation. Major irrigation diversions are operated by the Ahtanum Irrigation District (AID) and the Wapato Irrigation Project (WIP). The AID diverts surface water for irrigation from March until July 10. In 2002, the average diversion ranged from 14 cfs in March to 30 cfs in May. The WIP currently diverts water mostly during the late spring and early summer (Ecology, 2005b).

3.3.4.13 Toppenish Creek

Toppenish Creek, with a drainage area of 612 square miles, flows into the Yakima River at RM 80.4 (YBFWRB, 2005). Toppenish Creek has historically been dry from mid-June to mid-October due to irrigation diversions at the Toppenish Lateral Canal at RM 44.2. Recently, instream flows of 10 cfs have been adhered to, but natural seepage into the Toppenish Creek/Mill Creek alluvial fan has been as much as 18 cfs, resulting in a dry reach for several miles until WIP return flows enter Toppenish Creek (YBFWRB, 2009).

3.3.4.14 Satus Creek

Satus Creek has a drainage area of 625 square miles, approximately 10 percent of the Yakima River basin area (YBFWRB, 2005). It flows into the Yakima River at RM 69.6. Streamflow in Satus Creek is essentially unregulated, and previous irrigation diversions have been shut down since 1991 to protect instream flows. However, Satus Creek can still dry up in dry summers within the alluvial reach upstream of the confluence with Logy Creek at RM 23.6, although upstream reaches and headwaters are perennial (YBFWRB, 2009).

3.3.5 Yakima Project Operations

3.3.5.1 Total Water Supply Available

Total water supply available (TWSA) is defined in the *1945 Consent Decree* as:

> That amount of water available in any year from natural flow of the Yakima River, and its tributaries, from storage in the various Government reservoirs on the Yakima watershed and from other sources, to supply the contract obligations of the United States to deliver water and to supply claimed rights to the use of water on the Yakima River and its tributaries, heretofore recognized by the United States.

Reclamation interprets the above to mean:

> . . . the total water supply available for the Yakima River Basin above PARW (the United States Geological Survey (USGS) gage at Parker referred to as "Parker gage", located below Union Gap and the Sunnyside Diversion Dam), for the period April through September.

This is expressed in a mathematical formula, reading as follows:

April 1 through July 31 forecast of runoff
\+ August 1 through September 30 projected runoff
\+ April 1 reservoir storage contents
\+ Usable return flow upstream from Parker gage
= TWSA

TWSA provides an estimated total water volume available for use in determining the instream flow targets for each year in accordance with the operating criteria of the YRBWEP legislation. The total demand to be placed against this TWSA for irrigation, regulation, and flows passing Parker gage averages 2.7 million acre-feet (including Title XII target flows) in a normal year.

Return flows resulting from irrigation diversions above Sunnyside Diversion Dam are an integral part of the TWSA estimate. The amount of return flow depends on the quantity and location of diversion and loss, which is also controlled by amount, time, and availability of runoff. Return flow will vary from year to year, but the usable portion is a fairly uniform base flow that is generated by fairly stable upstream diversion rates. The return flow volume projected to be usable is 400,000 acre-feet in high runoff years; 375,000 acre-feet in average years; and 300,000 to 350,000 acre-feet in low runoff years, depending upon the severity of drought.

Each year Reclamation develops monthly runoff forecasts beginning in January and typically ending in July. Early forecasts (January and February) are primarily used in flood-control operations. By March, forecasts become more suitable for TWSA

estimation. The forecasts are made for anticipated precipitation levels of 50 percent, 100 percent, and 150 percent of normal. Table 3-5 lists historical TWSA estimates.

Table 3-5 Historical April 1 TWSA Estimates

Year	Total (acre-feet)
1977	2,037,000
1978	2,678,000
1979	2,657,000
1980	3,147,000
1981	2,367,000
1982	3,256,000
1983	3,392,000
1984	2,786,000
1985	3,111,000
1986	2,668,000
1987	2,559,000
1988	2,253,000
1989	3,071,000
1990	3,268,000
1991	2,962,000
1992	2,422,000
1993	1,974,000
1994	2,016,000
1995	3,044,000
1996	2,872,000
1997	4,542,000
1998	2,982,000
1999	4,198,000
2000	3,305,000
2001	1,678,000
2002	3,316,000
2003	2,644,000
2004	2,553,000
2005	1,715,000
2006	3,082,000
2007	3,071,000
2008	3,142,000
2009	3,132,000
2010	2,313,000
2011	3,361,000

Sources: Reclamation 2002; Reclamation 2008f; Lynch 2012.

3.3.5.2 Yakima River Flow and Diversions – Parker Gage

The average annual unregulated flow of the Yakima River basin at Parker gage totals approximately 3.4 million acre-feet, ranging from a high of 5.6 million acre-feet (1972) to a low of 1.5 million acre-feet (1977). The surface water entitlements above the Parker gage total 2.41 million acre-feet. Of that total, the five Yakima Project divisions diverting above the Parker gage have 1.94 million acre-feet of entitlements. The average diversions of the five Yakima Project divisions above Parker total 1.77 million acre-feet (period of record, 1990 through 2009) and have declined since the early 1990s. The average diversion in the last five nondrought years has totaled 1.6 million acre-feet.

The diversions in drought years are less: 1.21 million acre-feet in 2001 and 1.25 million acre-feet in 2005 (Reclamation and Ecology, 2011o). These volumes do not include other requirements for water in the basin, such as small irrigation districts and individual diversions, instream flows, and municipal and industrial uses.

3.3.5.3 Current Operations

Operational Objectives

The operational objectives of the current Yakima Project include the following:

- Store as much water as possible up to the reservoir system's full active capacity (approximately 1 million acre-feet) following the end of the irrigation season through early spring.
- Provide target flows and diversion entitlements downstream from the dams, meeting Title XII flows (described below) at Sunnyside and Prosser Diversion Dams.
- Provide reservoir space for flood control operations.

Meeting Irrigation Demands

The irrigation season starts around April 1. During the initial part of the irrigation season through late June, irrigation diversion demands and the Title XII target instream flows at Sunnyside Diversion Dam are generally adequately met by: (1) unregulated runoff from tributaries downstream from the five reservoirs; (2) incidental releases from the reservoirs (for target flows and flood control); and (3) irrigation return flows. Once these flows fail to meet diversion demands and Title XII instream target flows, reservoir releases are made, resulting in depletions in the stored water supply. This is commonly referred to as the beginning of the storage-control period. The storage-control period typically begins around June 24.

From the beginning of the storage-control period until early September, releases from Cle Elum Reservoir are used in coordination with releases from Keechelus and Kachess Reservoirs to meet mainstem Yakima River water entitlements from the Cle Elum River confluence (RM 179.6) to Sunnyside Diversion Dam (RM 103.8). These entitlements amount to approximately 1.46 million acre-feet to supply diversions, mostly from Roza

Diversion Dam downstream, including Roza Division, Wapato Irrigation Project, and Sunnyside Division. A peak of approximately 3,600 cfs for irrigation is moved through this area.

On or prior to September 1, Cle Elum Reservoir releases are reduced substantially over a 10- to 20-day period, and releases from Rimrock Reservoir are increased substantially to meet the September and October irrigation demands downstream from the confluence of the Naches and Yakima Rivers. This is referred to as the "flip-flop" operation, which was instituted to encourage spring Chinook to spawn at a lower streamflow that requires less stored water to be released during the egg incubation period to protect spawning nests (redds). Affected spring Chinook spawning reaches are the Yakima River downstream from the Cle Elum River to the City of Ellensburg and the Cle Elum River downstream from the dam.

A similar operation, referred to as "mini flip-flop," is performed between Keechelus and Kachess Reservoirs in years of sufficient water supply for similar reasons. Irrigation releases from Keechelus Reservoir are greater than from Kachess Reservoir from June through August. In September and October, irrigation releases from Keechelus Reservoir are decreased and correspondingly increased from Kachess Reservoir. The affected reach for the spring Chinook spawning reaches are the Yakima River from Crystal Springs downstream to the Cle Elum River confluence.

Carryover Storage

Conserving water during the summer/fall period of operations helps maximize carryover storage at the end of the irrigation season (October 21). The Yakima Basin storage system is designed to store only the current year's spring/summer runoff and deliver it as needed to meet irrigation demands from April through October. If only minimal storage (52,000 acre-feet) is left on October 21, the upcoming water year's operations are more likely to require lower base river flows and a tighter control over reservoir releases. In general, more rather than less carryover storage in the system reservoirs on October 20 leads to better flow and water supply conditions in the subsequent water year, particularly if the subsequent year turns out to be a dry year. The impacts of the drought year of 1977 were reduced because of favorable carryover storage from 1976. The 1994 drought was devastating to water users because there was virtually no carryover after the drought years of 1992 and 1993. A good carryover also helps assure sufficient spring Chinook incubation flow below the upper Yakima mainstem dams.

Irrigation Entitlements

The total of April through September "entitlement diversions" (existing contractual obligations) is approximately 2.41 million acre-feet. October entitlements total approximately 120,000 acre-feet. To date, entitlement in March is not completely quantified; however, some irrigation entities have rights that include flood water use. Entitlement diversions represent only the irrigation water entitlements stipulated in the *1945 Consent Decree* for the mainstem Yakima River and do not include irrigation diversions on tributaries or adjudicated streams such as Big Creek, Little Creek, Teanaway River, Taneum Creek, Manastash Creek, Wenas Creek, Cowiche Creek,

Ahtanum Creek, and others. Table 3-6 lists the irrigation entitlements recognized by the *1945 Consent Decree*.

Table 3-6 April to September Irrigation Entitlements Recognized by *1945 Consent Decree*

Month	Monthly Total (acre-feet)	Accumulated Total (acre-feet)
April	254,830	254,830
May	415,100	669,930
June	440,390	1,110,320
July	457,840	1,568,160
August	443,880	2,012,040
September	297,430	2,309,470

Source: Reclamation 2002

Some major entities, such as the Roza Irrigation District and KRD, have no natural flow rights and thus their entire water supply is contracted. Other entities needing a supplemental supply are furnished contract water under terms of the Federal Warren Act of February 21, 1911, which authorized Reclamation to contract for the sale of supplemental water from available supplies. These contracts specify the annual and monthly entitlements (nonproratable and proratable).

Table 3-7 lists the Yakima Project irrigation districts and their Yakima Project water rights divided into nonproratable water rights (priority date prior to May 10, 1905) and proratable water rights (priority date of May 10, 1905 or later).

Table 3-7 Yakima Project Irrigation District Water Rights (acre-feet per year)

District	Nonproratable Water Rights	Proratable Water Rights	Total Water Rights
Wapato Irrigation Project	305,613	350,000	655,613
Sunnyside Division	289,646	157,776	447,422
Roza Irrigation District	0	393,000	393,000
Kittitas Reclamation District	0	336,000	336,000
Yakima-Tieton Irrigation District	75,865	30,425	106,290
Kennewick Irrigation District	18,000	84,674	102,674

Source: Ecology 2010b

Prorationing and Drought Response

Prorationing is necessary when the TWSA is not adequate to meet all irrigation entitlements. Historically, the prorationing period has not started until the date of storage control. The amount of proration is determined monthly, biweekly, or as needed, by project operations and this information is provided to water-using entities at manager meetings. The nonproratable users can divert their full irrigation entitlements, which are

deducted from the water supply available for irrigation, with the remainder available for proratable irrigation entitlements.

Prorationing has been imposed an average of once every four years in the last 20 years. Table 3-8 lists the recent proration years.

Table 3-8 Yakima Project Proration Years and Percentages

Water Year	Proration Percentage
1992	58
1993	67
1994	37
2001	37
2005	42

Source: Reclamation, 2008f

Historically, Reclamation has followed a specific framework when faced with below-average years. The basic concepts of this policy are as follows:

- Share flood water and return flow during the main runoff period.
- Discourage storage releases during the tail end of the main runoff period (when runoff is unable to meet full demand).
- Allow water users to shape, via requests in advance, their estimated water supply use pattern during the period of heavy reservoir release (after the main runoff period).
- Maintain control during end-of-season (October) operations.

An emergency drought relief provision, established under Chapter 173-166 WAC, authorizes Ecology to determine when water supply conditions are expected to be 75 percent of the normal supply and cause undue hardship to water users. This definition was established by the Washington State Legislature in 1989 (RCW 43.83B.400). Following governor approval, Ecology can issue a drought condition order. This order:

- Allows water users to obtain water from alternate groundwater and surface water sources;
- Allows temporary water transfers and transactions; and
- Provides funding assistance to public bodies for projects and measures designed to help alleviate drought conditions relating to agriculture and fisheries.

During the water-short years of 1994, 2001, and 2005, emergency water right transfers were authorized for the declared drought condition. These transfers were intended to alleviate hardships, reduce burdens on water users (irrigation), and increase efficient and maximum use of the water supply during drought conditions.

In 1994, in anticipation of water shortages for irrigation within the Yakima basin, Reclamation proposed an emergency interdistrict water transfer program and developed

criteria for the transfers. These transfers were voluntary between willing lessees and lessors and only for temporary water supply during the 1994 water year. The transfers were consistent with appropriate State and Federal law, and had the concurrence of the irrigation districts in which they occurred. The rights of other water users (third parties) were not to be impaired.

Such transfers were limited to lands that had legal water rights and were being irrigated in full compliance with applicable laws, regulations, and contracts (including the Reclamation Reform Act). These legal responsibilities were not to be diminished by the transfers. Transfers had to be within the capability of Reclamation to deliver, and were considered on a first-come, first-served basis. Transfers were subject to Reclamation's responsibility to protect and maintain resources (including water, fisheries, wildlife, and cultural) held in trust by the United States for the Yakama Nation.

In the 2005 drought, a similar process was used, resulting in seasonal transfers of 39,654 acre-feet of water (Ecology, 2005c).

3.3.5.4 Target Flows

Historical Target Flows Developed through System Operation Advisory Committee

Target flows for the Yakima basin have been developed through a System Operation Advisory Committee established by Reclamation. The SOAC consists of fishery biologists, with one each representing the Yakama Nation, Serivce, WDFW, and irrigation entities represented by the Yakima Basin Joint Board. Reclamation also provides a fishery biologist as a liaison to the committee.

As discussed in Section 1.6.4.5, SOAC was established to advise Reclamation on Yakima Project operations to ensure that trust obligations to the Yakama Nation are met with regard to the protection of fish. Since 1981, the SOAC has provided information, advice, and assistance to Reclamation on fish-related issues associated with the operation of the Yakima Project. As part of that work they have been recommending target flows at various locations in the basin. Historical target flows from the 2002 Interim Comprehensive Basin Operating Plan for the Yakima Project (IOP) are presented in Table 3-9. The target flows have been modified in some reaches based upon input from Reclamation (Lynch, 2011).

Table 3-9 Historical Yakima Project Target Flows

River Reach	Fall Target Flow and Dates	Winter Target Flow and Dates[1]
Keechelus Reservoir Outflow	60-100 cfs – Sep 1-Oct 20	15-100 cfs – Oct 21-Mar 31
Yakima River – Crystal Springs to Lake Easton	60-100 cfs – Sep 1-Oct 20	30-100 cfs – Oct 21-Mar 31
Kachess Reservoir Outflow	Not Applicable (NA)	5-50 cfs – Oct 21-Mar 31
Yakima River – Easton Dam to Cle Elum River	150-300 cfs – Sep 10-Oct 20	80-300 cfs – Oct 21-Mar 31
Cle Elum Reservoir Outflow	150-650 cfs – Sep 10-Oct 20	60-300 cfs – Oct 21-Mar 31
Yakima River – Cle Elum River to Teanaway River	400-800 cfs – Sep 10-Oct 20	200-325 cfs – Oct 21-Mar 31
Yakima River – Roza Dam to Wenas Creek	200-300 cfs minimum – Jul 1-Oct 20	400 cfs – Power subordination target – all year
Bumping Reservoir Outflow	NA	50-120 cfs – Oct 21-Mar 31
Rimrock Reservoir Outflow	NA	15-50 cfs – Oct 21-Mar 31
Yakima River at Parker	NA	300-600 cfs minimum – Mar 15-Oct 21 (spring and summer target flow)

[1] – Winter target flow would be carried past March 31 if supplemental flows are still needed to reach target.
Source: Reclamation, 2002 (modified by Lynch, 2011).

Title XII Target Flows

One of the purposes of the YRBWEP is to implement water conservation measures to reduce out-of-stream irrigation water diversions from the Yakima River and its tributaries. Savings achieved through improvements to water delivery systems and changes in operation and management would result in more water remaining in the stream to improve flows for fish and wildlife and the reliability of the irrigation water supply.

Phase II of the YRBWEP was authorized by Title XII of the Act of October 31, 1994 (108 Stat. 4550, Public Law 103-434). Title XII established new instream flow targets to be maintained past the Sunnyside and Prosser Diversion Dams using criteria based on TWSA. The streamflow targets range from 300 cfs to 600 cfs, depending on the estimate of TWSA. Reclamation interprets the requirement for target flows as being subject to reasonable fluctuations due to project operations, not instantaneous flows to be uniformly maintained at all times. However, for any period exceeding 24 hours, flows cannot fall below 65 percent of target flow at the Sunnyside Diversion Dam (Parker gage) or more than 50 cfs below target flow at Prosser Diversion Dam. Target flows are listed in Table 3-10.

Table 3-10 Title XII Target Flows

TWSA (million acre-feet)				Parker and Prosser Flows (cfs)	Title XII Minimum Flow Past Parker Gage July-September Demand (acre-feet)
Apr-Sept	May-Sept	Jun-Sept	Jul-Sept		
3.20	2.90	2.4	1.9	600	117,000
2.90	2.65	2.2	1.7	500	100,000
2.65	2.40	2.0	1.5	400	84,000
Less than above TWSA				300	68,000

Source: Reclamation, 2008f

Phase II of the YRBWEP also provides that, as conservation measures are implemented under the conservation program and irrigation water demands are thereby reduced, the target flows will be increased by 50 cfs for each 27,000 acre-feet of diversion reduction during nonprorated water years. Such increases, however, may not lower the volume of water that otherwise would have been delivered in years when the water supply is prorated. During those years, the target flows obtained through water conservation would be increased above 300 cfs only where irrigation return flows previously entered the Yakima River downstream of Parker gage. Although diversion reductions would be accounted for, a "block of water" would not be set aside under TWSA for maintaining target flows at Parker gage. Title XII target flows (supplemented by conserved water) would continue to be met from TWSA the same way irrigation demands are met under the *1945 Consent Decree*. Water entitlements stipulated in the decree are not changed by Title XII.

3.3.6 Yakima River and Tributary Flow Issues

The management of water supply in the Yakima River basin has changed the flow regime, with effects on anadromous and resident fish. Table 3-11 compares the current flow regime to an unregulated or natural flow regime for upper Yakima River reaches, middle Yakima River reaches, and lower Yakima River reaches. In general, spring flows in the middle and lower Yakima River reaches are not sufficient to optimize survival of outmigrating smolts. Summer flows downstream of Sunnyside Diversion Dam are less than ideal for salmonid habitat and proper riparian function. High flows also persist during the summer in the upper Yakima River reaches, affecting juvenile salmonid rearing habitat (Reclamation, 2008f). The annual later summer “flip-flop” operation disrupts salmonid habitat spatially and has impacts on aquatic insect populations, while winter flows in the upper Yakima and Cle Elum Rivers are low, potentially impacting survival of overwintering juvenile salmonids (Reclamation, 2008f).

Flow conditions above the reservoirs are typically more natural, notwithstanding effects on flow from forest practices, roads, grazing, fire suppression, and other influences. The natural variations in flow are supported by the geographic surroundings and persistent flows contributed by springs and smaller drainages. Streams that have experienced flow alterations include Gold Creek, which drains to Keechelus Reservoir, and tributaries to the Kachess River, which become dewatered due to low flows or go subsurface as reservoirs are drawn down (Haring, 2001). Land use practices may be responsible for the flow alterations at Gold Creek; however, those alterations have not been quantified.

Table 3-11. Comparison of Current Streamflow Regime to Natural Streamflow Regime

Season	Upper Yakima River															
								Cle Elum River Basin								
	Above Dam	Mainstem Reach	Above Dam	Mainstem Reach		Tributaries		Above Dam	Mainstem Reach	Mainstem Reach	Tributaries					
	Above Keechelus Dam	Keechelus Dam to Lake Easton	Above Kachess Dam	Kachess River	Yakima River from Easton to Cle Elum River	Big Creek	Little Creek	Above Cle Elum Dam	Cle Elum River	Yakima River from Cle Elum River to Roza Dam	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Wilson Creek
Winter (Oct-March)	Flow is unregulated	Flow is reduced and is less variable	Flow is unregulated	Flow is reduced and is less variable	Flow is reduced	Flow is unregulated	Flow is unregulated	Flow is unregulated	Flow is reduced	Flow is reduced	Flow peaks are higher	Flow is unregulated	Flow is unregulated	Flow is unregulated	Flow is unregulated	Flow is unregulated
Spring (April-June)	Flow is unregulated	Flow is reduced	Flow is unregulated	Flow is reduced	Flow is reduced	Flow is slightly reduced	Flow is slightly reduced	Flow is unregulated	Flow is reduced	Flow is reduced	Flow peaks are higher	Flow is slightly reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced
Summer (July-Sept)	Flow is unregulated	Flow is greatly increased until early Sept flip-flop	Flow is unregulated	Flow is greatly increased, especially during mini flip-flop	Flow is increased until early Sept flip-flop	Flow is greatly reduced and dry in some areas	Flow is unknown, but likely reduced	Flow is unregulated	Flow is greatly increased until early Sept flip-flop	Flow is greatly increased until early Sept flip-flop	Flow is reduced	Flow is reduced and dry in some areas	Flow is greatly reduced	Flow is greatly reduced	Flow is dependent on KRD return	Flow is dependent on KRD return

Season	Middle Yakima River from Roza Dam to Prosser Dam																Lower Yakima River from Prosser Dam to the Columbia River	
		Naches River Basin																
	Mainstem Reach	Above Dam	Mainstem Reach		Above Dam	Mainstem Reach		Tributary	Mainstem Reach		Tributary	Mainstem Reach		Mainstem Reach	Tributaries		Mainstem Reach	Mainstem Reach
	Yakima River from Roza Dam to Confluence with Naches River	Above Bumping Dam	Bumping River from Bumping Dam to the Little Naches River	Upper Naches River from Bumping River Confluence to Confluence of Naches and Tieton Rivers	Above Rimrock Dam	Tieton River from Tieton Dam to Confluence with Naches River	Lower Naches River from Naches/Tieton Confluence to Yakima River	Cowiche Creek	Yakima River from Naches River to Roza Power Plant Return	Yakima River from Roza Power Plant Return to Wapato Diversion Dam	Ahtanum Creek	Yakima River from Wapato Diversion Dam to Sunnyside Diversion Dam	Yakima River from Sunnyside Diversion Dam to Marion Drain	Yakima River from Marion Drain to Prosser Dam	Toppenish Creek	Satus Creek	Yakima River from Prosser Dam to Chandler Canal Return	Yakima River from Chandler Canal Return to Columbia River
Winter (Oct-March)	Flow is reduced	Flow is unregulated	Flow is regulated	Flow is mostly unregulated	Flow is unregulated	Flow is reduced	Flow is reduced	Flow is unregulated	Flow is greatly reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is unregulated	Flow has higher peaks	Flow is reduced	Flow is reduced
Spring (April-June)	Flow is reduced	Flow is unregulated	Flow is reduced	Flow is mostly unregulated	Flow is unregulated	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is reduced	Flow is unregulated	Flow is reduced	Flow is reduced
Summer (July-Sept)	Flow is greatly increased	Flow is unregulated	Flow is increased	Flow is mostly unregulated	Flow is unregulated	Flow is increased starting early Sept for flip-flop	Flow is increased starting early Sept for flip-flop	Flow is reduced	Flow is increased but moderated by RID diversions	Flow is increased	Flow is greatly reduced	Flow is slightly increased	Flow is reduced to target flow at Parker	Flow is reduced	Flow is reduced	Flow is reduced	Flow is greatly reduced	Flow is reduced

3.4 Groundwater

For this section, the description of groundwater resources focuses on the areas that would be affected by the Integrated Plan. Those areas include the vicinities of the five storage reservoirs, the groundwater recharge areas, and some of the Yakima River tributaries. Information used in developing this groundwater section comes from the *Yakima Basin Groundwater Infiltration Appraisal-Level Study Technical Memorandum* (Reclamation and Ecology, 2011e), *Yakima River Basin Groundwater and Hydrogeologic Framework of the Yakima River Basin Aquifer System 2009–5152* (Vaccaro et al., 2009), or *Hydrogeologic Framework of Sedimentary Deposits in Six Structural Basins, Yakima River Basin, Washington: U.S. Geological Survey Scientific Investigations Report 2006-5116* (Jones et al., 2006).

In cooperation with Reclamation, Ecology, and the Yakama Nation, the (USGS completed a study of the groundwater system in the Yakima River basin and how it interacts with rivers and streams in the basin (Vaccaro et al., 2009). The USGS documented the hydrogeologic framework of the basin/aquifer system, collected well levels and pumping records, performed seepage studies of 155 stream reaches, and made simulation runs of a detailed groundwater flow model of the basin.

Groundwater is the principal source of drinking water in the Yakima River basin and supplies about 330,000 people, or about 80 percent of the population, in a three-county area. At least 45,000 wells withdraw water in the basin. Irrigation of cropland is the largest use of groundwater, with more than 300,000 acre-feet pumped annually from about 2,300 irrigation wells (Vaccaro and Sumioka, 2006).

3.4.1 Groundwater Setting

3.4.1.1 Geology Overview

Basaltic rocks beneath most of the Yakima River basin are part of the larger Columbia River Basalt Group (CRBG). The CRBG comprises more than 300 individual basalt flows that erupted from fissures in the eastern part of the Columbia Plateau during the Miocene Epoch (6–17 million years ago). The CRBG hosts multiple aquifers in various layers and formations that are collectively called the Columbia Plateau Aquifer System. The Columbia Plateau Aquifer System underlies about 63,000 square miles in central and eastern Washington, north-central and eastern Oregon, and a small portion of northwestern Idaho. Additional information on the geology of the Yakima basin is included in Section 3.2 and in the *Yakima Basin Groundwater Infiltration Appraisal-Level Study Technical Memorandum*.

One important hydrogeologic formation with respect to groundwater is the Ellensburg Formation, a set of volcaniclastic and fluvial sediments occurring throughout the Yakima Basin. The confined aquifer consists of consolidated deposits of the Ellensburg Formation and similar undefined continental sedimentary deposits. The thickness of the Ellensburg Formation ranges from zero to 2,040 feet with localized differences, depending on subbasin. Within the Yakima basin, interbedded sediments found between

some of the large basalt formations of the CRBG are typically part of the Ellensburg Formation.

Folding, faulting, and other large-scale geologic deformation can affect regional groundwater flow direction, influence hydraulic gradients, and create flow conduits or barriers. At least some of the faults in the Yakima Fold Belt are proven hydraulic barriers. Others appear to be conductive and may connect deep basaltic formations with shallower formations and surface springs. Folding increases the occurrence of fractures on the anticlinal ridges and tends to enhance aquifer hydraulic conductivity.

3.4.1.2 Groundwater Occurrence

Groundwater within the basalts is controlled primarily by the physical characteristics of the rock units, the geometry and relationship between rock units, and the geologic structure. The physical characteristics of the basaltic flows (density and texture, fractures, and internal structures) are important in determining their hydraulic properties. Internal structures found in the flows may influence both the ease of water movement and direction of flow through the formation. Individual basalt flows typically exhibit features that are formed from the emplacement and cooling of the flow.

The thickness and extent of basalt flows and the occurrence or absence of fine-grained sedimentary interbeds also influence groundwater movement. At the distal ends of the basalt flows or where erosion has interrupted the continuity of flows, interbedded sediments are able to commingle and may serve as a vertical conduit between previously separated flow systems.

Groundwater in the different hydrogeologic units occurs under perched, unconfined, semiconfined, and confined conditions (Vaccaro et al., 2009). Groundwater flow is generally from the ridges toward the streams and rivers in the valleys. Shallow groundwater flow is usually vertically downward from the surface to the underlying basalt units. However, because of the geologic structure of the basins, there are a number of areas that have upward flow and artesian wells in the lower valleys.

3.4.1.3 Aquifer Recharge and Discharge

Recharge refers to refilling of groundwater aquifers, as water from the land surface percolates downward into geologic units. Discharge refers to water leaving the groundwater system to enter surface lakes, rivers, or wetlands.

Local-, intermediate-, and regional-scale groundwater flow systems within the Yakima River basin are recharged by various mechanisms. Local and intermediate flow systems are recharged through basalts that are exposed to precipitation at the ground surface on the anticlinal ridges and through groundwater exchange with other basins and formations. On a regional scale, basaltic units are recharged along the western margin of the Columbia Plateau where the basalts merge with rocks and sediments at higher elevations in the Cascade Range.

Much of the natural recharge (from precipitation) occurs in the upper basin and is not available to the bedrock aquifers where most pumping takes place (Vaccaro and Olsen, 2007). The lower, arid portion of the Yakima River basin generally receives about 6 to 10 inches of precipitation annually, and most groundwater recharge is from application and distribution of irrigation water (Vaccaro and Olsen, 2007).

About 45 percent of the water diverted for irrigation is eventually returned to the river system as surface water inflows and groundwater discharge (Reclamation, 1999). Irrigation return flows to the lower Yakima River account for about 75 percent of the late-summer streamflow downstream from the Parker gage (Vaccaro and Sumioka, 2006).

Aquifer discharge occurs principally to major surface drainage systems (i.e., Yakima and Columbia Rivers) and through irrigation well pumping. Annual pumping in the Yakima River basin increased almost 270 percent from 1960 to 2000 (Vaccaro and Sumioka, 2006). About 312,000 acre-feet was pumped in 2000, with the majority of the pumping going to irrigation, and smaller quantities for a range of uses including municipal and commercial. The annual quantity appropriated in State water right certificates and permits is about 529,231 acre-feet (Vaccaro et al., 2009).

3.4.1.4 Groundwater Quality

Groundwater quality concerns in the Yakima basin generally are related to the impacts of agricultural operations on drinking water wells (Ecology, 2010a). Quality issues involve excess nitrate levels and bacterial contamination, particularly in the lower portions of the Yakima basin. Many residents in the lower basin rely upon shallow wells that are particularly vulnerable to contamination. According to an Ecology study, “approximately 12 percent of domestic well users are exposed to nitrate levels in their drinking water that exceed the health-based standard of 10 mg/L” (Ecology, 2010a).

3.4.2 Groundwater Recharge Pilot Projects

The Integrated Plan lists two agricultural areas for consideration as enhanced groundwater storage test sites. The KRD and WIP groundwater recharge areas will be investigated as part of the pilot testing program recommended in the Integrated Plan.

3.4.2.1 Kittitas Basin Recharge Area

The proposed KRD groundwater recharge pilot project is expected to be sited in the Kittitas basin, a broad, roughly southeast-northwest trending valley within the Yakima River basin, which covers an area of approximately 270 square miles in the central portion of Kittitas County (Jones et al., 2006; Vaccaro et al., 2009). The most promising general locations for infiltration in the KRD are in the vicinity of Naneum Creek and Badger Pocket.

Most of the wells in the subbasin are completed in basalt or basalt-derived deposits, with the remaining wells completed in gravels, cemented gravels, sandstone, or a mixture of clay, silt, sand, and gravels. The highest well yields (60 to 100 gallons per minute or

gpm) were reported for wells completed in basalt. Overall, the range in well yield for basalt was 7 to 100 gpm; the overall range in well yield for a nonbasalt well was 2.5 to 45 gpm.

Depth to groundwater in the valley ranges from less than 20 feet to more than 200 feet below ground surface. Groundwater elevations range from over 2,200 feet above mean sea level to less than 1,450 feet above mean sea level. The groundwater flow paths in the Kittitas subbasin converge in the area where the Yakima River flows out of the valley and into the Yakima subbasin just north of Umtanum. Based on available specific capacity data and yield information, the basin-fill material and basalt in the north KRD area is of moderate to low permeability.

3.4.2.2 Toppenish Basin Recharge Area

The proposed WIP groundwater recharge pilot project is expected to be sited on the west side of the Yakima River in the Toppenish subbasin. This subbasin is a broad, east-west trending valley within the Yakima River basin that covers approximately 440 square miles in the Yakima Valley (Jones et al., 2006; Vaccaro et al., 2009). An area between the WIP Main Canal and Marion Drain has been preliminarily delineated for further study, based on groundwater flow directions recently published by the USGS.

The Yakima River enters the Yakima Valley from the north through the Union Gap in Rattlesnake Ridge and flows southeast near the Town of Zillah before leaving the valley and entering the Benton subbasin near the Town of Granger. Toppenish Creek is a significant tributary to the Yakima River; it enters the Yakima Valley from the southwest and flows generally east to west, eventually meeting the Yakima River to the east of Granger in the Benton subbasin.

Based on well logs, the basin-fill deposits in the Toppenish subbasin increase in thickness to the south to over 200 feet, but decrease in thickness to the north with an estimated average thickness of less than 100 feet.

About 61 percent of the wells examined in the subbasin were completed in loose, unconsolidated sands and gravels. Most of the remaining wells were completed in sandstone. Unlike the Kittitas recharge area, many of the wells in the Toppenish subbasin are completed with screens, since the basin-fill deposits within the upper 200 feet of this subbasin are loose and unconsolidated. This suggests that the basin-fill deposits in the Toppenish subbasin are not as “tight” as the basin-fill deposits in the Kittitas subbasin and would likely have higher infiltration rates. It is also possible that the presence of screens is a result of the wells being constructed more recently and according to State standards.

Drains, tile drains, and streams are locations where the groundwater discharges from the basin-fill deposits (Vaccaro et al., 2009). Drains are unlined canals or laterals that can capture groundwater when the water table intersects the bottom of the drain. A number of drains on the east side of the study area may passively capture groundwater as the water table rises with surface infiltration.

Flow originating in the area south of Union Gap moves to the south-southeast, discharging to the Yakima River. Flow originating along the Main Canal area, however, discharges in a more southerly direction toward Marion Drain and the Toppenish Creek. Flow originating in the far western portion of the subbasin generally discharges in the upper reaches of the Toppenish Creek.

3.5 Surface Water Quality

3.5.1 Regulatory Setting

The Clean Water Act (CWA), passed in 1972, aims to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The CWA also establishes the basic structure for regulating pollutant discharges to regulated waterways.

Ecology has established water quality standards to protect public health and welfare and the quality of waters in Washington. Section 303(d) of the CWA requires Washington to develop a list of water bodies that do not meet water quality standards. When water quality fails to meet State water quality standards, Ecology determines the sources of pollutants and sets the maximum amount of pollutants that each source can discharge to a water body, called Total Maximum Daily Loads (TMDLs).

3.5.2 Reservoir Water Quality

Reservoir water quality is measured using limnological studies (a study of the biological, chemical, meteorological, and physical aspects).

There are five major reservoirs within the Yakima River basin. Keechelus Reservoir is the only one that has been included on Washington's 303(d) list as water-quality limited. It had 303(d) listings for dioxin and polychlorinated biphenyls (PCBs) in 2004 and 2008.

The Bumping Lake, Cle Elum, Keechelus, Kachess, and Rimrock Reservoirs have low concentrations of nutrients to support a diverse ecology and are thus considered oligotrophic (Lieberman and Grabowski, 2007; Rector, 1996; FERC, 1990). Thermal stratification (layers of water with different temperatures) is exhibited in Bumping Lake, Cle Elum, Keechelus, Kachess, and Rimrock Reservoirs (Service, 2002).

The maximum water temperatures in Bumping Lake and Cle Elum Reservoirs typically occur in July, exceeding 16°C to a depth of about 20 feet and 50 feet, respectively (Lieberman and Grabowski, 2007). Monitoring conducted in 1993 indicated that the upper 30 feet of Keechelus Reservoir had a temperature of about 16°C and dissolved oxygen of about 10 milligrams per liter (mg/L) (Rector, 1996). The upper layer (epilimnion) of Rimrock Reservoir exceeds the temperature standard in the summer, and then the reservoir undergoes turnover in mid-September.

Minimum dissolved oxygen concentrations in Bumping Lake and Cle Elem Reservoirs have ranged between 2 and 6.5 mg/L near the bottom (Lieberman and Grabowski, 2007), while Keechelus Reservoir has a dissolved oxygen concentration of about 10 mg/L

(Rector, 1996). Rimrock Reservoir dissolved oxygen is generally at or above saturation in the reservoir, although dissolved oxygen has not always met the State standards near the bottom, at the location of the intake (FERC, 1990).

3.5.3 Tributary Water Quality

Major tributaries within the Yakima River basin are listed in Table 3-12. Most of the tributaries are on Washington's 303(d) list as water-quality limited for temperature. Additional 303(d) listings are described in the following sections.

3.5.3.1 Upper Yakima Tributaries

Although water quality in the upper Yakima River basin is generally much better than in the lower basin, irrigation effluents and flow regulation have adversely affected some areas (Joy, 2002; Joy and Patterson, 1997 as cited in YBFWRB, 2009). The upper Yakima and Cle Elum Rivers, as well as tributaries to the Yakima River in the Kittitas Valley (Cherry, Cooke, Manastash, Taneum, and Wilson Creeks), have 303(d) listings (Table 3.7-2 in Ecology, 2008b).

Stream temperature data collected in the Teanaway River basin during the early 1990s showed numerous excursions above the State numeric temperature criteria, resulting in eight stream segments in the Teanaway basin being included on Washington State's 1996 and 1998 303(d) lists (Irle, 2001). Development of a temperature TMDL in 2003 resulted in removal of the basin's streams from the 303(d) list (Table 3.7-2 in Ecology, 2008b).

The Cle Elum River is 303(d) listed for water temperatures that are higher than the standard acceptable levels for fish immediately above the reservoir and immediately downstream of the reservoir (Ecology, 2008b). The temperature criterion for the Cle Elum River is aquatic life for summer salmonid habitat which is not to exceed 16°C (WAC 173-201A).

Downstream from the dam, higher water temperatures may be a result of dam impoundment and surrounding forest practices. However, above Cle Elum Reservoir higher water temperature in the upper reach of the Cle Elum River is more likely a result of water flowing slowly through warm, shallow Tucquala Lake, a natural lake (Reclamation, 2007b). Both the Cooper River and Thorp Creek, tributaries to the upper Cle Elum River, are also on the 303(d) list for temperature.

Table 3-12 Yakima River Basin Tributary 303(d) Listings

Tributary	Water Quality Parameters			
	1996	1998	2004	2008
Ahtanum Creek	None	None	Fecal Coliform	Fecal Coliform Temperature
Ahtanum Creek (N.F.)	None	None	None	Temperature
Ahtanum Creek (S.F.)	None	None	None	Temperature
Bumping River	Temperature	Temperature	Temperature	Temperature
Cherry Creek	None	None	None	pH
Cle Elum River	Temperature	Temperature	Temperature	Temperature
Cooke Creek	Temperature	Temperature	Dissolved Oxygen Temperature	Dissolved Oxygen Temperature
Cooper River	Temperature	Temperature	Temperature	Temperature
Cowiche Creek	Fecal Coliform Temperature	Fecal Coliform Temperature	4,4'-DDE Fecal Coliform Temperature	4,4'-DDE Dissolved Oxygen Fecal Coliform PCB pH Temperature
Manastash Creek	None	None	None	Dissolved Oxygen Fecal Coliform pH
Manastash Creek (S.F.)	Temperature	Temperature	Temperature	Temperature
Naneum Creek	Temperature	Temperature	Temperature	pH Temperature
Satus Creek	None	None	None	None
Swauk Creek	Temperature	Temperature	Temperature	Temperature
Taneum Creek	Temperature	Temperature	Temperature	Dissolved Oxygen Fecal Coliform Temperature
Taneum Creek (S.F.)	Temperature	Temperature	Temperature	Temperature
Teanaway River	Temperature	Temperature	None	None
Thorp Creek	Temperature	Temperature	Temperature	Temperature
Tieton River	None	None	None	Temperature
Toppenish Creek	None	None	None	None
Wilson Creek	Fecal Coliform Temperature	Fecal Coliform Temperature	Fecal Coliform Temperature	pH Temperature

Source: Ecology, 2011b

3.5.3.2 Naches River Basin Tributaries

Several streams in the Naches River basin are included on the 303(d) list for high temperatures (Table 3-12). For most of these streams, Ecology (2005c) identified forest practices, agriculture, riparian modification, and grazing as contributing nonpoint sources to high temperatures. In addition, industrial point sources were identified as contributors for four Cowiche Creek basin 303(d) temperature listings. Cowiche Creek also has been included on the 303(d) list for five other parameters. Generally, the water quality of the Bumping River is very good except for the elevated water temperatures (WSDOT and FHA, 2005).

Several streams within the Okanogan-Wenatchee National Forest were included on Washington's 303(d) list for temperature (Table 3-12). In 2001, the U.S. Forest Service (USFS) conducted a monitoring effort to evaluate stream temperatures throughout the Okanogan-Wenatchee National Forest. During that study, temperatures greater than 16°C, the applicable temperature criterion at the time, were measured in several streams including Bumping River, Taneum Creek, North Fork Taneum Creek, and South Fork Tieton River (Whiley and Cleland, 2003).

3.5.3.3 Middle and Lower Yakima River Tributaries

Ahtanum Creek and its North and South Forks are included on the 2008 303(d) list due to high temperature. Although neither Toppenish nor Satus Creeks are included on the 303(d) lists, temperatures have exceeded 20°C in both of these creeks. In lower Toppenish, Simcoe, and Agency Creeks (also not 303(d) listed), high water temperatures have resulted from diversion of annual spring flooding, draining of wetlands, riparian degradation, agricultural practices, and the large volume of warm irrigation returns routed from the Wapato Irrigation Project down Simcoe and Toppenish Creeks (YBFWRB, 2009). Stream temperatures increase with proximity to the mouth of Toppenish Creek, with the highest weekly average temperature among four locations in 2004 approaching 24°C at a point 10 miles upstream from the mouth. Data from the summer of 2007 indicate some cooling below this location may be related to groundwater upwelling. Temperatures in Marion Drain are moderated (about 6°C cooler in the summer and 5°C warmer in the winter than the mainstem) because of the drain intercepting groundwater.

Most of the Satus Creek watershed is undeveloped and is not exposed to agricultural, industrial, or domestic effluents although portions of middle and upper Satus Creek are heavily grazed by cattle and wild horses. However, maximum weekly average temperatures can exceed 26°C in the reach of Satus Creek between Logy Creek and Wilson Charley Creek because of riparian impacts and low flow. Logy Creek may cool Satus Creek for a few miles downstream from their confluence (YBFWRB, 2009). Although water quantity increases as Satus Creek flows through the WIP in its lowermost 8 miles, water quality suffers in this reach (YBFWRB, 2009).

3.5.4 Yakima River

Water quality in headwater streams and the upper Yakima River is good but degrades downstream to the mouth. This degradation is caused both by natural processes and by the impacts from human activities, including both point and nonpoint sources (Reclamation, 1999). The Yakima River is on Washington's 303(d) list as water-quality limited for multiple parameters (Table 3-13).

Table 3-13 Yakima River 303(d) Listings

River	Water Quality Parameters			
	1996	1998	2004	2008
Yakima River	4,4'-DDD 4,4'-DDE DDT Dieldrin Dissolved Oxygen Endosulfan Fecal Coliform PCB pH Temperature	4,4'-DDD 4,4'-DDE DDT Dieldrin Dissolved Oxygen Endosulfan Fecal Coliform PCB pH Temperature	4,4'-DDD 4,4'-DDE 4,4'-DDT Alpha-BHC Chlordane Dieldrin Dioxin Dissolved Oxygen Endosulfan Fecal Coliform PCB pH Temperature	4,4'-DDD 4,4'-DDE 4,4'-DDT Alpha-BHC Chlordane Dieldrin Dioxin Dissolved Oxygen Endosulfan Fecal Coliform PCB pH Temperature

Source: Ecology, 2011b

Surface water quality standards for water temperature, dissolved oxygen, pH, dichlorodiphenyl-trichloroethane (DDT), and other pesticides, as well as fecal coliform bacteria, are not met. The USGS has reported that the effects of agricultural return flow, urban runoff, and point source discharges on dissolved oxygen are noticeable in the lower Yakima Valley (Morace et al., 1999).

Nutrient (phosphorus and nitrogen) concentrations are conducive to eutrophication in the lower Yakima River. Eutrophication is the process by which a body of water becomes enriched in dissolved nutrients that stimulate the growth of aquatic plant life, usually resulting in the depletion of dissolved oxygen.

The primary factors affecting water temperatures are streamflow (river morphology and slope); air temperature; rate of vertical mixing; time of travel; flow fluctuation; and the temperature of inflowing water from natural tributaries (including groundwater discharge), canals, wasteways, and agricultural drains. Water in the upper basin is cold but warms as the river flows to the lower basin. In the lower portion of the basin, water temperatures in the late summer are warm, with cooler pockets of water provided by some irrigation returns and groundwater seepage (Hubble, 2012).

3.6 Hydropower

Seven small hydroelectric powerplants are located in the Yakima River basin. Two of the plants are owned and operated by Reclamation (Roza and Chandler Powerplants), two are owned and operated by the Yakima-Tieton Irrigation District, two are owned and operated by Yakama Power in the Wapato Irrigation Project (WIP), and one is owned and operated by Tieton Hydropower LLC (at Tieton Dam). The general locations of the existing facilities are shown on Figure 3-4.

The two Reclamation powerplants are located on the Roza Main Canal and the Chandler Power Canal. The Roza Powerplant was built in 1958 and the Chandler Powerplant in 1956. These two powerplants are integral parts of the Roza Irrigation District and Kennewick Irrigation District. Both were originally conceived, in part, as a means of paying for the infrastructure making up the Roza and Kennewick Irrigation District combined facilities and making them economically viable for the future. When power is being generated at Roza Powerplant, there is a minimum flow target of 400 cfs below Roza Diversion Dam and 450 cfs below Prosser Diversion Dam. Power generation is terminated when the subordination flow target cannot be met with the plant operating.

The Roza Powerplant is located about 3 miles northeast of Yakima, adjacent to Reclamation's offices. Water is diverted into the canal at Roza Diversion Dam about 11 miles north of Roza Powerplant and returns to the river below the powerplant. The Roza Powerplant is a conventional hydroelectric powerhouse with a single Francis wheel-style turbine, having a capacity of 12.9 megawatts (MW). The plant is rated at 158 feet of head, and produces an average of approximately 61,000 megawatt-hours of energy (based on Reclamation power records from 1988 through 2005), under current subordination practices.

The hydropower generation at Roza Powerplant is primarily used to supply at-cost power to pumps for irrigation water delivery to Roza Irrigation District (Roza) water users and the Reclamation project offices. When the power generated by Roza Powerplant exceeds the Roza power demand, the excess power is marketed through Bonneville Power Administration (BPA) under the Federal Columbia River Power System. During the irrigation season, when Roza's demand for power exceeds the power supply available from Roza Powerplant, the district receives additional power from BPA. This annual exchange of power is accomplished through an agreement between Reclamation and BPA (Reclamation, 2002).

The Chandler Power and Pumping Plant is located in Benton County about 10 miles east of Prosser. The Chandler Plant uses water diverted down the Chandler Main Canal (capacity is 1,500 cfs) at Prosser Diversion Dam to operate two Francis turbine-driven generators and two turbine-driven pumps.

The two Francis turbine generators are rated at 6 MW each and power is supplied to the BPA grid. Water not required for irrigation is used to produce power for revenue. The turbines operate at net heads between 106 feet and 122 feet. At 6 MW, a generator uses about 735 cfs of water.

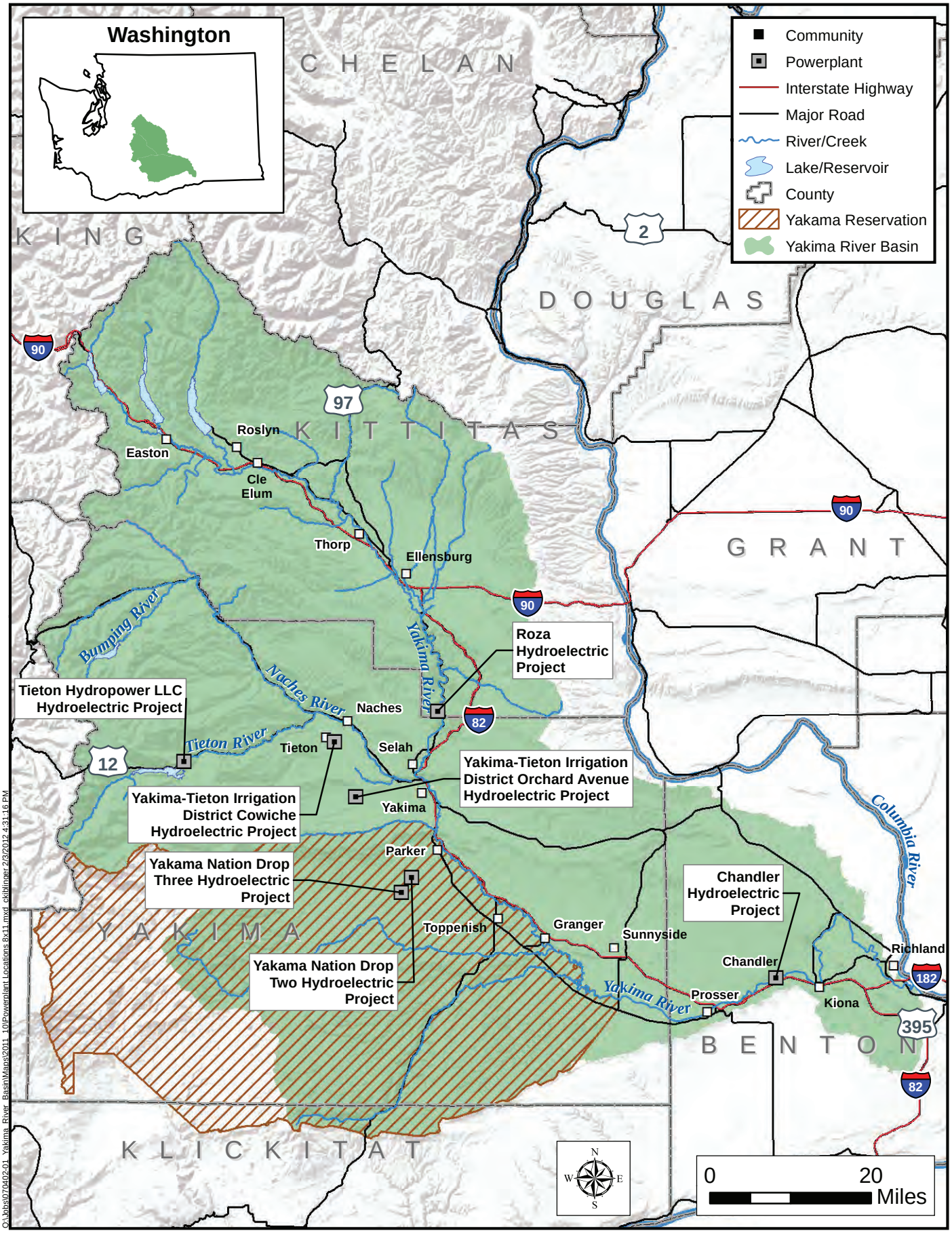


Figure 3-4. Yakima Basin Power Plant Locations

The two Francis turbine pumps are rated with a discharge of 167 cfs each at net heads between 103 feet and 122 feet. Directly connected to each of the pump turbines is a vertical shaft centrifugal pump. The pumps are designed to operate under total heads from 104 feet to 112 feet. Water is pumped from the Chandler Main Canal, through the pumps, under the Yakima River and up to the Kennewick Irrigation Main Canal.

Power production is subordinated to various flows throughout the year. In the spring, the subordination target is 1,000 cfs over Prosser Diversion Dam through the end of June. During the remainder of the season, the subordination target is 450 cfs or the YRBWEP Title XII flow, whichever is higher.

Two of the powerplants owned by the Yakima-Tieton Irrigation District are in-line plants that take advantage of an all piped system with excess pressure head. The operations of the plants are incidental to the operations of the irrigation district. The water is not diverted specifically for power generation, but whatever water is diverted for irrigation is used for power. The two powerplants operated by Yakama Power take advantage of canal drops in the gravity irrigation canal system. The operations of the plants are incidental to the operations of the canals.

The Tieton Hydroelectric Project is a run-of-river facility located at the base of a Reclamation dam on the Tieton River, in Yakima County approximately 40 miles west of Yakima. The operations of the powerplant are incidental to the operation of Tieton Dam.

3.7 Fish

This section describes the fish and aquatic resources in the Yakima River basin that could be affected by the Integrated Plan. The status of anadromous and resident fish species is described along with habitat conditions affecting those fish. The distribution and habitat conditions for aquatic invertebrates are also described. Information on Federal and State listed endangered species is provided in Section 3.10.

3.7.1 Anadromous Fish

The area potentially affected by the Integrated Plan includes the water bodies described in Section 3.3, Surface Water Resources. Anadromous fish are those that hatch in fresh water, migrate to salt water where they mature, and return to the same fresh water body to spawn.

3.7.1.1 Distribution of Steelhead and Salmon

Anadromous steelhead and salmon were historically widespread in the Yakima, Naches, and Tieton drainages. Spring and fall Chinook, coho, and steelhead currently reside in the Yakima River basin, while summer Chinook and sockeye have been extirpated (became locally extinct). Coho were extirpated in the 1970s but were reintroduced in the mid-1980s. Spring Chinook spawn and rear as juveniles in the Bumping, American, Little Naches, upper Yakima, Cle Elum, Teanaway, and Naches Rivers and their

tributaries. Fall Chinook generally spawn and rear as juveniles in the Yakima River, downstream from the Naches River to the mouth of the Yakima River. Steelhead spawn and rear as juveniles in many of the tributaries to the Yakima and Naches Rivers, including the mainstem of the Naches and upper Yakima Rivers (upstream of Roza Diversion Dam). Coho (reintroduced) spawn and rear primarily in the Ellensburg and Thorp reaches of the Yakima River and in the lower Naches River downstream from the Tieton River. Some coho spawning and rearing is known to occur in Ahtanum, Cowiche, Buckskin Slough, Taneum, Wilson, Reecer, and Big Creeks in the Yakima River basin. Coho spawning and rearing also occur in the Nile, Pileup, and Rattlesnake Creeks and the North Fork of the Little Naches River in the Naches River subbasin (Reclamation and Ecology, 2008).

Until recently, barriers blocked anadromous steelhead or salmon from reaching the tributary habitat upstream from Reclamation's reservoirs. However, beginning in 2006, the Yakama Nation introduced coho on a limited basis above Cle Elum and Bumping Lake Dams, and they have also reintroduced sockeye into Cle Elum Reservoir (Reclamation and Ecology, 2011c). Resident bull trout are also present above all of Reclamation's dams. Salmon and steelhead are present in the other tributaries up to the point of barriers, either natural or manmade. The upstream extent of anadromous salmonids is provided in Table 3-14.

Table 3-14 Upstream Extent of Anadromous Salmonid Passage in the Affected Area

Stream	Upstream Extent
Naches River Tributaries	
Little Naches River	Entire mainstem
Bumping River	To Bumping Dam; otherwise, upstream at natural falls on Deep Creek and upper Bumping River
Tieton River	To Tieton Dam; otherwise, to natural falls on South Fork Tieton, Indian Creek, and North Fork Tieton
Cowiche Creek	Entire mainstem
Yakima River Tributaries	
Cle Elum River	To Cle Elum Dam; otherwise, RM 9 at natural steep cascades
Upper Yakima River	To Keechelus Dam; otherwise, to Cold Creek railroad culvert
Kachess River	To Kachess Dam; otherwise, none on mainstem
Teanaway River	Entire mainstem
Swauk Creek	Partial barrier at WSDOT culvert immediately below Swauk campground*
Taneum Creek	Entire creek (partial barrier at Brain Ranch)
Jack Creek	To barrier at Stream Mile (SM) 5.6
Indian Creek	To possible barrier at SM 3.0
Manastash Creek	To partial/seasonal barrier at Anderson Ditch at SM 3.4 from mid-spring to early summer
Naneum Creek	To barrier located at SM 2.72
Reecer Creek	To barrier at SM 2.34 Currier Branch: To barrier around SM 2.5
Wilson/Naneum Creeks Systems[1]	To SM 8.0 at confluence with Mercer Creek Cherry Creek: Entire creek Cooke Creek: To barrier located at SM 0.94 Parke Creek: To barrier located at SM 0.49 Coleman Creek: To barrier located at SM 2.13
Ahtanum Creek[2]	Entire creek
Wide Hollow Creek	Entire creek
Toppenish Creek	Entire creek (partial barriers do exist)

* May not be completely impassable barrier, but extremely difficult fish passage.
[1] Includes Wilson, Naneum, Coleman, and Cherry Creeks, which are all interconnected.
[2] Includes North and South Forks.
Source: Haring (2001); Appendix A of Haring (2001); EES (2001); YBFWRB (2005); Nicolai (2012); Lael (2012); and Hubble (2012). The sources contain information for the other smaller tributaries that flow to these creeks not listed here.

3.7.1.2 Anadromous Fish Status

Anadromous salmonids currently using the Yakima basin include the Mid Columbia River Evolutionarily Significant Unit (ESU) steelhead (federally listed as threatened),

spring, summer (reintroduced), and fall Chinook, sockeye (reintroduced), and coho (reintroduced). There is only one nonsalmonid anadromous fish species currently using the Yakima basin—the Pacific lamprey, which is a Federal species of concern. Listed species are discussed in Section 3.10, Threatened and Endangered Species.

Spring Chinook

The upper Yakima, Naches River basin, and American River spawning groups compose the Yakima River basin spring Chinook population. About 60 to 70 percent of the spring Chinook population returns to the upper Yakima River (Keechelus Dam to Ellensburg) and Cle Elum River annually. Adult spring Chinook return to the Yakima River beginning in late April through June, and spawning occurs from August to September. Juveniles migrate downstream from the time of emergence through summer and fall. After spending 1 year in fresh water, spring Chinook begin their seaward migration, with the majority passing Prosser Diversion Dam (RM 47) in April. Returning adults spend from 1 to 3 years in the ocean before returning to spawn. Variability in run timing is influenced by high and low flows. Run timing for spawning runs of all salmon and steelhead is delayed during years of high flow and accelerated in years of low flow (Reclamation, 2008e).

Over the 10-year period from 2002 to 2011, spring Chinook basinwide escapement averaged 10,854 fish, ranging from 4,303 in 2007 to 17,960 in 2011 (Bosch, 2012).

Fall Chinook

Fall Chinook inhabit approximately 100 miles of the lower Yakima River from Sunnyside Dam to the Columbia River confluence. In some years, fall Chinook have been documented spawning in the reach between Union Gap and Selah and in the lower Naches River downstream of the Town of Naches. The Yakama Nation has been acclimating and releasing fall Chinook into the Naches River at Gleed for several years. The Yakama Nation and WDFW plan to transition the releases upstream of Union Gap from fall to summer Chinook salmon as part of their plans to reintroduce extirpated summer Chinook to the middle Yakima River and lower Naches River. There is also a self-sustaining fall Chinook population in Marion Drain. Typically, the mainstem Yakima spawning run begins in early September, peaks in late September, and concludes by the second week of November. Typical emergence timing for Yakima River fish occurs from late March through May. Marion Drain fish spawn at the same time as Yakima River fish, but because of warmer water temperatures, they emerge in mid-February to late March.

Over the 10-year period from 2002 to 2011, fall Chinook escapement past Prosser Dam averaged 3,010 fish, ranging from 1,132 in 2007 to 6,241 in 2002 (Bosch, 2012). It is estimated that the Prosser count represents approximately 80 percent of the total count, since the majority of spawning occurs downstream of Prosser Dam (Bosch, 2012). Marion Drain escapement fell sharply after 1988 (Haring, 2001) and remains relatively low.

Coho

Although endemic coho were extirpated (became locally extinct) from the Yakima River basin in the early 1980s, natural reproduction of hatchery-reared coho is now occurring in both the Yakima and Naches Rivers. Factors contributing to the extirpation of coho salmon from the Yakima basin include the construction of dams on the Columbia River, overharvest of wild stocks, and the lack of screens on irrigation diversions on small streams where most of the coho rearing habitat exists. The Yakama Nation releases approximately 1.0 to 1.7 million coho smolts in the Yakima basin annually from both in basin and out-of-basin broodstock (Newsome, 2012).

Coho (reintroduced) spawn and rear primarily in the Ellensburg and Thorp reaches of the Yakima River and in the lower Naches River downstream from the Tieton River. Some coho spawning and rearing is known to occur in Ahtanum, Cowiche, Buckskin Slough, Taneum, Wilson, Reecer, and Big Creeks in the Yakima River basin. Coho spawning and rearing also occur in the Nile, Pileup, and Rattlesnake Creeks and the North Fork of the Little Naches River in the Naches River subbasin (Reclamation and Ecology, 2008).

Currently, coho salmon enter the Yakima River in the fall and winter. Spawning occurs soon afterward; the eggs incubate over the winter and hatch in the spring. After the fry emerge from the gravel, the juveniles rear in the stream until the following spring when they outmigrate as 1-year-old smolts (Reclamation, 2008f; Bosch, 2012).

Over the 10-year period from 2002 to 2011, coho basinwide escapement averaged 4,483 fish, ranging from 818 in 2002 to 10,248 in 2009 (Bosch, 2012).

Sockeye

The four natural glacial lakes in the Yakima River basin historically supported sockeye salmon. Sockeye salmon runs in the Yakima River basin were historically larger than any other runs in the Columbia River Basin in terms of numbers (Reclamation, 2008e). The construction of privatelyconstructed crib dams at the outlet of the lakes contributed to the extirpation of the species from the basin in the early 1900s. Construction of Reclamation's five storage dams eliminated access to previously productive spawning and rearing habitat for sockeye. The reintroduction of sockeye salmon into Cle Elum Reservoir began in 2009 with the release by the Yakama Nation of 1,000 adult sockeye (Wenatchee and Lake Osoyoos stocks) and 1,500 adults in 2010 and 4,800 adults in 2011 trapped at Priest Rapids Dam (Reclamation and Ecology, 2011c; Johnston, 2012).

3.7.1.3 Habitat Conditions for Anadromous Fish

Flows, temperature, sediment, large woody debris (LWD), channel condition, fish passage barriers, and habitat alterations all affect salmonid growth and survival in the basin. The following sections summarize fish habitat conditions in the Yakima and Naches River mainstem and tributaries.

Flow Conditions

Yakima and Naches Rivers

Under current conditions, river flows are altered substantially to meet water entitlements, primarily for irrigation (see Section 3.3, Surface Water Resources, for additional detail on existing water management conditions). In some areas of the basin, flows are higher and in other areas flows are lower than would naturally occur, affecting anadromous and resident fish habitat conditions at different life stages. The results of other studies suggest that the natural, unregulated flow regime of the Yakima River and its tributaries encouraged the distribution and abundance of riverine species and sustained the ecological integrity of the ecosystem (Leopold et al., 1964; Schlosser, 1985; Resh et al., 1988; Allan, 1995; Power et al., 1995; Stanford et al., 1996; Poff et al., 1997).

Flow variability provides ecological benefits to floodplain ecosystems and the terrestrial and aquatic organisms that depend upon them (Williams and Hynes, 1977; Chapman et al., 1982; Poff and Ward, 1989; Closs and Lake, 1996). The natural timing of variable flows provides numerous environmental cues for fish to spawn, hatch eggs, rear, move to off-channel floodplain habitats for feeding or reproduction, and migrate upstream or downstream (Seegrist and Gard, 1972; Montgomery et al., 1983; Nesler et al., 1988; Junk et al., 1989; Welcomme, 1992; Naesje et al., 1995; Sparks, 1995; Trepanier et al., 1996; Poff et al., 1997).

In general, spring flows and water quality in the middle and lower Yakima River reaches are not sufficient to optimize survival of outmigrating smolts. Summer flow and water quality conditions in these reaches are generally not optimal for rearing juvenile salmonids. Flows steadily increase downstream of Sunnyside Dam in the summer as a result of irrigation return flows from groundwater sources and surface drains and the increase in flows becomes more pronounced between Zillah to Granger (river mile 88 to 83). High flows also persist during the summer in the upper Yakima River reaches that affect juvenile salmonid rearing habitat (Reclamation, 2008f). The annual late summer "flip-flop" operation disrupts salmonid habitat spatially, dewaters off-channel rearing habitat which can result in stranding, and impacts aquatic insect populations, while winter flows in the upper Yakima and Cle Elum River are low, potentially impacting survival of overwintering juvenile salmonids (Reclamation, 2008f). Table B-1 in Appendix B provides additional detail about existing flow conditions and effects on anadromous species on the Yakima and Naches River mainstem and tributaries.

Temperature Conditions

Dams, riparian vegetation removal, water withdrawal and regulation, irrigated agriculture, channel engineering (e.g., straightening, channelization, diking, revetments, etc.), urbanization, increasing impervious surfaces, disconnection of the stream from its functional floodplain, and floodplain development alter the factors that drive stream temperature (Poole and Berman, 2001). All of these factors occur in the Yakima River basin to some extent and have altered the temperature regime from the predevelopment, natural condition. Water temperature, especially in the lower Yakima River, has consistently been acknowledged as a limiting factor affecting salmonids, especially

during some life stages. High temperatures at the mouth of the Yakima River may affect anadromous fish, including migrating smolts and adults. In the upper parts of the basin, bottom-draw release structures, like those used at Keechelus, Kachess, Cle Elum, Tieton, and Bumping Lake Dams, provide thermally homogeneous, cold discharge to the Yakima, Kachess, Cle Elum, Tieton, and Bumping Rivers. This would interfere with certain aspects of salmonid ecology in the Yakima River basin (e.g., migration cues, spawn timing, and growth).

Instream and Riparian Habitat Conditions

Instream and riparian habitat conditions in the affected area have been significantly altered from historic conditions. Alterations include fish passage barriers caused by water diversions and culverts, channel modifications, road construction and logging, wetland disturbance, irrigation, loss of flood activity, reservoirs, and other development in the watershed.

Channel Conditions

Clear Lake Dam acts a constructed barrier on the North Fork Tieton River above Rimrock Reservoir and there is a culvert located on Cold Creek above Keechelus Dam. There are no constructed barriers above the other reservoirs. However, degraded channel conditions have resulted from the slowing of flow as streams approach the reservoirs, the loss of LWD, and the reduction of riparian vegetation in the upper watersheds. Other stream alterations stem from logging practices and an associated reduction in canopy cover along the stream corridor.

Irrigation diversions are one of the most widespread alterations to instream habitat conditions. In many cases, diversions are associated with low-flow conditions, stream channelization, and sedimentation. Low flows cause reduced fish passage, while sedimentation and channelization negatively impact spawning success.

Erosion is affected by natural processes and land use practices. Natural slide events contribute significant quantities of sediment to streams. Erosion from bank disturbance and bank cutting also contributes fine sediments. In the upper watershed, road construction associated with timber harvest and off-road vehicle use leads to increased sedimentation (USFS, 1997). In recent years, many stream crossings in off-road recreational areas have been improved or eliminated to help reduce sedimentation. Other sources of sedimentation include grazing, and in the lower stream reaches, development for residential and recreational activities. Heavy loads of suspended sediments directly impact salmonids through their avoidance of impacted habitats, mortality (in extreme cases), a skewed distribution of prey species within the habitat, reduced feeding and growth, and reduced tolerance for disease (Waters, 1995). Fine sediment also fills the spaces between gravels, which affects habitat quality by reducing the flow of oxygenated water around incubating or fertilized eggs. This results in reduced survival.

The disconnection of rivers from their floodplains has resulted in a loss of habitat complexity, including connectivity between off-channel and mainstream habitats. These changes impact the ability of the ecosystem to support salmonid populations, including steelhead and bull trout. Construction of flood control dikes, levees, railroads, and

highways has contributed to the loss of these historical connections (Eitemiller et al., 2002). Channel conditions vary significantly within a particular stream and between streams.

Some streams in the forested areas generally exhibit good stream channel conditions with high-quality gravels and gradients for salmonid spawning and rearing. These areas also have more functional riparian corridors and cover (CBSP, 1990). Some stream reaches have poor riparian cover, especially where roads are located immediately adjacent to streams (Plum Creek Timber Company, 1996). Lower in the watershed, streams are lower in gradient and often have confined reaches.

In the lower reaches, habitat quality is degraded by water management and land use, resulting in reduced habitat complexity, including straightened and incised stream channels, lower pool frequency, reduced or perched riparian vegetation and associated reduced LWD recruitment, and poorer water quality.

Large Woody Debris Conditions

LWD is abundant in the upper portions of the Tieton and Bumping River systems. Upper stream segments serve as the main source of instream LWD for these river systems, the material moving downstream during high flow events, settling in low-gradient, unconfined channel reaches. However, where forest harvest practices are common in the upper watershed, LWD is lacking in the streams (USFS, 1998). LWD recruitment to lower stream reaches is also interrupted by reservoirs (and prior to dam construction the naturally occurring lakes) where LWD washes up on the shores or becomes waterlogged and sinks.

In many Yakima River tributaries, LWD that enters the lower reaches is actively removed to avoid damaging or disrupting irrigation diversion and delivery systems. When LWD is sparse, habitat complexity is reduced and problems related to channel stability and bed scour become more frequent.

3.7.2 Resident Fish

The affected environment for resident fish is the same as described for anadromous fish in Section 3.7.1 of this document. Resident fish do not migrate to salt water but spend their entire life cycles in the same water body.

3.7.2.1 Description and Distribution

Resident native salmonids in the Yakima River basin include the Columbia River Distinct Population Segment (DPS) bull trout, westslope cutthroat trout, rainbow trout, kokanee, mountain whitefish, and pygmy whitefish (Pearsons et al., 1998; Service, 1998). Eastern brook trout, a nonnative (introduced) salmonid, is also present. Of these species, those of special concern include bull trout (federally threatened) and pygmy whitefish (Federal species of concern and State sensitive). Bull trout are discussed in Section 3.10.

Thirty-seven resident nonsalmonid species are present in the Yakima River basin (Pearsons et al., 1998). The most abundant of these in the upper Yakima River basin are speckled dace, longnose dace, redside shiners, northern pikeminnow, largescale suckers,

bridgelip suckers, and sculpins. Burbot is present in Keechelus, Kachess, and Cle Elum Lakes (Bonar et al., 2000). Other less abundant species of special concern include the mountain sucker (State candidate) and leopard dace (State candidate). For a complete fish species list for the Yakima River basin, refer to Pearsons et al. (1998).

3.7.2.2 Habitat Conditions for Resident Fish

Habitat conditions for native resident fish in the river segments downstream from the storage dams are identical to those discussed in Section 3.7.1, Anadromous Fish. Unlike anadromous fish, resident fish are also present in the storage reservoirs, which are part of the area affected by the alternatives. Reservoir operations may affect resident fish by altering their food base and by affecting access from the reservoir to tributary spawning streams.

3.7.3 Aquatic Invertebrates

The affected environment for aquatic invertebrates is the same as described for anadromous fish in Section 3.7.1 of this document. Invertebrate responses to regulated river systems are often complex and variable. Invertebrates are a major source of food for fish, and changes in invertebrate communities may result in changes in condition of fish communities (Waters, 1982; Bowlby and Roff, 1986; Wilzbach et al., 1986). Invertebrates, like other aquatic organisms, respond to changes in water quality, food abundance, and other habitat parameters (Ward, 1976; Armitage, 1984; Armitage et al., 1987). Key conditions that influence the aquatic invertebrate communities include flow controls and the presence of organic matter in the system (Reclamation and Ecology, 2008; Reclamation, 2005b).

Aquatic invertebrates appear to be adapted to flow fluctuations within a range of what can be considered normal conditions. For example, Morgan et al. (1991) found that invertebrate density doubled if flows were generally held within a range of about one to three times the base flow. However, under extreme flood conditions, benthic biomass can be significantly reduced (Moog, 1993).

Artificially high flows at unseasonable times may have a major effect on benthic composition. The length of time that invertebrates are exposed to high flows also likely plays a role in biological community resiliency, with short-term (pulse) alterations being less damaging than long-term alterations.

Arango (2001) determined that the flip-flop operation affected the insect community in an upper Yakima River riffle near the City of Ellensburg. It appeared that some insects were stranded as the water level was lowered in the Yakima River, while other insects entered the drift. The study suggested that a major portion of the invertebrate community is successful in moving down the drying bank and back into the wetted area.

Backwaters in natural systems often function as areas for macroinvertebrates to take refuge from extreme flows. Backwaters accumulate macroinvertebrates during sudden

flood events (Negishi et al., 2002). Floodplain production of invertebrates can be orders of magnitude greater than that produced in the river channel (Gladden and Smock, 1990) and result in enhanced growth and survival of salmonids (Sommer et al., 2001). Extreme high flows can flush out backwaters and reduce macroinvertebrate production, while low flows can also dewater areas and reduce production (Reclamation, 1998g; Stanford et al., 2002). Reduced productivity in benthic invertebrates caused by flow alterations is likely to impact the quality of food for salmonids.

The presence of coarse particulate organic matter (CPOM) is positively correlated with aquatic invertebrate biomass in upstream portions of the Yakima River basin (Nelson, 2005). CPOM is associated, to a large degree, with riparian trees, particularly black cottonwoods. Leaf fall in the autumn provides a large input of CPOM both directly to the main channel and through connection with side channels and floodplains.

3.8 Vegetation

The following discussion focuses on the areas where vegetation would be directly impacted or where changes to vegetation communities and species over time are anticipated as a result of the Integrated Plan. Vegetation issues of concern involve the loss of forest and shrub-steppe communities associated with the development of facilities under some of the elements and effects on riparian and wetland habitat in the basin as a result of changed conditions. The affected area for vegetation includes the following:

- The location of proposed fish passage facilities at the five major reservoirs (Keechelus, Kachess, Cle Elum, Bumping, and Rimrock Lakes) and Clear Lake Dam;
- The areas of additional inundation and drawdown for proposed water storage at existing reservoirs (Cle Elum Lake, Bumping Lake Reservoir, and Lake Kachess);
- The location of new pipeline, canal improvements, pump stations, and transmission lines associated with proposed structural and operation changes on the KRD canals, Keechelus-to-Kachess pipeline, and Wapatox Canal;
- The area of inundation for water storage at the proposed Wymer off-channel reservoir;
- The location of new infrastructure associated with proposed groundwater recharge sites and infiltration systems;
- The location of pipeline, canal improvements, reregulating reservoirs or other measures associated with proposed agricultural water conservation and market reallocation projects; and
- The location of land acquisitions to protect watershed functions, forest habitat, and shrub-steppe habitat. These include lands in the Teanaway, Taneum and Manastash Creek basins, as well as lands adjacent to the Yakima River canyon.

Proposed flow increases in the mainstem and tributary streams could also result in alteration or creation of riparian plant communities over time, so these areas are described below.

The 2005 Yakima Subbasin Plan (YBFWRB, 2005) contains comprehensive descriptions of plants and wildlife in the basin as well as Federal and State listed species. Lists of WDFW-designated priority habitats and species records in the vicinity of the proposed action areas are presented in Appendix C of this document. Threatened and endangered plant species are discussed in Section 3.10.

3.8.1 Upper Yakima River Basin

The Yakima River originates at the Keechelus Dam at 2,450 feet, which is within the ponderosa pine community zone (Franklin and Dyrness, 1988). This zone currently extends from the headwaters to the confluence with the Teanaway River. Mixed conifer stands occur in the vicinity of Cle Elum, Keechelus, and Kachess Lakes. Habitat is characterized by Douglas fir, grand fir, and young ponderosa pine with an understory of bitterbrush and kinnikinnick. Lodgepole pine is also present as well as black cottonwood along downstream rivers. Near the confluence of the Teanaway River, vegetation communities transition toward agricultural areas and grasslands.

Riparian areas are associated with backwaters, sloughs, and oxbows as well as the main river channel. Vegetation is dominated by black cottonwood, red alder, and red-osier dogwood. Wetlands in the basin are located along the mainstem of the Yakima River and especially in the Kittitas Valley. In the upper basin, wetlands are found along smaller tributaries, at seeps and springs, at high-elevation wet meadows, and along the shorelines of natural lakes.

Site-specific studies of vegetation were conducted at the Cle Elum Reservoir, river, and tributaries for the *Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS* (Reclamation and Ecology, 2011c). No site-specific studies are available for Keechelus or Kachess Reservoirs, but vegetation communities are likely similar due their proximity and similar elevation, topography, and climate. Site-specific studies would be conducted when projects are carried forward. Mixed conifer forests surround Cle Elum Reservoir, Cle Elum River, and their tributaries. The forest habitat is dominated by ponderosa pine and Douglas fir, with serviceberry, hazelnut, bitterbrush, snowberry, Oregon grape, kinnikinnick, balsamroot, lupine, strawberry, and a variety of native grasses in the understory. Within the rocky reservoir and river riparian areas, woody vegetation includes black cottonwood, red alder, vine maple, big-leaf maple, rose, and spirea.

3.8.2 Lower Yakima River Basin

The lower Yakima River flows through a more arid landscape than the upper basin and includes mixed conifer forests similar to those previously described, as well as shrub-steppe, wetlands, riparian areas dominated by black cottonwood, and grassland communities. Wetlands are present throughout the lower basin and are primarily

associated with the mainstem and tributaries of the Yakima River. In semiarid environments, wetlands are important to many species of wildlife as they provide some of the best vegetative growth for food and cover, invertebrate production, and water. The National Wetlands Inventory classification system (Cowardin et al., 1979) identified 43,695 acres of wetlands within the entire Yakima River basin, the majority of which are found in the lower basin. This includes 20,040 acres of herbaceous or emergent wetlands; 20,044 acres of scrub-shrub and forested wetlands; and 3,611 acres of unvegetated wetlands. Riparian areas are also present throughout the lower basin. Black cottonwood is the dominant plant species in lowland riparian forests and plays a key role in the integrity of Yakima River riparian systems (Reclamation, 2008f).

Shrub-steppe communities were historically a dominant vegetation type in eastern Washington and have been extensively studied (YBFWRB, 2005). The shrub-steppe vegetation type is a mixture of woody shrubs, grasses, and forbs generally dominated by Wyoming big sagebrush and bluebunch wheatgrass in east-central Washington (Daubenmire, 1970). Environmental factors such as elevation, aspect, soil type, proximity to water, and others contribute to an individual site's vegetation diversity potential. For example, at higher elevations and on north-facing slopes, three-tip sagebrush and Idaho fescue may dominate; on ridge tops with shallow soils, rigid sage-brush and Sandberg's bluegrass and/or bluebunch wheatgrass may dominate (YBFWRB, 2005). Rabbitbrush may be common on recently burned sites. Other grasses and shrubs that may be scattered throughout dominant stands of Wyoming big sagebrush and bluebunch wheat-grass include needle and thread, Thurber's needle grass, Indian rice grass, squirreltail, Cusick's bluegrass, short-spine horsebrush, antelope bitterbrush, spiny hopsage, and basin sagebrush (Crawford and Kagan, 2001). More alkaline sites may support black greasewood, basin wild rye, and inland saltgrass (Daubenmire, 1970). Estimates of historic vegetation cover on undisturbed sites range from 5 to 30 percent shrub cover and from 69 to 100 percent bunchgrass cover. The proposed Wymer Reservoir site contains shrub-steppe vegetation.

Agricultural, residential, and urban development over the past century has changed the landscape drastically, resulting in large losses of shrub-steppe habitat. The further loss of habitat and the degradation of remaining shrub-steppe can be attributed to increased fragmentation, varying fire management practices, competition with exotic and invasive species, overgrazing from livestock, off-road vehicle use, and overall conversion and development (Crawford and Kagan, 2001). In the Yakima River basin, three large properties remain that continue to support large blocks of shrub-steppe: the Yakima Training Center (YTC); a portion of the Yakama Reservation; and the ALE Reserve, located on Hanford Reach National Monument and managed by the U.S. Fish and Wildlife Service (YBFWRB, 2004). More detailed treatment of this vegetation type is found in the *Yakima Subbasin Plan* (YBFWRB, 2004).

3.8.3 Naches River Basin

The Naches River begins near Naches Pass at 5,860 feet elevation. The mainstem of the Naches River upstream of the Bumping River confluence is known as the Little Naches River. The river flows 75 miles through mixed conifer forest and irrigated agricultural

land until its confluence with the Yakima River northwest of Yakima. The large drop in elevation between the headwaters and the confluence (approximately 4,700 feet) results in a significant change of vegetation communities, from alpine habitats to arid lower valleys. Conifer forests are dominated by Douglas fir, western red cedar, western white pine, ponderosa pine, and western hemlock. Riparian areas in the lower basin are dominated by scrub-shrub vegetation such as black cottonwood, wild rose, willow, osier dogwood, and alder.

According to the Limiting Factors Inventory, riparian forests along the Naches River have undergone a significant decline as a result of direct removal for construction of dikes and roads from the mouth to the confluence of the Tieton River (Haring, 2001). Direct removal of forest along the Naches River has been a significant mechanism of loss of floodplain. The area available for inundation and groundwater recharge decreased dramatically as forests were removed for agricultural expansion and road construction. The loss is estimated at over 57 percent since the 1900s (Haring, 2001). Additionally, changes in flow regime coupled with floodplain constriction appear to have decreased recruitment of cottonwood trees (the keystone riparian tree in the lower Naches River basin) and may be impacting the health of existing trees. With existing mature forest size reduced and recruitment of younger trees declining, forest size and health along the lower Naches River are continuing to decline (GeoEngineers, 2003).

Bumping Reservoir lies at 3,400 feet elevation and is surrounded by mixed conifer forest characterized by Douglas fir, western larch, lodgepole pine, western white pine, black cottonwood, grand fir, western red cedar, and Engelmann spruce (Reclamation, 2008a). The shrub layer includes red-osier dogwood, red alpine blueberry, wild rose, Oregon grape, mountain alder, Douglas maple, kinnikinnick, and snowberry. Herb species include bunchberry, twinflower, pipsissewa, vanilla leaf, and strawberry. In forest openings and meadows, sedges and rushes are present.

Rimrock Reservoir is surrounded by conifer forest similar in character to those adjacent to Bumping Lake. Dominant trees include ponderosa and lodgepole pine, western white pine, and Douglas fir. Understory vegetation consists of small shrubs, such as snowberry and vine maple, and perennial grasses. Narrow riparian areas along the Tieton River are dominated by black cottonwood, quaking aspen, water birch, mountain alder, and red-osier dogwood.

3.8.4 Yakima River Tributaries

Riparian habitat along many tributaries in the Yakima River basin is currently degraded due to flow diversions and excessive livestock grazing and agricultural practices to the ordinary high water mark of many streams. Wetlands are common along Toppenish and Satus Creeks due to their low gradient and braided channels. As in other Yakima River basin areas, most emergent wetland habitat along these streams has been removed through draining and land leveling; however, the Yakama Nation has undertaken extensive wetland restoration efforts in the area. Past channelization of tributaries associated with irrigation has resulted in significant loss of spawning and rearing habitat.

3.8.5 Naches River Tributaries

Vegetation along the Bumping River is characterized by intact and mature mixed conifer forest. Dominant species include Douglas fir, western red cedar, ponderosa pine, and black cottonwood, with alder and willow present near the banks. Scrub-shrub and forested wetlands are present on the south side of the river near Goose Prairie and Soda Springs and near the confluence with the Naches River.

The Tieton River flows from the dam at Rimrock Lake through mature forest dominated by ponderosa pine before entering a columnar basalt canyon. Riparian vegetation includes black cottonwood, quaking aspen, willow, and dogwood. Oak woodlands dominated by Oregon white oak also occur in the corridor.

3.9 Wildlife

The following discussion focuses on the areas where wildlife would be directly impacted or where changes to vegetation communities that could affect wildlife habitats and species over time are anticipated with implementation of the Integrated Plan. Wildlife issues of concern involve the loss of forest and shrub-steppe habitats and alterations to movement corridors for some species with the development of some of the facilities. The affected area for wildlife is the same as described in Section 3.8 for Vegetation.

3.9.1 Upper Yakima River Basin

The Yakima River originates at the Keechelus Dam at 2,450 feet, within coniferous forest that extends from the headwaters to the confluence with the Teanaway River. Mixed coniferous and deciduous forest stands occur in the vicinity of Cle Elum, Keechelus, and Kachess Lakes. Conifer forests are used by elk and deer, small mammals, raptors, owls, grouse and a wide range of songbird species. Federal and State-listed species that use habitats in upper Yakima River basin, including gray wolf and cougar, are discussed in Section 3.10. WDFW priority species in the upper basin include fisher, northern goshawk, and pileated woodpecker (WDFW, 2008) (see Appendix C).

Near the confluence of the Teanaway River, vegetation communities transition toward agricultural areas and grasslands. Riparian areas are associated with backwaters, sloughs, and oxbows as well as the main river channel. Riparian areas are noted for having highly diverse plant and animal communities (Kauffman et al., 2001). Approximately 85 percent of Washington's terrestrial vertebrate species use riparian habitat for essential life activities, and the density of wildlife in riparian areas is comparatively high (Knutson and Naef, 1997). Riparian habitats along the mainstem of the Yakima River are highly productive and used by a diverse number of wildlife species including deer, elk, black bear, cougar, bobcat, wintering eagles, heron, waterfowl, and many amphibian species and cavity-nesting birds. Good riparian habitat is generally found along some forested headwater reaches, whereas degraded riparian habitat is concentrated in the valleys and frequently associated with agriculture, grazing, and fluctuating, regulated streamflow.

Wetlands in the basin are located along the mainstem of the Yakima River and especially in the remaining unconfined reaches in the Kittitas Valley. In the upper basin, wetlands are found along smaller tributaries, at seeps and springs, at high-elevation wet meadows, and along the shorelines of natural lakes. Many wetlands are designated as WDFW priority habitats, as well as open water areas that support high concentrations of waterfowl (WDFW, 2009) (see Appendix C).

3.9.2 Upper Basin Reservoirs

Site-specific studies were conducted at the Cle Elum Reservoir, river, and tributaries for the *Cle Elum Dam Fish Passage EIS* (Reclamation and Ecology, 2011c). No site-specific studies are available for Keechelus or Kachess Reservoirs, but wildlife species are likely similar due to similarities in vegetation communities and similar elevation and degree of disturbance and human activity. Site-specific studies will be conducted for all projects when they are carried forward. The forest and riparian habitat areas surrounding Cle Elum Reservoir and Cle Elum River are relatively undisturbed and provide high-quality habitat for a variety of native wildlife species (Appendix C).

Riparian areas are used by many species including bear, deer, elk, heron, waterfowl, small mammals, reptiles, amphibians, cavity-nesting birds, raptors, and a variety of songbirds. Invertebrate species are also important in the Cle Elum River basin food web, for nutrient cycling, and as a food source for fish and wildlife species.

3.9.2.1 Lower Yakima River Basin

The lower Yakima River flows through a more arid landscape than the upper basin and includes riparian habitats similar to those previously described, as well as shrub-steppe habitat and grassland habitats.

Shrub-Steppe Habitat

An abundance of diverse wildlife inhabits and utilizes shrub-steppe communities in the region including the proposed Wymer Dam and reservoir sites. The Service lists core habitat for the following species within the Wymer site vicinity: bighorn sheep, Townsend ground squirrel, golden eagle, ferruginous hawk, short-eared owl, long-billed curlew, loggerhead shrike, sage sparrow, Brewer's sparrow, sage thrasher, greater sage-grouse, black-tailed jackrabbit, Merriam's shrew, mule deer, pallid bat, and small-footed myotis (Reclamation, 2007a). Peripheral habitat exists for the white-tailed jackrabbit. Other species within the affected areas include the coyote, badger, western kingbird, western meadowlark, mourning dove, western rattlesnake, Great Basin spadefoot toad, and northern sagebrush lizard (Service, 2007b).

Appendix C presents a list of the known wildlife species within the affected area of the Wymer Reservoir, as well as a partial list of potential wildlife species that may occur in the vicinity (Reclamation and Ecology, 2008).

Wetlands and Riparian Habitats

Wildlife in wetlands and riparian areas in the lower Yakima River basin include beaver, mink and river otter. Reptile and amphibian species found in these habitats include western painted turtle and spotted frog. Common bird species include Wilson's phalarope, belted kingfisher, peregrine falcon, and hairy woodpecker. Species of waterfowl that utilize the wetland and riparian habitats within the affected area include mallard and American wigeon (Service, 2011a). Unlined canals and drains provide habitat (nesting, brood rearing, feeding and thermal escape and cover) for upland game, waterfowl, furbearers, and many songbird species (Yakama Nation, 1992). Priority species in the lower basin include bald eagle, western grebe, and greater sage-grouse (WDFW, 2008) (see Appendix C). Greater sage-grouse presence is quite limited to the uplands adjacent to the Yakima River canyon. This species is discussed in more detail in Section 3.10.1.7.

3.9.2.2 Naches River Basin

Wildlife species in the Naches River basin include those found in the adjacent Yakima River basin. Riparian areas in the lower basin are dominated by riparian vegetation such as black cottonwood, wild rose, willow, and alder. Wildlife that use the riparian areas in the lower basin include deer, coyote, rabbit, small rodents, pika, raptors, owls, waterfowl, and a variety of small reptiles and songbirds. Canada geese nest on adjacent shorelines and islands of Bumping Lake and Rimrock Reservoirs. WDFW priority species include fisher, northern goshawk, and pileated woodpecker (WDFW, 2008) (see Appendix C).

Bumping Lake and Rimrock Reservoirs

The areas around Bumping and Rimrock Reservoirs support a variety of terrestrial mammals including elk and deer, though winter use is marginal due to snow depths (Reclamation, 2008a). Mountain goats occur on American Ridge, adjacent to Bumping Lake, on Nelson Ridge to the south, and on many other high ridges in the basin. Aquatic mammals include beaver, river otter, muskrat, and mink. Small mammals likely include snowshoe hare, northern flying squirrel, golden-mantled ground squirrel, Douglas squirrel, yellow-bellied marmot, and yellow pine chipmunk.

A variety of reptiles and amphibians are present as well as raptors, owls, waterfowl, and many songbird species. Osprey tend to nest along the lakeshore and a golden eagle nest has been recently documented (Service, 2011a). Principal waterfowl species nesting in lake-fringe habitats include mallard and green-winged teal, and cavity-nesting ducks that may occur in the area include wood duck and Barrow's goldeneye. Amphibian species include Cascades frog, Pacific tree frog, western toad, northern long-toed salamander, and western skink. Reptile species include northern alligator lizard, rubber boa, and garter snake.

Priority species in the vicinity of Bumping Lake include lynx, wolverine, Townsend ground squirrel, western toad, northern goshawk, and common loon (WDFW, 2009) (see Appendix C).

3.9.2.3 Yakima River Tributaries

Riparian habitat along many tributaries in the Yakima River basin is currently degraded due to flow diversions, livestock grazing, and agricultural practices. Overhanging vegetation and large woody debris have also been removed to improve flows, eliminating many miles of channels and creeks for use by nesting waterfowl. Agricultural conversion from row crops to orchards has also contributed to the decrease of active waterfowl and pheasant nesting. Although current land use practices limit riparian habitat, the remaining vegetation provides nesting cover for many species of waterfowl and songbirds. Waterfowl use the canals and drains of irrigation facilities and areas of undisturbed wetland habitat. Spring burning of canal banks is generally followed by herbicide applications through the summer (Reclamation, 2002). Aquatic herbicides are also used within water delivery structures. Late spring burning has decreased waterfowl and pheasant nesting (Oakerman, 1979; Oliver, 1983).

Wetlands are common along Toppenish and Satus Creeks due to their low gradient and braided channels. As in other Yakima River basin areas, emergent wetland habitat along these streams has been removed through draining and land leveling; however, the Yakama Nation has undertaken extensive wetland restoration efforts in the area. Many areas are still heavily grazed during spring and summer months, decreasing wildlife habitat. However, flooded areas are heavily used by migratory waterfowl such as mallards and Canada geese. Refuges along Toppenish Creek provide important habitat for migratory and wintering waterfowl.

3.9.2.4 Naches River Tributaries

Vegetation along the Bumping River is characterized by intact and mature mixed conifer forest. Wildlife species described previously are likely to use mixed conifer forest as well as several bird species including common merganser, harlequin duck, and American dipper.

Wildlife species in the vicinity of the Tieton River include elk, bighorn sheep, mule deer, black bear, and cougar. Golden eagles are known to use cliffs for nesting, and spotted owls occupy adjacent conifer forest. Multiple woodpecker species are also present, including white-headed, Lewis' and acorn, which are uncommon across much of the state. Several priority species occur in the Tieton River drainage, including peregrine falcon and white-headed and Lewis's woodpeckers (WDFW, 2009).

3.9.2.5 Movement Corridors in the Yakima River Basin

Valleys and associated riparian corridors are often used as movement corridors by numerous land animals. This is especially true for species with relatively large home ranges such as deer and elk. The following discussion of movement corridors was provided as part of the *Yakima River Basin Water Storage Feasibility Study* (Reclamation, 2008f) and applies generally to the proposed infrastructure or habitat alterations described in this EIS.

Movement corridors are crucial to wildlife and may be seasonal, depending on the species. The primary function of a corridor is to connect two areas of habitat and allow migration and dispersal into these areas. Wildlife movement is essential to healthy wildlife populations because it does the following:

- Provides connectivity and, thereby, genetic variation and biodiversity between differing populations and habitats, connects isolated habitats, and may allow recolonization of extirpated species;
- Provides varying habitats for migration patterns (e.g., foraging, nesting, brood-rearing, wintering, and mating); encourages plant propagation; and allows populations to move in response to habitat changes such as fires; and
- Can provide habitat for "corridor dwellers," species that live within corridors for extended periods (Beier and Loe, 1992).

The YTC supports a small population of elk that migrate northwest from the ALE Reserve and south from the Colockum and Quilomene Wildlife Areas. Neither the Yakima nor the Colockum herds have been observed within the Wymer area or in the areas directly east of the Yakima River (Stephenson, 2007). WDFW has identified and mapped the corridor between the YTC and the Yakima River as priority habitat for multiple species including steelhead and white-tailed jackrabbit (WDFW, 2009).

3.10 Threatened and Endangered Species

The following discussion focuses on the areas where wildlife, fish, and plant species that are federally or State listed as threatened or endangered would be directly impacted. The affected area for listed species is the same as described in Section 3.8 for Vegetation.

The Yakima Subbasin Plan (YBFWRB, 2005), developed to support protection and restoration of fish and wildlife, contains a detailed list of known rare plant occurrences and rare plant communities in the basin. According to the *Yakima Subbasin Plan*, the Yakima River basin contains at least 67 rare plant species and 52 inventoried rare or high-quality plant communities. Approximately 8 percent of the rare plant communities are associated with grassland habitat, 28 percent with shrub-steppe habitat, 56 percent with upland forest habitat, and 8 percent with riparian habitat (YBFWRB, 2005). In terms of wildlife, there are 26 bird species, 16 mammal species, 11 amphibian species, and 5 reptile species listed as endangered, threatened, or candidate by Federal and/or State agencies.

Table 3-15 shows the wildlife species listed under the Federal ESA and State threatened and endangered species. The Federal species lists were obtained from the Service and NMFS, and the State species lists were obtained from WDFW in September 2011 (NMFS, 2011; Service, 2011a). The WDFW Priority Habitats and Species (PHS) database was also reviewed for occurrences in the vicinity of the affected areas of the proposed Integrated Plan elements and actions (WDFW, 2009). The following sections discuss the listed species and their occurrence in the vicinity of the affected areas.

Appendix C of this document presents a summary of the information received from WDFW on priority habitats and species in the vicinity of the affected areas.

Table 3-15 Federally and State-Listed Endangered, Threatened, Sensitive and Candidate Species that May Occur in the Yakima River Basin

Species	Scientific name	Federal Status*	State Status*
Federally Listed and Candidate Species			
bull trout	*Salvelinus confluentus* – Columbia River DPS	T, CH	C
steelhead	*Oncorhyncus mykiss* – Middle Columbia River DPS	T, CH	C
gray wolf	*Canis lupus*	E	E
grizzly bear	*Ursus arctos horribilis*	T	E
Canada lynx	*Lynx canadensis*	T	T
greater sage-grouse	*Centrocerus urophasianus*	C	T
northern spotted owl	*Strix occidentalis caurina*	T, CH	E
Ute ladies'-tresses	*Spiranthes diluvialis*	T	E
Federal Species of Concern and State Designated Species			
leopard dace	*Rhinichthys falcatus*	none	C
mountain sucker	*Castostomus platyrhynchus*	none	C
Pacific lamprey	*Lampetra tridentate*	SC	M
pygmy whitefish	*Prosopium coulteri*	SC	S
fisher	*Martes pennati* – West Coast DPS	C	E
wolverine	*Gulo gulo*	SC	C
western gray squirrel	*Sciurus griseus*	SC	T
Townsend's ground squirrel	*Urocitellus townsendii townsendii*	SC	C
Townsend's big-eared bat	*Corynorhinus townsendii*	SC	C
bald eagle	*Haliaeetus leucocephalus*	SC	S
black-backed woodpecker	*Picoides arcticus*	none	C
common loon	*Gavia immer*	none	S
ferruginous hawk	*Buteo regalis*	SC	T
flammulated owl	*Otus flammeolus*	none	C
golden eagle	*Aquila chrysaetos*	none	C
great blue heron	*Ardea herodias*	none	M
Lewis' woodpecker	*Melanerpes lewis*	none	C
northern goshawk	*Accipiter gentilis*	SC	C
peregrine falcon	*Falco peregrinus*	SC	S
pileated woodpecker	*Dryocopus pileatus*	none	C
Sage sparrow	*Amphispiza belli*	none	C
Sage thrasher	*Oreoscoptes montanus*	none	C
Western grebe	*Aechmophorus occidentalis*	none	C
white-headed woodpecker	*Picoides albolarvatus*	none	C
Oregon spotted frog	*Rana pretiosa*	none	none
Larch Mountain salamander	*Plethodon larselli*	SC	S
Rocky Mountain tailed frog	*Ascaphus montanus*	SC	C
western toad	*Bufo boreas*	SC	C
sharptail snake	*Contia tenuis*	SC	C
Thompson's chaenactis	*Chaenactis thompsonii*	none	S
western ladies'-tresses	*Spiranthes porrifolia*	none	S

*E = Endangered; T = Threatened; C = Candidate; CH = Critical habitat has been designated for this species; S = Sensitive; SC = Species of Concern; M = monitor species.

3.10.1 Federally Listed and Candidate Species in Yakima River Basin

3.10.1.1 Bull Trout

In June 1998, the Service listed the Columbia River Basin "distinct population segment" (DPS) of bull trout as threatened under the ESA (63 CFR 31647). The Service identified 12 subpopulations in the Yakima River basin. Bull trout require cold, clear water with stable channels and adequate cover (Thurow, 1987; Ziller, 1992). Critical habitat for bull trout was designated in 2005 and revised in 2010 and includes reaches within the affected area.

Bull trout occurred historically throughout most of the Yakima River basin. Today, however, they are fragmented into relatively isolated populations. Although bull trout were probably never as abundant as other salmonids in the basin—due in part to their requirements for cold, clear water—they were likely more abundant and more widely distributed than they are today (WDFW, 1998).

Three bull trout life history forms are present in the Yakima River basin: adfluvial (migrate to lakes), fluvial (migrate to rivers), and resident. Adfluvial and fluvial fish reside in lakes and mainstem rivers, respectively, during part of the year. Fry and juveniles rear in their natal streams for 1 to 4 years before migrating downstream into lakes or mainstem river systems. Adults migrate back into tributary streams to spawn, after which they return to the lake or river. The resident life history form resides in a particular stream for its entire life cycle.

An adfluvial population could still be present in Cle Elum Reservoir; however, no spawning population has been documented in the upper Cle Elum basin. Adfluvial bull trout may have been replaced by nonnative lake trout, which have been naturally reproducing in Cle Elum Reservoir since being stocked in the 1920s. A fluvial population is present in the mainstem Yakima River, although few bull trout have been recorded in the mainstem above Roza Diversion Dam. Bull trout are late summer/early fall spawners and most spawning activity in the Yakima River basin, irrespective of life history form, occurs from early September through early October. However, spawning may occur as early as August or as late as mid-October to early November. For the migratory life history forms, the spawning migration can begin as early as mid-July when adults move upstream to hold in deep pools, or it may occur just prior to spawning.

The primary downstream migration period for juvenile bull trout from their natal tributaries into lakes or rivers occurs from June through November. The early summer migration appears to be in response to increased flows and may correspond with a switch in prey from invertebrates to fish. The fall migration appears to be primarily in response to decreasing water temperatures and the need to find suitable overwintering habitat (Fraley and Shepard, 1989; Murdoch, 2002).

Additional information on the presence of bull trout in the Cle Elum vicinity is available in the *Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project EIS* (Reclamation and Ecology, 2011c) and the *Washington Salmonid Stock Inventory: Bull Trout and Dolly Varden* (WDFW, 1998).

The WDFW Salmon and Steelhead Stock Inventory (SASSI) program characterizes bull trout stocks in the Yakima River basin. Stocks upstream of Rimrock Reservoir are characterized as healthy; Bumping Lake Reservoir bull trout stock are characterized as depressed; Yakima River, Ahtanum Creek, North Fork Teanaway, Kachess Reservoir, and Keechelus Reservoir stocks are characterized as critical; and Cle Elum Reservoir bull trout stocks are characterized as unknown (WDFW, 1998). Bull trout in the Naches River fluvial group are characterized as depressed in Rattlesnake Creek and in the American River, and critical in Crow Creek (WDFW, 1998). There are only a few historical catch records that indicate the presence of bull trout in Yakima River tributaries; relatively few fish were noted in these records (Haring, 2001).

The Service has recently revised designated critical habitat areas in the Yakima River basin (Service, 2010). The Yakima River is within critical habitat unit (CHU) 11 and includes the mainstem and tributaries. The majority of the critical habitat area remains the same as previously designated with some additional tributary habitat added. The Service is currently drafting the *Yakima Bull Trout Action Plan*, a locally-developed plan that will provide Yakimabasin-specific input to the Service as they develop a rangewide recovery plan. The action plan is expected to be completed in 2012.

3.10.1.2 Middle Columbia River Steelhead

The steelhead population in the Yakima River basin is a component of the Middle Columbia River (MCR) DPS steelhead that was listed as threatened in 1999 (64 CFR 14517). Four genetically distinct spawning populations of wild steelhead have been identified in the Yakima River basin, one of which spawns in the upper Yakima River and its tributaries (Phelps et al., 2000). Critical habitat was designated for the MCR steelhead and includes portions of the affected area.

Steelhead are found throughout the basin, which includes the Satus, Toppenish, Naches, upper Yakima, and Ahtanum watersheds (YBFWRB, 2009). Steelhead enter the Yakima River in greatest numbers in September through November and then again in February through April (Haring, 2001). Steelhead hold in the mainstem until moving into tributaries throughout the basin to spawn. Adults spawn February through June, mostly in tributaries, and fry emerge from the gravel from May into July. Overall, most spawning occurs between March and May (Hockersmith et al., 1995), although WDFW personnel have observed steelhead spawning as late as July in the Teanaway River (RM 176.1), a tributary to the upper Yakima River.

Steelhead spend from 1 to 3 years in fresh water before beginning to migrate to the ocean in spring, with the majority of outmigrants passing Prosser Dam (RM 47) in April. Juvenile steelhead utilize tributary and mainstem reaches throughout the Yakima River basin as rearing habitat and use faster and deeper water as they grow. Some downstream movement begins in November, but the peak of the smolt outmigration occurs between mid-April and May. As with other salmon species, steelhead rely on spring freshets to move them successfully downriver through the Yakima River into the Columbia River (Reclamation and Ecology, 2008).

Over the past 10 years, steelhead basinwide escapement has averaged 3,679 fish, ranging from 1,537 in 2006-2007 to 6,793 in 2009-2010 (Bosch, 2012). The run is dominated by wild fish. The run also contains a hatchery component of about 5 percent over the last 10 years (YBFWRB, 2009). The hatchery component is attributed to strays originating from outside the basin (WDFW, 2009).

Data from Columbia River dams suggest that, although annual numbers fluctuate widely, there is a decreasing trend in the number of adult Pacific lampreys counted at each project (U.S. Federal Register, 2004). Data indicate that large declines occurred during the late 1960s and 1970s, and that current counts continue to be well below historical levels (Close et al., 1995; BioAnalysts, Inc., 2000).

3.10.1.3 Gray Wolf

The gray wolf is a Federal endangered and State endangered species. The Federal listing covers only the western half of Washington, including the entire Yakima basin. The gray wolf is a wide-ranging carnivore that uses a variety of habitats. Its primary prey includes deer and elk. Wolves were once common throughout most of Washington, including the potentially affected areas of the Integrated Plan. The breeding population was decimated by the 1930s as a result of the expansion of ranching and farming in the state. In the early 2000s, reliable reports of wolves began increasing in Washington due in part to the recent recovery of wolf populations in Idaho, Montana, and Wyoming. Five wolf packs have been identified and confirmed by WDFW in Washington since 2008. In July 2011, a gray wolf pack was confirmed in the Teanaway region of the Yakima basin (WDFW, 2011a). The other four packs occur in north-central and northeast Washington in Okanogan, Chelan, and Pend Oreille Counties.

In response to the return of wolves to Washington, WDFW prepared the *Wolf Conservation and Management Plan for Washington* (WDFW, 2011b), which was adopted by the Washington Fish and Wildlife Commission on December 3, 2011. The plan focuses on recovering gray populations sufficient to support downlisting and delisting wolves at the state level, and management strategies to reduce and address conflicts with livestock and big game herds.

The affected areas of the Integrated Plan elements are not likely to support this species due to the presence of roads and fragmentation of suitable habitats. Wolves tend to move away from areas with high road densities (Mech et al., 1988; Mech and Boitani, 2003). High road densities, present throughout much of the affected areas, reduce the likelihood of this species occurring on a regular basis.

3.10.1.4 Grizzly Bear

The grizzly bear is a Federal threatened and State endangered species. Grizzly bears are wide-ranging and feed on roots, berries, ants, grubs, carrion, small mammals, ungulates, and salmon. Suitable habitat existed in the upper Yakima River basin historically, but fairly high road densities, development, and increased human use have decreased the quality of the habitat in the area. Grizzly bear observations have been recorded in the

vicinity of Cle Elum Reservoir (WDFW, 2009). Small numbers of this species may also be found in other areas of the Yakima River basin.

3.10.1.5 Canada Lynx

In March 2000, the Service listed the Canada lynx as threatened under the ESA. Canada lynx are known to occur in several western and northern tier states including Washington. The life history and habitat requirements of Canada lynx are described in detail in the *Endangered and Threatened Wildlife and Plants: Determination of Threatened Status for the Contiguous U.S. Distinct Population Segment of the Canada Lynx and Related Rule; Final Rule* (Service, 2000) and are summarized in the following paragraph.

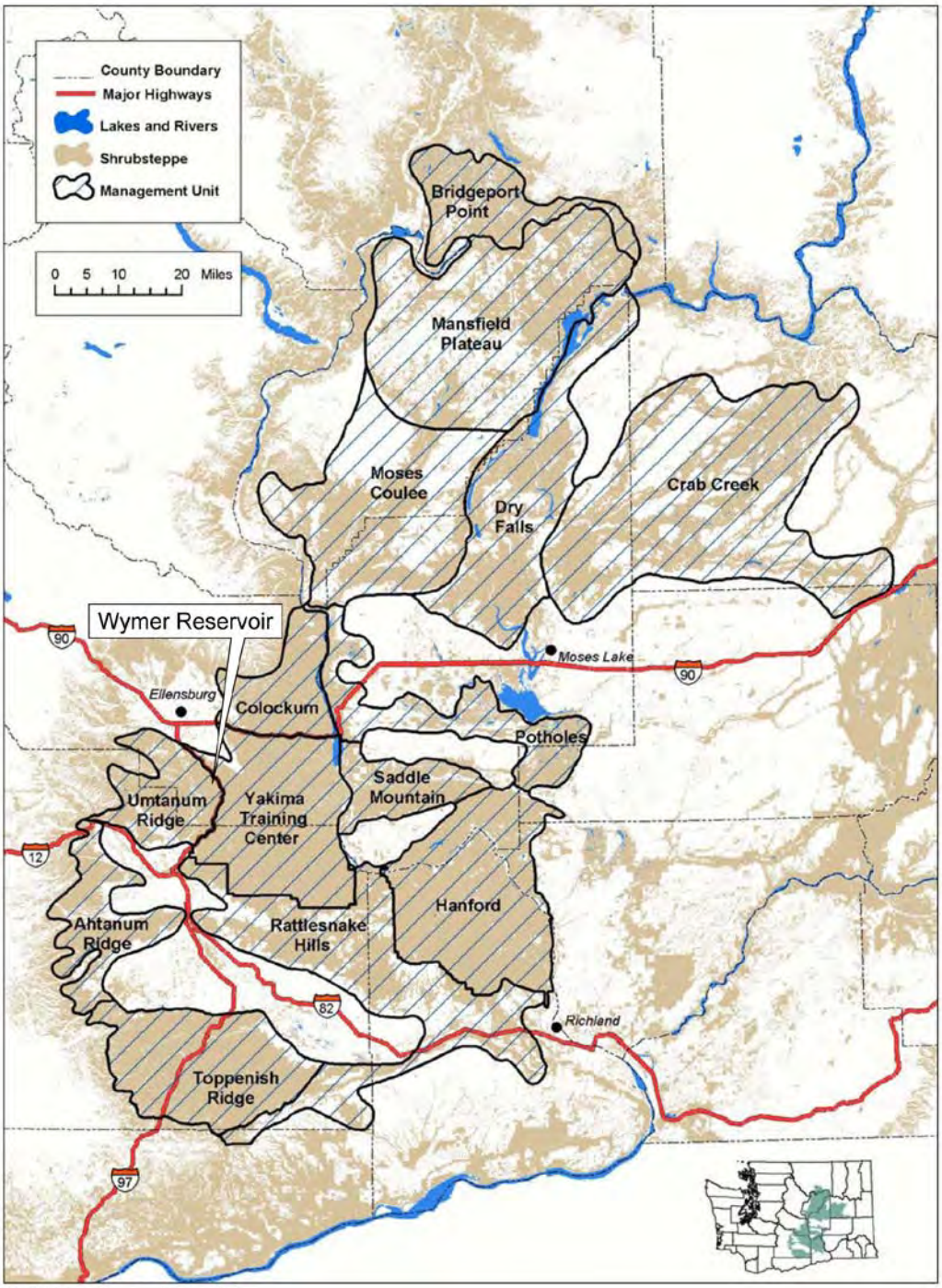
In Washington, resident lynx populations were historically found in the northeast and north-central regions and along the east slope of the Cascade Mountains. In the West, the distribution of the lynx is associated with subalpine coniferous forest. Within these general forest types, lynx are most likely to persist in areas that receive deep snow, for which the lynx is highly adapted. Most of the lynx occurrences are in the 4,920- to 6,560-foot elevation class. The WDFW PHS data do not indicate any documented occurrences of Canada lynx in the affected areas (WDFW, 2009). If present in the Yakima River basin, they are most likely to occur at higher elevations.

3.10.1.6 Greater Sage-Grouse

The greater sage-grouse is a Federal candidate for listing under the ESA and is State-listed as threatened. In Washington, sage-grouse formerly ranged from the Columbia River north to Oroville, west to the foothills of the Cascade Range, and east to the Spokane River. Sage-grouse in Washington currently are restricted to two isolated populations. The largest (estimated to be approximately 426 birds) is located on mostly private land in Douglas and Grant Counties. A second population of 213 sage-grouse is on the YTC in Kittitas and Yakima Counties adjacent to the proposed Wymer site (WDFW, 2011). Reintroduction efforts are underway on the Yakama Reservation and in Lincoln County.

Data from radio-tagged sage-grouse indicate that they use habitat in the Wymer Reservoir site. The shrub-steppe habitat in the project area is within the Umtanum Ridge Management Unit identified by the State as a potential expansion and reintroduction area for greater sage-grouse (see Figure 3-5) (Stinson et al., 2004).

Preferred habitat for greater-sage-grouse includes areas with greater than 10 percent cover of sagebrush, with moderate bunchgrass understory. Typical home-range size is 0.8 to17 square miles in Washington (Stinson et al., 2004). Males gather at leks (mating and displaying locations), returning to the same lek annually. Females choose nest sites then travel to leks to select mates. Females were found to nest approximately 0.5 to 12 miles from leks on the YTC (Stinson et al., 2004).



SOURCE: Stinson et al. 2004.

Figure 3-5 Sage-Grouse Habitat Management Units

3.10.1.7 Northern Spotted Owl

The northern spotted owl was listed as a threatened species by the Service in 1990, primarily due to widespread habitat loss and inadequate protective mechanisms. It is listed by the State as endangered due to its sharp decline in recent years in Washington State. Spotted owls generally rely on older forested habitats because such forests contain the structure diversity and characteristics required for nesting, roosting, and foraging. Features that support nesting and roosting typically include a moderate-to-high canopy closure (60 to 90 percent); a multilayered, multispecies canopy with large overstory trees (with diameter at breast height of greater than 30 inches); a high incidence of large trees with various deformities (large cavities, broken tops, mistletoe infections, and other evidence of decadence); large snags; large accumulations of fallen trees and other woody debris on the ground; and sufficient open space below the canopy for spotted owls to fly (Thomas et al., 1990). Forested stands with high canopy closure also provide thermal cover (Weathers et al., 2001) and protection from predators. Spotted owls forage on wood rats, northern flying squirrels, mice, bats, and occasionally small birds, moths, crickets, and large beetles.

The Service has recently released the *Revised Recovery Plan for the Northern Spotted Owl* (Service, 2011b). The 2011 plan retains elements of the 2008 plan, including a strategy to assess and address threats from barred owls and support for forest restoration techniques. The previous recovery plan was completed and later remanded in 2008 due to a court challenge and investigation. The previous plan established a network of Managed Owl Conservation Areas (MOCAs) across the range of the northern spotted owl. As described in the *Yakima River Basin Water Storage Feasibility Study* (Reclamation, 2008f), the northern half of Cle Elum Reservoir lies within a proposed MOCA and the southern half lies within a proposed Conservation Support Area (CSA) under the previous plan. Bumping Lake and the surrounding forests to the south and northeast are within spotted owl Critical Habitat Unit (CHU) Number 6: Southeast Washington Cascades (Service, 2008). However, based on scientific peer review comments on the recovery plan, the Service is not incorporating the previously recommended MOCA network or CSAs and critical habitat designations into the revised recovery plan. Currently, critical habitat is being revised to address new threats and to incorporate emerging science regarding habitat management in fire-prone areas. Critical habitat designations will be updated by the Service as part of a rulemaking process and are expected to be published by the end of 2012. The revised recovery plan states that in the interim, Federal land managers should continue to implement the standards and guidelines of the Northwest Forest Plan as well as fully considering other recommendations in the revised recovery plan (Service, 2011b).

3.10.1.8 Ute Ladies'-tresses

Ute ladies'-tresses is a species within the orchid family that was federally listed as a threatened species on January 17, 1992 (50 CFR Part 17) due to habitat loss or modification, small population size, and low reproductive rate (Service, 1992). Ute ladies'-tresses are found in moist soils near riparian areas, lakes, moderately moist

(mesic) to wet meadows, river meanders, and perennial spring habitats. This plant generally occurs within an elevation range between 1,500 and 7,000 feet, with the lower elevations in the western part of its range. The orchid generally occurs below montane forests, in open areas of shrub or grassland, or in transitional zones. It is considered a lowland species, typically occurring near streams and rivers. This species tends to occupy grass, rush, sedge, and willow sapling dominated openings.

Ute ladies'-tresses were discovered in Washington State for the first time in Okanogan County in 1997. It was also found near the Chief Joseph Dam in Chelan County (Service, 2009b). At present, there are no known populations of Ute ladies'-tresses within the project area at Cle Elum Reservoir (WDNR, 2008; 2009); however, potential habitat for this species is present and potential habitat is likely to exist at other Integrated Plan project sites.

3.10.2 State Threatened and Endangered Species in the Yakima River Basin

3.10.2.1 Pacific Lamprey

In eastern Washington, Pacific lamprey historically occurred in the Yakima River basin and in numerous other Columbia River basins, including the Spokane River and Asotin Creek (Wydoski and Whitney, 1979). Current knowledge of Pacific lamprey in the Yakima River basin is limited to incidental observations of approximately five adults annually at the Prosser adult fish passage facility since 1985 (Johnston, 2009). Pacific lamprey are very rare in the Yakima River basin and little is known about their life history, historic distribution, or current limiting factors; therefore, the Yakama Nation considers reintroduction of this species a long-term objective. The Yakama Nation is conducting studies of lamprey in the basin and the potential for providing passage for lamprey at existing dams.

3.10.2.2 Fisher

The fisher is a State endangered and Federal candidate species that feeds on a variety of small- to medium-sized mammals, birds and carrion. It inhabits dense coniferous forest with extensive and continuous canopy, using riparian areas and ridgelines as movement corridors. Fisher populations have declined because of overtrapping, predator control, and habitat alteration. Fishers are typically found in large areas of relatively contiguous late-successional coniferous forest or mixed coniferous deciduous forest. Currently, the fisher is very rare in Washington State although there are several sightings on record in the Naches Ranger District to the southwest (USFS, 2006). The WDFW's status report for the fisher suggest that without a recovery program that includes reintroductions, the species is likely to be extirpated from the state (Lewis and Stinson, 1998).

3.10.2.3 Western Gray Squirrel

The western gray squirrel is the largest tree squirrel native to the Pacific Northwest and is most frequently associated with pine and oak trees that provide nesting cover and seeds for food. In Washington, they also use stands of Douglas fir trees when a component of

oak or pine is present. Western gray squirrels require mature stands of trees with sufficient canopy cover to allow arboreal travel and provide secure nest sites, and sufficient complexity of vegetation to provide a multitude of food resources.

Once common in suitable habitat on both sides of the Cascade Mountains, western gray squirrels in Washington have declined over the last century and their range has diminished due to losses of suitable habitat. Distribution of western gray squirrels in Washington currently is limited to only three locations: south Puget Trough, the North Cascades (Chelan and Okanogan Counties), and south-central Washington (primarily Klickitat County). Western gray squirrels are not known to inhabit the project area. Additional threats to western gray squirrels in Washington include fragmentation of oak woodlands, invasion of oak woodlands by nonnative plants like Scotch broom, diseases such as mange, and potential competitors such as the introduced eastern gray squirrel and California ground squirrel.

While once hunted in Washington, the western gray squirrel has been protected since 1944 and was listed as threatened by the WDFW in 1993. A species recovery plan was completed in 2007 (Linders and Stinson, 2007).

3.10.2.4 Ferruginous Hawk

The ferruginous hawk is a Federal species of concern and a State threatened species. This large hawk inhabits dry, open country of the plains, prairies, grassland, shrub-steppe, and deserts, especially in those areas with native bunchgrasses. Ferruginous hawks nest on rocky cliff ledges, utility towers, or nest platforms. They have declined in recent years across the continent, including Washington, with the greatest concentration remaining in Franklin and Benton Counties. They can also be seen in shrub-steppe habitats in the Yakima basin. Threats to the population in Washington include increased human disturbance and habitat destruction (specifically shrub-steppe). The Conservation Reserve Program and other shrub-steppe conservation programs may help protect and restore habitat for ferruginous hawks.

3.10.3 Federal Species of Concern and State Designated Species

In addition to the federally listed species discussed above, several other wildlife species that occur in the Yakima River basin are Federal species of concern or State designated species (Table 3-15). In the upper Yakima basin, northern goshawk and pileated woodpecker use conifer forests. Wolverine, a State candidate species, may use alpine and subalpine zones in the upper basin and disperse throughout the lower basin. In the Kittitas Valley, wetlands along the mainstem of the Yakima River support high concentrations of waterfowl and bald eagle. In the lower Yakima basin, riparian areas and freshwater lakes provide habitat for western grebe, great blue heron and other waterfowl. Habitats in the Naches River basin, including Bumping Lake Reservoir, support northern goshawk and pileated woodpecker. The Wymer Reservoir area provides habitat for a number of large and small mammals and bird species, including Townsend's ground squirrel, golden eagle, and ferruginous hawk. Appendix C contains a more

comprehensive description of state listed species and habitat associations in the affected areas.

3.11 Visual Quality

This section describes the visual setting of the areas where visual quality would likely be affected by the Integrated Plan elements. These areas include the following:

- Yakima River basin reservoirs (Keechelus, Kachess, Cle Elum, Bumping, Rimrock, and Clear Lake);
- Yakima and Naches River and their tributaries, including:
    - Middle and lower Teanaway River basin (for land acquisition);
    - Yakima River canyon (between Yakima River and I-82) (for land acquisition);
    - Little Naches River, Taneum and Manastash Creeks headwaters (for land acquisition);
    - Lands surrounding Bumping Lake (for Wilderness designation);
    - Roadless area in Teanaway, between Kachess and Cle Elum Reservoirs, and upper reaches of Manastash and Taneum Creeks (for Wilderness designation); and
    - America, Upper Cle Elum, and Waptus Rivers (for Wild and Scenic River Designation).
- Rural/agricultural areas of Kittitas, Benton, and Yakima Counties; and
- Urban/suburban areas of the City of Yakima.

3.11.1 Regulatory Setting

Federal land management agencies such as the Bureau of Land Management (BLM) and have developed systems specifically designed to inventory, evaluate, and manage for scenic (visual) resources on public lands. To evaluate scenic resources under BLM jurisdiction and to develop management objectives for those resources, the BLM developed the Visual Resource Management (VRM) system, which utilizes a Visual Resource Inventory (VRI). The VRI consists of three data components: scenic quality, visual sensitivity, and distance zones (BLM, 2011). Together, these three elements comprise a final VRI class that reflects the current physical condition of the visual resource within a geographic area. The lands around the proposed Wymer Dam are managed by BLM and would be subject to BLM's VRM system for evaluating visual impacts.

The USFS has a parallel system, known as the Scenery Management System (SMS). The primary components of the SMS are similar to BLM's VRM system (e.g., BLM's scenic quality versus the SMS inherent scenic attractiveness; visual sensitivity/public concern levels; and distance zones/seen areas and distance zones). In addition, the USFS provides

management directions for scenic viewsheds containing dams and reservoirs, described in terms of Visual Quality Objective (VQO). Under this system, there are five VQO categories: Preservation, Retention, Partial Retention, Modification, and Maximum Modification. VQOs are established based on an evaluation of the following:

- Sensitivity Level (the public's concern for scenic quality – High, Moderate, and Low);
- Variety Class (the diversity of natural features – Distinctive, Pleasing but Common, and Dull or Monotonous); and
- Distance Zones (Foreground, Middleground, and Background).

These terms are from the Visual Management System (USFS, 1974 in Reclamation, 2008a) and the National Forest Landscape Management handbooks.

The VQOs for the Yakima River basin reservoirs are considered Scenic Travel 1 (ST-1)-Retention VQO (Jackson, 2008 in Reclamation, 2008a). Under Retention VQO, activities may only repeat form, line, color, and texture which are frequently found in the characteristic landscape. Changes in their qualities of size, amount, intensity, direction, pattern, etc., should not be evident. Immediate reduction in visual contrast (form, line, color, and texture) should be accomplished either during construction or immediately after.

Under USFS's SMS, Scenic Integrity Levels (SILs) are established for each Management Area, ranging from Very High, meaning the landscape is unaltered, to Low, meaning moderate alterations are apparent on the landscape. The SIL for lands around the reservoirs is High, meaning the landscape appears intact (Reclamation, 2008e). The visual resource analysis in this EIS references both the VQO and the SIL of the study area. Table 3-16 describes the relationship between VQOs and SIL as contained in the SMS (USDA, 1995).

Table 3-16 Relationship between Visual Quality Objectives and Scenic Integrity Levels

SIL/VQO	Condition	Perception, Degree of Deviation
High/Retention	Appears Unaltered	Not Evident. Deviations may be present but must repeat form, line, color, and texture of characteristic landscape in scale.

Source: USDA 1995, 2-4.

The lands around Keechelus, Kachess, Cle Elum, Bumping, Rimrock, and Clear Lake Reservoirs are within the Okanogan-Wenatchee National Forest. Individual projects proposed in these areas would be subject to the USFS's SMS system for evaluating visual impacts. This area is managed by the USFS principally as scenic viewsheds. The USFS

manages these lands according to its 1990 Land and Resource Management Plan (Forest Plan) (USFS, 1990).

The lands around Keechelus, Kachess, and Cle Elum Reservoirs are part of the Mountains to Sound Greenway National Scenic Byway, which is also designated as a Washington State Scenic and Recreational Highway. State Route (SR) 182 through Yakima River canyon is similarly designated. This designation is based on the route's outstanding scenic character and environmental experiences, establishing a high level of sensitivity to visual quality for any action considered within the corridor. An overall goal of the Washington State Scenic and Recreational Highways Strategic Plan 2010-2030 is to: "Plan for, protect and preserve resources associated with the State's Scenic and Recreational Highways" (WSDOT, 2010).

3.11.2 Visual Setting: Reservoirs

All the reservoirs in the Yakima River basin share the characteristic of being drawn down during the summer. The reservoirs are generally full in late spring and early summer, but are drawn down for irrigation starting in June. The reservoirs do not refill until the following spring. This leaves large areas of exposed shorelines from late summer through the winter. Stumps from trees that were logged before the dams were raised or constructed are exposed. In dry years, the reservoirs may not completely fill and the upper portions of the reservoir are exposed year-round. In some reservoirs, such as Keechelus, shrubby vegetation has grown up in the exposed shorelines. That vegetation is green during the summer.

The visual settings of Keechelus, Kachess, Cle Elum, Bumping, Rimrock, and Clear Lake Reservoirs are described below.

3.11.2.1 Keechelus Reservoir

The visual setting for Keechelus Reservoir provides a perceived "natural" landscape, contrasting with a developed eastern shore—the I-90 corridor. Because of its proximity to I-90, Keechelus Reservoir is viewed by more people than any other Yakima River basin reservoir. The John Wayne Pioneer Trail is the principal development on the western shore of the lake.

The dominant landscape character is openness with dramatic contrasts of rock rising sharply to the east and water immediately adjacent to I-90 to the west, which curves around the eastern shore of the lake. Background views to the west are generally forested, with views of distant hills and mountains beyond. Douglas fir trees dominate the vegetation.

Foreground views to the west at the southern end of Keechelus Reservoir are dominated by I-90 and its concrete Jersey barrier. The middleground view is of grasses between the road and the lake. The earth-filled Keechelus Dam can be seen in the background, as well as the mountains in the far distance. Beyond the dam, the Yakima River flows to the south. The dam's low profile relative to the surrounding landscape allows it to blend with the landscape, but it is visible and noticeable from I-90.

The John Wayne Pioneer Trail follows the western shoreline of Keechelus Reservoir. The view from the trail on the north end of the lake is very natural, with Gold Creek and native vegetation in the foreground, and stumps in the middle ground. To the south, views from the trail are dramatic and sweeping. The foreground is occupied by vegetation along and below the trail. Additional background views are of distant peaks. Evidence of development is limited to the narrow band of the highway, which is obscured by trees.

3.11.2.2 Kachess Reservoir

The visual setting for Kachess Reservoir provides a perceived "natural" landscape with limited development along the shores. Viewers of the lake are primarily recreationists and seasonal residents. Kachess Reservoir is located between the north-south trending Keechelus Ridge to the west and Kachess Ridge to the east. Background views are forested, with views of valley walls, ridges, and mountains beyond. Douglas fir forests dominate the vegetation. Development is generally limited to USFS roads on both the east and west shores, boat launches, other recreational facilities, and increasing residential development on the south and west shore.

Kachess Dam is located on the southern end of the lake and is approximately 115 feet tall and 1,400 feet in length with a gated spillway.

3.11.2.3 Cle Elum Reservoir

The visual setting for Cle Elum Reservoir provides a perceived "natural" landscape with limited development along the shores. Viewers of the lake are primarily recreationists and seasonal residents. Background views are forested with patches of logged hillsides, valley walls, ridges, and mountains beyond. Pine and Douglas fir trees dominate the vegetation. Development adjacent to the reservoir is generally limited to USFS roads on the east and west shore, boat launches, campgrounds, and cabins. Year-round residences and resorts are more common south of the reservoir.

Cle Elum Dam is located on the southern end of the lake and is approximately 165 feet tall and 1,800 feet in length with a gated spillway. Public views of the downstream side of the dam are limited by steep topography and restricted access.

3.11.2.4 Bumping Lake Reservoir

The visual setting for Bumping Lake Reservoir provides a perceived "natural" landscape, with relatively limited development in evidence. Development at the lake includes Bumping Lake Dam, USFS campgrounds and day use area (south shore), recreational residences, the Bumping Lake Marina (north shore), and USFS roads and trailheads. The existing dam is 61 feet tall and 2,925 feet in length, with an outlet from a 1,300-acre glacial lake in the floor of Bumping River valley. The dam site is a deep, steep-walled canyon. Glacial deposits dominate the valley floor. Mixed-conifer forests surround the lake. Viewers are primarily boaters and hikers, summer residents, and Goose Prairie residents.

The William O. Douglas Wilderness is located approximately 1 mile from the north and south shores of Bumping Lake Reservoir and is managed in a natural state.

3.11.2.5 Rimrock Reservoir

The visual setting at Tieton Dam/Rimrock Reservoir provides a perceived "natural" setting characterized by extremely rugged terrain. Tieton Dam is located in a steep-sided, mountainous valley, carved by the Tieton River. Background views are forested with valley walls, ridges, and mountains beyond. Pine and Douglas fir trees dominate the vegetation. Development adjacent to the reservoir is generally limited to USFS roads, boat launches, and campgrounds. The valley area is forested. Tieton Dam is visible from Highway 12. The downstream face of the dam generally does not support vegetation and the spillway channel is generally barren, solid rock and concrete channels. Because of the attractive combination of the forested valley and the lake, visual quality is generally high.

3.11.2.6 Clear Lake Reservoir

The visual setting at Clear Lake Reservoir provides a perceived "natural" setting characterized by extremely rugged terrain. Clear Lake Dam is located in a steep-sided, mountainous valley, with an outlet to the 5,300-acre lake. Clear Lake Reservoir is located above Rimrock Lake and has a similar visual setting. Development adjacent to the reservoir is generally limited to USFS roads, campgrounds, a day use area, and a boat launch. Because of the attractive combination of the forested valley and the lake, visual quality is generally high.

3.11.3 Visual Setting: Yakima and Naches River Tributaries

The landscape in which structural and operational changes (canal modifications), surface water storage (Wymer Dam and Pump Station), habitat/watershed protection and enhancements, and targeted watershed protections and enhancements would take place is both the mainstem and tributaries of the Yakima River and the Naches River. This is a large area with varied landscapes, but is most commonly characterized by irrigated agricultural lands and other large-lot rural development. Agricultural lands are a mix of orchards, vineyards, and row/field crops. Agricultural infrastructure (canals and appurtenant facilities) is strongly in evidence. Structures are generally residential and farm-oriented.

Typical foreground and middleground views are of valley agricultural lands, rangeland, and rolling hills of sagebrush. Background views are of mountains and sky. The visual character and quality are also defined by dispersed residential areas, existing transmission and generation facilities, and the way topography and vegetation relate to the sky and the changing patterns of light throughout the day and year. All of these factors contribute to the area's visual interest and perceived visual quality. Viewers would typically be residents of the low-density, scattered valley homes, dispersed recreationists, and motorists on highways and on rural roads in the area.

The landscape in which the Wymer Dam would be established is primarily the Yakima River canyon, along SR 821, north of Selah and south of Ellensburg. It is only within the Yakima River canyon where facilities associated with this alternative would be visible to the public. While the dam and reservoir would be located in the Lmuma Creek basin (tributary to the Yakima River canyon to the east), that entire basin is privately owned with no public access, no existing residents, and very limited public viewpoints from surrounding areas (Reclamation, 2008f).

The Yakima River canyon is generally narrow and meandering, with the Yakima River dominating the canyon bottom and steep to gently rolling basalt hills rising high on both sides. Much of the canyon is undeveloped, presenting a natural desert canyon landscape with riparian vegetation along the river and low-growing scrubland/grassland on the hillsides. Evidence of human development is present, including SR 182, the railroad, Roza Diversion Dam and associated infrastructure, instances of irrigated agriculture (with associated residences and other buildings), large-lot residential area north of the proposed Wymer Dam, and canyon-oriented recreational sites and businesses (for example, a river rafting company) where the canyon widens. SR 821 through the canyon is designated a National Scenic Byway and a State Scenic and Recreational Highway (Reclamation, 2008f).

Public viewpoints in the canyon are from the highway and the river (i.e., rafters, anglers, and kayakers) (Reclamation, 2008f).

3.11.4 Visual Setting: Rural/Agricultural Kittitas, Benton, and Yakima Counties

The setting of the proposed outlet and distribution facilities/systems under the Structural and Operational Changes Element and agricultural conservation projects under the Enhanced Water Conservation Element is characterized largely by irrigated agriculture and other large-lot rural residential development. Local agriculture includes a mixture of orchards, vineyards, and row/field crops. Agricultural infrastructure (canals and appurtenant facilities) is strongly in evidence. Structures are generally residential and farm-oriented.

Public viewpoints from which the locations of facilities would be visible are generally along local roads, residences, and farms. Relevant views in this setting generally are dominated by surrounding agriculture, often with open hillsides as a backdrop.

3.11.5 Visual Setting: Urban/Suburban Yakima

The visual setting of the municipal (Yakima) aquifer storage and recovery system, part of the Groundwater Storage Element, is typical of moderate-sized cities. The “cityscapes” where a water treatment facility, wells, and a pump station could be located include residential developments of varying densities, commercial sites and complexes, limited industrial development, and associated infrastructure (e.g., road systems, utility lines). Where the facilities would be sited in this setting, public views of the facilities would likely be short-range from adjacent roadways, residences, and businesses.

3.12 Air Quality

This section describes the area studied for the air quality analysis as well as the regulatory and environmental setting. The regulatory setting is described in terms of Federal, State, and local requirements. The environmental setting is described in terms of air pollutant sources and existing concentrations. Air quality changes over time as economic development occurs and regulatory programs affect the emissions from sources. The following discussion provides a general picture of air quality in the Yakima River basin which includes all or parts of Kittitas, Yakima, Klickitat, and Benton Counties where the proposed projects would be located.

3.12.1 Regulatory Setting

The Federal Clean Air Act has set National Ambient Air Quality Standards (NAAQS) that define levels of air quality necessary to protect the public health (primary standards) and the public welfare (secondary standards). The Clean Air Act requires States to classify air basins as either attainment or nonattainment with respect to these air pollutants. Counties or regions designated as nonattainment areas for one or more pollutants must prepare a State Implementation Plan (SIP) that demonstrates how the area will achieve attainment by federally mandated deadlines. Section 176(c) of the Clean Air Act requires any entity of the Federal Government that engages in, supports, or in any way provides financial support for, licenses, or permits or approves any activity to demonstrate that the action conforms to the applicable SIP required under Section 110(a).

According to EPA guidance, before any approval is given for a proposed action, the regulating Federal agency must determine the regional significance of the action and its general conformity on a pollutant-by-pollutant basis. If the emissions are determined to be *de minimis* (minimal), no further analysis is required. However, if the conformity regulations apply, then an evaluation must be conducted.

Ecology has identified State ambient air quality standards (SAAQS) for total suspended particulates, lead, particulate matter, sulfur dioxide, carbon monoxide, ozone, and nitrogen dioxide.

Historically, the City of Yakima has experienced exceedances of the NAAQS for particulate matter and carbon monoxide. Through actions taken in the SIP, ambient air concentrations of these pollutants were brought into line with the NAAQS.

Today, portions of the City of Yakima are designated as maintenance areas for particulate matter and carbon monoxide. All other areas within the Yakima basin study area are currently in attainment for regulated pollutants.

The EPA has designated some areas of Washington as Class 1 Federal wilderness where visibility is an important factor (40 CFR 81.410, 81.425, and 81.434). SIPs must also address visibility within federally designated Class I areas, where good air quality is deemed to be of national importance (Section 162 Clean Air Act, August, 1977, defines Class I areas).

The Alpine Lakes Wilderness, at the headwaters of the Cle Elum River, and the Goat Rocks Wilderness, just east of Clear Lake, are both listed as Class I areas (WAC 173-400-030). WAC 173-400-117 sets forth requirements for projects in Class I areas. The WAC regulations apply to a permitting action where a project requires a permit application for a new major stationary source or a major modification; or the submittal of a notice of construction application for a major stationary source or a major modification to a stationary source in a nonattainment area, as defined in WAC 173-400-720.

Projects that require earthwork or otherwise have the potential to create fugitive or windborne dust are required to use best management practices (BMPs) to control dust at the project site. According to WAC 173-400-030, fugitive air emissions are emissions that "do not and which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening." These emissions include fugitive dust from unpaved roads, construction sites, and tilled land. Fugitive emissions are considered in determining the level of air permitting required only for a certain subset of sources, not including this type of proposed project. However, pursuant to WAC 173-400-040(8)(a): "The owner or operator of a source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions."

Several subsections of WAC 173-400-040, *General Standards for Maximum Emissions*, would apply to construction activities. These include subsections (1) Visible emissions, (2) Fallout, (3) Fugitive emissions, (5) Emissions detrimental to persons or property, and (8) Fugitive dust sources.

3.12.2 Current Air Quality Environment

Various agencies including Ecology, the Yakima Regional Clean Air Agency, the Benton County Air Authority, and the Yakama Nation collect ambient air quality data in the project area.

Air quality in the Yakima basin is well within most of the standards for pollutants. Sources of regulated air pollutants in the Yakima basin include transportation sources (such as cars, buses, trucks, trains, boats, and aircraft), urban sources (including wood smoke, emissions from commercial operations, and gas-powered residential equipment), re-entrained dust (naturally occurring particulate matter that is resuspended into the atmosphere through natural processes such as wind, including from drawdown activities at regional reservoirs), agricultural practices (including field burning, re-entrainment of dust from practices such as plowing, and emissions from farm equipment), and wildfires. These types of sources occur, to varying degrees, throughout the study area. Historical exceedances have occurred due to windblown dust from area agricultural fields (BCAA, 1996) followed by windblown dust from open lands, outdoor and agricultural burning, woodburning stoves and fireplaces, wildfires, industrial sources, and motor vehicles (BCAA, 2003).

3.13 Climate Change

Climate change has the potential to affect water resources in the Yakima River basin. The Integrated Plan has the potential to alter how water resources are affected by climate change.

For this analysis, the project team used data from hydrologic modeling studies conducted during the development of the Integrated Plan. These studies are documented in the *Modeling of Reliability and Flows Technical Memorandum* and the Secure Water Act Addendum to the Integrated Plan (Reclamation and Ecology, 2011k; Reclamation and Ecology, 2011a). Original data used were developed and documented in *Climate and Hydrology Datasets for Use in the RMJOC Agencies' Longer-Term Planning Studies Parts I, II, and III* (RMJOC, 2010; Reclamation, 2011a), or in *The Washington Climate Change Impacts Assessment* by the Climate Impacts Group at the University of Washington (CIG, 2009).

3.13.1 Regulatory Setting

In March 2009, Congress passed the Secure Water Act (Public Law 111-11, Subtitle F). Congress found that adequate and safe water supplies are fundamental to the health, economy, security and ecology of the United States. Additionally, global climate change poses a significant challenge to the protection and use of water resources in the United States due to an increased uncertainty with respect to the timing, form, and geographical distribution of precipitation, which may have a substantial effect on the supplies of water for agriculture, hydroelectric power, industrial, domestic uses, and environmental needs.

Federal agencies conducting water management and related activities are directed to take a lead role in assessing the risks to water resources of the United States, including the risks posed by global climate change, and to develop strategies to mitigate the potential impacts of these risks.

The Yakima River basin is part of the Columbia River system, which is subject to Public Law 111-11(12)(A) Section 9503, Reclamation Climate Change and Water Program. Section 9503 requires the Secretary of the Interior to establish a climate change adaptation program to assess the effect of and risk resulting from global climate change with respect to water resources. Reclamation has documented how the Integrated Plan complies with Section 9503; this evaluation can be viewed at http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/plan/addenvol1.pdf.

3.13.2 Global Climate Change

Global climate change has the potential to impact water resources in the Yakima River basin. Potential impacts relate to changes in future temperatures and precipitation patterns, and the resulting implications for stream runoff rate and timing, water temperatures, and reservoir operations.

3.13.3 Climate Change Effects in Yakima River Basin

3.13.3.1 Risks to Water Supply

The Yakima River basin is dominated by a mix of direct runoff from fall rain and spring snowmelt. Simulations predict that this type of watershed will be most affected by climate change (Mantua et al., 2010). Recent climate change studies to assess the risks to water supply in the Yakima River basin include those conducted by the Climate Impacts Group (CIG) at the University of Washington, working with the U.S. Fish and Wildlife Service and other Federal agencies. The study results were included in Addendum A to the *Yakima River Basin Study, Proposed Integrated Water Resource Management Plan*, which addresses requirements of Public Law 111-11, Subtitle F – Secure Water Act, http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/plan/addenvol1.pdf

For development of the Integrated Plan, climate change effects were modeled using the Yakima Project RiverWare (Yak-RW) model. Four scenarios were used to analyze climate change effects. The first scenario, called "No Regulation No Irrigation" (NRNI), represents current or historical hydrologic conditions. The other three scenarios are derived from climate-specific hydrologic modeling conducted by the University of Washington's CIG. The three selected climate-impacted scenarios use a range of assumptions about future greenhouse gas emissions and a range of different global climate models (RMJOC, 2010). The selected scenarios represent "less adverse," "moderately adverse," and "more adverse" climate change conditions that may occur during the 2040s (Reclamation and Ecology, 2011k). Table 3-17 summarizes the climate change scenarios.

Table 3-17 Summary of Climate Change Scenarios

Scenario	Climate Model Used	Descriptive Label	Average Temperature Change	Average Precipitation Change	Average Annual Reservoir Inflow (1,000 Acre-Feet)
NRNI (Existing or Historical)	Historically Based	Historic	0	0	1,660
Less Adverse	CGCM3.1	2040s Less Warming/ Wetter	1.8 ºC average increase	13.4% increase	1,860
Moderately Adverse	HADCM	2040s Central Change	1.7 ºC average increase	3.7% increase	1,480
More Adverse	HADGEM1	2040s More Warming, Drier	2.8 ºC average increase	2.5% decrease	1,380

Source: Reclamation and Ecology 2011k (page 42).

The following sections present changes to water supply under different climate change scenarios as related to the Yakima River basin.

Changes in Snowpack

Increased air temperatures from climate change would cause more precipitation to fall as rain rather than snow in the Cascade Mountains. This would reduce snowpack in the headwaters of the Yakima River system. Also, higher air temperatures would cause snowpack to melt earlier than under current conditions (Reclamation and Ecology, 2011a).

Studies have shown that the Yakima River basin is likely to have a 12-percent decrease in snowmelt volume given a 1^{o} C rise in air temperature, and a 27-percent decrease in snowmelt volume given a 2^{o} C rise (Vano et al., 2010).

Snowpack is considered the "sixth reservoir" in the Yakima River basin because most demands in the spring and early summer are met from runoff that comes from melting snowpack. Only 30 percent of the average annual total natural runoff can be stored in the current Yakima River basin reservoir storage system (Reclamation and Ecology, 2011p). Because of this, the water supply of the Yakima River basin is susceptible to changes in snowpack due to climate change.

Changes in Quantity and Timing of Runoff

To analyze changes in runoff due to climate change, total inflow into the five major reservoirs (Keechelus, Kachess, Cle Elum, Bumping Lake, and Rimrock) for the climate change scenarios discussed above in Section 3.13.3.1 were compared. Figures 3-6, 3-7, and 3-8 compare the modeling results of runoff into the five major reservoirs of the NRNI scenario (historically-based) and the Less Adverse (CGCM3.1 model), Moderately Adverse (HADCM model), and More Adverse scenarios (HADGEM1 model), respectively.

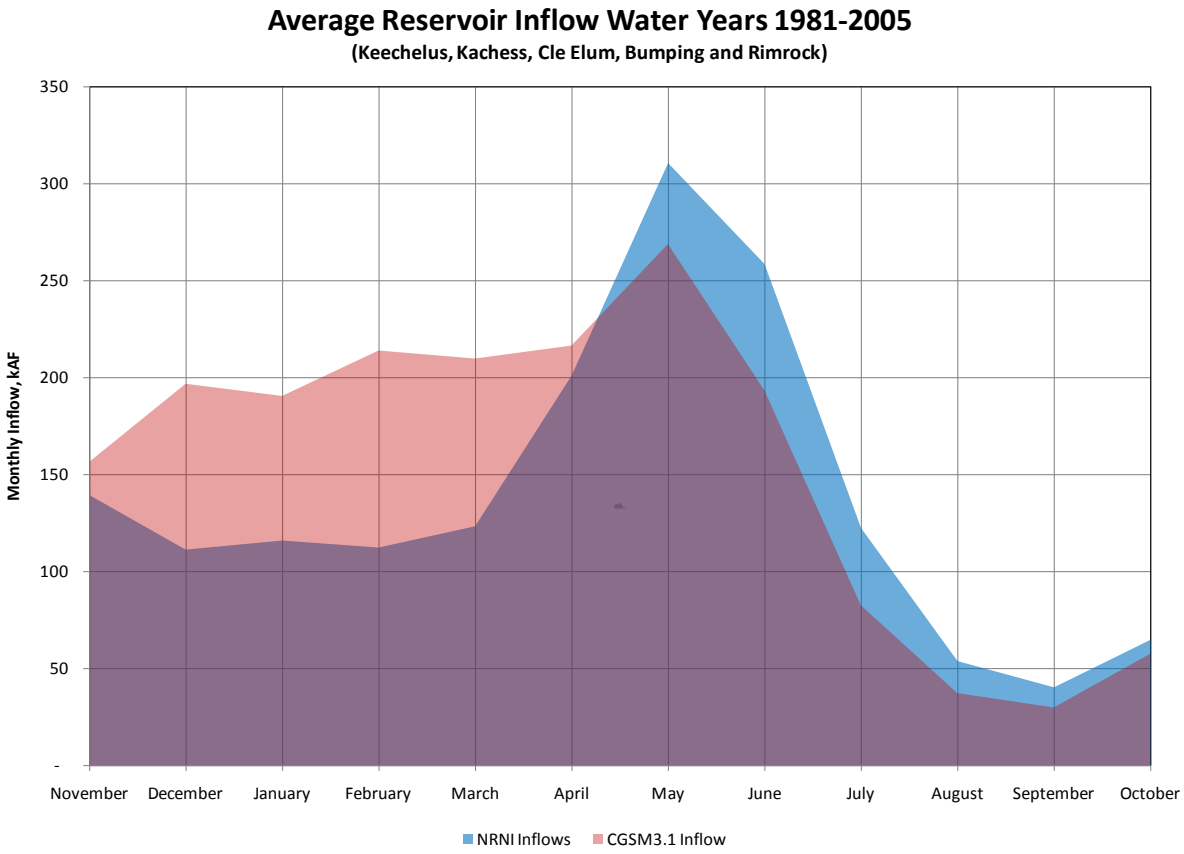


Figure 3-6 Comparison of Average Monthly Reservoir Inflows between Historically Based (NRNI) and Less Adverse Scenario (Source: Reclamation and Ecology, 2011k)

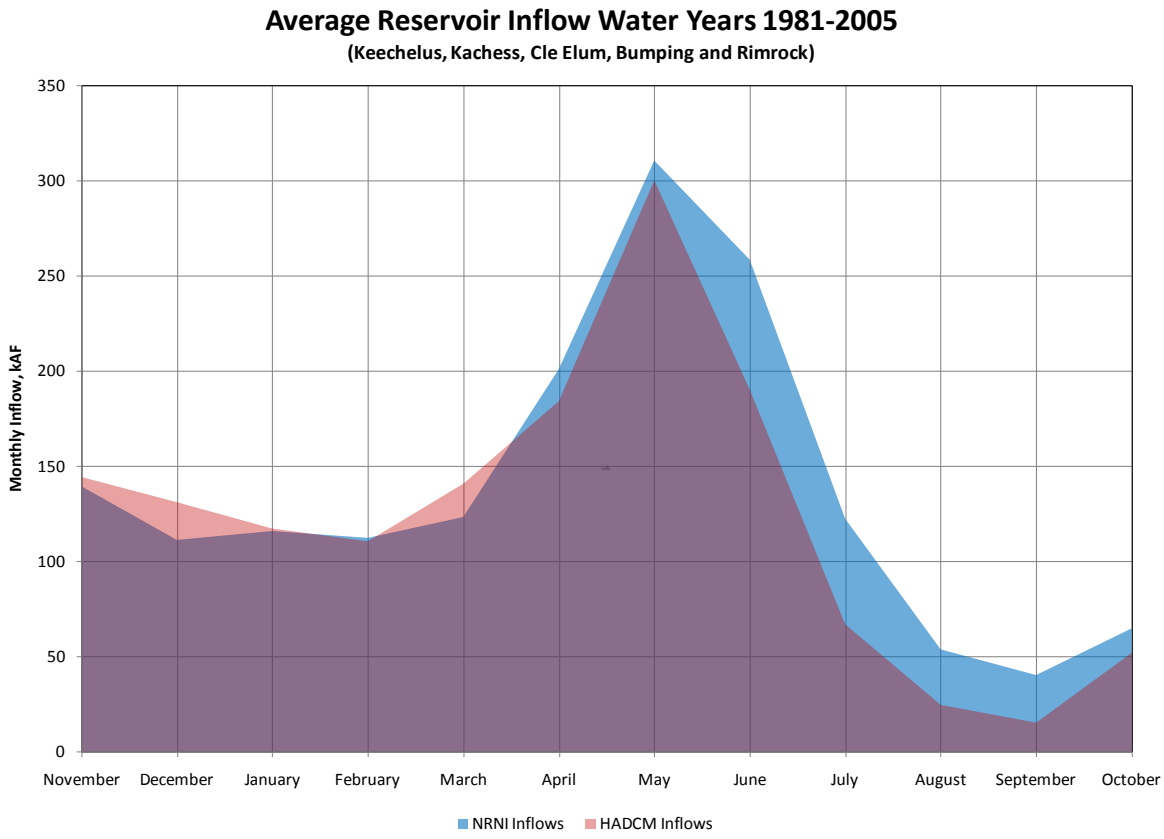


Figure 3-7 Comparison of Average Monthly Reservoir Inflows between Historically Based (NRNI) and Moderately Adverse Scenario (Source: Reclamation and Ecology, 2011k)

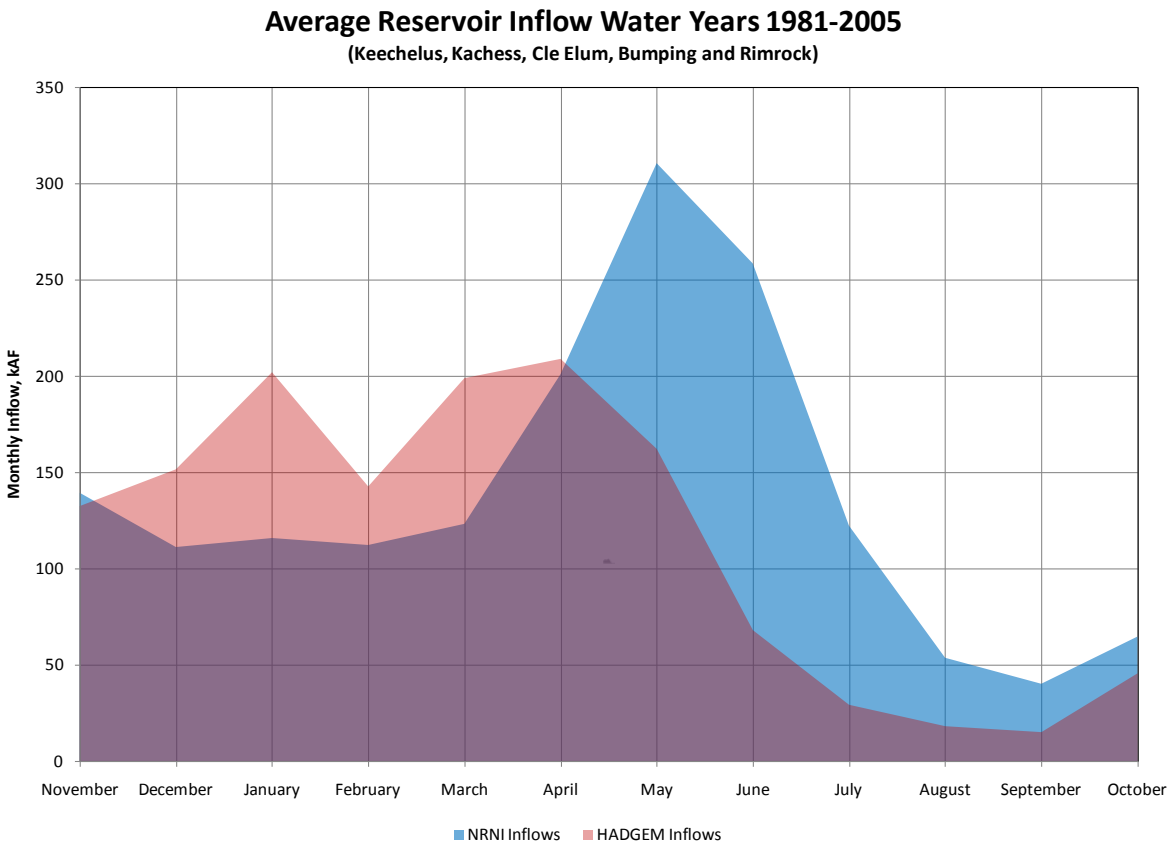


Figure 3-8 Comparison of Average Monthly Reservoir Inflows between Historically Based (NRNI) and More Adverse Scenario (Source: Reclamation and Ecology, 2011k)

Table 3-18 compares the climate change scenarios for seasonal inflow into the five major reservoirs from the model results.

Table 3-18 Comparison of Average Seasonal Inflows into Keechelus, Kachess, Cle Elum, Bumping, and Rimrock Reservoirs for the Climate Change Scenarios (Results in Thousands of Acre-Feet)

Scenario	Fall (October-December)	Winter (January-March)	Spring (April-June)	Summer (July-September)	Total
NRNI (Existing or Historical)	316	353	771	217	1,657
Less Adverse	412 (+30.4%)	615 (+74.2%)	679 (-11.9%)	151 (-30.4%)	1,856 (+12.0%)
Moderately Adverse	328 (+3.8%)	369 (+4.5%)	675 (-12.5%)	108 (-50.2%)	1,480 (-10.7%)
More Adverse	330 (+4.4%)	544 (+54.1%)	440 (-42.9%)	64 (-70.5%)	1,378 (-16.8%)

Based on the model results, changes in runoff in the Yakima River basin due to climate change are expected to be significant. For the three climate change scenarios modeled as part of the Yakima River Basin Study, the average annual change in reservoir inflow ranges from a decrease of 17 percent to an increase of 12 percent compared to the existing or historically based scenario. For all three climate change scenarios, spring and summer runoff is expected to decrease (ranging from 12 to 71 percent of existing runoff) and fall and winter runoff is expected to increase (ranging from 4 to 74 percent of existing runoff).

The shifts in runoff quantity and timing shown in the model results would cause significant risks to water supply. Fall and winter inflow will increase, but the reservoir system may not have sufficient capacity to be able to capture and hold enough winter and spring flow for release to meet needs during the high-demand and lower inflow period of the summer. Additionally, a decrease in spring and summer flow will cause water stored in reservoirs to be depleted at a faster rate to meet demand. The combined effects will likely cause a decrease in overall supply during the high-demand period.

3.13.4 Changes in Groundwater Recharge and Discharge

Changes in groundwater due to climate change have not specifically been studied in the Yakima River basin. However, the surface and groundwater systems of the basin are interconnected (Reclamation and Ecology, 2011a). Therefore, effects on surface water (such as runoff) due to climate change would also have an effect on groundwater. As such, risks in the water supply relating to changes in groundwater discharge and recharge are similar to those described above in Section 3.13.3.1 in the subsection, Changes in Timing and Quantity of Runoff.

Groundwater aquifers would likely be affected by a reduction in groundwater recharge through surface soils because of an increase in evapotranspiration (ET) from a warmer climate. Evapotranspiration is the combination of water that evaporates from the earth's surface and water released to the atmosphere by plants. As ET increases, more water is consumed by plants, and less precipitation and possibly less irrigation water may infiltrate to groundwater aquifers. In addition, riparian areas would consume more water due to increased ET, reducing groundwater outflows to surface water and surface water inflows to groundwater. Some of the increased ET may be offset by increased precipitation, although the timing of the precipitation will be an important factor.

The reduction in runoff quantity and change in timing described in previous sections would also impact groundwater recharge generated by application of surface water to farmland. As less water is available for irrigated agriculture, less recharge of aquifers would result, reducing groundwater discharge to surface water bodies such as the Yakima River. A smaller surface water supply reduces the amount of return flow available for water supply.

3.13.5 Changes in Related Resources

Climate change may also affect water-related resources in the Yakima River basin, including flood control, hydropower, fish and wildlife, and surface water quality.

With or without offsetting precipitation increases, studies indicate that winter runoff increases under regional warming could motivate adjustments to Yakima River flood control strategies.

Climate change may also affect existing and proposed hydroelectric power generation facilities in the Yakima River basin by altering the volume or timing of flow available for generating energy. Reductions in spring and summer flow caused by climate change could affect hydropower generation by reducing the flow available to be diverted through the existing facilities below historical levels. Increases in flow caused by climate change could affect hydropower generation by increasing the flow available to be diverted, but if the historical flow is already above the plant capacity, climate-caused increases in flow would not be usable to increase generation.

The availability of water-related recreation in the Yakima River basin could be affected by a number of climate change-related factors, including changes in snowpack and changes in the timing and quantity of streamflow. Climate change is expected to result in a decline in the quantity and quality of freshwater habitat for salmonid populations across Washington State (Mantua et al, 2010). Studies have predicted increasing water temperatures and thermal stress for salmonids in eastern Washington that are minimal for the 2020s but increase considerably later in the century (Mantua et al, 2010).

Based on projections for the 2040s, climate change may significantly alter the temperature, amount and timing of runoff and fish habitat in the Yakima River basin. Average annual air temperature is expected to increase, with accompanying increased water temperatures, according to the Climate Impact Group (CIG), and more precipitation is expected to fall as rain rather than snow. These temperature changes could affect fish in the Yakima River basin, including two federally listed threatened fish species, Middle Columbia River steelhead and Columbia River bull trout.

Climate change would have a direct impact on water temperature and probably dissolved oxygen. In general, an increase in air temperature due to climate change will cause water temperatures to increase. In the upper Yakima River, climate change models predict that the number of weeks when average water temperatures exceed 21^{o}C may rise from less than 5 weeks in historic conditions to over 10 weeks in the 2040s (Mantua et al, 2009). Warmer water can hold less dissolved oxygen than cooler water, so dissolved oxygen will decrease as air and water temperatures increase due to climate change (Karl et al, 2009).

3.14 Noise

Noise is generally defined as unwanted sound. Noise is measured in terms of the sound pressure level expressed in decibels (dB). The number of fluctuation cycles or pressure waves per second of a particular sound is the frequency of the sound. The human ear is less sensitive to higher and lower frequencies than to mid-range frequencies. Therefore, sound level meters used to measure environmental noise generally incorporate a filtering system that discriminates against higher and lower frequencies in a manner similar to the human ear to produce noise measurements that approximate the normal human

perception of noise. Measurements made using this filtering system are termed "A-weighted decibels," abbreviated as dBA. Noise levels referred to in this EIS are stated as hourly-equivalent sound pressure levels (L_{eq}) in terms of dBA.

Noise levels decrease with distance from a noise source. The L_{eq} noise level from a line source, such as a road, will decrease by 3 to 4.5 dBA for every doubling of distance between the source and the receiver. The L_{eq} noise level from a point source, such as a generator, will decrease by approximately 6 dBA for every doubling of distance between the source and the receiver. Subjectively, a 10 dBA change in noise levels is perceived by most people to be approximately a twofold change in loudness (e.g., an increase from 50 dBA to 60 dBA causes the perceived loudness to double). Generally, 3 dBA is the minimum change in outdoor sound levels that can be perceived by a person with normal hearing.

General ambient environmental noise is often described using the day-night noise level (L_{dn}). The L_{dn} is a community noise metric which describes a receiver's cumulative noise exposure from all events over a full 24 hours, with events between 10 p.m. and 7 a.m. increased by 10 decibels to account for people’s greater nighttime sensitivity to noise.

Sound levels produced by common noise sources and expected in common types of environments are shown in Table 3-19. The affected environment is characterized in these general terms, because of the broad range of environments and geography involved in the Integrated Plan.

Table 3-19 Sound Levels of Common Sources and Noise Environments

Noise Sources (Distance from the Receiver)	Sound Level (dBA)	Subjective Evaluations	Possible Effects on Humans
Human threshold of pain Carrier jet takeoff (50 feet)	140	Deafening	Continuous exposure can cause hearing damage
Siren (100 feet) Jackhammer, power drill	130		
Loud rock band Auto horn (3 feet)	120		
Busy video arcade Baby crying	110		
Lawn mower (3 feet) Noisy motorcycle (50 feet)	100	Very Loud	
Heavy truck at 40 mph (50 feet) Shouted conversation	90		
Kitchen garbage disposal (3 feet) Busy urban street, daytime	80	Loud	
Normal automobile at 65 mph (25 feet) Vacuum cleaner (3 feet)	70		Speech interference
Large air conditioning unit (20 feet) Normal conversation (3 feet)	60	Moderate	
Suburban area (daytime) Light auto traffic (100 feet)	50		Sleep interference
Library Quiet home Suburban area (nighttime)	40	Faint	
Soft whisper (15 feet) Rural area (nighttime)	30		
Broadcasting studio	20	Very Faint	
Threshold of human hearing	0-10		

Source: U.S. EPA, 1971.

Note: Both subjective evaluations and physiological responses are continuous, without true threshold boundaries. Consequently, there are overlaps among categories of response that depend on the sensitivity of the noise receptors.

3.14.1 Regulatory Setting

3.14.1.1 Federal Noise Control Standards

The Federal Noise Control Act of 1972 established a requirement that all Federal agencies administer their programs to promote an environment free of noise that would jeopardize public health or welfare.

3.14.1.2 State and Local Noise Control Standards

The Washington Administrative Code (WAC) imposes limits on the allowable environmental noise levels from a variety of sources in any 1-hour period (WAC 173-60, *Maximum Environmental Noise Levels*). The maximum allowable levels depend on the classification of the property receiving the noise and the noise source. The classification system is called the Environmental Designation for Noise Abatement (EDNA) and is generally based on a property's use.

The WAC 173-60-040 establishes maximum permissible environmental noise levels. There are three EDNA designations (WAC 173-60-030), which generally correspond to residential, commercial/recreational, and industrial/agricultural uses:

- Class A: Lands where people reside and sleep (such as residential);
- Class B: Lands requiring protection against noise interference with speech (such as commercial/recreational); and
- Class C: Lands where economic activities are of such a nature that higher noise levels are anticipated (such as industrial/agricultural).

Table 3-20 summarizes the maximum permissible levels applicable to noise received at the three EDNAs.

Table 3-20 Maximum Allowable Noise Levels

Environmental Designation for Noise Abatement of Noise Source	Environmental Designation of Noise Abatement of Receiving Property		
	Class A (dBA)	Class B (dBA)	Class C (dBA)
Class A (residential/recreational)	55	57	60
Class B (commercial)	57	60	65
Class C (industrial)	60	65	70

WAC 173-60-050 identifies noise sources or activities that are exempt from the noise limits described in the above table:

- Sounds created by traffic on public roads;
- Sounds created by warning devices (i.e., back-up alarms); and

- Sounds from blasting and from construction equipment are exempt from the standards during the day (7 a.m. to 10 p.m. weekdays and from 9 a.m. to 10 p.m. on weekends) in rural and residential districts.

For the purpose of this evaluation, construction activities associated with the project elements would be considered either maintenance of an essential utility service or a temporary construction activity. Thus, noise would be exempt from regulation between 7 a.m. and 10 p.m. per WAC 173-60-050(1)(e) and (3)(a).

There are no local county noise ordinances in Kittitas, Yakima, or Benton County that would be applicable.

3.14.2 Current Noise Environment

The study area for noise is defined as the immediate vicinity of the proposed project-related activity within the Yakima River basin. The study area is primarily rural and includes project construction areas as well as nearby agricultural, commercial, industrial, recreational, and residential areas. Existing noise sources are likely to include isolated industrial facilities, train and boat operation, small airports, highways, and agricultural activities.

3.15 Recreation

Washington provides a variety of recreation settings from designated Wilderness to urban greenways. Within the Yakima River basin, recreation opportunities are found in both developed and rural natural settings. The recreational areas most likely to be affected by the projects analyzed in this document are those associated with the reservoirs and the mainstem and tributaries of the Yakima River, and land acquisitions under the targeted watershed protection and enhancement program. The five primary rivers within the basin that supply recreation opportunities are the Yakima, Naches, Tieton, Cle Elum, and Bumping Rivers. The many tributaries of these rivers also provide additional areas for outdoor recreation. Lands affected by the Integrated Plan include lands in the Teanaway, Manastash and Taneum Creek basins and the Little Naches River basin. Rivers affected by the proposed Wild and Scenic River designations include the American, upper Cle Elum, Waptus, and Teanaway Rivers.

Recreationists are attracted to the basin by the quality of the scenery and water, and by the variety of recreation opportunities. Primary recreation activities include fishing the reservoirs and rivers for cold-water species; whitewater boating and kayaking; motorized boating; and other related activities such as camping, hiking, picnicking, and wildlife viewing. Public demand for access to rivers, streams, and reservoirs continues to increase yearly.

3.15.1 Recreational Setting

The Yakima River has a national reputation for its high-quality fly fishing, one of the fastest growing activities on the river. The Yakima River is also considered a “blue

ribbon" trout stream (Yakima Valley Visitors and Convention Bureau, 2011). The prime periods for fishing the river are February through May and September and October, although fishing occurs on the river throughout the year. There are camp sites along the Yakima River mainstem near the Keechelus, Kachess, and Cle Elum Reservoirs, in the Yakima River canyon between the City of Ellensburg and Roza Dam, and in the City of Yakima. All of these sections of the Yakima River are also popular for swimming during summer months, and rafting is popular in the Yakima River canyon.

Cle Elum, Kachess, and Keechelus Reservoirs are located in the Okanogan-Wenatchee National Forest. Cabins, camping, swimming, boating, picnicking, and fishing for some species, primarily for trout and freshwater ling, are available at all three reservoirs, with Kachess having the highest amount of recreational visitation.

Primary recreation activities in the Cle Elum River area include fishing the reservoir and rivers for cold-water species; boating and kayaking; whitewater rafting; motorized boating; and other related activities such as camping, swimming, hiking, hunting, horseback riding, picnicking, and wildlife viewing. In the winter, recreation activities include cross-country skiing, snowshoeing, and snowmobiling. Recreation opportunities are largely found along the eastern shore of Cle Elum Reservoir and both downstream and upstream of the reservoir along the Cle Elum River and its tributaries. The Cle Elum River does not provide the quality of fishing found in the Yakima River because of more limited access, swift water, and the amount of woody debris. The Cle Elum River has regionally acclaimed whitewater rafting (American Whitewater, 2009).

The Naches River provides high-quality trout fishing opportunities. In particular, the upper Naches River, above the confluence with the Tieton River, provides good fishing opportunities for wild westslope cutthroat, rainbow trout, and mountain whitefish (Jeff Tayer, personal communication, 2009). Although drift-boat access is limited, there is public access to substantial sections of the Naches River for wading and bank fishing from the SR 410 right-of-way, as well as for inflatable watercraft.

Bumping Lake, Rimrock, and Clear Lake Reservoirs are in the Okanogan-Wenatchee National Forest. The rugged mountain terrain, surrounded by coniferous forests, creates magnificent scenic settings. Bumping Lake has high recreational use and includes developed facilities for camping, boating and fishing, as well as having privately-owned cabins. Much of the shoreland at Clear Lake is reserved for group camp use. Clear Lake Reservoir is primarily used for recreational boating.

The Tieton River below Tieton Dam does not provide high-quality fishing opportunities, mainly due to poor quality habitat and low channel complexity. This river has been highly altered and regulated so that it is no longer able to support a quality wild trout fishery (Jeff Tayer, personal communication, 2009).

The Tieton River has regionally acclaimed whitewater rafting during a 3-week period in September when water from Rimrock Lake is released to enhance available irrigation in the Yakima Valley. The rapids during that time are rated as Class III (Osprey Rafting

Company, Inc., 2008). There is very little rafting on the Naches River, because of a lack of facilities on public land.

Rimrock Reservoir is used intensively by fishermen and other recreationists. There are private cabins and several campgrounds in the area. Good fishing is available in the reservoir for rainbow and other trout, and in the stream below the dam for rainbow trout and whitefish.

The larger Yakima River basin as a whole also has a Pacific Northwest regional reputation for motorized recreation opportunities associated with trail bikes, all-terrain vehicles (ATVs), and snowmobiles, primarily on USFS lands. In particular, the areas around the I-90 reservoirs and Rimrock Lake are popular recreation sites with trails for motorized vehicles. Other uses of USFS lands in the Yakima basin include hunting, fishing, hiking, and horseback riding.

3.15.2 Recreation Visitation

Table 3-21 presents the estimated annual visitation to the key reservoirs and rivers in the Yakima River basin (Reclamation, 2008f).

Table 3-21 Estimated Annual Visitation to Key Reservoirs and Rivers in the Yakima River Basin, 2006

Reservoir	Number of annual visitors
Keechelus Lake	660
Kachess Lake	17,292
Cle Elum Lake	6,996
Rimrock Lake	10,824
Clear Lake	4,620
Bumping Lake	7,524
Lake Easton	19,260
River	**Number of annual visitors**
Yakima River	18,000
Tieton River	8,844
Naches River	3,696
Bumping River	5,016
Cle Elum River	5,280

3.16 Land and Shoreline Use

This section addresses land use and shoreline resources within the study area and describes current land uses, land ownership/land status, and governing policies for the Yakima River basin.

3.16.1 Federal, Tribal, State and Local Land Use Regulations and Policies

Federal, Tribal, State, and local land use regulations and policies apply to implementation of the Integrated Plan. At the Federal level, the Wilderness Act, the National Forest Management Act and others are relevant to land use practices in the basin. At the Tribal level, land use is governed by Tribal laws and policies. At the State level, these include the State Shoreline Management Act and the Forest Practices Act. Local land use regulations include zoning, comprehensive land use planning, and sensitive areas ordinances. These are described briefly below.

3.16.1.1 Regulation of Federal Lands

The Federal Government controls and manages a substantial portion of the land in the project area, including forests, rangeland, a national park, the Army's Yakima Training Center, and other lands. Federal activities on these lands are not subject to the local regulations or State regulations, but Federal policies generally direct that activities of the Federal Government should be consistent with local regulations to the extent feasible within the mission of each agency.

Wilderness Act, 1964

The Wilderness Act (16 U.S.C.§§1131-1136) established the National Wilderness Preservation System. The purpose of the act is "to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the U.S. and its possessions, leaving no lands designated for preservation and protection in their natural condition."

The Wilderness Act works in conjunction with establishment and administration of national forests and units of national parks and national wildlife refuge systems. Each agency administering any Wilderness is responsible for preserving the area's wilderness character. Federally designated Wilderness in the Yakima River basin include the Alpine Lakes Wilderness in the headwaters of the Cle Elum River, William O. Douglas Wilderness adjacent to Bumping Lake Reservoir, and Goat Rocks Wilderness adjacent to Clear Lake Reservoir. As part of the Integrated Plan, Wilderness designations would be proposed for some lands around Bumping Lake that would not be inundated by reservoir expansion, for the roadless areas in the Teanaway, in the area between Kachess and Cle Elum Reservoirs, and in the upper reaches of Manastash and Taneum Creeks.

Wild and Scenic Rivers Act, 1968

This Act (16 U.S.C. §§ 1271-1287) establishes a National Wild and Scenic Rivers System for the protection of rivers that have important scenic, recreational, fish and wildlife, and other resources. The system protects the designated river and an adjacent corridor of land. Rivers are classified as wild, scenic or recreational. The Act contains procedures and limitations for control of lands within the system that are administered by Federal agencies. The Federal agencies are required to assist other regional and local agencies, political subdivisions, landowners, private organizations, and individuals to plan, protect, and manage river resources. For non-Federal lands, management plans can

be developed in cooperation with public and private landowners and local governments with land use jurisdiction.

No Federal department or agency may assist by loan, grant, license or any other means in the construction of a water resources project that would have a direct and adverse effect on the values for which a river is designated as an actual or potential Wild and Scenic River. This does not preclude developments below or above an actual or potential Wild, Scenic or Recreational river area, or on a stream tributary which will not invade the area or diminish the scenic, recreational and fish and wildlife values of the area. (§ 1278.; (http://wildlifelaw.unm.edu/fedbook/wildrive.html)

There are currently no designated Wild and Scenic Rivers in the Yakima River basin. However, the Integrated Plan recommends that the American, Upper Cle Elum, Waptus, Cooper, and South Fork Tieton Rivers; the North, Middle, and West Forks of the Teanaway River; Indian, Rattlesnake, and Deep Creeks; and Rainier Fork should be designated as Wild and Scenic Rivers under the Habitat/Watershed Protection and Enhancement Element.

National Recreation Areas

A Federal Executive Branch Policy dated March 26, 1963, establishes National Recreation Areas. The purpose of the policy is "to fulfill adequately the steeply mounting outdoor recreation demands of the American people." National Recreation Areas are established by acts of Congress. Private lands are not included in National Recreation Areas and are not bound by NRA rules.

The National Recreation Area designation is flexible enough to provide protection for key habitat functions while preserving the overall theme of recreational use for the lands. National Recreation Area designation also raises the profile of designated recreational lands and is, in essence, a marketing feature that will attract more users who contribute to local economic vitality (Reclamation and Ecology, 2012).

There are currently no designated National Recreation Areas in the Yakima River basin. However, the Integrated Plan recommends creation of a 100,000-acre Upper Yakima National Recreation Area and a 41,000-acre Manastash-Taneum National Recreation Area, both within the Okanogan-Wenatchee National Forest.

National Forest Management Act, 1976

The National Forest Management Act requires every national forest or grassland managed by the U.S. Forest Service to develop and maintain a Land Management Plan (also known as a Forest Plan). The process for the development and revision of the plans, along with the required content of plans, is outlined in the planning regulations, or planning rule. Individual forests and grasslands then follow the direction of the planning rule to develop a Land Management Plan specific to their unit. The Forest Plan for the Wenatchee National Forest was adopted in 1990 and is currently being revised and updated as the Okanogan-Wenatchee Forest Plan.

3.16.1.2 Regulation of Tribal Lands

Substantial portions of the project area, over 1,500 square miles, are lands reserved under treaty with the Yakama Nation. These areas are not subject to any State regulations. Each Tribe or confederation of Tribes enacts its own laws to control land use and protect natural resources on lands within the reservation. Although the Integrated Plan would have very little effect on Tribal land, some programs would provide an overall benefit to the system, including resources on Tribal lands, such as improved water reliability. Water conservation funding would also be available to the Tribes.

3.16.1.3 Regulation of State Lands

Washington Shoreline Management Act, 1972

Many of the activities that would emerge from the Integrated Plan have the potential to impact shorelines that are governed under shoreline master programs developed under the authority of the State's Shoreline Management Act (SMA) (Chapter 90.58 RCW, WAC 173-18). Local shoreline master programs, which must be approved by Ecology, are intended to protect shoreline ecology, public access, and water-dependent uses and to require mitigation of impacts where appropriate.

The streams and lakes within the project area that are regulated by the SMA are listed in Appendix D.

3.16.1.4 Washington Forest Practices Act

Forest practices on all non-Federal and non-Tribal lands in Washington are regulated by means of the Forest Practices Act (Chapter 76.09 RCW). The Washington Forest Practices Board (the Board) governs the industry in order to protect the state's public resources while maintaining a viable timber industry. The rules adopted by the Board are implemented and enforced by the Washington Department of Natural Resources. These rules require the maintenance and restoration of aquatic and riparian habitat. Through the Forest Practices Habitat Conservation Plan, the State of Washington seeks to provide long-term conservation of covered species, support an economically viable timber industry, and create regulatory stability for landowners.

3.16.2 Current Land Use

Land use in the Yakima River basin is diverse, ranging from designated Wilderness to timber production and intensive agriculture to areas of urban development. Private ownership totals 36 percent, or over 1.4 million acres, of the 4 million acres in the Yakima River basin. However, the single largest landowner is the U.S Government with 1.5 million acres, or 38 percent, of the land area. Most of the Federal land is within the Okanogan-Wenatchee National Forest in the upper portion of the Yakima River basin, on the eastern slopes of the Cascade Range. The national forest area is managed for multiple uses, including water, wildlife, recreation, and commercial timber production. Private forest lands are also common in these mountainous areas. In addition to the Cascade

Range to the west and northwest, the basin is also flanked by the Stuart Range on the north and northeast.

Other large Federal land holdings include the U.S. Army YTC, a portion of the Hanford Nuclear Reservation, and BLM lands. Other public ownership (State, county, and local governments) totals over 400,000 acres.

The Yakama Nation Reservation covers 1,573 square miles (1,371,918 acres) in southern Yakima County and a smaller part of Klickitat County. The Yakama Nation and its members have over 880,000 acres held in trust; only a small portion is deeded land (YBFWRB, 2005).

Less than 60 square miles (1 percent) of the 6,150 square miles of the Yakima River basin has been converted to urban/suburban development. Significant urban areas include Cle Elum, Ellensburg, Selah, Yakima/Union Gap, Toppenish, Sunnyside, Grandview, and Prosser. These urbanized areas host much of the basin's population, as well as its manufacturing, commercial, and service industry base.

Rangelands (2,900 square miles) are primarily used and managed for grazing, military training, wildlife habitat, and Tribal cultural activities. The 2,200 square miles of forested areas in the northern and western portions of the basin are primarily used and managed for timber harvest, water quality, fish and wildlife habitat, grazing, Tribal cultural activities, and recreation. About one-fourth of the forested area is designated as Wilderness. The 1,000 square miles of irrigated agriculture includes pasture, orchards, grapes, hops, and field crops. Diverse recreational activities, including hunting, fishing, camping and motorized and nonmotorized trail use occur across much of the project area (YBFWRB, 2005).

3.17 Utilities

Public utilities in the Yakima River basin are provided by a combination of Tribal, county, city, special purpose districts, and private suppliers. Wastewater and solid waste utilities are provided by counties and cities. In some cases, wastewater treatment is provided by private treatment facilities serving individual developments outside urban areas. In most rural areas, wastewater treatment is provided through individual private septic systems. Electricity is provided by the private utilities Puget Sound Energy and PacifiCorp, and public utility districts Kittitas County P.U.D. No. 1 and Benton Rural Electric Association. Section 3.6 describes hydropower facilities within the basin.

Potable water supply is provided by public and private water systems and individual wells. Within the basin, approximately 325,900 people are served by public water systems and domestic wells (Reclamation, 2011o). There are more than 20,000 wells in the basin, over 70 percent of which are shallow (10 to 250 feet deep) domestic wells (Vaccaro et al, 2009).

Several applications have been filed with the Federal Energy Regulatory Commission

(FERC) to add hydroelectric facilities to existing Bureau of Reclamation dams in the Yakima River basin. The applications do not include plans for implementation at this time. It would be the responsibility of the proposer to ensure that new hydroelectric facilities do not impact Yakima Project operations or the location or effectiveness of fish passage facilities.

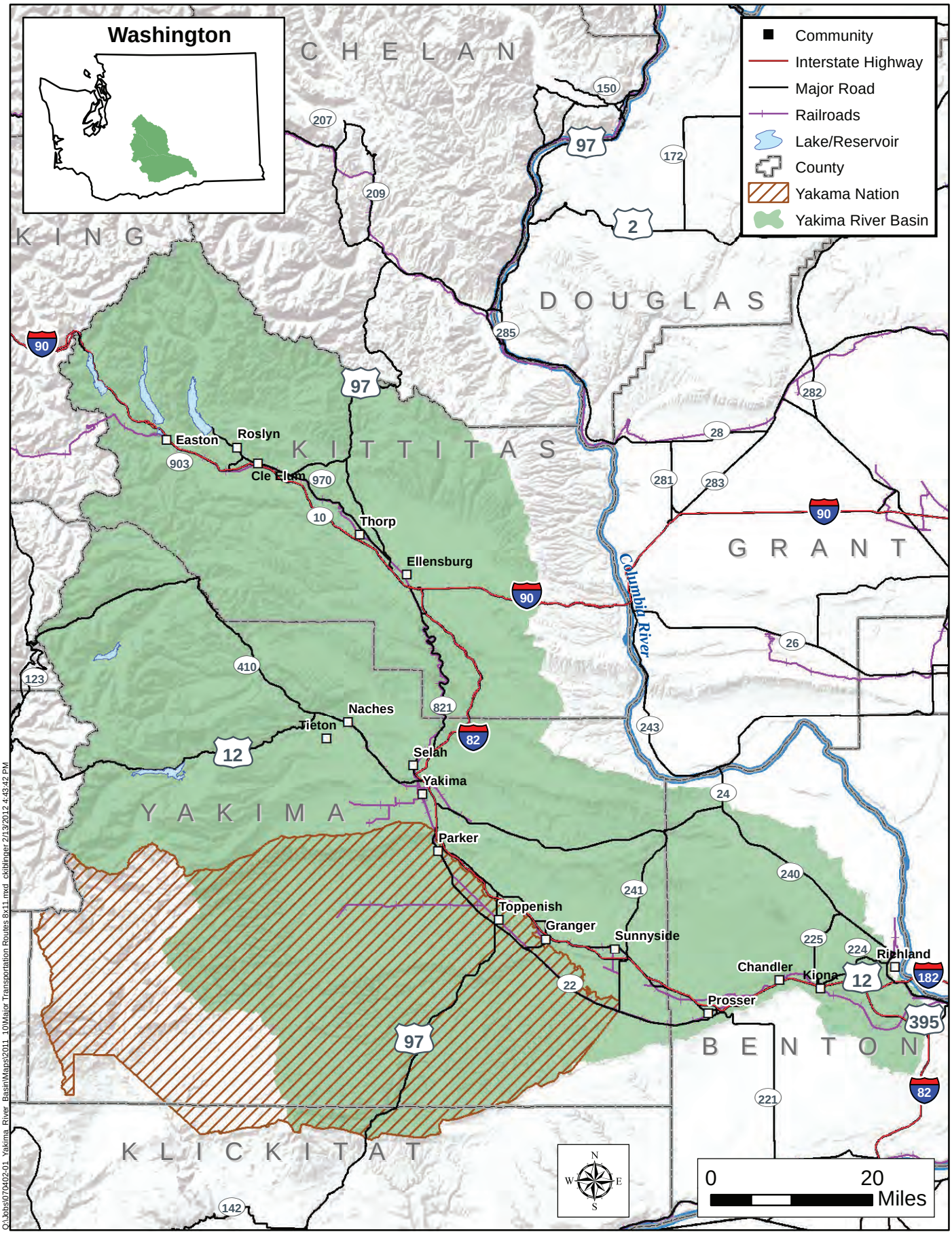
3.18 Transportation

This section addresses road/highway and railroad transportation facilities in and serving the areas where the Integrated Plan elements would be located. No air or navigable waterway transportation system or facilities would be involved or impacted by any of the alternatives. Information sources used to identify existing transportation facilities include mapping from the Washington State Department of Transportation (WSDOT) and county geographic information systems.

Major highways in the Yakima River basin include Interstates 90 and 82, Federal Highways 97 and 12, and State and local Highways 10, 821, 410, 24, 240, and 241 (Figure 3-9). In addition, local and Forest Service roads serve the rural areas of the basin.

The Burlington Northern Santa Fe (BNSF) Railroad runs through the basin. The rail route is generally parallel to Interstate 90 in the upper basin east of Easton, west of the Yakima River through the Yakima River canyon (parallel to SR-821), and parallel to Interstate 82 toward the Tri-Cities area.

The following projects of the Integrated Plan are likely to temporarily affect transportation facilities: new or expanded surface water storage at Wymer Reservoir, Kachess Reservoir, and Bumping Lake Reservoir; structural changes to existing facilities at Cle Elum Dam; construction of the Keechelus-to-Kachess pipeline; installation of fish passage facilities at all reservoirs; and floodplain restoration. The transportation facilities at these sites are described below.



Q:\obbs\070402-01_Yakima_River_Basin\Maps\2011_10\Major Transportation Routes 8x11.mxd ckiblinger 2/13/2012 4:43:42 PM

Figure 3-9. Yakima Basin Major Transportation Routes

3.18.1 Reservoir Sites

Regional and local access to the proposed Wymer Reservoir site, as well as sites and alignments of associated facilities, would be exclusively via SR 821, a two-lane roadway in the Yakima River canyon in southern Kittitas County. The easternmost extent of the reservoir pool at high water would pass under I–82, but no access to project facilities is proposed from this location, either for construction or long-term operation. There are no public roads or rail facilities in the Lmuma Creek basin where the proposed Wymer Reservoir would be built. The only access present is an unpaved, private ranch road. The pumping plant would be built west of and adjacent to SR 821, and the pipeline to Wymer Reservoir would cross this road. SR 821 between Ellensburg and Yakima is designated by WSDOT as the Yakima River Canyon Scenic Byway, and is notable for views of geological features that define the region and access to the Yakima River for recreation.

Regional and local access to the Kachess Reservoir and associated facilities would be via I-90 and local roads. Under Option 1, the proposed gravity flow tunnel would roughly parallel 1-90 east of the Yakima River.

Regional and local access to the proposed Bumping Lake Reservoir expansion site and associated facilities would be via SR 410, a two-lane roadway extending northwest from Yakima in northwest Yakima County to Forest Road (FR) 1800. Forest Service roads serve the Bumping River basin where Bumping Lake would be expanded. There are no rail facilities where Bumping Lake would be expanded. The only access is a forest road that is closed in the winter. Several forest roads near Bumping Lake provide access to trailheads into the surrounding area, including the William O. Douglas Wilderness.

3.18.2 Cle Elum Dam

Regional and local access to Cle Elum Dam is via SR 903/Salmon La Sac Road, a two-lane roadway extending northwest from the town of Cle Elum to FR 4330. Access to Tucquala Lake is provided by FR 4330 (also known as Cle Elum Valley Road or Salmon La Sac Road). Access to the left abutment of the dam is provided by SR 903 and County Road 25010 (Cle Elum Lake Dam Road). Access to the right abutment of the dam is from Bull Frog Road, a Kittitas County road.

3.18.3 Keechelus-to-Kachess Pipeline

From Keechelus Lake Reservoir, the Keechelus-to-Kachess pipeline would cross I-90 near the interchange at Milepost 62. Reclamation intends to coordinate this project with construction of a new wildlife crossing of I-90 planned by WSDOT. The pipeline would continue east until it intersects Kachess Lake Road, following the road to the northeast until it diverges to continue down the lakeshore slope to Kachess Lake Reservoir.

3.18.4 Fish Passage Elements

Fish passage elements of the Integrated Plan involve "trap and haul" activities, where fish are transported on local roads around reservoir fish passage barriers. Fish "hauling" activities would vary by season, location, and timing of fish migration.

3.18.5 Floodplain Restoration

Throughout the basin, roads and bridges (Interstate, State, county, city, and private) currently constrict floodplain functions. Floodplain restoration projects potentially implemented under the Integrated Plan could involve modifications to roads and bridges in some areas.

3.19 Cultural Resources

Human occupation in the project area dates to 11,500 years ago based upon the discovery of a Clovis-style projectile point along the pre-reservoir shoreline of Cle Elum Lake. These earliest peoples were likely pursuing large game animals such as mammoth. The human occupants during the subsequent Windust and Vantage Phases (11000 to 4500 BC) were nomads and occupied temporary camps. Windust Phase peoples relied on hunting mammals and birds, and the gathering of wild plants. The Vantage Phase showed an increased reliance on riverine resources such as fish. After 5200 BC, the pattern towards fish, smaller game and plant resources continued. Beginning about 3000 BC, people were starting to live in shallow pithouses and re-occupying locations for salmon harvesting while continuing to occupy fishing and hunting camps. After 1900 BC, populations in the area had increased and widespread use of pithouses indicates a heavy reliance on fishing. By at least 1000 AD, large winter villages consisting of semi-subterranean pithouses and larger longhouses had been established along the major rivers. People were heavily reliant on salmon runs. The architecture and layout of winter villages became even more permanent with the introduction of the horse in the early 1700s.

Today the project area includes significant portions of the reservation lands of Yakama Nation as well as the majority of their ceded lands. The federally recognized Yakama Nation consists of 14 Tribes and Bands that were combined socially and politically following the Yakima Treaty of June 9, 1855. The areas affected by the Integrated Plan are in the territory ceded in the 1855 Treaty. The Yakama Nation Governing Tribal Council, located at the Yakama Nation Reservation headquarters at Toppenish, speaks for and manages the interests of the constituent 14 Tribes and Bands.

The project area also encompasses a portion of the ceded territory of the Confederated Tribes of the Umatilla Indian Reservation around the lower Yakima River; this land was ceded following the Walla Walla Treaty of June 9, 1855.

At least as early as 11,500 years ago, the ancestral inhabitants of today's Yakama Nation, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Umatilla

Indian Reservation, and the Wanapum Band, developed a thriving economy based on the natural richness and bounty of the Columbia Plateau. Thousands of years prior to the arrival of European and Euro-American explorers, the Yakama and neighboring groups consisted of small, politically autonomous, yet closely related bands, which lived in permanent winter villages located on major watercourses. The villages were essentially autonomous, although each group as a whole shared a common culture, maintained intervillage kinship ties, shared subsistence resources, and were engaged in frequent social interactions.

Settlement centered on winter villages located in sheltered areas along the shores of rivers. The largest of these villages among the Kittitas and Yakama people could have as many as 500 residents housed in circular-shaped houses with conical roofs. About 2,000 people typically inhabited one village of the lower Yakima, known as *tsíkik* or 'spring.' From these villages, subsistence forays extended into the surrounding areas to fish, gather, and hunt. The foods processed from these subsistence activities were stored at the villages for the winter. In addition to residential structures, villages also contained menstrual huts, sweat huts, food caches, and burial grounds.

Today the Yakama people, as well as the Umatilla, Colville and Wanapum people, continue to have access to their "usual and accustomed places" within the Yakima River basin for a variety of traditional uses, including areas outside of the reservation boundaries. Additionally, within the boundaries of the reservation, the Yakama Nation and its Tribal Historic Preservation Office manage cultural resource concerns including traditional cultural properties, sacred sites, hunting and gathering locations, archaeological resources, historic resources, places related to legends, and ancestral sites.

By the early 19th century, Euro-American explorers and fur traders arrived, later followed by the military and missionaries. By the late 19th century, Euro-American towns were settled such as Yakima City in 1883. Agricultural development flourished following irrigation infrastructure projects; much of this infrastructure remains in use and is now historic in age. Today agriculture and ranching continue to be important industries in the area.

The State Historic Preservation Office is responsible for overseeing cultural resource compliance on non-reservation lands including Native American sites and historic properties related to Euro-American use of the landscape. These might include dams, logging or mining camps and associated infrastructure, railroads, agriculture, ranching, and recreational cabins. Other stakeholders include landowners such as the USFS, Reclamation, and State, county, and municipal agencies.

Information about the full range of cultural resources is not always accessible without detailed background research, which is outside the scope of the current programmatic level of evaluation. As a result, the discussion of cultural resources in this document is general in nature. Once more specific plans are developed, more intensive evaluation of cultural resources at project sites would be required.

The affected environment for the Integrated Plan elements would be the footprint of any ground disturbance, including construction access and staging areas, offsite mitigation areas, reservoirs, dams, canals, and other infrastructure. The affected environment could also include historic structures in the viewshed of the Integrated Plan elements. Additionally, the affected environment could include Traditional Cultural Properties (TCPs) near the Integrated Plan project sites, where projects affect the characteristics that provide the integrity of setting, feeling or association.

Some of the areas in the Integrated Plan, such as Cle Elum Dam, have been subject to previous cultural resource investigations, while others have not been extensively surveyed although cultural resources are likely present. In cases where recorded cultural resources are present in a project area, most of these have not yet been evaluated for eligibility to the National Register of Historic Places (NRHP). Sites that have not yet been evaluated are considered eligible to the NRHP. Prior to project implementation, all resources within a project's Area of Potential Effects (APE) must be evaluated for eligibility and, for any eligible sites, adverse effects would require mitigation.

The limited review of records and known historic resources for the Integrated Plan indicate that there is a high potential for historic resources (Reclamation, 2008f; Reclamation and Ecology, 2011c; Reclamation and Ecology, 2011d). The individual size of each of the Integrated Plan elements and associated impacts, the relationship of these alternatives to the Yakima River and Indian ceded lands, the Holocene geomorphology, the historic character of the existing water storage and delivery features, and the high site density in nearby locales are indicators of a high level of complexity in the cultural and historic resources. In addition, these factors predispose the Integrated Plan elements to a high level of interest and scrutiny from Indian Tribes, State, and Federal partners and reviewers, the professional historic preservation community, and the public.

3.20 Indian Sacred Sites

Executive Order 13007, Indian Sacred Sites (May 24, 1996), directs Federal agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners and to avoid adversely affecting the physical integrity of such sacred sites on Federal lands. The agencies are further directed to ensure reasonable notice is provided for proposed land actions or policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites. The Executive Order defines a sacred site as a "specific, discrete, narrowly delineated location on Federal land that is identified by an Indian Tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion."

Sacred Sites may include ceremonial areas and natural landmarks which are religious or symbolic representations. No sacred sites have yet been identified that are associated with elements of the Integrated Plan. However, the Yakama Nation has expressed concern in the past about other projects in the Yakima River basin which impact their religious activities.

3.21 Indian Trust Assets

Indian Trust Assets (ITAs) are legal interests in property held in trust by the United States for federally recognized Indian Tribes or individual Indians. ITAs may include land, minerals, federally reserved hunting and fishing rights, federally reserved water rights, and instream flows associated with trust land. Beneficiaries of the Indian trust relationship are federally recognized Indian Tribes with trust land; the U.S. acting as trustee. By definition, ITAs cannot be sold, leased, or otherwise encumbered without approval of the U.S. Government.

As stated in the 1994 memorandum *Government-to-Government Relations with Native American Tribal Governments*, Reclamation is responsible for the assessment of project effects on Tribal trust resources and federally recognized Tribal Governments. Reclamation is tasked to actively engage and consult federally recognized Tribal Governments on a Government-to-Government level when its actions affect ITAs.

The U.S. Department of Interior (DOI) Departmental Manual Part 512.2 delegates the responsibility for ensuring protection of ITAs to the heads of bureaus and offices (DOI, 1995). The DOI is required to "protect and preserve ITAs from loss, damage, unlawful alienation, waste, and depletion" (DOI, 2000). Reclamation is responsible for determining if a proposed project has the potential to affect ITAs.

3.22 Socioeconomics

The Integrated Plan might affect five distinct components of socioeconomic conditions in Washington State:

- The value of water-related goods and services;
- The level and composition of jobs and incomes;
- The distribution among different groups of the costs and benefits resulting from management of water resources;
- The socioeconomic structure; and
- Economic uncertainty and risk.

3.22.1 Value of Goods and Services

Water and related resources in the Yakima River basin are economically important when, as part of an ecosystem, they produce goods and services that benefit people, impose costs on them, or both (U.S. EPA, 2009; National Research Council, 2004). The Integrated Plan would affect socioeconomic conditions in the basin by increasing or decreasing the supply and, hence, the value of individual goods and services derived from the basin's water-related ecosystems. There exists no overall accounting of the value of the goods and services that the Integrated Plan might affect, but studies of the larger Columbia River Basin demonstrate the potential value of marginal (incremental) changes in the supply of water to produce some crops and a few other goods and services

(Huppert et al, 2004). Layton, Brown, and Plummer (1999) estimate the value of changes in goods and services associated with potential increases in the regional population of salmon and steelhead. The marginal value of water that produces other goods and services could be substantial, but reliable estimates are not available. With some exceptions, the demand for water-related goods and services would likely increase if the population grows and becomes wealthier, and if the economy expands.

3.22.2 Jobs and Incomes

Water and related resources of the Yakima River basin influence jobs and incomes through the following three mechanisms:

- Providing goods and services that are inputs to commercial activities;
- Producing goods and services that create a quality of life that influences the location decisions of households and businesses; and
- Providing other valuable ecosystem goods and services.

Impacts on jobs and incomes would materialize in the context of the two distinct regional markets for labor and local commerce that split the Yakima River basin, with Kittitas County connected more closely to the Seattle-Tacoma metropolitan centers, and the rest of the basin connected more closely to the Kennewick-Richland-Pasco centers (Johnson and Kort, 2004).

Between 2006 and 2009, farm income and employment have followed mixed trajectories. In general, farm income in the three counties increased between 2006 and 2008 and declined in 2009. Exceptions were Benton County, which experienced a decrease in income in both 2008 and 2009, and Kittitas County, whose farm income decreased between 2006 and 2008 but increased in 2009. During the same period of time, farm employment increased in all three counties. In 2009, farm employment represented 14 percent of the total employment in the Yakima County, 7 percent in Kittitas County, and 5 percent in Benton County (U.S. Department of Commerce, 2011).

An estimate of agricultural employment in the Columbia River Basin provides a context for anticipating the potential impacts of changes in water use in the Yakima River basin. Huppert et al (2004) found that permanently shifting 1,000 acre-feet of water into (or out of) irrigation would increase (or decrease) employment directly linked to the agricultural industry by about 18 jobs, and related statewide employment by about 45 jobs. Griffin (2005) found, however, that any increases resulting from increased irrigation likely would be offset by reductions elsewhere in the state. Any such increases or decreases in employment probably would be accompanied by tradeoffs in jobs associated with alternative uses of water, such as water-related recreation, especially if the economy is operating at full employment. Additional research is needed to determine the full impacts on jobs and incomes associated with changes in water use in the Yakima River basin.

Quality-of-life impacts materialize when amenities, such as water-related recreational opportunities, induce households and businesses to locate nearby or increase the consumer surplus of the households already located in the region. Some water-related

goods and services can influence jobs and incomes even though they are not direct inputs for commerce or amenities for households. Wetlands and floodplains, for example, can influence the risk of flood damage and, therefore, the cost of living and doing business in downstream communities (Daily, 1997).

3.22.3 Distribution of Costs and Benefits

The costs and benefits of implementing the Integrated Plan would likely fall unevenly on different groups. This distribution can have important consequences not just for the groups themselves, but also for the overall perception of the Integrated Plan's fairness, and the functioning of social institutions and relationships. Impacts on salmon and steelhead, for example, can have important distributional effects governed by treaties, laws, and regulations (Independent Economic Analysis Board, 2005). If those who enjoy the benefits of a good or service resulting from the Integrated Plan do not bear the full costs of its production, the beneficiaries may consume the goods and services beyond optimal levels (U.S. Army Corps of Engineers, 1991).

3.22.4 Socioeconomic Structure

Many aspects of economic activity and social organization in the basin have long been tied directly to water. Harvest of salmon and steelhead has provided a cultural focus and the basis for much economic activity for the members of Tribal groups, commercial fisheries, and recreational fisheries (Fluharty, 2000). Irrigation has enabled the expansion of agriculture, and water for municipal and industrial uses supports urban development and economic activity.

An important element of the socioeconomic structure is the State's water right system, which gives priority on a first-come basis, rather than to the highest and best use. The basin has seen several efforts to shift water from uses with a lower value to uses with a higher value. The voluntary transfer of water—through donation, conservation, lease, or purchase—from one place, type, and time of use to another has long been seen as necessary to reduce the economic damage from drought, offset the adverse impacts of water withdrawals on streamflows, increase water-related economic benefits and jobs, and provide water for new demands. It also is possible for a private or public entity to purchase land to gain control over the appurtenant water right, and then redirect the water to another type of use (Reclamation and Ecology, 2011j). Full realization of the potential efficiency gains from market-based reallocation of water will entail overcoming several barriers, such as uncertainty about water rights, and the limited capabilities resulting from efforts to date to provide an information clearinghouse, brokerage, technical support, verification, conveyance, and mitigation for third-party effects.

3.22.5 Uncertainty and Risk

Uncertainty exists when the outcome of taking an action (including no action) remains unknown. Risk exists when uncertainty includes one or more possible outcomes that would have an undesired effect or significant loss. Uncertainty and risk are economically undesirable, and, all else equal, decisions that reduce them are preferred over those that

do not. Major concerns about risk and uncertainty have been expressed regarding habitat for salmon and steelhead, especially during critical times and conditions, and for irrigators, especially during times of drought for those who have invested in orchards and other perennial crops (Huppert et al, 2004; National Research Council, 2004). The greatest risk occurs during periods of drought.

Additional uncertainty and risk accompany anticipated changes in climate, which some research indicates may diminish runoff in spring and summer in the Yakima River basin, reducing the availability of water to meet the demands for irrigation, especially to proratable water rights holders, instream flows, and other uses (Vano et al., 2010). Such findings indicate there may be increased risks associated with droughts, and particularly the risks associated with high-value water uses, such as instream flows to provide habitat for at-risk fish and other aquatic species, and irrigation to sustain perennial crops. As these risks rise, the potential gains from transferring water from lower value uses to higher value uses in an expeditious manner, via conservation, groundwater storage, and/or market-based reallocation of water, may also rise.

3.23 Environmental Justice

Sources of information for this section include the U.S. Census Bureau (2010) and the American Community Survey (2009).

Environmental justice addresses the fair treatment of people of all races and incomes with respect to actions affecting the environment. Fair treatment implies that no group should bear a disproportionate share of negative impacts. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," dated February 11, 1994, requires agencies to identify and address disproportionately high and adverse human health or environmental effects of their actions on minorities and low-income populations and communities, as well as the equity of the distribution of the benefits and risks.

Table 3-22 provides the numbers and percentages of population by racial category for Yakima basin counties and the State of Washington. The information is based on the 2010 U.S. Census data, the most recent consistent source of information for the basin.

In comparison to the State of Washington, Kittitas and Benton Counties have a smaller percentage of total racial minority and ethnic (Hispanic or Latino) populations, while Yakima County has a higher percentage. Additional potentially affected minority populations include members of the Yakama Nation and downstream Indian Tribes. While census data are available for recognized Indian reservations, specific data for Tribal members are not. Tribal members may be affected regardless of whether or not they reside on their reservations.

Table 3-22 Race and Ethnicity

	Kittitas County Number (%)	Yakima County Number (%)	Benton County Number (%)	State of Washington Number (%)
Total Population	40,915 (100%)	243,231 (100%)	175,177 (100%)	6,724,540 (100%)
One race	39,669 (97.0%)	234,122 (96.3%)	168,955 (96.4%)	6,411,614 (95.3%)
White	36,544 (89.3%)	155,056 (63.7%)	144,418 (82.4%)	5,196,362 (95.3%)
Black or African American	364 (0.9%)	2,320 (1.0%)	2,221 (1.3%)	240,042 (3.6%)
American Indian and Alaska Native	394 (1.0%)	10,568 (4.3%)	1,574 (0.9%)	103,869 (1.5%)
Asian	810 (2.0%)	2,560 (1.1%)	4,691 (2.7%)	481,067 (7.2%)
Native Hawaiian and Other Pacific Islander	57 (0.1%)	204 (0.1%)	253 (0.1%)	40,475 (0.6%)
Some other race	1,500 (3.7%)	63,414 (26.1%)	15,798 (9.0%)	349,799 (5.2%)
Two or more races	1,246 (3.0%)	9,109 (3.7%)	6,222 (3.6%)	312,926 (4.7%)
Racial Minority	4,371 (10.7%)	88,175 (36.3%)	30,759 (17.6%)	1,528,178 (22.7%)
Hispanic or Latino (of any race)	3,121 (7.6%)	109,470 (45.0%)	32,696 (18.7%)	755,790 (11.2%)
Minority[1]	5,071 12.4%	127,207 52.3%	44,740 25.5%	1,847,736 27.5%

Source: US Census Bureau, 2010
[1] The total Minority calculation includes all respondents who selected a race other than white as well as all respondents who selected both white and Hispanic or Latino.
Note: Klickitat County is not included because the portion of the Yakima basin in the County is uninhabited.

Table 3-23 provides income, poverty, unemployment, and housing information for the same geographic area. Information in this table is from the 2009 American Community Survey. Low-income populations are identified by several socioeconomic characteristics. Specific characteristics include income (median family and per capita), percentage of the population below poverty (families and individuals), unemployment rates, and substandard housing. Median family income and per capita income for all three counties is less than the State. Compared to the State, the Yakima basin counties have greater percentages of families and individuals below the poverty level.

Table 3-23 Income, Poverty, Unemployment, and Housing

	Kittitas County	Yakima County	Benton County	Washington
Income				
Median household income	$41,025	$41,854	$55,253	$56,384
Per capita income	$22,451	$18,562	$26,250	$29,320
Percent below poverty level				
Families	11.0	15.7	9.4	7.8
Individuals	22.8	20.8	12.4	11.8
Percent unemployed	6.9	10.2	6.7	7.0
Percent of Housing				
1.01 or more occupants per room	2.2	6.3	2.7	2.3
Lacking complete plumbing facilities	0.6	0.5	0.1	0.5

Source: American Community Survey, 2009
Note: Klickitat County is not included because the portion of the Yakima basin in the County is uninhabited.

Other measures of low income, such as unemployment and substandard housing, also characterize demographic data in relation to environmental justice. The 2009 unemployment rate for Yakima County was higher than the State's, but Kittitas and Benton Counties' were lower. Substandard housing units are overcrowded and lack complete plumbing facilities. The Census definition of "lacking complete plumbing facilities" is the lack of any of the following within the housing unit: hot and cold piped water; bathtub or shower; and flush toilet. The percentage of occupied housing units with 1.01 or more occupants per room in Kittitas County was lower than the percentage for the State, but the percentages in Yakima and Benton Counties were higher. When compared to the State, the percentage of housing units lacking complete plumbing facilities was higher in Kittitas County, equal in Yakima County, and lower in Benton County.

Chapter 4

SHORT-TERM IMPACTS AND MITIGATION MEASURES

CHAPTER 4.0 SHORT-TERM IMPACTS AND MITIGATION MEASURES

4.1 Introduction

This chapter describes the short-term impacts of the Integrated Plan elements and projects proposed in this FPEIS. Short-term impacts refer to those that are construction related or expected to last less than 4 years. Possible mitigation measures for the impacts are also discussed. Because this EIS is programmatic, the details of construction and project implementation are not known for many elements, projects, and actions. Thus, short-term impacts are discussed commensurate with the level of detail used to describe the proposed element, project, or action. Some basic assumptions for construction have been made for the purposes of this FPEIS, to assist in the evaluation of program-level impacts.

Typical equipment that would be used for construction include excavators, dozers, backhoes, dump trucks, concrete trucks, flatbed trucks, front-end loaders, compactors, dewatering pumps, jackhammers, concrete saws, generators, and various air and electric-powered hand tools. For all construction activities, dewatering may be necessary if excavation activities occur below the water table. In general, staging areas would be needed to accommodate storage of equipment and stockpiling of material. Staging areas may be accommodated on-site or off-site, depending on space availability. Clearing and excavating areas for temporary and permanent access roads would be needed for some projects. Haul routes have not been identified, and would be selected based on access to highways and site-specific considerations. Some projects may require new electrical lines to provide power for new facilities. The number of construction crews needed for each project and the construction schedule would vary depending on the complexity of the project.

Reclamation and Ecology expect that the projects or actions included as features of the Integrated Plan would be subject to project-level environmental review before being approved for implementation. The process for this environmental review is described in Section 1.2.1. For projects included in the No Action Alternative, the lead agencies would also conduct appropriate environmental review. Impacts are evaluated for the No Action Alternative and the Integrated Plan. The focus of the impacts analysis on the No Action Alternative is on potential construction-related impacts of ongoing habitat improvements and water conservation projects. The focus of the impacts analysis on the Integrated Plan Alternative is on potential impacts anticipated for the seven main elements of the Plan—fish passage, structural and operational changes, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market reallocation. The discussion includes impacts associated with specific projects for which there is sufficient detail. Short-term cumulative impacts are presented at the end of this chapter. Long-term impacts are described in Chapter 5.

4.2 Earth

Short-term earth impacts are based on the soil area that would be temporarily disturbed for any construction project and the duration of soil exposure. This includes associated stockpile or staging areas or temporary access roads. Short-term impacts are considered more substantial where extensive areas of soil are exposed for long periods of time, thus increasing the erosion potential, and minor when small areas of soil are exposed for relatively short periods of time.

4.2.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term impacts on earth resources. Construction associated with these actions has the potential to disturb the ground and increase the potential for erosion and delivery of sediments to the Yakima River system. If located near steep slopes, construction activities could increase the potential for slope stability impacts. The potential for increased erosion and sedimentation of surface waters would be greatest where construction activity occurs near streams. YRBWEP Phase II water conservation projects, including canal lining, pipelines, pump stations, and other improvements, would have the potential for erosion and slope stability impacts because of the amount of disturbance. Construction of off-channel areas, removal of fish passage barriers, placement of large woody debris (LWD), and other actions related to habitat improvements would also have the potential for erosion and slope stability impacts, as well as the potential to temporarily increase sedimentation because of disturbance in proximity to streams.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing habitat improvements and water conservation projects under the No Action Alternative would generally be smaller in scale with less construction disturbance to earth resources than major capital projects.

4.2.2 Integrated Water Resource Management Alternative

Short-term impacts of the individual elements would be primarily related to construction activities that may result in erosion and sedimentation. These elements are discussed in the following sections.

4.2.2.1 Reservoir Fish Passage Element

Construction activities related to installing fish passage facilities would require ground disturbance that could increase the potential for sediment delivery to the nearby stream systems. Construction activities may include adult fish upstream collection and transportation facilities, temporary bypass channels and weirs, temporary cofferdams, new spillways, multilevel gated intake structures, and/or construction of spawning channels or riffles. Because all of the proposed fish passage elements would occur on or

near streams, they have the potential to increase the delivery of sediment to surface waters. Temporary increases in turbidity are likely.

Impacts for fish passage facilities at Cle Elum, Tieton, Keechelus and Kachess Dams are expected to be similar. Impacts at Clear Lake Dam would be less because the project is smaller in scale and some fish passage facilities would be located on existing dam structures.

4.2.2.2 Structural and Operational Changes Element

Modifications requiring construction activities would cause short-term impacts similar to those discussed in Section 4.2.2.1. Construction could include structural changes to existing water supply facilities such as modification of spill gates, outfalls, and canal/piping systems, and the installation of pump systems for pipe pressurization.

Changes to operations, such as subordination of power at Roza and Chandler powerplants, would not require construction or increase erosion or sediment entering surface waters.

Short-term impacts to earth resources are not anticipated from construction to raise the level of Cle Elum Dam because flashboards would be installed on the existing dam and would require no ground disturbance. Ground disturbance would occur when shoreline protection measures are installed. These activities would result in increased erosion and slope stability impacts at the shoreline, but impacts are expected to be limited because the total amount of shoreline protection would be limited to approximately 1 mile and construction would be done in dry conditions.

Construction activities for KRD and Wapatox Canal improvements would include excavation of canals that could cause increased erosion and slope stability impacts. The potential for sedimentation in nearby surface waters is limited because of the small areas that would be disturbed. Construction would occur in the dry season and best management practices (BMPs) would be used to minimize erosion.

Construction to install the approximately 5-mile-long Keechelus-to-Kachess buried pipeline has the greatest potential to increase erosion and cause slope stability impacts because of the length of the pipeline. Construction would require disturbance of a 75-foot-wide area along the length of the pipeline. The potential for increased sedimentation of surface waters would be greatest near stream crossings.

4.2.2.3 Surface Storage Element

The surface storage element would have the highest potential for short-term impacts to earth resources. Creating new or expanded storage reservoirs, such as Wymer Dam and Reservoir or Bumping Lake Reservoir, would involve clearing and excavating large areas for access roads, creating borrow areas, excavating along the shoreline, and constructing new dams or modifying existing dams. Excavation and fill activities would increase the potential for erosion during construction, although erosion could be minimized through

the use of BMPs. Erosion during construction would contribute to turbidity in downstream waters, but would not have a long-term impact on downstream water quality. Construction of a pump station for Wymer Dam could cause increased erosion in the Yakima River. Site-specific geologic studies to determine slope stability problems would be conducted as part of further project-specific environmental review.

Construction of the tunnel or the pump station and pipeline for the Kachess Reservoir inactive storage project could result in short-term erosion and slope stability impacts. Construction activities would result in an increased potential for sedimentation in nearby surface waters. Site-specific geologic studies would be conducted as part of further project-specific environmental review.

4.2.2.4 Groundwater Storage Element

Groundwater storage projects involving construction activities would cause short-term erosion impacts. Construction activities for this element could include water treatment facilities, wells, conveyance facilities, and/or infiltration basins.

The pilot study for shallow aquifer recharge would have minor impact areas (less than 5 acres in two locations) which would result in a small potential for erosion. If the projects are developed at full scale, they would have larger impact areas (estimated 160 to 500 acres), resulting in a larger potential for erosion. Construction of surface recharge ponds also requires the removal of vegetation and scraping of the soil. Development of transmission infrastructure would also disturb soil. Site-specific geologic studies would be conducted as part of further project-specific environmental review.

Few impacts are expected from aquifer storage and recovery (ASR) projects which would mostly use existing infrastructure. Short-term impacts would be minimal for the City of Yakima proposal. A new well would be drilled to pump water during the summer months. Well drilling would result in limited disturbance and impacts to earth resources. If new treatment facilities are required for ASR projects in other cities, additional soil disturbance would occur.

4.2.2.5 Habitat/Watershed Protection and Enhancement Element

Fish habitat enhancement projects could include reconnecting side channels, floodplains, and off-channel habitat to streams; restoring natural channels, riparian areas, wet meadows, and natural function including natural rates of lateral migration and recruitment of gravel and large woody material; removing and relocating dikes/levees and other infrastructure; and replanting and restoring riparian areas on the Yakima River and many of its tributaries. Enhancement-related construction activities may include placement of LWD and engineered log jams in streams, bank reshaping, channel reconstruction, and construction of fish passage facilities on tributaries as well as mainstem streams. These projects are expected to have limited impacts because they would involve short sections of streams and BMPs would be employed. Project areas

would be tested for contamination prior to construction, and contaminated soils would be removed.

The land acquisition included in this program would not directly affect earth resources. Management of the lands could include enhancement projects, which would have impacts similar to those described above.

4.2.2.6 Enhanced Water Conservation Element

Construction of canal lining, pipelines, pump stations, reregulating reservoirs, or on-farm irrigation improvements could disturb soils and temporarily increase soil erosion. Most individual projects would be small scale and constructed during the dry season, using BMPs to minimize impacts.

Short-term impacts are not anticipated for the Municipal and Domestic Water Conservation Element because no construction activities would occur.

4.2.2.7 Market Reallocation Element

No impacts on earth resources are anticipated because no construction is expected under the water rights transfer programs.

4.2.3 Mitigation Measures

Large projects such as new surface storage would require site-specific geotechnical studies to identify subsurface issues, unstable slopes, and other local factors that could contribute to slope instability and increase erosion potential. These studies would be used in the design of project-specific BMPs and temporary erosion and sediment control plans in accordance with Federal, State, or local requirements. Requirements for each construction project would be defined through review by State and local regulatory agencies. The following measures could be included to minimize the potential for sediment production and delivery to stream channels:

- Timing construction activities to avoid disturbing soils during wet weather;
- Using straw bales, silt fencing, or other suitable sedimentation control or containment devices;
- Washing truck tires to reduce tracking of sediments and aquatic invasive species from construction sites;
- Covering exposed soil stockpiles and exposed slopes;
- Using straw mulch and erosion control matting to stabilize graded areas where appropriate;
- Retaining vegetation where possible to minimize soil erosion;
- Seeding or planting appropriate vegetation on exposed areas as soon as possible after work is completed;

- Constructing temporary sedimentation ponds to detain runoff waters where appropriate;
- Installing and operating dewatering facilities to eliminate the potential for slope stability impacts associated with excavation;
- Using berms, ditching, and other onsite measures to prevent soil loss;
- Monitoring downstream turbidity during construction to document the effectiveness of implemented measures; and
- Visually monitoring for signs of erosion and for correct implementation of control measures.

4.3 Surface Water Resources

Short-term impacts on surface water resources were evaluated by analyzing potential changes to flows caused by the construction or initial implementation of the alternatives. For this section, impacts are defined as affecting water deliveries to water users, streamflows, flood control operations, or TWSA, or causing a surface water body to be temporarily diverted from its typical location.

4.3.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term impacts on surface water resources. For example, YRBWEP Phase II water conservation projects would require construction of canal lining, pipelines, pump stations, and other irrigation district improvements. Habitat improvements would require construction of off-channel areas, removal of fish passage barriers, placement of LWD, and other actions. Potential short-term impacts could include an interruption in water service during construction of irrigation system improvements and diversion of surface water around work areas during dewatering and construction. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for complying with applicable local, State, and Federal environmental review requirements and permits.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing habitat improvements and water conservation projects would generally be smaller in scale with less construction disturbance than major capital projects, resulting in lower levels of surface water impacts.

4.3.2 Integrated Water Resource Management Plan Alternative

4.3.2.1 Reservoir Fish Passage Element

Impacts for fish passage facilities at Tieton, Keechelus, and Kachess Dams are expected to be similar to those identified for Cle Elum Dam (Reclamation and Ecology, 2011d).

Construction would be coordinated to allow flow releases from the dams to remain unchanged. During the first year of construction, there could be a minor loss of storage due to the intake structure cofferdam. Approximately 30 to 40 acre-feet could be lost, but this is not expected to affect water delivery contracts, TWSA, or flood control operations (Reclamation and Ecology, 2011c).

Fish passage facilities at Bumping Lake Dam would be included with the enlarged reservoir (Section 4.3.2.3). No impacts to surface water are expected for the Clear Lake Dam facilities because construction would not affect releases from downstream Rimrock Reservoir.

4.3.2.2 Structural and Operational Changes Element

This element may require revisions to reservoir operations that may impact outflows and flood control operations. Work for project elements would be planned to minimize impacts on operations and flows.

Construction in the Cle Elum Pool Raise project would be scheduled during a lower pool elevation period (late summer to winter). Short-term impacts on surface water would be unlikely.

Installing a pump station on the Yakima River for the Manastash Pump portion of the KRD Canal Modifications project would require the construction area to be isolated and dewatered but would not affect flows. Other portions of the KRD Canal Modifications and the Wapatox Canal Improvements projects would not likely cause short-term impacts to surface water because construction is not expected to occur during the irrigation season.

Constructing the new outlet tunnel bifurcation on the existing Keechelus outlet works could require special operations and outflows. This work would be scheduled and planned to minimize impacts on normal operations and streamflows.

Power subordination at Roza and Chandler powerplants would not require construction or result in short-term impacts on surface water. Recurring seasonal effects on streamflows in the Yakima River are discussed in Chapter 5.

4.3.2.3 Surface Storage Element

This element may require short-term changes in reservoir storage and outflows as well as bypassing streams around construction areas. Impacts to surface water would be dependent on construction timing.

Lmuma Creek would need to be bypassed temporarily around the construction area of Wymer Dam during the construction of the dam and outlet works. Flows into the Yakima River are not expected to be impacted. Installing the pump station on the Yakima River would require the construction area to be dewatered or isolated but would not affect flows. For the Bumping Lake Enlargement project, the Bumping River would

need to be bypassed around the construction area. This bypass would last the duration of the construction project. Bumping Lake Reservoir may need to be temporarily drawn down to allow removal of a portion or all of the existing dam. This may reduce storage volume during construction and may affect the ability to achieve minimum target flows in the Bumping River. The actual amount of storage loss would be dependent on construction timing. Construction would be scheduled to minimize impacts on storage loss and target flows.

During the first fill of Wymer Dam and the enlarged Bumping Reservoir, flows in the Yakima River downstream of Lmuma Creek, the Bumping River, and Naches River would be reduced from existing conditions. The amount of flow reduction would depend on the runoff and rate of fill of Wymer Reservoir and the runoff, rate of fill, and agreed minimum flows to be released from Bumping Reservoir.

Construction of the Kachess Reservoir Inactive Storage project may require a temporary drawdown in reservoir levels. This may decrease the amount of storage and reduce the chance of being able to refill the reservoir for the following irrigation season. Actual storage lost would depend on construction timing, runoff during the following season, and scheduling of other projects that may mitigate this risk. The drawdown would be scheduled to reduce effects on water delivery contracts, TWSA, or flood control operations.

4.3.2.4 Groundwater Storage Element

This element may result in temporary, construction-related impacts to surface waters. Areas near the construction site may be dewatered. These impacts are not expected to affect streamflow or deliveries to water users because construction of this element is expected to be scheduled outside of the irrigation season.

4.3.2.5 Habitat/Watershed Protection and Enhancement Element

The process of acquiring and protecting properties in the basin is not expected to affect surface water. Fish habitat enhancement projects may have short-term impacts on surface water in the Yakima River and its tributaries at construction locations. When enhancing fish habitat, there is the possibility of construction occurring instream, which may require dewatering, isolating the construction area from the stream, or bypassing the stream around the construction area. Construction would be scheduled to minimize impacts on flows and fish.

4.3.2.6 Enhanced Water Conservation Element

Agricultural water conservation projects are not expected to have short-term impacts on surface waters because projects would be constructed outside of the irrigation season. The municipal and domestic conservation program is not expected to have a short-term impact on surface water because no construction is anticipated.

4.3.2.7 Market Reallocation Element

No short-term impacts on surface water are anticipated because there would be no construction associated with market reallocation.

4.3.3 Mitigation Measures

Specific mitigation measures would be developed as part of future environmental analysis if projects are authorized. To mitigate short-term disruptions in surface water irrigation supply due to construction activities, the irrigation districts would coordinate with water users and construction personnel to ensure that construction activities are scheduled to minimize disruptions. To the extent possible, conveyance construction would occur outside the irrigation season. Mitigation for stream bypasses would be negotiated with regulatory agencies as part of permitting for individual projects. Reservoir drawdowns would be scheduled to minimize effects on salmon and bull trout and on water supplies for that year and the following year.

4.4 Groundwater

Groundwater impacts described in this section are limited to the effects of dewatering during construction, which would occur in the immediate vicinity of the construction sites. If groundwater wells are located near construction sites, drawdown associated with dewatering could temporarily reduce the usability of those wells. Impacts would be temporary (limited to the period of active construction) and are likely to be minor, given the rural character of the area surrounding the proposed projects and the expected absence of wells in these immediate areas. Potential impacts on groundwater quality would be minimized by the dispersed, rural location of the projects and the use of construction BMPs.

4.4.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term impacts on groundwater resources in the basin. Those impacts largely relate to the need for dewatering of construction areas. Dewatering would potentially be required for pump stations and other improvements included in ongoing YRBWEP Phase II water conservation projects. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for conducting dewatering in accordance with Ecology requirements.

4.4.2 Integrated Water Resource Management Alternative

Construction dewatering may cause temporary, localized reductions in groundwater levels and availability. The amount of necessary groundwater withdrawals and the disposal method would be determined on a site-specific basis. Should dewatering be required, it would be conducted in accordance with Ecology requirements.

4.4.2.1 Reservoir Fish Passage Element

If construction dewatering occurs at Cle Elum, Tieton, Keechelus, or Kachess Dams, a minor and short-term impact on groundwater quantity in the immediate area of the site may occur. No impacts on groundwater quality are anticipated.

Fish passage facilities at Bumping Lake Dam would be constructed as part of the enlargement of the reservoir (Section 4.4.2.2). Impacts to groundwater at Clear Lake Dam would be similar to those described above, but this project is less likely to require dewatering because the weir and fish ladder are expected to be located on the existing dam.

4.4.2.2 Structural and Operational Changes

Modifying existing structures may impact groundwater quantity in the short term if construction dewatering occurs. Any impacts are expected to be localized within the immediate vicinity of the project and to be completed within a relatively short time period. No impacts to groundwater quality are anticipated.

Raising the existing dam for the Cle Elum Pool Raise project would not require dewatering, and no dewatering is likely to be required to install shoreline protection during the dry season. No short-term groundwater impacts are expected during canal lining or piping associated with the KRD and Wapatox projects. The Keechelus-to-Kachess pipeline would likely require a large amount of construction dewatering along the pipeline route. However, groundwater use within this area is minor and impacts would be temporary and relatively brief in any one location. No construction is involved for power subordination at Roza and Chandler Powerplants; therefore, there would be no impacts on groundwater.

4.4.2.3 Surface Storage Element

During excavation for pumping plants, tunnels, and appurtenant structures associated with storage options, dewatering may be necessary in some areas. The amount of dewatering necessary would depend on the site-specific conditions and the final design details of each project. Some provision for dewatering and disposal of pumped water would be necessary. No impacts on groundwater quality are anticipated from any of the projects.

Construction activities for an expanded reservoir at the Wymer site would have limited impact on groundwater resources. The pumping plant to supply Wymer Reservoir would be located along the Yakima River, and construction of the plant would require dewatering. The pumped water would need to be treated or allowed to settle to remove turbidity and suspended sediments prior to discharging the water back to the river. There are no private wells in the immediate area that would be affected by the dewatering. Dewatering also would be required during construction of the dam foundation. No impacts to groundwater quality are anticipated. Construction of the new dam at Bumping

Lake Reservoir would also require substantial dewatering, which would be evaluated as part of future project-specific review.

Construction of the pumping plant and intake or tunnel to allow drawdown of Kachess Reservoir below its current minimum active storage level would require dewatering within the vicinity of the construction. Because of the greater underground depth of the construction activities near Kachess Reservoir, dewatering activities may be larger and more prolonged than for the other project elements. Impacts on water users are expected to be minor because of the absence of private wells within the area.

4.4.2.4 Groundwater Storage Element

The impacts of the Groundwater Storage Element were described in the *Groundwater Infiltration Appraisal-Level Study Technical Memorandum* (Reclamation and Ecology, 2011e). The initial projects would be constructed as pilot studies including site-specific groundwater studies and monitoring.

Construction of the new facilities to allow additional surface infiltration of Yakima River flow may require some dewatering for the shallow aquifer recharge projects. Limited impacts to groundwater could occur. However, in some locations, the depth of excavation during construction may not extend to the groundwater table and thus no dewatering would be required. No impacts to groundwater quality are anticipated.

The ASR projects are expected to have impacts similar to the shallow aquifer recharge projects except construction would be on a smaller scale and use existing facilities to the extent possible. Limited impacts on groundwater could occur during construction of the facilities necessary to treat water prior to injection. However, the depth of excavation during construction is not expected to extend to the groundwater table, and dewatering would probably not be required. Impacts on groundwater quality due to the construction of treatment facilities and groundwater wells for injection and extraction are expected to be minor because permitting requirements and construction BMPs would be designed to prevent groundwater contamination.

4.4.2.5 Habitat/Watershed Protection and Enhancement Element

No adverse groundwater impacts are expected from construction activities related to habitat restoration. Habitat/watershed protection and enhancement activities are in natural areas away from private wells. Construction BMPs would limit discharges of sediment-laden water.

4.4.2.6 Enhanced Water Conservation Element

Construction associated with conservation projects is not expected to affect groundwater. Construction of facilities would be limited, not requiring extensive excavation or dewatering. The municipal and domestic water conservation program does not involve construction, so no short-term effects are anticipated.

4.4.2.7 Market Reallocation Element

Market reallocation would not cause short-term impacts to groundwater because there would be no construction.

4.4.3 Mitigation Measures

The following measures could be used to reduce the potential for construction-related impacts on groundwater:

- Conduct site-specific hydrogeological studies prior to construction to determine impacts on short-term groundwater levels and quantity from dewatering activities.
- Treat groundwater withdrawn for dewatering prior to release to surface waters or groundwater to reduce impacts on water quality.
- Schedule construction during the dry summer months, when possible, to reduce the need for dewatering and the potential for generating stormwater that could enter groundwater.

In addition, all dewatering would be conducted in accordance with Federal, State, and local requirements.

4.5 Water Quality

Short-term impacts on water quality are most likely to occur during construction in or near water bodies. Construction activities can increase the risk of erosion and the introduction of contaminants. Appropriate mitigation measures, such as obtaining necessary construction and operational permits and implementing appropriate BMPs, can reduce these risks. While short-term impacts on water quality can occur, the long-term purpose of the projects includes an overall improvement in water quality. Taking actions to improve the long-term water quality of the region should provide benefits that offset these potential temporary impacts.

4.5.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term impacts on water quality in the basin. Construction of water conservation projects, habitat improvements, and other ongoing projects, has the potential to result in water quality impacts in the Yakima River basin, including sedimentation, increased turbidity, changes in temperature, and contamination from spills or construction activities. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for complying with applicable local, State, and Federal environmental review requirements and permits.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation

projects and habitat enhancements under the No Action Alternative would generally be smaller in scale with less construction disturbance than major capital projects, resulting in lower levels of water quality impacts.

4.5.2 Integrated Water Resource Management Plan Alternative

Instream work may cause local, temporary increases in turbidity during installation and removal of cofferdams. These increases would likely be most intense near the construction activity itself and would decrease over time and distance. Construction equipment in or near waterways could temporarily disturb the streambanks or streambed. These disturbances could temporarily degrade nearby water quality (for example, by increasing suspended sediments in the water). This could be mitigated by restricting in-water access to periods of low flows.

Short-term impacts on water quality could also result from near-stream soil disturbance; inadvertent release of fuel, uncured concrete, oil, or other construction equipment-related fluids; dewatering; and cast-in-place concrete work. Both sediment and contaminants can increase turbidity and affect other water quality parameters such as dissolved oxygen.

4.5.2.1 Reservoir Fish Passage Element

The construction of juvenile fish passage facilities would be done behind cofferdams. Construction of cofferdams would be performed during normal reservoir drawdown. Construction of fish passage structures would be within the area of the dewatered cofferdams. Sedimentation and turbidity would occur during construction and removal of the cofferdam.

Increases in turbidity and sedimentation are likely to occur during construction of the adult fish upstream collection and transportation facilities, temporary cofferdams, stream bypass structures, new spillways, multilevel gated intake structures, or spawning channels or riffles. Fish passage projects have the potential to increase the delivery of sediment to surface waters on which they are located. Temporary increases in turbidity are likely.

There is a potential for soil disturbance and accidental spills of contaminants (such as fuel, oil, grease, antifreeze, hydraulic fluids, and uncured concrete) associated with the use of heavy equipment during construction. Contamination is also possible during use of concrete or grout. Construction impacts would be controlled through the proper implementation of BMPs.

Impacts for installing fish passage facilities at Cle Elum, Tieton, Keechelus, and Kachess Dams are expected to be similar. Impacts at Clear Lake Dam would be similar, but of a lesser magnitude because of the smaller scale of the project. Bumping Lake Dam fish passage facilities would be included in the reservoir expansion project (Section 4.5.2.3).

4.5.2.2 Structural and Operational Changes Element

Construction to modify existing structures and facilities would cause short-term water quality impacts. Increases in sedimentation and turbidity could occur. There is a potential for soil disturbance and accidental spills of contaminants (such as fuel, oil, grease, antifreeze, and hydraulic fluids) associated with the use of heavy machinery during construction. Contamination is also possible during use of concrete or grout due to loss of containment.

Raising the level of Cle Elum Dam is not expected to directly cause water quality impacts because all construction would take place on the existing dam. Water quality impacts could occur along the shoreline when erosion protection measures are installed. Excavation activities near the lake could impact water quality if sediments are allowed to enter the lake.

Construction activities to improve irrigation facilities for the KRD or Wapatox projects outside of the irrigation season are not anticipated to impact water quality.

The Keechelus-to-Kachess pipeline route would cross at least six streams and require work along portions of the Yakima River, Swamp Lake area, and Lodge Creek. Construction activities have the potential to degrade water quality, particularly at stream crossings.

Power subordination does not involve any construction activities; therefore, there would be no short-term impacts on water quality.

4.5.2.3 Surface Storage Element

Construction of new storage project such as Wymer Dam and Reservoir and Bumping Lake Reservoir enlargement could have short-term water quality impacts. During dam construction, a cofferdam and bypass channels may be required to route the flowing water away from construction activity. Filling reservoirs would inundate new areas, and cause decaying vegetation to increase the availability of nutrients in the reservoir and downstream waters. Constructing reservoirs in new locations would generally cause more extensive water quality impacts than modifying existing facilities. Construction activities related to a new reservoir and its associated water conveyance facilities would increase the potential for erosion and contamination over large areas and therefore have the potential to cause substantial short-term water quality impacts. There is also a potential for spills of hazardous materials used in the construction equipment. Pollutants could include gasoline, oil, hydraulic fluids, and sediments.

The Kachess Reservoir inactive storage project would require work on the reservoir bed, potentially disturbing sediments and causing increased erosion and sedimentation. However, work would be conducted when the reservoir is drawn down, minimizing potential impacts.

4.5.2.4 Groundwater Storage Element

The construction of groundwater storage projects could transport sediments into surface waters or result in spills of hazardous materials used in the construction equipment. Pollutants could include gasoline, oil, hydraulic fluids, and sediments. If not captured and treated through stormwater BMPs, these constituents could contribute to water quality degradation of surface water or groundwater.

4.5.2.5 Habitat/Watershed Protection and Enhancement Element

Construction of habitat enhancements is expected to impact water quality on a short-term basis. Impacts would include potential sediment deposition from construction operations. Excavation activities in or near surface water bodies could impact water quality by increasing erosion and sedimentation.

Degradation of surface and groundwater quality could also result if floodplain restoration projects inundate lands with contaminated soils. The levels of contaminants in inundated lands would largely be determined by historical land use practices. Agricultural areas are likely to have elevated levels of nutrients, pesticides and herbicides, and areas near roads are likely to have elevated levels of metals and petroleum products. Project areas would be tested for contamination prior to construction, and contaminated soils would be removed.

4.5.2.6 Enhanced Water Conservation Element

This approach to conserving water would include numerous small-scale improvements, which would require construction activities. Construction associated with these improvements could increase sedimentation and turbidity in water bodies.

The municipal and domestic conservation program does not involve construction activities; therefore, no short-term water quality impacts would occur.

4.5.2.7 Market Reallocation Element

Market reallocation would not involve construction and therefore is not expected to alter water quality.

4.5.3 Mitigation Measures

Mitigation measures would be performed to achieve compliance with Federal, State and local water quality regulations. Mitigation measures, such as applying BMPs to control, isolate, and contain stormwater runoff, erosion, and fluids from construction equipment, would be used to address short-term impacts on water quality. Contracts for construction projects would include language to protect water quality during construction. Contractors would be required to prepare and implement a spill prevention, control, and countermeasure plan and develop and implement a temporary erosion and sediment control plan. Turbid or contaminated dewatering water would be treated prior to

discharge as necessary to comply with the requirements of the Washington Administrative Code, Hydraulic Project Approval, construction NPDES permit, and/or the local grading permit. Appropriate measures for handling and storing construction materials, fuels, and solvents would also be required. During construction, impacts to water bodies or other sensitive areas would be limited by selecting in-river equipment routes that minimize the disturbance. Necessary permits and BMPs to protect water quality will be identified before starting any project. Section 4.2.3 lists additional mitigation measures to minimize erosion and sedimentation impacts.

4.6 Hydropower

4.6.1 No Action Alternative

Short-term impacts on hydropower production are not expected to occur under the No Action Alternative because no change in flow through a hydroelectric facility would occur. Several FERC applications have been submitted to develop hydroelectric facilities on Reclamation storage dams. If those projects are carried forward, they could cause substantial construction impacts. Installation of hydroelectric facilities would require coordination with Reclamation and Federal NEPA review through FERC.

4.6.2 Integrated Water Resource Management Alternative

4.6.2.1 Reservoir Fish Passage Element

The fish passage element is not expected to have short-term impacts on hydropower because the projects would not cause changes in streamflows. None of the dams proposed for fish passage facilities include hydropower production.

4.6.2.2 Structural and Operational Changes Element

Construction associated with changes to existing facilities would not change streamflows or cause short-term impacts on hydropower. Cle Elum, Keechelus, and Kachess Dams do not currently include hydropower facilities.

Power subordination at Roza and Chandler powerplants would not require any construction activity; therefore no short-term impacts would occur. Long-term impacts from power subordination are discussed in Section 5.6.

4.6.2.3 Surface Storage Element

The construction of the surface water storage projects is not expected to have short-term impacts on hydropower because minimal changes in flow would occur during construction. Neither Bumping Lake Dam nor Kachess Dam includes hydropower facilities that could be affected by construction.

4.6.2.4 Groundwater Storage Element

There would be no construction impacts on hydropower from the Groundwater Storage Element because construction would not change flows through any hydroelectric facilities.

4.6.2.5 Habitat/Watershed Protection and Enhancement Element

The habitat/watershed protection and enhancement element is not expected to have short-term impacts on hydropower. Construction of habitat enhancement projects would not change flows through existing hydroelectric facilities.

4.6.2.6 Enhanced Water Conservation Element

Improvements to irrigation facilities under the enhanced water conservation element are not expected to have short-term impacts on hydropower because no changes in flow through existing hydroelectric facilities would occur. The municipal and domestic conservation program does not involve construction and would have no impacts.

4.6.2.7 Market Reallocation Element

Market reallocation would not require construction or result in short-term impacts on hydropower.

4.6.3 Mitigation Measures

Because no short-term impacts on hydropower are anticipated, no mitigation measures are proposed.

4.7 Fish

4.7.1 No Action Alternative

Under the No Action Alternative, various agencies and other entities would continue to undertake individual actions to restore and enhance fish and aquatic resources in the Yakima River basin. These actions would likely result in short-term impacts such as dewatering of instream habitat, disturbance and displacement of juvenile salmonids and resident species, disturbance of shoreline habitat, increased water temperatures, sedimentation, fish passage obstruction, and potential for accidental spills of hazardous materials (i.e., uncured cement, fuel, hydraulic fluid). Additionally, Reclamation would remove the temporary wooden fish passage flume at Cle Elum Dam before it fails, which would stop the fish reintroduction efforts that have begun in the basin (Reclamation and Ecology, 2011c). Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for mitigating any impacts

according to applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat improvements under the No Action Alternative would generally be smaller in scale with less construction disturbance than major capital projects, resulting in lower levels of short-term impacts on fish and other aquatic resources.

4.7.2 Integrated Water Resource Management Plan Alternative

Individual water storage and fish enhancement projects would be implemented over a period of years to decades as part of a comprehensive, integrated set of actions. These actions are intended to provide overall benefits to fish and aquatic resources. Short-term impacts would occur only during periods of active construction and would be temporary and localized. These impacts are described below for the individual elements. Short-term impacts could be mitigated by planting and sediment control measures during and immediately following construction activities to return the site to preproject conditions. The threshold for significance is whether or not the impact would exceed permit criteria during construction (i.e., water quality criteria or area of impacts) and avoid dewatering and flow fluctuations that could cause stranding of fish. Avoidance and minimization measures would be identified and implemented consistent with State and Federal environmental review and permitting requirements.

4.7.2.1 Reservoir Fish Passage Element

Short-term impacts could include dewatering of instream habitat, disturbance of juvenile salmonids, disturbance of shoreline habitat, increased water temperatures, sedimentation, temporary fish passage obstruction, and potential for accidental spills of hazardous materials (i.e., cement, fuel, hydraulic fluid).

Construction of fish passage facilities may require temporary dewatering of stream channels to isolate work areas. The method typically involves placing cofferdams or other stream bypass structure in the stream channel and dewatering the work area within the cofferdams. The rest of the stream channel outside of the cofferdams continues to receive flows and function as fish habitat. Little sedimentation or turbidity is expected during cofferdam installation or removal, and this would be managed through the use of best management practices, as applicable. Effects of increased turbidity from placing and removing the cofferdams would not likely extend more than 200 feet downstream of the site at any time during the construction period. The timing and duration of the disturbance would be limited to instream work windows established by permitting agencies to avoid and minimize impacts on fish and aquatic habitat. Permit conditions typically allow an instream work window of a few months in late spring and late summer, but are dependent on site-specific conditions. Methods of fish isolation seek to avoid impacts to stream channels, returning the work area to preconstruction conditions with mitigation for unavoidable impacts, as applicable.

Construction within riparian buffers or stream channels could temporarily disturb salmonids that are resting, rearing, or migrating in the vicinity of the work area. Timing of activities would be scheduled to reduce overlap with fish use, and alteration of shoreline and aquatic habitats would be minimized. Construction activities could require clearing along streambanks and grading of soils. The removal of shoreline vegetation has the potential to increase water temperatures, but because of the limited area that would be disturbed, this is unlikely. If there were a measureable change in water temperature, it would be localized and limited to the period of the day when the water surface may be exposed to direct sunlight if stagnant water conditions existed.

Soils disturbed by grading could result in potential erosion and slope stability impacts, and increased sedimentation and turbidity in the channel if not properly managed during construction activities and stabilized following the restoration activity. A moderate increase in sedimentation and turbidity may cause some downstream displacement of juvenile salmon as they instinctively avoid turbid water. Sediment screens and other runoff and erosion control BMPs would be implemented to avoid sedimentation of streams and to minimize erosion during construction. The short-term impacts of soil disturbance generally extend until the following growing season when vegetation can be reestablished on disturbed surfaces. Until that time, erosion control mats and sediment screens would remain in place.

Impacts for installing fish passage facilities are expected to be similar for all major dams. Impacts at Clear Lake Dam would be similar, but of lower magnitude because of the smaller scale of the project.

4.7.2.2 Structural and Operational Changes

There are no anticipated short-term impacts associated with installing flashboards on the existing dam for the pool raise at the Cle Elum Reservoir. Limited ground disturbance activities (e.g., clearing along streambanks, grading of soils) would occur when shoreline protection is installed. This could result in short-term erosion and slope instability, and disturbance of riparian habitat and streambanks. Isolation of the work area may be required, depending on the shoreline protection actions.

Construction of the Keechelus-to-Kachess pipeline would temporarily disturb aquatic habitats and shorelines utilized by juvenile salmonids. Subordination of power at Roza and Chandler Powerplants does not involve construction that could result in short-term impacts to fish.

4.7.2.3 Surface Storage Element

Short-term impacts from Wymer Dam construction would occur on both Lmuma Creek and the Yakima River and would be similar to impacts described above for the Fish Passage Element. Specifically, impacts would be associated with disturbance related to constructing and removing cofferdams, constructing within riparian buffers and stream channels, and disturbing soils within the construction footprint.

Short-term impacts from the Bumping Lake enlargement project would be similar to those outlined for the Fish Passage Element and as described for Wymer Dam.

Short-term impacts from construction of the Kachess Reservoir Inactive Storage project are likely to be similar to those described above for the Fish Passage Element. Impacts would include disturbance and inundation of riparian buffers and shorelines of the Kachess and Yakima Rivers for construction of inlet structures. Disturbance associated with the construction of an outlet at Lake Kachess could include isolation of the work area in the bed of the lake and disturbance to riparian habitat and shorelines associated with staging of materials related to construction.

4.7.2.4 Groundwater Storage Element

Short-term impacts associated with construction of intakes within stream channels could include those outlined above for the Fish Passage Element. Most infiltration and injection facilities would be located away from streams. However, screened intakes and infrastructure to convey water from the Yakima River to the groundwater storage site would be located within riparian buffers and along shorelines, causing disturbances to fish and fish habitat.

4.7.2.5 Habitat/Watershed Protection and Enhancement Element

Short-term impacts could include those outlined for the Fish Passage Element. In addition, construction projects associated with the Habitat/Watershed Protection and Enhancement Element could disturb streambed materials. Disturbance of these materials might cause a decrease in prey production or otherwise influence fish to avoid these habitats in the short term.

Habitat enhancement work would entail construction along shorelines within riparian buffers and stream channels where salmonids may be present, requiring isolation of the work areas. Construction activities may include placement of LWD and engineered log jams in streams, bank reshaping, channel reconstruction, and construction of fish passage facilities (e.g., small-scale fishways and culvert replacement). Enhancements requiring ground disturbance may result in erosion and slope stability impacts, increasing sedimentation and turbidity in the receiving waters.

4.7.2.6 Enhanced Water Conservation Element

Short-term impacts would be minimal, temporary, and localized, and would be similar to those outlined for Structural and Operational Changes.

4.7.2.7 Market Reallocation Element

Market reallocation would not require construction or result in short-term impacts on fish.

4.7.3 Mitigation Measures

Appropriate mitigation measures would be identified through Federal, State, and local environmental review and permitting processes and would therefore be project-specific. In addition to mitigation measures described to protect water quality (Section 4.6), typical mitigation measures to protect fish include:

- Working within appropriate instream fish work windows to avoid critical periods (i.e., breeding/spawning, migration);
- Following NMFS or WDFW guidelines for fish removal if stream dewatering is required;
- Implementing erosion control plans to prevent the delivery of silt-laden water to stream channels during ground disturbing activities;
- Stabilizing the work area during any significant breaks in work;
- Isolating and containing the work area to protect water quality during construction below the ordinary high water line;
- Screening water intakes used for the project, including pumps used to dewater work isolation areas, and operating and maintaining them according to NMFS fish screen criteria, to prevent fish entrainment;
- Treating all discharge water created by construction to avoid degrading water quality or impacting flows;
- To the extent possible, avoiding entering stream channels with heavy equipment and using vegetable oil for equipment hydraulic systems when conducting in-water or bank work;
- Implementing native plant species revegetation/enhancement plans to mitigate potential impacts to sensitive areas, including streams, buffers, and wetlands and restore disturbed areas to the maximum extent possible, and
- Maintaining fish passage around work areas.

All of these measures are consistent with WDFW Stream Habitat Restoration guidelines (WDFW, 2004).

4.8 Vegetation

Short-term vegetation impacts are based on the area that would be disturbed for any construction project and subsequently revegetated with native species following construction. This includes any associated stockpile or staging areas or temporary access roads. Short-term impacts are considered more substantial where extensive areas of rare or intact vegetation communities are present. Impacts are considered minor where areas have been previously disturbed and vegetation has been removed or currently contain invasive species.

4.8.1 No Action Alternative

Under the No Action Alternative, agencies and entities in the basin would continue to implement projects to improve water supply and fish habitat. Some of these projects could result in removal of vegetation during construction. Many water conservation projects would likely be located in already disturbed areas and some would not require any construction. Agricultural water conservation projects could include lining canals or replacing them with piping, which would have minimal impacts on vegetation. Habitat improvements that involve streambank reshaping, channel reconstruction, and restoration of fish passage at manmade barriers would likely remove existing vegetation. These projects would also likely include the removal of nonnative vegetation, which would provide long-term benefits. Short-term impacts on vegetation could also occur if stockpile or staging areas are needed during construction. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for mitigating any impacts according to applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat enhancements under the No Action Alternative would generally be smaller in scale with less construction disturbance, resulting in lower levels of vegetation impacts.

4.8.2 Integrated Water Resource Management Plan Alternative

Under the Integrated Plan, the extent of vegetation disturbance or removal is unknown for the majority of elements. Site-specific studies would be conducted to evaluate impacts to vegetation as part of future environmental review if the projects are authorized. Vegetation impacts would be minimized to the extent possible during facility siting and construction. Disturbed areas would be revegetated and monitored for several years to assure success and control invasive species.

4.8.2.1 Reservoir Fish Passage Element

Construction of fish passage facilities could disturb vegetation at the existing reservoirs. Approximate areas of disturbance for facilities located at Cle Elum Dam are available (Reclamation and Ecology, 2011c), but no similar detailed information is available for Kachess, Keechelus, or Tieton Dams or for Clear Lake Dam. In general, impacts on vegetation for all these projects would be similar, except vegetation removal at Clear Lake Dam would be less because of the smaller scale of the project and the location of most fish passage facilities on the existing dam.

In general, construction areas would be previously disturbed areas adjacent to existing spillways or dam abutments and embankments, where vegetation is limited to grasses or is nonexistent. Staging and stockpile areas, access roads, and dam crossings would be located in already disturbed areas to the extent possible. Conifer removal would be minimized to the extent possible.

Installation of fish passage facilities at the Cle Elum Dam would result in short-term impacts to vegetation communities during the three-year construction period. On the west side of Cle Elum Dam, approximately 4.5 acres of forest consisting of young Douglas fir, ponderosa pine, and bitterbrush would be removed for a temporary stockpile and staging area (Reclamation and Ecology, 2011c). The fish passage conduit would disturb about 15 acres of Douglas fir, black cottonwood, lodgepole pine, and chokecherry along with the dirt roadway adjacent to the existing spillway facilities. The majority of disturbed areas would be revegetated after construction is completed. Short-term impacts to vegetation would likely be minor at Cle Elum Dam based on the limited amount of intact vegetation removal for facility construction and the proposed replanting of disturbed areas.

Installation of fish passage facilities at the Bumping Lake Dam would occur at the same time as expansion of the reservoir. Impacts of the construction project are described in Section 4.8.2.3.

4.8.2.2 Structural and Operational Changes Element

The majority of the proposed modifications would result in no impacts to vegetation because construction would take place in disturbed areas or agricultural lands. Some projects could result in the short-term disturbance of vegetation associated with staging and stockpile areas.

Raising the pool level behind Cle Elum Dam would inundate approximately 56 acres of additional land around the reservoir for approximately 3 to 10 weeks per year (average of 7 weeks). Short-term impacts from inundation could be possible where vegetation is present. Some species may tolerate being inundated, but spring growth could be affected for some species because the higher water levels would typically occur between April and August. Short-term impacts on vegetation would likely be minor due to the narrow area of additional inundation and limited amount of vegetation along portions of the shoreline.

For the KRD and Wapatox Canal modifications, construction activities could require removal of vegetation where present. The extent of vegetation removal is unknown at this time because facilities have not yet been designed. Because the project is located along canals in an active agricultural area, few impacts to native vegetation are anticipated.

Construction of the Keechelus-to-Kachess pipeline would require removal of vegetation where present, including forest areas, along the 5-mile corridor. Assuming a 75-foot-wide area of disturbance for the pipeline corridor, approximately 40 to 50 acres of vegetation would be removed. Much of the area would be revegetated with native vegetation and some would be permanently removed. Permanent impacts are discussed in Section 5.8. Additional short-term impacts to vegetation could also occur if stockpile or staging areas are needed during construction.

No short-term impacts on vegetation are anticipated from power subordination because there would be no construction requiring vegetation disturbance or removal.

4.8.2.3 Surface Storage Element

New storage facilities would include the construction of new access roads, staging and stockpile areas, and other work requiring the removal of vegetation. Some of the disturbed areas would be used only during construction and replanted with appropriate native vegetation after construction is complete. Other areas would be permanently impacted by new reservoirs. Permanent impacts on vegetation are discussed in Section 5.8. This element has the greatest potential to cause short-term impacts on vegetation.

Construction of Wymer Dam and Reservoir would require removal of vegetation where present in areas identified for temporary access roads, staging or stockpiling. To the extent possible, these areas would be located in the reservoir footprint area to minimize the area of permanent vegetation disturbance or removal. The Wymer location is an area of relatively undisturbed shrub-steppe habitat, and short-term vegetation removal could further reduce shrub-steppe habitat in the Yakima River basin. It is expected that disturbed areas would likely take several years to decades to reestablish the current vegetation after revegetation. Previous efforts to restore or enhance shrub-steppe communities in the Yakima basin have been conducted with mixed success.

Construction of a new dam downstream of the existing Bumping Lake Dam would require access roads that would result in vegetation removal. Short-term impacts would be similar to those described above for the Wymer Dam. Bumping Lake is surrounded by old second-growth conifer forest supporting a canopy of lodgepole pine, western hemlock, western red cedar, Englemann spruce, and a dense shrub understory. Some of this forest is late successional (old-growth) and vegetation removal for construction facilities could further reduce old-growth habitat in the Yakima River basin. It is expected that disturbed areas would likely take many decades to reestablish the current vegetation after revegetation. A more precise estimate would likely be determined during site-specific studies of vegetation as part of future environmental review if the projects are authorized.

The Kachess Reservoir Inactive Storage project would likely require removal of vegetation where present in areas that would be disturbed for the gravity flow tunnel or temporary access roads, staging and stockpile areas. Vegetation removal may include forested areas and areas where vegetation has been disturbed or currently contain invasive species. It is expected that disturbed areas would likely take several years to decades to reestablish the current vegetation after revegetation.

4.8.2.4 Groundwater Storage Element

Most of the proposed groundwater storage would not affect native vegetation because the projects would likely be located in already disturbed areas, would rely mostly on existing infrastructure, and would require minimal construction. Some projects would require construction that would disturb or remove vegetation.

Shallow aquifer recharge projects would require the construction of infiltration systems such as ponds, canals, or spreading areas. The infiltration systems would be less than 5 acres in size and would require additional stockpile or staging areas during construction. Vegetation removal in the stockpile and staging areas would be considered short-term impacts, and the areas would be revegetated following construction.

Municipal ASR projects would require an existing water treatment facility and the construction of injection wells, a pump station, and conveyance lines. Short-term impacts on vegetation would be the same as described above for shallow aquifer recharge projects except on a smaller scale.

4.8.2.5 Habitat/Watershed Protection and Enhancement Element

Construction of some habitat restoration projects could result in short-term impacts on existing vegetation. Habitat enhancement projects on the mainstem of the Yakima River and its tributaries that involve streambank reshaping, channel reconstruction, and restoration of fish passage at manmade barriers would likely remove existing vegetation. These projects would also likely include the removal of nonnative vegetation, which would provide long-term benefits. Habitat restoration projects are intended to provide improved native plant species diversity, and disturbed areas would be revegetated after construction.

4.8.2.6 Enhanced Water Conservation Element

Construction of some of the conservation projects could result in short-term impacts on vegetation. However, many projects would be located in already disturbed areas and some would not require any construction. Agricultural water conservation projects could include lining canals or replacing them with piping. Short-term impacts on vegetation could occur if stockpile or staging areas are needed during construction.

4.8.2.7 Market Reallocation Element

The Market Reallocation Element does not require construction and no short-term impacts on vegetation would occur.

4.8.3 Mitigation Measures

Short-term impacts on vegetation caused by the development of the required facilities and infrastructure would be mitigated through site and facility design to minimize the need for vegetation removal to the extent possible. Facilities, access roads and staging areas should be located in areas of previously disturbed vegetation. If intact vegetation is present, the footprint of the facility should be minimized and situated to reduce disturbance. Where possible, vegetation that is removed for construction should be replaced with appropriate native plant species. Revegetated areas would be monitored to assure success and invasive species would be controlled. The Integrated Plan will take an adaptive approach for revegetation and mitigation efforts, which will include monitoring

that allows for ongoing modifications as needed. Watershed and habitat restoration projects are expected to be an overall benefit to vegetation.

4.9 Wildlife

Short-term impacts are based on the temporary disturbance of wildlife in the vicinity of any construction project due to noise and human activity. Short-term impacts are considered more substantial when construction periods span multiple years or occur in rare or high-quality habitats where high species diversity exists. Impacts are considered minor where construction occurs over a short duration or in previously disturbed habitats provided work during critical time periods is avoided.

4.9.1 No Action Alternative

Under the No Action Alternative, agencies and entities in the basin would continue to implement projects to improve water supply and fish habitat. Some of these projects could result in temporary displacements of wildlife due to noise and disturbance during construction. Most water conservations projects would likely be located in already disturbed areas and some would likely not require any construction. Because most of these areas provide poor habitat for wildlife, few impacts are anticipated. Wildlife would likely avoid the location of canals or ditches proposed for piping during construction periods. Wildlife in the vicinity of habitat restoration project may be temporarily displaced by noise and construction activities. Most of these projects would likely involve small sites (less than 100 feet of streambank). Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for mitigating any impacts according to applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat enhancements under the No Action Alternative would generally be smaller in scale with less construction disturbance than major capital projects, resulting in lower levels of impacts to wildlife.

4.9.2 Integrated Water Resource Management Alternative

Under the Integrated Plan, short-term impacts on wildlife are based on the degree of disturbance to wildlife in the vicinity of the project elements as a result of noise and human activity. Site-specific studies would be conducted to evaluate impacts on wildlife as part of future environmental review if the projects are authorized.

4.9.2.1 Reservoir Fish Passage Element

Installation of fish passage facilities at the Cle Elum Dam would result in short-term impacts on wildlife and their habitats during construction. Wildlife species that inhabit riparian and upland forests in the project vicinity would be disturbed or displaced during

the three years of project construction. Riparian areas are used by many species including bear, deer, elk, heron, waterfowl, small mammals, reptiles, amphibians, cavity-nesting birds, raptors, and a variety of songbirds. Short-term impacts on wildlife would likely be minor at Cle Elum Dam based on the availability of adjacent intact habitats that could be used by displaced wildlife. Some losses of individual animals and of potential habitat could occur if there is not sufficient unoccupied habitat in the adjacent areas during construction. This would be offset somewhat by the relatively small areas disturbed. Construction-related noise impacts on wildlife at Cle Elum Dam are discussed in detail in the *Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS* (Reclamation and Ecology, 2011c). In summary, the types of equipment that would be used during construction would produce noise above background levels up to approximately 2.4 miles from the construction site. This is a conservative estimate and the actual distance is likely to be much less due to topography, dense vegetation, and wind in the project area.

Short-term impacts on wildlife at Tieton, Keechelus, and Kachess Dams are expected to be similar to Cle Elum Dam. Bumping Lake Dam fish passage facilities would be constructed as part of the reservoir enlargement discussed in Surface Storage Element below. Impacts at Clear Lake Dam are expected to be of a lesser extent because of the more limited area of disturbance and the one-year construction period.

4.9.2.2 Structural and Operational Changes Element

Most of the proposed changes would result in minimal short-term impacts on wildlife during construction. Wildlife in the vicinity of the construction areas could experience noise and human activity and would likely avoid the area during construction periods. Site-specific studies would be conducted to evaluate impacts on wildlife as part of future environmental review if the projects are authorized.

Short-term impacts associated with raising the pool level behind Cle Elum Dam would be related to disturbance from modifying the spill gates and installing shoreline protection for private residences. Both activities are expected to have little or no impacts on wildlife in the vicinity because they would be located in developed areas that provide limited habitat for wildlife.

Human activity and noise associated with the canal modifications proposed for KRD and the Wapatox Canal would result in short-term impacts on wildlife in the vicinity. Wildlife would likely avoid the area during construction periods. Both projects are located in areas that have been disturbed for agriculture and provide limited habitat for wildlife. Therefore, impacts are expected to be minimal.

Impacts on wildlife associated with construction of the Keechelus-to-Kachess pipeline are expected to be greater because of the higher likelihood of wildlife in the forested habitat. No short-term impacts are anticipated from the power subordination projects because no construction would occur.

4.9.2.3 Surface Storage Element

New storage facilities would include the construction of new access roads, dams, and other construction activities that would introduce noise and human activity. Wildlife in the vicinity would likely avoid the area during construction periods. This element has the greatest potential for short-term impacts on wildlife because of the long duration and large scale of construction. Long-term impacts, including the permanent displacement of wildlife due to additional areas of inundation, are discussed in Chapter 5.

The proposed Wymer Reservoir would affect approximately 1,055 acres of shrub-steppe wildlife habitat used by birds, reptiles, and small and large mammals. Many species of migratory and resident birds would be affected during construction, such as sage thrasher, western meadowlark, loggerhead shrike, and long-billed curlew. Nests and eggs on the ground and in shrubs would be destroyed if construction activities and reservoir filling occurred during the breeding season(s) for wildlife. The new reservoir may affect the movement of white-tailed jackrabbit, bighorn sheep, and mule deer. Based on the scarcity of similar habitat in the vicinity that could be used by wildlife within the Wymer Reservoir footprint combined with the extended construction period, short-term impacts on wildlife could be potentially substantial.

Construction of a new dam downstream of the existing Bumping Lake Dam would require access roads, staging areas, and the dam site in a forested area. Construction noise and human activities would disturb wildlife in the vicinity and removal of riparian vegetation would affect wildlife using the habitat.. Some losses of individual animals could occur if there is not sufficient unoccupied habitat in the adjacent areas during construction. Long-term impacts to wildlife, such as permanent habitat removal and inundation in an area designated as habitat for northern spotted owl, are described in section 5.9.2.3 and in 5.10.2.3 with regards to threatened and endangered species.

Construction of the gravity flow tunnel or the pump station (whichever option is selected) for the Kachess Reservoir inactive storage would also disturb wildlife which would likely avoid the area during construction periods. Impacts would be on a smaller scale than the Bumping and Wymer projects because of the smaller scale of the project and the previously disturbed habitat at Kachess Reservoir.

4.9.2.4 Groundwater Storage Element

Construction of the proposed groundwater storage projects would include the construction of new infiltration or recovery systems that would introduce noise and human activity. Wildlife would likely avoid the location of infiltration ponds and other structures during construction periods. Because the potential locations of the aquifer recharge facilities are in agricultural areas with disturbed habitats, few wildlife species are expected to be impacted. Short-term impacts would be similar for the shallow aquifer recharge projects and the ASR projects, but the ASR projects would be smaller in scale.

4.9.2.5 Habitat Enhancement and Protection Element

Both the targeted watershed protection and enhancement and mainstem floodplain and tributary habitat enhancement programs would include construction of habitat restoration projects that could result in temporary impacts on wildlife in the vicinity. Projects on the mainstem and tributaries of the Yakima River that involve streambank reshaping, channel reconstruction, and restoration of fish passage at manmade barriers would likely alter existing habitats through removal of vegetation. Habitat restoration projects are intended to provide improved habitat for wildlife in the long term. Wildlife in the vicinity of the restoration project may be temporarily displaced by noise and construction activities. Impacts are expected to be minor for projects that involve a few hundred feet of streambank and greater for larger projects.

4.9.2.6 Enhanced Water Conservation Element

Construction of some of the conservation projects could result in short-term impacts on wildlife during construction. Human activity and noise associated with construction of conservation projects would result in short-term impacts on wildlife in the vicinity. Wildlife would likely avoid the location of canals or ditches proposed for piping during construction periods. However, most projects would be located in already disturbed areas and some would not require any construction. Because most areas provide poor habitat for wildlife, few impacts are anticipated.

4.9.2.7 Market Reallocation Element

The Market Reallocation Element would not require construction or result in short-term impacts on wildlife.

4.9.3 Mitigation Measures

No specific mitigation is proposed for the temporary displacement of wildlife because this is expected to be a minor impact. Wildlife is likely to return following construction and subsequent revegetation, except in the area that would be inundated by a new or expanded reservoir or replaced by facilities. Those impacts are considered long term and are discussed in Section 5.9. Where possible, vegetation that is removed for construction would be replaced with appropriate native plant species. Measures to reduce noise and limit human activity should be incorporated for project activities that are near high-quality habitats such as old-growth forests or riparian zones. Construction work should be avoided during critical time periods such as nesting and migration seasons. As described in 4.8.3, revegetation efforts will follow an adaptive approach that allows ongoing modifications as needed. Habitat restoration projects are expected to be an overall benefit.

4.10 Threatened and Endangered Species

Short-term impacts on listed species would be associated with any land or in-water construction that would affect suitable habitat or result in noise and human activity. Short-term impacts are considered more substantial when construction periods span multiple years or occur in rare or high-quality habitats. Impacts are considered minor where construction occurs over a short duration or where vegetation has been disturbed or currently contains invasive species.

4.10.1 No Action Alternative

Under the No Action Alternative, agencies and entities in the basin would continue to implement projects to improve water supply and fish habitat. Some of these projects could result in temporary displacements of listed species due to noise and disturbance during construction. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for mitigating any impacts according to applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat enhancements under the No Action Alternative would generally be smaller in scale with less construction disturbance than capital projects, resulting in lower levels of short-term impacts on listed species.

4.10.2 Integrated Water Resource Management Alternative

Under the Integrated Plan, short-term impacts on listed species are based on the degree of disturbance resulting from any land or in-water work. Short-term impacts on bull trout and steelhead are expected to occur with some of the elements where in-water work would occur and temporary fish removal would be necessary. Impacts on northern spotted owl could occur with some of the elements that would produce increased noise and human activity during construction. Site-specific studies would be conducted to evaluate impacts on listed species as part of future environmental review if the projects are authorized.

4.10.2.1 Reservoir Fish Passage Element

At Cle Elum Dam, habitat for listed fish species, including bull trout and Middle Columbia River steelhead, would be temporarily affected by construction of the fish ladder and adult collection facility. Individual fish would be affected by temporary removal during construction if stream dewatering is required. Fish removal activities would follow NMFS or WDFW guidelines. Other short-term impacts include increased potential for erosion, sedimentation, or contamination from vehicle oil or gas spills. Reclamation will comply with the Essential Fish Habitat Conservation Recommendations provided by NMFS in its concurrence letter for Endangered Species Act consultation on the Cle Elum Dam project (Reclamation and Ecology, 2011c).

Other listed wildlife species may occur in the vicinity, such as gray wolf, fisher, grizzly bear, and Canada lynx. These species occur rarely in the project vicinity and would likely avoid the area during the three-year construction period. Short-term impacts on listed wildlife would likely be minor at Cle Elum Dam based on the availability of adjacent intact habitats that could be used by displaced wildlife. If listed species are present in the area and may be affected by the proposed action, identified conservation measures would be followed.

Impacts on threatened and endangered species are expected to be similar for construction of fish passage facilities at Rimrock, Keechelus, and Kachess Dams. Steelhead are found in specific areas of the Yakima River basin and bull trout are found upstream of Rimrock Reservoir and in both the Keechelus and Kachess Reservoirs. Impacts would be similar at Clear Lake Dam, but would be of lesser magnitude because of the smaller project scale and shorter construction period. At the Bumping Lake Dam, fish passage facilities would be constructed as part of the proposed reservoir enlargement (impacts are described in the Surface Water Storage Element).

4.10.2.2 Structural and Operational Changes Element

Raising the pool level behind Cle Elum Dam is not expected to affect listed fish species because all work would take place on top of the existing dam. Other listed wildlife in the vicinity would likely avoid the area during construction (similar to the impacts described for Cle Elum Dam fish passage). Installation of shoreline protection measures would also generate noise and activity that would displace wildlife. No Middle Columbia River steelhead are located above the dam. Isolated populations of bull trout are located above the dam and the area is critical habitat for bull trout. Short-term impacts are anticipated to be minor due to the limited extent of habitat that could be affected. Flooding the shoreline riparian vegetation could enhance habitat for bull trout.

Modifications to the KRD and Wapatox Canals are not expected to affect listed species because most work would take place along existing canals which do not provide fish habitat. Construction of the pump station for Manastash Creek would occur in the Yakima River which provides habitat for Middle Columbia River steelhead and bull trout. Short-term impacts on listed fish would be similar to those described for Cle Elum Dam. Individual fish would be affected by temporary removal during construction and there would be increased potential for erosion, sedimentation, or contamination from vehicle oil or gas spills. Other listed wildlife are not likely to occur in the vicinity because of the lack of suitable habitat.

For the Keechelus-to-Kachess pipeline, short-term impacts on listed fish species would be associated with the installation of the pipeline at the Keechelus Dam outlet. The pipeline would be screened. Similar to the impacts described for Cle Elum Dam, individual fish would be affected by temporary removal and there would be increased potential for erosion, sedimentation, or contamination. Short-term impacts on listed wildlife species, such as gray wolf, fisher, grizzly bear, and Canada lynx, could occur due to the presence of suitable habitat for these species. Human activity and noise associated with construction of the Keechelus-to-Kachess pipeline could result in displacement of

listed wildlife or interruption of migration routes or normal dispersal patterns in the vicinity during construction periods.

No construction is associated with the power subordination project. All fish species would immediately benefit from the additional subordination due to the improvement in out-migration flows.

4.10.2.3 Surface Storage Element

New storage facilities would include the construction of new access roads, dams, and other construction activities that would introduce noise and human activity or require in-water work. In-water work and ground disturbance would be conducted in accordance with species-specific construction timing windows for breeding or spawning season avoidance and other mitigation measures to reduce short-term impacts.

Construction at Wymer Dam would occur in habitat for greater sage-grouse, a Federal candidate species, and the threatened Middle Columbia River steelhead and bull trout in the Yakima River. Human activity and noise associated with construction of new access roads, the reservoir and dam, and water conveyance facilities would disturb or displace listed wildlife such as sage-grouse in the vicinity. Construction of the pump station near the mouth of Lmuma Creek would result in short-term impacts on listed fish species. Individual fish would be temporarily affected during removal from the stream during construction, and the potential for erosion, sedimentation and contamination of stream habitats would be increased. Based on the known presence of listed wildlife in the vicinity and the extended construction period, short-term impacts on listed fish and wildlife could be potentially substantial. However, a moderate level of human activity and noise in the vicinity is present due to an existing state highway, human use of the river corridor, and existing agricultural uses.

Short-term impacts on listed fish and wildlife associated with enlargement of the Bumping Lake Reservoir would be similar to those described for Wymer Dam. Habitat for listed fish species, including bull trout and Middle Columbia River steelhead, would be temporarily affected by construction of the new dam. Individual fish would be affected by temporary removal during construction. Other short-term impacts include increased potential for erosion, sedimentation, or contamination from vehicle oil or gas spills. Construction of the new dam would be a large scale operation lasting three to five years and would occur in and adjacent to the Bumping River. It would also involve the removal of trees in the reservoir expansion area. Based on the known presence of listed wildlife in the construction area, including northern spotted owl and bull trout, short-term impacts on listed fish and wildlife could be potentially substantial.

Short-term impacts on listed fish and wildlife for the Kachess Reservoir inactive storage project would be similar to those described for Cle Elum Dam fish passage. Human activity and noise associated with construction of the fish ladder and adult collection facility may disturb wildlife in the vicinity. Fish would be exposed to an increased potential for erosion, sedimentation, or contamination from vehicle oil or gas spills.

4.10.2.4 Groundwater Storage Element

Shallow aquifer recharge projects would require the construction of infiltration ponds, canals, and other facilities. The projects would be located in agricultural areas and, therefore, are expected to have limited impacts on listed species which are not likely to be present in the area. Most municipal ASR facilities would be located in urban areas with no habitat for listed species. Water diversions from the Yakima River could impact habitat for listed fish species. Short-term impacts on listed species would be similar to those described for the Manastash pump station in the Structural and Operational Changes Element unless an existing diversion is used.

4.10.2.5 Habitat/Watershed Protection and Enhancement Element

Construction of some habitat restoration projects could result in temporary impacts on listed fish and wildlife in the vicinity. Projects on the mainstem and tributaries of the Yakima River that involve streambank reshaping, channel reconstruction, and restoration of fish passage at manmade barriers would likely alter existing habitats through removal of vegetation and in-water work. It is anticipated that both small and large projects would be proposed under this element. Short-term impacts on listed fish, such as bull trout and Middle Columbia River steelhead, would be associated with those projects where in-water work is required. Such short-term impacts would likely be similar to other ongoing habitat/watershed protection and enhancement projects in the Yakima River basin, which have been documented as not adversely affecting listed fish species.

4.10.2.6 Enhanced Water Conservation Element

Construction of some the conservation projects could result in short-term impacts during construction. However, most projects would be located in already disturbed areas and some may not require any construction. Short-term impacts on listed species would be the same as described above for Shallow Aquifer Recharge projects. No short-term impacts are anticipated with the municipal and domestic conservation program because no construction would occur.

4.10.2.7 Market Reallocation Element

The Market Reallocation Element would not require construction or result in short-term impacts on listed fish and wildlife.

4.10.3 Mitigation Measures

The impacts on listed species caused by the development of the required facilities and infrastructure would be mitigated through site and facility design to minimize the need for habitat removal and construction activity. The design should incorporate an evaluation of existing wildlife habitats and species in the vicinity and a rare-plant survey. Habitat that is determined to be of significant importance (e.g., presence of listed species) should be preserved to the greatest extent possible. Facilities, access roads and staging

areas should be located in areas of disturbed vegetation. If intact vegetation is present, the footprint of the facility should be minimized and situated to result in the least amount of disturbance. Where possible, vegetation that is removed for construction would be replaced with appropriate native plant species. Timing of construction work would occur outside of critical time periods for listed species such as nesting and migration seasons. As described in 4.8.3, revegetation efforts will follow an adaptive approach that allows ongoing modifications as needed. Habitat restoration projects are expected to provide an overall benefit to listed fish and wildlife.

Mitigation for both short- and long-term impacts to listed fish and wildlife species would be associated with conservation measures identified during future ESA consultation. Section 5.10.3 provides additional details regarding mitigation for listed species and uncertainties associated with mitigation effectiveness.

4.11 Visual Quality

This section analyzes the short-term impacts on visual quality resulting from implementation of the Integrated Plan and the No Action Alternative. The analysis primarily entails the identification and description of changes to visual resources in the landscape during construction. Short-term impacts relate to the presence of construction activity and equipment and its effect on the visual landscape and the sensitivity of viewers.

4.11.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term impacts on visual quality. Short-term impacts could include the presence of construction activities, fugitive or uncontrolled dust, heavy equipment, and other temporary structures at varying intensities and durations during the construction period for individual projects. Views of the construction sites would generally create an unattractive visual setting during the construction period. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for complying with applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat enhancements under the No Action Alternative would generally be smaller in scale with less construction disturbance than major capital projects, resulting in lower levels of short-term impacts on visual quality.

4.11.2 Integrated Water Resource Management Plan Alternative

4.11.2.1 Reservoir Fish Passage Element

Construction activities, fugitive dust, heavy equipment, cofferdams, and other temporary structures would be in evidence at varying intensities and durations during the construction period for individual projects. Views of the construction sites would generally create an unattractive visual setting during the construction period. Viewpoints are generally limited to local roads, highways, and public access areas along the rivers and reservoirs. In areas with nearby residences, residents may also have views of the construction area.

4.11.2.2 Structural and Operational Changes

Modifications to spill gates, fish bypass systems, and canals would create short-term, minor, localized, and temporary visual impacts during the construction period of individual projects. Because access to and views of these facilities are limited, few people would notice the construction. The power subordination project does not require construction and would have no impacts on visual resources.

For the Keechelus-to-Kachess pipeline project, construction equipment and activities would be visible to residents and recreationists in the area, and in places to vehicles travelling on I-90, a National Scenic Byway and a Washington State Scenic and Recreational Highway. Travelers on this highway could have a heightened sensitivity to visual intrusions, so construction may result in visual impacts to highway drivers.

4.11.2.3 Surface Storage Element

Visual impacts during construction of new storage facilities would be extensive during the construction period. Construction would require clearing, stump removal and grading of the reservoir area, and construction of an earthfill or other dam. All of these activities would change existing landscapes, possibly block existing views, and create a potentially interesting, but unattractive visual intrusion. These activities could last several years. The extent of impacts would depend on how visible the construction site would be to the public, the extent to which the scenic quality of the existing landscape has already been modified, the sensitivity of the viewing public, and the viewers' expectations based upon the visual character of the setting in which the alterations to views is taking place.

Because the Wymer Dam site is relatively isolated from public areas, there would be limited views of construction activity and equipment. The public would have limited views of the dam construction site, with the only views being brief glimpses from SR 821, the Yakima River Canyon which is designated a State Scenic Byway. Construction associated with the pump station on the Yakima River would be visible to travelers on the highway as well as recreationists on the river. Travelers on this highway could have a heightened sensitivity to visual intrusions and there has been relatively little modification of the scenic quality of the landscape, so construction may result in visual impacts to highway drivers. It is likely that the Bureau of Land Management (BLM) Visual

Resource Inventory management objectives would not be met in the short term (four years) at certain locations. A more detailed analysis of potential impacts on visual resources from Wymer Dam construction would be completed in accordance with the methods described in BLM visual assessment guidelines as part of future project-level environmental review.

Because of Bumping Lake's location in a popular recreation area, visual impacts during construction could be significant. Construction equipment and activities would be visible to recreationists and residents of the area. Viewpoints around the reservoir construction area would primarily be from USFS roads and adjacent trails. Seasonal residences and recreation facilities along the existing reservoir would be permanently removed during construction. Users of Wilderness typically have a heightened sensitivity to visual intrusions associated with construction activities. Except for the reservoir and recreational facilities, there has been relatively little modification of the scenic quality of the Bumping Lake landscape. It is likely that the USFS Visual Quality Objectives and Scenic Integrity Levels would not be met in the short term (three to five years) at certain locations. A more detailed analysis of potential impacts to visual resources at Bumping Lake would be completed in accordance with the methods described in the USFS Scenic Management System as part of future project-level environmental review.

Construction equipment and activities associated with the Kachess Reservoir Inactive Storage project would be visible to residents and recreationists on Kachess Reservoir and in the area of the new tunnel. The impact would be minor because of the limited duration of construction at any one location and limited views of the construction area.

4.11.2.4 Groundwater Storage Element

No significant changes to visual resources are anticipated during construction of the groundwater storage element projects. Construction equipment and activities for shallow aquifer recharge would be visible in agricultural areas and from adjacent roadways. For ASR projects, most construction would occur at existing treatment facilities and generally would not be visible to the public. Impacts during construction would be minor.

4.11.2.5 Habitat/Watershed Protection and Enhancement Element

Construction of enhancement projects involving streambank reshaping, channel reconstruction, and restoring fish passage at manmade barriers would have the greatest temporary visual impacts of the fish habitat enhancement projects. Potential impacts would be related to the intensity of construction activities, presence of heavy equipment, and temporary impacts on vegetation. Construction areas could be visible from adjacent areas and to boaters and recreationists on the rivers. Visual impacts would be minor and temporary because of the small scale of the projects and short construction periods. In project areas where vegetation is removed or banks graded, the area would appear different until new vegetation is established. This visual impact could last approximately three years.

4.11.2.6 Enhanced Water Conservation Element

Conservation projects would consist of improvements to existing irrigation systems in rural areas. No changes to visual resources are anticipated with most conservation projects. Construction equipment and activities would be visible from surrounding agricultural areas and roadways. No short-term impacts on visual quality are anticipated for the municipal and domestic conservation program since it involves no construction.

4.11.2.7 Market Reallocation Element

No construction is associated with market reallocation; therefore, there would be no short-term impacts on visual resources.

4.11.3 Mitigation Measures

Specific mitigation measures would be developed for individual construction projects if they are advanced for implementation. Typical mitigation measures include the following:

- Limiting the area of ground disturbance through site and facility design;
- Locating temporary construction access roads and staging areas within previously disturbed areas or colocating them with proposed project activities;
- Utilizing flat, nonreflective earth-tone colors on heavy equipment that will be present onsite for 6 months or longer within visually sensitive areas; and
- Removing and restoring temporary access roads and other temporarily affected areas to their appropriate native vegetation following construction.

4.12 Air Quality

Short-term air quality impacts from construction activities within the Yakima River basin study area would be exempt from air quality permitting requirements. However, construction contractors would be required to comply with WAC 173-400-040 which sets forth various standards for construction equipment, methods, and best practices to minimize effects of construction-related emissions. The requirements under WAC 173-400-040 are not impact thresholds as such, but requirements for construction activities that specific projects must incorporate. As such, these regulations are not used to determine the significance of temporary air quality impacts in a programmatic EIS of this type. Rather, the general types of anticipated emissions from different construction elements under the alternatives are discussed qualitatively.

Compliance with the national and state ambient air quality standards, and with visibility goals within federally designated Class I areas, are addressed regionally through the Washington State Implementation Plans and are not addressed at a project level. Therefore, these standards and regulations, although important for regional air quality and conformity purposes, are not used to determine the significance of impacts for the

specific actions discussed below. However, these regulations are included in the qualitative discussion for each project element, where applicable, to provide some additional context for understanding the likely impact of each proposed element on general air quality.

4.12.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term impacts on air quality. Short-term construction-related air quality impacts under the No Action Alternative would largely result from emissions resulting from the transit and operation of equipment used for construction of projects. In addition, construction activities have the potential to create windblown particulate matter (dust), particularly during the clearing and grading of land, and from the transport and placement of excavation material, soils and other materials.

Overall, because existing air quality in the study area is currently in attainment with the national standards for criteria pollutants, and due to the relatively limited scope of construction in any one location, and the BMPs required by the WAC for construction activities, short-term air quality construction impacts would be expected to be temporary, relatively minor, and not likely to cause exceedances of the national standards.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat enhancements under the No Action Alternative would generally be smaller in scale than major capital projects, resulting in less construction-related emissions.

4.12.2 Integrated Water Resource Management Plan Alternative

Short-term construction-related air quality impacts under the Integrated Plan would largely result from emissions from transporting and operating construction equipment. In addition, construction activities have the potential to create windblown particulate matter (dust), particularly during the clearing and grading of land, and from the transport and placement of excavation material, soils and other materials.

The amount of dust emissions from construction activities would depend on meteorological conditions (particularly wind speeds), soil types and moisture content, and the surface area of soils or sediments exposed.

The level of short-term construction emissions from the various projects would depend on the amount of material moved and the number of pieces of equipment used in the peak day and peak year of construction activity. The major sources of volatile organic compounds, carbon monoxide, and nitrogen oxide emissions are expected to be the onsite construction equipment and haul trucks. The projects would require varying levels of construction with heavy machinery and equipment. Typical construction activities would include excavation, earthwork, trenching, tunneling, and concrete work. Most trenching

work would involve little stationary equipment and would be complete at any one location within a few weeks.

Construction emissions from construction sites would be exempt from air quality permitting requirements. However, contractors would be required to comply with WAC 173-400-040 through the use of BMPs to minimize construction-related emissions. Construction emissions would vary from day to day, depending on the timing and intensity of construction. Dust emissions may be noticeable by recreational users and nearby residents.

Overall, because existing air quality in the study area is currently in attainment with the national standards for criteria pollutants, the relatively limited scope of construction in any one location, and the BMPs required by the WAC for construction activities, short-term air quality construction impacts would be temporary, relatively minor, and not likely to cause exceedances of the national standards.

4.12.2.1 Reservoir Fish Passage Element

Air quality impacts from the construction of fish passage facilities would be similar to the general impacts described above. Cle Elum, Tieton, Keechelus, and Kachess Dams would require similar levels of construction activity and would generate similar amounts of construction emissions and dust. The Clear Lake Dam project is of a smaller scale and shorter duration and would produce lesser air quality impacts. Bumping Lake Dam fish passage facilities would be installed as part of reservoir expansion and impacts are included in the Surface Storage Element below.

Short-term air quality construction impacts associated with constructing fish passage facilities would be temporary, relatively minor, and not likely to cause exceedances of the national standards. The primary type of air pollution during construction would be combustible pollutants from equipment exhaust and small dust particles from disturbed soils becoming airborne. Short-term emissions from construction sites are exempt from air quality permitting requirements. Construction emissions would vary from day to day, depending on the timing and intensity of construction. Dust emissions would be noticed by recreational users and residents near the dams.

4.12.2.2 Structural and Operational Changes

Soil disturbances during construction have the potential to create windblown particulate matter (dust), particularly during clearing and grading, and during the transport of vehicles and materials. Short-term construction impacts from the Cle Elum Dam pool raise project would result from emissions from mechanized construction equipment used for modifying the spillway gates at the Cle Elum Dam and to construct shoreline protection measures around the reservoir. Canal modifications for the KRD and Wapatox projects would generate emissions from mechanized construction equipment. Short-term construction impacts would result from emissions from mechanized construction equipment used to install pipelines to convey water from Keechelus Reservoir to Kachess Reservoir.

Overall, the air quality impacts of the Structural and Operational Changes Element are expected to be similar to those for the Fish Passage Facilities Element due to the relatively limited scope of construction in any one location.

No short-term air quality impacts are anticipated from operational changes associated with the subordination of power at the Roza Dam and Chandler Powerplants.

4.12.2.3 Surface Storage Element

Short-term construction impacts would result from emissions from mechanized construction equipment used to build Wymer Dam and associated structural features, build a new Bumping Lake Dam and expand Bumping Lake Reservoir, and construct the facilities needed for the Kachess Reservoir inactive storage project. Soil disturbances during construction have the potential to create windblown particulate matter (dust), particularly during clearing and grading, and during the transport of vehicles and materials. Short-term air quality impacts are expected to be similar to those described for the Fish Passage Element, but construction of reservoirs at Wymer and Bumping Lake would cause air quality impacts for a longer time period and would likely generate more vehicle and particulate emissions because of the large scale land clearing that would be required. Overall, the impacts from projects are expected to be temporary, minor, and not likely to cause exceedances of the National Ambient Air Quality Standards (NAAQS).

4.12.2.4 Groundwater Storage Element

Short-term construction impacts from the Groundwater Storage Element are expected to be temporary and relatively minor. Existing air quality in the study area is currently in attainment with the national standards for criteria pollutants, the scope of construction in any one location is relatively limited, and BMPs would be required by the WAC for construction activities.

4.12.2.5 Habitat/Watershed Protection and Enhancement Element

Construction projects associated with the Habitat/Watershed Protection and Enhancement element would be relatively small in scale and are expected to have short-term air quality impacts similar to the Fish Passage Element, but of a shorter duration.

4.12.2.6 Enhanced Water Conservation Element

Due to existing air quality in the study area, the relatively limited scope of the agricultural conservation projects, and the BMPs required by the WAC, short-term impacts are expected to be temporary and minor.

No short-term air quality impacts are anticipated from the municipal and domestic conservation program because no construction would be required.

4.12.2.7 Market Reallocation Element

No short-term air quality impacts are anticipated from efforts to reduce barriers to water trading between water users because no construction is required.

4.12.3 Mitigation Measures

BMPs that could be used to reduce construction impacts for all alternatives include the following:

- Complying with applicable dust control policies and plans;
- Spraying dry soil with water to reduce dust;
- Minimizing idling of equipment when not in use;
- Covering dirt and gravel piles; and
- Sweeping paved roadways to reduce mud and dust.

If future NEPA documentation of specific projects included in the Integrated Plan predicts that emissions are anticipated to exceed the general conformity *de minimis* thresholds, additional mitigation may need to be applied to the emission sources. Such mitigation could include the following:

- Use of emulsified or aqueous diesel fuel;
- Use of equipment with engines that incorporate exhaust gas recirculation systems;
- Installation of a lean nitrogen oxide catalyst in the engine exhaust system;
- Wet suppression and soil stabilization;
- Wind fencing around the active area;
- Paving of onsite roadways;
- Truck wheel washing facilities at site exits on public roadways; and
- Maintaining minimal truck bed freeboard or covering haul truck beds.

4.13 Climate Change

Projects proposed as part of the Integrated Plan could both affect and be affected by climate change. Projects could affect climate change by increasing carbon emissions that contribute to global warming. Ecology guidance suggests that increased carbon emissions of less than 25,000 metric tons per year are presumed not to be significant (Ecology, 2011a). As noted in Section 3.13, climate change could affect precipitation, snowmelt and runoff in the Yakima River basin, affecting water management in the basin. For purposes of this EIS, the effects of proposed projects on climate change are discussed as short-term impacts. The effects of climate change on the projects are discussed as long-term impacts (Section 5.13).

4.13.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that would likely result in minor amounts of greenhouse gas emissions during construction. Piecemeal implementation would likely result in a continuation of current trends. To the extent that NEPA or SEPA analysis would be required for these actions, appropriate documentation of the impacts from construction would be the responsibility of the project proponent, separate from this PEIS.

4.13.2 Integrated Water Resource Management Plan Alternative

For all the elements of the Integrated Plan that involve construction activities, greenhouse gas emissions would be generated during construction. Information is not currently available to estimate whether construction of the Integrated Plan elements would exceed the Ecology guidance level of 25,000 metric tons. The amount of emissions generated would depend on the amount of heavy construction and the duration of construction for specific projects, as well as the timing of construction of the multiple elements. Potential greenhouse gas emissions from construction projects would be estimated and potential impacts analyzed separately when specific project details are available. In general, the increased emissions are not expected to cause appreciable impacts on climate change because they would be small compared with local, national, and global levels of emissions.

4.13.2.1 Reservoir Fish Passage Element

Construction work for fish passage projects would last two to three years at each site. Most of the heavy construction work would last only a few months out of that time period. During the remainder of the construction period, increased emissions would primarily be limited to worker vehicles accessing the sites. Because potential fish passage sites are in relatively remote areas, workers would likely have to drive 20 to 50 miles to access the sites. Heavy construction equipment would be needed for excavating intake structures, cofferdam placement and removal, hauling materials, concrete pouring, and similar activities. The increased emissions are not expected to cause appreciable impacts because they would be relatively small.

4.13.2.2 Structural and Operational Changes

Construction associated with raising the level of Cle Elum Reservoir includes installing flashboards on the dam and shoreline protection around the reservoir. Construction is expected to last three years, but actual work would likely be complete at one given location within a few weeks. Construction equipment would produce greenhouse gas emissions, but the project is not expected to cause appreciable impacts because it would be small compared with local, national, or global emissions.

Most of the modification for the KRD and Wapatox projects would be completed at one given location within a few weeks, with overall construction lasting a few months. Emissions would be generated by worker vehicles, trenching equipment, concrete

pouring, hauling materials, and similar activities. Construction equipment would generate increased greenhouse gas emissions, but the increased emissions are not expected to cause appreciable impacts because they would be small compared with local, national, or global emissions.

The Keechelus-to-Kachess pipeline project would have similar climate change impacts to those of the KRD Canal Modifications project, except this larger construction project would produce more greenhouse gas emissions.

Subordinating power at Roza Dam and Chandler Powerplants is not expected to generate increased greenhouse gas emissions since there would be no construction.

4.13.2.3 Surface Storage Element

The Surface Water Storage Element has the greatest potential for generating greenhouse gas emissions because of the duration and intensity of construction.

Construction would last three to five years at Wymer and Bumping Lake Dams and would require extensive use of heavy machinery. Equipment would be required for excavation and grading, hauling materials, access road construction, vegetation removal from areas planned for inundation, and similar activities. Because the sites are in relatively remote areas, workers would likely have to drive 20 to 50 miles to access the site. Although these large construction projects would produce greenhouse gas emissions, none of the increased emissions are expected to cause appreciable impacts because they would be small compared with local, national, or global emissions.

Climate change impacts from the Kachess Reservoir inactive storage project would be similar to those described for Wymer Dam and pump station except on a smaller scale because much less construction and clearing would be required.

4.13.2.4 Groundwater Storage Element

Construction activities for the shallow aquifer recharge projects could last from a few weeks to several months. The increased emissions are not expected to cause appreciable impacts because they would be relatively small. Impacts of the ASR projects would be similar to the Shallow Aquifer Recharge projects but smaller in scale because less excavation and equipment would be required.

4.13.2.5 Habitat/Watershed Protection and Enhancement Element

Construction associated with habitat enhancement projects would likely generate a limited amount of emissions. Most construction work for fish habitat enhancement would be completed at any one location within a few weeks or months. Heavy equipment would be limited to that needed for excavation and grading. Many of the areas where enhancements would occur are closer to populated areas, limiting worker

vehicle miles. The increased greenhouse gas emissions are not expected to cause appreciable impacts because they would be relatively small.

4.13.2.6 Enhanced Water Conservation Element

Construction required for the agricultural water conservation program is not expected to cause appreciable impacts because it would be relatively small. The municipal and domestic conservation program of education and incentives is not expected to generate increased greenhouse gas emissions because no construction is involved.

4.13.2.7 Market Reallocation Element

Market reallocation would not require construction and therefore would not generate greenhouse gas emissions.

4.13.3 Mitigation Measures

Emissions from construction vehicles could be reduced by following BMPs such as maintaining engines in good working order and minimizing trip distances. Other measures to minimize emissions include coordinating project planning, combining workers' trips, and using local materials.

4.14 Noise

This section uses standard information about noise levels from typical construction equipment to present a generalized, qualitative discussion of short-term changes in noise during construction. Construction and blasting noise is exempt from regulation if conducted between 7 a.m. and 10 p.m. (daytime hours) per WAC 173-60-050. In addition, noise created by traffic (including heavy construction vehicles) on public roads is exempt from regulation under WAC 173-60-050. Therefore, there are no applicable standards to determine the significance of short-term noise impacts from construction activities.

4.14.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in short-term noise impacts. Short-term impacts would largely result from transporting and operating mechanized construction equipment. The magnitude of short-term construction impacts in each case would depend on specific types of equipment used and the distance between construction activities and the nearest noise-sensitive property. However, overall construction noise impacts are likely to be relatively minor, localized, and limited to daytime hours.

Under the No Action Alternative, no blasting would likely be required for ongoing projects, and no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat

improvements under the No Action Alternative would generally be smaller in scale than major capital projects, resulting in less short-term noise.

4.14.2 Integrated Water Resource Management Plan Alternative

Short-term noise impacts resulting from the Integrated Plan would be associated with transporting and operating mechanized construction equipment, as well as the potential for blasting under certain conditions.

The increase in short-term noise resulting from construction would be temporary and limited to the construction period. Construction noise conducted between 7 a.m. and 10 p.m. (daytime hours) and traffic noise from public roads is exempt from regulation under the Washington Administrative Code as described above.

4.14.2.1 Reservoir Fish Passage Element

Short-term noise impacts would result from construction activities associated with building fish passage structures. Short-term construction impacts would be similar at each proposed site and, more specifically, would result from transporting and operating mechanized construction equipment. For reference, noise levels of typical construction equipment at 50 feet from the source of the noise are shown in Table 4-1.

Table 4-1 Construction Equipment Average Maximum Noise Level (L_{max})

Equipment	Examples	Actual Measured Average L_{max}[a] at 50 ft in Decibels
Earth Moving	Compactors	83
	Front End Loader	79
	Backhoe	78
	Tractors	84
	Graders	89
	Pavers	77
Materials Handling	Concrete Mixer Truck	79
	Concrete Pump Truck	81
	Crane	81
Stationary	Pumps	81
	Compressors	78
	Generators	81
Hauling	Dump Truck	76
Impact Equipment	Pile drivers	110
Impact Tools	Jackhammers	81
	Rock Drills	81
	Pneumatic Tools	85

Source: FHA, 2006.
[a] L_{max} is the maximum value of a noise level that occurs during a single event.

Depending on the activity, peak noise levels from equipment shown in Table 4-1 would range from 69 to 110 A-weighted decibels (dBA) at 50 feet from the source. However, noise levels decrease with distance from the source at a rate of approximately 6 to 7.5 dBA per doubled distance. For example, noise levels from construction equipment would range from approximately 57 to 98 dBA at a distance of 200 feet; from 51 to 92 dBA at 400 feet; and from 45 to 86 dBA at 800 feet.

The increase in noise would be temporary, localized, and limited to daytime hours. People recreating in the area adjacent to the dams would be subject to construction noise. These users may choose to recreate in other areas of the reservoirs during the construction period.

Although not regulated, short-term construction noise can be disruptive during certain activities. Some of the construction equipment that would be used to install the fish passage facilities would operate at noise levels high enough to cause hearing damage at very short distances (less than 50 feet). Because the noise levels would quickly dissipate below those levels, the only people likely to be exposed to damaging noise levels would be construction workers and other workers at the dam. Those workers would wear hearing protectors to prevent hearing damage. Noise impacts at Clear Lake Dam would be similar to those described for the major reservoirs; however, the duration of construction would be much shorter.

4.14.2.2 Structural and Operational Changes Element

Short-term construction impacts would result from noise associated with transporting and operating mechanized construction equipment. Equipment used for the construction of new structural and operational elements would be similar to that described in Table 4-1. The magnitude of short-term construction impacts in each case would depend on specific types of equipment used and the distance between construction activities and the nearest noise-sensitive property. However, overall construction noise impacts are likely to be relatively minor, localized, and limited to daytime hours.

The Keechelus-to-Kachess pipeline may require the use of blasting or impact tools and equipment to construct the pipeline. That would result in higher levels of construction noise.

No short-term noise impacts are anticipated from operational changes associated with the subordination of power at the Roza Dam and Chandler Powerplants because there would be no construction.

4.14.2.3 Surface Storage Element

Short-term noise impacts at Wymer and Bumping Lake Dams would be of greater intensity than other Integrated Plan projects because of the larger scale and longer duration of the projects. The projects are likely to require impact tools and equipment that generate more noise (Table 4-1).

Wymer Dam is located in an isolated canyon with few residents, but it is close to the heavily used recreation corridor through the Yakima River Canyon. Recreational users would be exposed to construction noise. Noise from the dam site would be moderated by the distance to the river area. Construction noise associated with the pump station would be more evident, but would be of shorter duration and require less noisy equipment than dam construction. Bumping Lake Dam is located in the Okanogan-Wenatchee National Forest adjacent to the William O. Douglas Wilderness. Construction noise may disturb recreational users and may detract from the wilderness experience (the William O. Douglas Wilderness is located approximately 0.1 mile from the shore of Bumping Lake Reservoir). Although the Wilderness Act of 1964 generally prohibits the use of motor vehicles and motorized equipment within federally designated Wilderness, the Act does not set forth any restrictions from noise created outside the Wilderness boundaries. Therefore, there are no noise standards applicable at Bumping Lake in relation to the adjacent Wilderness.

For the Kachess Reservoir inactive storage project, short-term construction impacts would result from noise associated with transporting and operating mechanized construction equipment and potentially the blasting needed to construct the gravity-flow tunnel, conveyance channel, and fish passage facilities; or to construct the pump station, conveyance pipeline, discharge structure, and fish passage facilities under the second option. Equipment used for the construction of inactive storage elements would be similar to that described in Table 4-1.

4.14.2.4 Groundwater Storage Element

Short-term construction impacts would result from noise associated with transporting and operating mechanized construction equipment used to construct specific infiltration systems, such as ponds, canals, or spreading areas. Equipment used for the construction of shallow aquifer recharge structural elements and ASR facilities would be similar to that described in Table 4-1.

4.14.2.5 Habitat/Watershed Protection and Enhancement Element

Short-term construction impacts are expected to be relatively minor because equipment would be limited to earth moving and hauling (Table 4-1) and projects would last from a few weeks to a few months.

4.14.2.6 Enhanced Water Conservation Element

Short-term noise impacts from agricultural water conservation projects are expected to be similar to those described for habitat/watershed protection projects. No short-term impacts are anticipated from the municipal and domestic conservation program.

4.14.2.7 Market Reallocation Element

No short-term noise impacts are anticipated from efforts to reduce barriers to water trading between water users.

4.14.3 Mitigation Measures

Construction noise impacts could be mitigated by limiting construction hours, using equipment with mufflers or noise control, and situating noise-generating equipment away from houses. Projects located within city limits would comply with applicable construction noise hours. Where blasting is required, a blasting noise mitigation plan may be prepared depending on the anticipated location of blasting and the presence of surrounding noise-sensitive land uses.

4.15 Recreation

Short-term recreation impacts are those things that could temporarily alter the ability to use the recreational resource. For example, if construction activities block access to a facility or recreational area, this would be considered a short-term impact until access is restored. Short-term impacts may also include a reduced ability to enjoy the resource due to disturbances such as construction noise or changes in scenic views due to the presence of construction equipment.

4.15.1 No Action Alternative

Under the No Action Alternative, agencies and entities in the basin would continue to implement projects to improve water supply and fish habitat. Some of these projects could result in temporary recreation impacts due to noise, disturbance, and access restrictions during construction. .The primary types of recreational uses affected would be streamside activities such as fishing and wildlife viewing. These construction impacts would be temporary and localized to the vicinity of construction. Construction activities could temporarily limit access to and from adjacent recreational facilities and resources; however, the short-term impacts are not known. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for mitigating any impacts according to applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat improvements under the No Action Alternative would generally be smaller in scale with less construction disturbance.

4.15.2 Integrated Water Resource Management Alternative

Recreation activities that could be impacted include fishing, boating, hiking, camping, sightseeing, wildlife viewing, hunting, and similar activities. Short-term impacts would

be primarily related to construction activities that may result in temporary access restrictions or nuisance dust and noise. These potential impacts are discussed in the following sections.

4.15.2.1 Reservoir Fish Passage Element

Construction activities, heavy equipment, and temporary structures would be in evidence at varying intensities and durations during the construction period for individual projects. Access to and from some recreational facilities, such as parks, boat launches, trails, and campgrounds near the reservoirs, may be limited during this time.

One of the primary effects on recreation users with construction of the Cle Elum Dam fish passage project would be disruption caused by construction traffic (Reclamation and Ecology, 2011c). Construction would occur during the prime recreation season for up to three years; however, the intensity of construction traffic would vary and would be light during some periods. Equipment deliveries would be limited to weekdays. Worker traffic would mostly occur outside peak recreation times. Therefore, construction traffic is not expected to cause significant delays for most recreationists.

Recreationists within sight and sound of the construction area could experience disruption or impairment of their recreational experience because of noise and dust. The magnitude of the impact would be directly related to the distance from the project area. The project would not affect recreation facilities such as established campgrounds, boat ramps, or trailheads. Reservoir users would be able to move to areas of the reservoir where disruption would be minimal.

These short-term impacts from construction activities would be temporary and limited in area. They are not expected to have a significant impact on recreational use of Cle Elum Reservoir.

Short-term impacts to recreation are expected to be similar at Tieton, Keechelus, and Kachess Dams although those reservoirs have fewer developed recreation areas. The Clear Lake Dam area has several recreational sites for camping and picnicking on the southeast end of the lake and between Clear Lake and Rimrock Lake. Impacts associated with fish passage facilities at Clear Lake Dam would be similar to those for Cle Elum Dam, except the magnitude would likely be less as construction is expected to be somewhat shorter.

The Bumping Lake Dam fish passage improvements are included in the reservoir enlargement project described in Surface Water Storage below.

4.15.2.2 Structural and Operational Change Element

Modifications requiring construction activities would cause short-term impacts similar to those discussed above for the fish passage element. Construction activities for this element could, however, be larger in scale, such as for the lateral piping projects. Impacts to access at nearby recreational facilities could last longer, but would still be localized and temporary.

Construction for the Cle Elum Pool Raise project would be limited to the area surrounding the dam spillway gates. For this reason, the short-term impacts would be similar to those described above for the Fish Passage Element. Shoreline protection measures would be installed around the lake where erosion could occur from the higher level of inundation. Recreational areas could be affected by access limitations and increased construction traffic. Those impacts are expected to last a few weeks and would not cause major impacts to recreation.

Short-term impacts from the KRD and Wapatox Canal modifications would vary depending on the location and timing of construction. Most of the projects are not located near recreation areas. The exception is the Manastash Creek pump station in the Yakima River. Construction activities could disrupt recreational use of that section of the river, but would be limited to the area needed for placement of a cofferdam and would last for less than one year. This limited disruption would not be considered a significant impact to recreational use of the river.

The proposed Keechelus-to-Kachess pipeline alignment would not pass near any developed recreation facilities. However, the area is generally used for dispersed recreation activities such as fishing, hiking, wildlife viewing, and boating. Construction activities could temporarily alter access to and from the dispersed recreation activities along the pipeline corridor.

No short-term impacts are expected to occur with implementation of the power subordination projects because no construction would be involved.

4.15.2.3 Surface Storage Element

Recreationists within sight and sound of the construction areas for new and expanded reservoirs could experience impairment of their recreational experience because of construction traffic, noise, and dust. Construction would last several years; however, these short-term impacts from construction activities would be temporary and limited in area.

Recreational uses at the proposed Wymer dam and reservoir site include hunting on private property, among other activities. Hunting on portions of the reservoir site acquired for public use would be restricted during and following construction. The nearby Yakima River and Yakima River Canyon provide water access, camping, wildlife viewing, and fishing opportunities. SR 821, which parallels the Yakima River, is a designated Washington State Scenic Byway. Recreationists are expected to be able to move to areas of the river and canyon where disruption would be minimal if space allows; although their experience could be compromised due to increased crowding. No public recreation areas or access are expected to be closed. Construction activities and traffic may result in inconveniences and traffic-related slowdowns, but are not anticipated to prohibit access to recreational uses in the area.

Construction associated with the proposed Bumping Lake expansion would be extensive and the area has many recreation facilities and opportunities. In addition to the recreational uses that would be inundated by the expansion of Bumping Lake (described in Section 5.15), access to other recreational facilities outside of the direct impact area

would likely be limited or blocked during the approximate three- to five-year construction period. Reservoir users and users of the adjacent William O. Douglas Wilderness within sight and sound of the construction area could experience disruption or impairment of their experience because of noise, dust, and visual intrusion. The magnitude of the impact would be related to the distance from the project area.

At some point during construction, recreational facilities around the existing lakeshore would be demolished to allow for inundation of the expanded reservoir. Access roads to trailheads and the Wilderness would also be permanently blocked. Reclamation would coordinate the demolition and access blockages with the USFS. Specific impacts to recreation and appropriate mitigation strategies would be developed as part of the project-level environmental analysis if the project is authorized.

There are no developed recreational facilities along the proposed Lake Kachess Inactive Storage tunnel alignment. However, portions of the alignment are included in the Okanogan-Wenatchee National Forest which is used for dispersed recreation such as hiking and wildlife viewing. If the pump station option is chosen, dispersed recreation along the lakeshore and that vicinity would be temporarily disrupted.

Short-term impacts from this project would be similar to those described for the Keechelus-to-Kachess pipeline project, except the magnitude of recreational access limitations may be slightly less because there are fewer recreational opportunities in the vicinity.

4.15.2.4 Groundwater Storage Element

The specific areas proposed for shallow aquifer recharge have not yet been selected. However, the projects would be located in agricultural areas and are not likely to be in or adjacent to existing recreational facilities. Therefore, few impacts on recreation are anticipated. The short-term impacts from ASR projects are expected to be similar to those for shallow aquifer recharge.

4.15.2.5 Habitat/Watershed Protection and Enhancement Element

The greatest temporary impacts on recreational resources associated with this element would result from construction of habitat enhancement projects on rivers and tributaries. These impacts would be related to the intensity of construction activities and access limitations that would likely occur. The primary types of recreation affected would be streamside activities such as fishing and wildlife viewing. These construction impacts would be temporary and localized to the vicinity of construction. Changes in recreational use of the acquired properties are considered a long-term impact and are described in Section 5.16. Construction activities could temporarily limit access to and from adjacent recreational facilities and resources; however, the short-term impacts are not known.

4.15.2.6 Enhanced Water Conservation Element

Agricultural conservation efforts are not expected to have any substantial impact on recreational uses. Improvements to irrigation systems would be confined to lands already

designated for agriculture. Construction associated with these projects would be temporary and unlikely to adversely affect surrounding recreational uses. The municipal and domestic conservation program would not involve any construction, and as such, would not have any short-term impacts on recreational uses.

4.15.2.7 Market Reallocation Element

There would be no short-term impacts to recreation because the Market Reallocation Element does not require construction.

4.15.3 Mitigation Measures

Access to and from recreational facilities may be temporarily closed, or limited, during construction. To the extent possible, alternate access routes would be provided. To minimize the negative impact to users, informational signage and alternate directions would be posted along access routes, at the recreational sites, and on agency websites. Construction BMPs would be implemented to minimize the impact on recreation facilities and their patrons from nuisance dust, noise, and conflicts with construction traffic during temporary construction activities. Recreation would coordinate with the USFS to determine appropriate mitigation for recreation impacts at Bumping Lake Reservoir.

4.16 Land and Shoreline Use

Short-term land use impacts are those things that could temporarily alter the current use of the project site and surrounding area. For example, if construction activities block access to an area that is normally accessible, it would be considered a short-term impact until access is restored.

4.16.1 No Action Alternative

Under the No Action Alternative, agencies and entities in the basin would continue to implement projects to improve water supply and fish habitat. Some of these projects could result in temporary land use impacts during construction. For some projects, acquisition of property or easements may be necessary. Short-term construction activities and access restrictions may preclude use of some areas, such as for recreational purposes, but would only be temporary. The duration of impact would vary, depending on the size and location of the project. Any resulting impacts would likely be minor and the agencies or entities implementing the projects would be responsible for mitigating any impacts according to applicable local, State, and Federal environmental review and permit requirements.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat improvements under the No Action Alternative would generally be smaller in scale, resulting in lower levels of short-term land use impacts.

4.16.2 Integrated Water Resource Management Plan Alternative

Short-term impacts to land use would be primarily related to temporary access restrictions as discussed below. Individual construction projects would be subject to the regulations and permitting requirements of the presiding jurisdiction, which may include NEPA and/or SEPA compliance, permits required under the Shoreline Management Act, and local building permits

4.16.2.1 Reservoir Fish Passage Element

Construction activities, heavy equipment, and temporary structures could limit access to and from adjacent properties. Potential impacts to land use associated with the construction of fish passage facilities would be minor, localized, and temporary.

Land surrounding Cle Elum Reservoir is primarily in public ownership with areas of private ownership. The Federal Government is the primary landowner in areas to the west, east, and north of the reservoir.

Construction activities associated with the fish passage facilities at Cle Elum Dam could disrupt access to some surrounding land uses. These include recreational uses, as described in Section 4.15, and some residential uses. Construction would occur from mid-April through November for three years; however, the intensity of construction traffic would vary and would be light during some periods. Access to surrounding areas may be delayed at times. Equipment deliveries would be limited to weekdays, and worker traffic would mostly occur outside the peak use times. Therefore, construction traffic is expected to cause only limited delays for land uses in the area. For these reasons, short-term impacts from the fish passage facilities at Cle Elum Dam would be minimal.

Impacts of constructing fish passage facilities at Tieton, Keechelus, and Kachess Dams are expected to be similar to those for Cle Elum Dam. Impacts at Clear Lake Dam would also be similar to those for Cle Elum Dam, except the magnitude would likely be less as the duration of construction is expected to be shorter. Because fish passage is included in the Bumping Lake Reservoir enlargement project, those potential land use impacts are described in Surface Water Storage Element below.

4.16.2.2 Structural and Operational Changes Element

Modifications requiring construction activities would cause short-term impacts similar to those discussed in the Fish Passage Element, and would be subject to the same regulatory requirements. Construction activities for this element could, however, be larger in scale, such as for the lateral piping projects. Impacts to access to adjacent properties could last longer, but would still be temporary.

Most construction for the Cle Elum pool raise project would be limited to the area surrounding the dam spillway gates. For this reason, the short-term impacts would be similar to those described under the Fish Passage Element at Cle Elum Dam. However, shoreline protection measures would require construction activities in the shoreline area of the reservoir, which would require acquisition of easements from property owners.

Most of the KRD and Wapatox Canal modifications projects are unlikely to cause short-term land use impacts because it is expected that all construction would occur within existing rights-of-way for the canals. The Manastash Creek pump station in the Yakima River would require a shoreline substantial development permit.

The land along the proposed Keechelus-to-Kachess pipeline alignment is primarily owned by private parties, with a smaller portion owned by the Federal government and the Kittitas Conservation Trust. Construction would require the acquisition of temporary construction easements and a permanent easement for the pipeline corridor.

No short-term impacts are expected with implementation of the power subordination projects because no construction would occur.

4.16.2.3 Surface Storage Element

Short-term land use impacts at all potential storage sites would be localized and temporary and would be subject to the same regulatory requirements as described in Section 4.16.2.1.

The land surrounding the Wymer Dam site is entirely privately owned by one family. Land uses in this area are primarily open space and rangeland, with some residential use near SR 821/Canyon Road. Construction of the dam would require acquisition of the private property. This is considered a permanent impact and is discussed in Section 5.16.

The land surrounding Bumping Lake Reservoir is federally owned, so no land acquisition would be required. The lands are within the Okanogan-Wenatchee National Forest and jointly managed by the U.S. Forest Service and the Bureau of Reclamation. The new damsite and all the area proposed for inundation is under joint jurisdiction by both agencies and Reclamation has reserved an area around the existing reservoir for expansion. No portion of the inundation area would be within the William O. Douglas Wilderness. Reclamation would coordinate with the USFS on the expansion of the reservoir and appropriate mitigation. Leased recreational properties, such as the marina and summer cabins, would be inundated. Impacts to these properties are considered a long-term impact which is discussed in Section 5.16.2.3.

The land along the proposed Kachess Reservoir Inactive Storage tunnel alignment is primarily owned by private parties, with a smaller portion owned by the Federal Government. Construction would require the acquisition of 100-foot temporary construction easements for the pipeline corridor. Permanent easement acquisition is discussed in Section 5.16. If the pump station option is chosen, the pipeline alignment would be shorter, requiring fewer easements, but would also require a larger area of disturbance near the lake for construction of the pump station.

4.16.2.4 Groundwater Storage Element

The specific areas proposed for shallow aquifer recharge have not yet been selected. The proposed pilot projects involve two areas less than 5 acres in size in the Badger Pocket and Toppenish areas. Construction easements may be required to access the sites of the infiltration ponds and other facilities. Property acquisition may be required for the infiltration pond sites. This impact is discussed in Section 5.16 as a long-term impact.

The short-term impacts from ASR projects would be similar in nature to those described for shallow aquifer recharge but lower in magnitude because the project sites would be smaller.

4.16.2.5 Habitat/Watershed Protection and Enhancement Element

The purchase or acquisition of conservation easements on the proposed 71,000 acres of private land or substitute lands would not result in short-term impacts. Properties would be acquired from willing sellers. Conservation efforts may constitute long-term changes in land use, which is covered in Section 5.16. The habitat enhancement projects on mainstem and tributary streams, especially floodplain restoration projects, may require the acquisition of property or easements. Short-term construction activities and access restrictions may temporarily preclude public use of these areas, such as for recreational purposes. The duration of construction would vary, depending on the size and location of the project.

4.16.2.6 Enhanced Water Conservation Element

Agricultural conservation efforts are not expected to have any substantial impact on land use. Improvements to irrigation systems would be confined to lands already designated for agriculture, and many would take place within existing canal rights-of-way. The municipal and domestic conservation program would not have any short-term impacts on land use.

4.16.2.7 Market Reallocation Element

There would be no short-term impacts associated with market reallocation because there would be no construction.

4.16.3 Mitigation Measures

Property acquisition and temporary and permanent easements would be required for most projects. Properties impacted would likely be a mix of public and private lands supporting a variety of uses. To the extent possible, alternate access routes would be provided, and access to private property would be maintained at all times. If individual projects that require the acquisition of land or easements are advanced for implementation, appropriate compensation would be required in accordance with applicable Federal or State regulations.

4.17 Utilities

Short-term impacts are based on the temporary disturbance of utilities affected by or located near construction. Impacts are considered minor when construction occurs over a short duration and can be coordinated with local services and utilities and scheduled to minimize impacts.

4.17.1 No Action Alternative

The No Action Alternative includes conservation-oriented water supply system improvements, including pumping plants and pipelines, at various locations in the Yakima Valley region (Kittitas, Yakima, and Benton Counties). These improvements are associated with existing approved programs and primarily existing facilities. To the extent that NEPA or SEPA analysis is required for these actions, appropriate documentation of the directly affected public services or utilities would be the responsibility of the project proponent, separate from this EIS.

4.17.2 Integrated Water Resource Management Alternative

4.17.2.1 Reservoir Fish Passage Element

Construction activities at Cle Elum Dam would take place on and near the existing dam and are not expected to disrupt any utilities. New electric lines would be needed for the fish intake facilities and the roller gates on the dam. These lines would connect to existing power lines at the dam and are not expected to affect existing utilities. Construction impacts for Tieton, Keechelus, and Kachess Dams are anticipated to be similar to those at Cle Elum Dam. Bumping Lake Dam fish passage facilities would be installed as part of the reservoir expansion project and are described in the Surface Water Storage Element below. Construction activities at Clear Lake Dam would be minor and are not anticipated to disrupt utilities.

4.17.2.2 Structural and Operational Changes Element

Construction activities on the Cle Elum Dam for the pool rise are not anticipated to disrupt utilities. The installation of shoreline protection measures would take place in a narrow strip on the reservoir shoreline and it is unlikely that any utilities would be impacted.

For the KRD Canal modifications project, construction of a re-regulation reservoir and pump station could cause minor temporary interruptions to electrical services when the facilities are brought online. However, with planning and coordination between the construction activities and the utility providers, such impacts could likely be avoided. The Wapatox project pipeline and pump station construction could cause minor temporary disruption of utilities, but could be coordinated with local services and utilities and scheduled to minimize impacts.

Construction associated with the Keechelus-to-Kachess pipeline could cause minor temporary disruption of utilities, and some utilities may require relocation. Relocations would be coordinated with local services and utilities and scheduled to minimize impacts.

The power subordination projects would not require construction or result in short-term impacts to utilities. Impacts to power generation are discussed in Section 5.6.

4.17.2.3 Surface Storage Element

New or enlarged storage reservoirs could cause short-term impacts to utility services (e.g., temporary service interruptions and requirements for infrastructure relocation). At Wymer Dam, the one local resident in the immediate project area could experience temporary disruptions. However, with proper construction-phase planning, such impacts likely could be avoided. Impacts to utilities at Bumping Lake Reservoir would be of greater magnitude due to the greater amount of existing infrastructure in the area. Power lines may need to be relocated in the dam site area. Utilities that serve recreation facilities and cabins at the reservoir would need to be relocated or removed. This would include power lines, propane tanks, and septic tanks. The relocations and removals would be coordinated with local services and utilities and scheduled to minimize impacts.

4.17.2.4 Groundwater Storage Element

Construction associated with building infiltration ponds, injection wells, and conveyance infrastructure could cause minor temporary disruption of utilities, but could be coordinated with local services and utilities and scheduled to minimize impacts. Pumps would require connection to electrical power.

4.17.2.5 Habitat/Watershed Protection and Enhancement Element

Construction for restoration projects could cause minor temporary disruption of utilities, but could be coordinated with local services and utilities and scheduled to minimize impacts.

4.17.2.6 Enhanced Water Conservation Element

Construction along roadways associated with irrigation improvements under the agricultural conservation program could cause minor temporary disruption of utility services. However, any disruptions would be coordinated with local services and utilities and would be scheduled to minimize impacts. The municipal and domestic conservation program is not expected to have a short-term impact on utilities because no construction is anticipated.

4.17.2.7 Market Reallocation Element

Market reallocation would not require construction or result in any construction-related impacts on utilities.

4.17.3 Mitigation Measures

The following measures could be used to avoid impacts to utilities during construction:

- Provide public notification of proposed construction activities, including the timing of construction, to all local service providers and schools within the immediate vicinity of any facilities or infrastructure projects.

- Coordinate with local utility service providers to assist in utility locations, if applicable, and to identify specific mitigation measures to minimize impacts to utility purveyors.
- Coordinate with local utility purveyors to identify other specific mitigation measures to minimize impacts.

Mitigation planning for utilities should also include close coordination with involved service providers, as well as with potentially impacted local residents and landowners. Where local utility system connections or installations would be impacted by construction activities, plan for and implement alternative or relocated connections and facilities prior to construction (i.e., avoid service disruptions).

4.18 Transportation

Construction activities would typically involve the movement of heavy equipment to and from the project site, as well as the commute by workers during construction.

4.18.1 No Action Alternative

Under the No Action Alternative, agencies and entities in the basin would continue to implement projects to improve water supply and fish habitat. Some of these projects could result in short-term impacts on highways and roads in the Yakima River basin in the immediate vicinity of these projects. There would be increased traffic on roadways with worker traffic, equipment, and deliveries. The degree of impact depends, in part, on the current level of service on potentially affected roads. To the extent that NEPA or SEPA analysis would be required for these actions, appropriate documentation of the transportation impacts from construction would be the responsibility of the project proponent, separate from this EIS.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. Ongoing water conservation projects and habitat improvements under the No Action Alternative would generally be smaller in scale, involving lower levels of temporary traffic disruptions.

4.18.2 Integrated Water Resource Management Plan Alternative

4.18.2.1 Reservoir Fish Passage Element

Construction of the various fish passage elements would have minor, short-term impacts on highways and roads in the Yakima River basin. Construction of fish passage facilities would temporarily increase traffic on roadways with worker traffic, equipment, and deliveries. All the fish passage facilities are located in areas served by local roads and Reclamation access roads that carry low volumes of traffic. Traffic would increase and may be slowed by the transport of construction equipment. No roadways would be closed by the construction projects. Standard safety procedures would be followed for transport of heavy equipment to project sites.

4.18.2.2 Structural and Operational Changes Element

Construction of the various structural changes to existing facilities could have minor, short-term impacts on highways in the Yakima River basin. Where canals or other delivery systems are located adjacent to roadways, there could be temporary disruptions of traffic. Piping of canals could require that culverts be installed or replaced under roadways, resulting in temporary closures or detours around affected areas. There would be increased traffic on roadways with worker traffic, equipment, and deliveries. The degree of impact depends, in part, on the current level of service on potentially affected roads. Cle Elum Reservoir pool elevation could impact State Route 903. Further investigation into this impact would occur during project-level environmental review.

The Keechelus-to-Kachess pipeline project includes installing approximately 5 miles of large-diameter pipe with a crossing of I-90 just east of Keechelus Reservoir. To the extent possible, the pipeline crossing would be coordinated with the ongoing reconstruction of I-90 and associated plans for wildlife crossings. Pipeline crossings of existing roads would have temporary and moderate adverse impacts on affected roadways.

No impacts on the transportation system would occur from the power subordination projects.

4.18.2.3 Surface Storage Element

Construction of new storage facilities would have an adverse impact on transportation facilities for the duration of the three to five-year construction period. Construction would cause increased traffic on roadways with worker traffic and equipment and materials hauling.

SR 821 provides the only access to the proposed Wymer Dam. SR 821 is a designated State Scenic Byway (see Section 3.18), and disruption by construction traffic would have a temporary adverse effect on traffic using this roadway. Impacts would include intermittent delays, increased trucks and heavy equipment on a roadway that is narrow and winding in places, and changes in the views of the surrounding landscape or access to the Yakima River (see Sections 4.11 and 4.15 for additional impacts to the Scenic Byway). In addition, construction of the proposed discharge and intake pipelines under SR 821 would have direct, short-term adverse effects, including temporary closure of the highway. Notification and signed detours of the closure would reduce the effects on travel. Detours would likely involve diverting traffic to I-82, which would cause some out-of-direction travel for users of SR 821. Road closure would adversely affect access to the Yakima River at points along SR 821. Average daily traffic on SR 821 in the vicinity of the proposed Wymer Dam is approximately 1,300 vehicles per day (Washington State Department of Transportation (WSDOT), 2011). Temporary diversion of SR 821 traffic to I-82 would be unlikely to have a substantial adverse effect on I-82 traffic (average daily traffic on I-82 is approximately 20,000 vehicles per day) (WSDOT, 2011).

Wymer Reservoir would inundate the piers supporting the I-82 bridges over Lmuma Creek. The piers would be reinforced and protected to prevent adverse effects from inundation. Construction to reinforce the bridge piers would not affect travel on I-82 and would protect the stability of the structures and the highway. This construction would require coordination with WSDOT.

Construction activities occurring over the three to five-year construction period at Bumping Lake Dam would have short-term impacts to SR 410 and Forest Road 18, which would provide access to the proposed site of the new dam. Portions of Forest Road 18 may be closed during certain periods of the construction project, blocking access to recreational areas and trailheads in the immediate vicinity of the dam. Construction traffic and detours may cause temporary delays in accessing the Goose Prairie area; however, access would be maintained to the extent possible.

Construction associated with the inactive storage project would have minor, short-term impacts on local roads in the vicinity of Kachess Reservoir. It would temporarily increase traffic on roadways with worker traffic, equipment, and deliveries.

4.18.2.4 Groundwater Storage Element

The construction of infiltration and injection facilities for groundwater storage projects would temporarily increase trips by worker vehicles, construction equipment, and material delivery on adjacent roadways. If treatment facilities are required for injection facilities, construction would generate more traffic. Depending on the location of the infiltration and injection facilities, new access roads may need to be constructed.

Conveyance facilities would be required to convey water from the Yakima River to the injection or infiltration site. Where groundwater is actively recovered, pipelines would also be required to convey the water from the recovery well to the municipal supply system. In some cases, these conveyance facilities may cross existing roads. The conveyance lines would typically be installed by a cut-and-cover method that would require temporary lane closures.

4.18.2.5 Habitat/Watershed Protection and Enhancement Element

Land management and property acquisition under the habitat program would not affect transportation. The construction of the various fish habitat enhancement projects could have minor, short-term impacts on highways and roads in the Yakima River basin in the immediate vicinity of these projects. There would be increased traffic on roadways with worker traffic, equipment, and deliveries. Throughout the basin, roads and bridges (Interstate, State, county, city, and private) currently constrict floodplain functions. Floodplain restoration projects potentially implemented under the Integrated Plan could involve construction activity with short-term effects on use of roads and bridges in some areas, including I-90, I-82, SR-10, SR-22, SR-223, and SR-241. Any projects affecting State roads would be coordinated with WSDOT.

4.18.2.6 Enhanced Water Conservation Element

Construction of facilities to improve agricultural water conservation would have minor, short-term impacts on roads in the Yakima River basin. Where canals or other delivery systems are located adjacent to or pass under roadways, there would be temporary disruptions of traffic. Piping of canals could require that culverts be installed or replaced under roadways. There would be increased traffic on roadways with worker traffic, equipment, and deliveries. The degree of impact depends, in part, on the current level of service on potentially affected roads. Because most irrigated lands are located on local, rural roads with limited traffic, only minor impacts are anticipated.

Municipal and domestic conservation programs involve promoting improved efficiencies in uses of water, and would not affect transportation.

4.18.2.7 Market Reallocation Element

The Market Reallocation Element would not affect transportation because there would be no construction.

4.18.3 Mitigation Measures

Mitigation measures to reduce short-term construction impacts on transportation would include maintaining access to properties, installing signs, marking detour routes, flagging, and providing information to the public, including notifications in advance of construction activities.

For elements with substantial impacts on roads or highways, such as new dam construction, short-term traffic and road impacts would be unavoidable. Specific mitigation measures would be developed in the design phase for these elements. Reclamation would coordinate with the Washington State Department of Transportation, U.S. Forest Service, and Federal, local, and Tribal transportation authorities to review plans, establish specific mitigation actions, and obtain necessary permits if the actions are authorized.

4.19 Cultural Resources

Short-term impacts on historic structures, traditional cultural properties, or sacred sites may include increased dust, vibration, noise, or construction activity. Impacts on archaeological sites would be permanent and are addressed as long-term impacts in Chapter 5.

Short-term impacts to cultural resources were considered based on the level of ground disturbance anticipated and knowledge about general patterns of Native American and Euro-American land use throughout time. Because the exact locations of many elements are not known, and the inventory of cultural resources (particularly TCPs) is not

complete, specific impacts are not yet identified. Significance of the impacts is based on the criteria for inclusion on national, State, or local historic registers.

4.19.1 No Action Alternative

Short-term impacts on cultural resources are possible under the No Action Alternative, including impacts from ground disturbing activities and any structural improvements to historic structures associated with habitat improvements and water conservation projects. To the extent that NEPA or SEPA analysis would be required for these actions, appropriate documentation of the impacts from construction would be the responsibility of the project proponent, separate from this PEIS.

Under the No Action Alternative, no reservoir fish passage projects, water storage projects, or large-scale facilities are likely to be constructed. There would be no modification of historic dams. As a result, the No Action Alternative would have lower levels of potential short-term impacts on cultural resources than large capital projects.

4.19.2 Integrated Water Resource Management Alternative

4.19.2.1 Reservoir Fish Passage Element

Short-term impacts on cultural resources could include modification of historic dams and their appurtenances; while the actions would occur in the short term, these impacts would be permanent. All dams are historic in age, although not all have been evaluated for significance. Measures to avoid affecting cultural resources would be employed prior to construction to minimize these potential impacts.

Short-term impacts to cultural resources could include noise and disturbance at Traditional Cultural Properties (TCPs). If TCPs are present, these impacts could substantially affect the characteristics (such as isolation or resource access) which provide the integrity of setting, feeling or association. No short-term impacts on buried cultural resources are anticipated because any impacts would be permanent (see Chapter 5).

Impacts for all fish passage projects would be similar. Impacts at Clear Lake Dam would be on a smaller scale. Bumping Lake Dam fish passage facilities would be installed as part of the reservoir enlargement project and are described in the Surface Storage Element below.

4.19.2.2 Structural and Operational Changes Element

Short-term impacts on cultural resources could include noise and disturbance of TCPs. If TCPs are present, these impacts could substantially affect the characteristics (such as isolation or resource access) which provide the integrity of setting, feeling or association. Flashboards added to the Cle Elum Dam would be permanent additions used seasonally but might not be used each year. The potential for permanent impacts on buried cultural resources is described in Chapter 5. The canal modifications and other facilities for the

KRD and Wapatox projects could affect TCPs if present. However, all construction would take place in previously disturbed agricultural lands; therefore, the potential to encounter undisturbed cultural resources is low. The Keechelus-to-Kachess pipeline has a moderate potential to encounter TCPs. Excavation in the 5-mile pipeline corridor could temporarily disrupt access to and use of TCPs. No short-term impacts to cultural resources are anticipated with the power subordination projects because no construction is associated with the projects.

4.19.2.3 Surface Storage Element

Construction for new storage at Wymer and Bumping Lake Dams could adversely impact access to TCPs, traditional use areas, and sacred sites if present. At Bumping Lake Reservoir, historic recreational cabins eligible or listed on the National Register of Historic Places would be relocated or demolished; relocation can be an adverse impact since it impacts the setting and feeling of a historic property. The Kachess Reservoir inactive storage project could also affect TCPs, if present, and limit access to those areas in the short term. Construction at Kachess Dam could affect the historic dam structure; the extent of any impacts is not yet known. No short-term impacts to buried cultural resources are anticipated because any impacts would be permanent, therefore long term (see Chapter 5).

4.19.2.4 Groundwater Storage Element

Construction for groundwater storage could adversely impact access to TCPs and traditional use areas if present. However, based on the types of landforms selected for groundwater storage, these areas may have a lower likelihood for cultural resources. If alternative site locations are feasible, then complete avoidance of significant cultural resources may be possible. No short-term impacts on buried cultural resources are anticipated because any impacts would be permanent (see Chapter 5).

4.19.2.5 Habitat/Watershed Protection and Enhancement Element

Short-term impacts to cultural resources could include noise and disturbance at TCPs. If TCPs are present, these impacts could substantially affect the characteristics (such as isolation or resource access) which provide the integrity of setting, feeling or association. No short-term impacts on buried cultural resources are anticipated because any impacts would be permanent.

4.19.2.6 Enhanced Water Conservation Element

Short-term impacts to cultural resources could include noise and disturbance at TCPs. If TCPs are present, these impacts could substantially affect the characteristics (such as isolation or resource access) which provide the integrity of setting, feeling or association. However, the potential for TCPs may be lower because the Enhanced Water Conservation projects would be located in active agricultural lands.

4.19.2.7 Market Reallocation Element

No impacts to cultural resources are anticipated from the Market Reallocation Element as this project consists primarily of transfer of water rights and not actual transfer of water to new uses. In cases where additional water is transferred for agricultural uses, it is assumed the land will already be in agriculture.

4.19.3 Mitigation Measures

Additional cultural resources review including field investigations would be required once specific locations for project elements are identified. These inventory investigations would determine if any archaeological sites, historic structures, or TCPs would be affected. Once the inventory and evaluation is complete, then mitigation measures could be determined.

The first level of mitigation is to design the project to avoid or minimize impacts on cultural resources. This would be particularly valuable for designs that altered the exterior of the historic dams. If a project cannot avoid or minimize impacts, it is assumed a permanent impact would result and mitigation is addressed in Chapter 5.

Mitigation measures for short-term impacts to TCPs would need to be determined in consultation with the appropriate cultural group. Because TCPs contribute to the maintenance of a culture, mitigation efforts may include documentation of the significance of the place through oral histories or recording traditional storytellers. It is not always possible to come to agreement with the appropriate cultural group on how to mitigate adverse effects on TCPs.

Construction contracts would require that if any archaeological material is encountered during construction, construction activities in the immediate vicinity would halt, and the Department of Archaeology and Historic Preservation and a professional archaeologist would be contacted for further assessment prior to resuming construction activity in that area. Construction contracts may also include specific requirements for working around historic dams.

4.20 Indian Sacred Sites

Because details of specific Integrated Plan projects have not yet been identified, Reclamation has not begun consultation with the Yakama Nation or the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) to identify Indian Sacred Sites. Reclamation will consult with the Yakama Nation and CTUIR to determine the presence of sacred sites as part of project-level environmental review when specific projects are carried forward to implementation. The process for consultation is described in Chapter 6. Short-term impacts to sacred sites are expected to be those in which access to sacred sites, if they are extant, is being temporarily denied to Tribal members because of construction-related activities.

4.21 Indian Trust Assets

Because details of specific projects have not yet been identified, Reclamation has not begun consultation with affected Tribes to identify Indian Trust Assets. Reclamation would consult with affected Tribes and the Bureau of Indian Affairs to determine the presence of Indian Trust Assets as part of project-level environmental review when specific projects are carried forward to implementation. The process for consultation is described in Chapter 6.

4.22 Socioeconomics

The assessment of short-term socioeconomic impacts considers potential effects on the supply and value of goods and services derived from the basin's water and related resources, resource-related jobs and incomes, resource-related uncertainty and risk, the distribution of resource-related costs and benefits, and the structure of the economy. This assessment examines the Integrated Plan from a programmatic perspective. As specific projects are carried forward to implementation, they would undergo additional analysis of potential socioeconomic effects.

4.22.1 No Action Alternative

Under this alternative, the current patterns and trends in the relationship between the basin's natural resources and the regional, State, and national economies would likely continue over the short term. The ongoing projects would not likely have a discernible short-term effect on socioeconomic conditions in the basin.

4.22.2 Integrated Water Resource Management Alternative

Some of the individual elements of the Integrated Plan might have discernible short-term effects on the supply and value of some goods and services derived from the basin's water-related ecosystem. Project-related funding mechanisms and expenditures would likely have short-term impacts on jobs and incomes, the distribution of resource-related costs and benefits, and the structure of the economy. Project-related activities might trigger short-term changes in uncertainty and risk.

4.22.2.1 Reservoir Fish Passage Element

Short-term impacts for the Fish Passage Element would occur relating to the value of goods and services, jobs and incomes, uncertainty and risk, distribution of costs and benefits, and socioeconomic structure. These impacts are discussed below.

Value of Goods and Services

Projects to construct fish passage facilities would require financial resources, volunteer resources, land, construction equipment, and other resources, making these resources unavailable for use elsewhere. However, the projects are not likely to have a discernible

effect—across the regional, State, and national economies—on the value of the goods and services associated with these resources.

Jobs and Incomes

Short-term expenditures associated with projects to construct the fish passage facilities would generate jobs and incomes for the workers directly associated with these activities and as businesses, governments, and households respend the initial amounts. The impacts would be dampened, however, to the extent that expenditures on these activities draw funding, labor, or other resources away from other activities.

In its assessment of proposed fish passage expenditures, Reclamation (2008a) estimated that the projects would create local jobs at the rate of about one job per every $102,900 of total construction expenditures for fish passage facilities at Cle Elum Dam, of which $64,000 would be spent locally. The analysis predicted that fish passage construction at Cle Elum Dam would result in 937 direct and indirect jobs. The number of jobs that would be filled by local residents has not been determined, but project-specific economic analysis probably would describe the effect on the local labor market. The 600 construction jobs represent 5 percent of the total construction jobs in the three Yakima basin counties in 2009, the most recent year for which data exist. The same direct employment represents 0.3 percent of the counties' total nonfarm employment in 2009 (Washington Employment Security Department, 2011b). The analysis also estimated that the local expenditure of $1 on construction would generate about $0.28 to $0.37 of local labor income. These estimates do not, however, account for second-order effects that could significantly reduce the overall impacts on jobs and income. Such effects would materialize, for example, if fish passage projects would secure the services of some local construction firms and workers only by attracting them away from other projects, so that the net short-term impact on the overall level of local construction would be smaller than the fish passage projects in isolation.

Uncertainty and Risk

Projects proposed under the fish passage element likely would not affect a large enough portion of the basin's water and related resources for a long enough time to have a discernible effect on resource-related risk and uncertainty. The projects might have additional effects, to the extent that a decision to proceed with them would signal to private and public entities potential changes in the demand for and supply of related goods and services. Such signals might convince households and businesses that the risk and uncertainty associated with related investments have diminished, and induce them to make investments that otherwise would not occur.

Distribution of Costs and Benefits

In general, projects associated with the fish passage element would involve costs, concentrated in the short term, aimed at producing long-term benefits. Therefore, the short-term impacts on the distribution of costs and benefits would be determined by each project's impacts on its source of funding for the project, and on the types of land and

other nonfinancial resources it would consume. Overall, these projects would likely have a minor short-term effect on the distribution of costs and benefits.

Socioeconomic Structure

The fish passage element would involve expenditures on construction and related activities that otherwise would not occur, but these likely would be too small to cause discernible changes in the overall regional, State, and national economies.

4.22.2.2 Structural and Operational Changes Element

Implementation of the Structural and Operational Changes Element would cause short-term socioeconomic effects generally similar to but smaller in scale than those discussed in Section 4.22.2.1 for fish passage. The power subordination projects do not involve construction and therefore would not cause short-term economic impacts. Long-term impacts associated with reduced power generation are discussed in Section 5.22.

4.22.2.3 Surface Storage Element

The Surface Storage Element would generally have the same types of short-term, socioeconomic impacts as those described for the Fish Passage Element, with the magnitude depending on the scale of the individual projects.

Jobs and Incomes

In its assessment of proposed construction expenditures at Wymer Dam and Reservoir, Reclamation (2008c) estimated the project would create an average of about 570 annual jobs over three to five years, the expected duration of construction. Of the total, 255 average annual jobs represent onsite and offsite labor directly related to construction. The estimated direct jobs represent 2 percent of the three counties' total construction employment in 2009 and 0.1 percent of the total nonfarm employment (Washington Employment Security Department, 2011b). Construction expenditures at Bumping Lake Reservoir are expected to be similar to those at Wymer Dam while those for the Kachess inactive storage project would be smaller due to the smaller scale of the project and shorter construction period.

Uncertainty and Risk

Projects to develop new surface water storage likely would have minor short-term effects on risk and uncertainty associated with the basin's water and related resources, similar to those described in Section 4.22.2.1.

Distribution of Costs and Benefits

Projects to develop new surface water storage likely would have minor short-term effects on the distribution of costs and benefits, similar to those described in Section 4.22.2.1.

Socioeconomic Structure

The overall socioeconomic structure of the regional, State, and national economies likely would not change in the short term in response to the surface water storage element of the Integrated Plan.

4.22.2.4 Groundwater Storage Element

Implementation of the Groundwater Storage Element would have short-term socioeconomic impacts similar in type, but potentially different in scale, than those described for the Fish Passage Element depending on the size of individual projects.

4.22.2.5 Habitat/Watershed Protection and Enhancement Element

The scope and design of specific habitat enhancement projects would determine their costs, benefits, and net benefits (or net costs); their impacts on jobs and income; the distribution of costs and benefits; their interaction with the structure of the economy; and the levels of risk and uncertainty they would generate for affected parties. Short-term impacts of habitat enhancement projects that involve construction would likely be similar to those described in Section 4.22.2.1, but on a smaller scale. The acquisition of properties for watershed protection likely would have little, if any, short-term effect on the management of these resources and, therefore, few socioeconomic effects other than those associated with the funding mechanisms used for the acquisition.

4.22.2.6 Enhanced Water Conservation Element

The scope, design, and level of expenditures for specific agricultural water conservation projects would determine their costs, benefits, and net benefits (or net costs); their impacts on jobs and income; the distribution of costs and benefits; their interaction with the structure of the economy; and the levels of risk and uncertainty they would generate for affected parties. Short-term, socioeconomic impacts of agricultural water conservation projects that require construction would likely be similar to, but smaller in scale than, those described in the Fish Passage Element section. The expenditure of funds on conservation projects would generate some jobs and incomes in the region, but these would be offset, regionally, State-wide, or nationally, to the extent that the funds would not be spent on other things in the basin, State, or nation. The municipal and domestic water conservation program would not include construction and therefore would have no short-term, construction-related socioeconomic impacts.

4.22.2.7 Market Reallocation Element

There would be no construction involved with this element; therefore, there would be no short-term, construction-related impacts. Some short-term impacts, such as the creation of new job opportunities, likely would accompany expenditures to establish procedures, activities, or institutions to facilitate market reallocation. The overall regional, State, or national impacts likely would not be discernible.

4.22.3 Mitigation Measures

Because no significant short-term socioeconomic impacts are anticipated, no mitigation is proposed.

4.23 Environmental Justice

Environmental justice issues arise when a project disproportionately impacts minority or low-income populations. If significant impacts are anticipated, demographic information for the project area is compared to the Yakima basin as a whole and the State of Washington to determine if minority populations would be disproportionately impacted.

4.23.1 No Action Alternative

Under the No Action Alternative, projects could be undertaken that could have environmental justice impacts. If those projects trigger NEPA compliance, the agencies and entities implementing the projects would conduct environmental justice analyses separate from this EIS.

4.23.2 Integrated Water Resource Management Alternative

4.23.2.1 Reservoir Fish Passage Element

Short-term impacts associated with the installation of fish passage facilities at Cle Elum Dam would be minor, temporary, and construction related. The immediate geographic area potentially affected has lower percentages of minority and low-income populations than the Yakima basin counties or the State of Washington. There would be no disproportionate adverse impact to those populations resulting from the project (Reclamation and Ecology, 2011c).

Environmental justice impacts for Tieton, Keechelus, Kachess, and Clear Lake Dams are expected to be similar to those at Cle Elum Dam. Bumping Lake Dam fish passage facilities would be installed as part of the reservoir enlargement project and are described in the Surface Water Element below.

4.23.2.2 Structural and Operational Changes Element

The projects proposed for the Structural and Operational Changes Element would not have disproportionate impacts on minority or low-income populations.

4.23.2.3 Surface Storage Element

New and expanded storage projects have the potential to generate major construction impacts such as impaired air quality, increased noise, and traffic delays. Those impacts could be mitigated using standard measures and are not expected to be significant. Therefore, there would be no disproportionate adverse impacts to low-income or minority populations. In addition, all three of the proposed storage projects are located in remote

areas with expectedly small populations of minority and low-income people (U.S. Census Bureau, 2010).

4.23.2.4 Groundwater Storage Element

The shallow aquifer recharge projects are not expected to cause disproportionate adverse impacts on minority and low-income populations.

4.23.2.5 Habitat/Watershed Protection and Enhancement Element

Construction of enhancement projects under this element is not expected to create disproportionate adverse impacts to minority and low-income populations.

4.23.2.6 Enhanced Water Conservation Element

Agricultural water conservation projects would not generate disproportionate adverse impacts to minority or low-income populations. There would be no construction associated with the municipal and domestic conservation program and thus no short-term impacts.

4.23.2.7 Market Reallocation Element

There would be no construction associated with market reallocation so there would be no short-term impacts.

4.23.3 Mitigation Measures

None of the elements are expected to create short-term environmental justice impacts; therefore, no mitigation is expected to be required.

4.24 Overall Short-term Impacts and Benefits of Integrated Plan

Construction of the Integrated Plan elements would cause short-term construction-related impacts, including erosion and sedimentation, water quality, increased dust, noise and traffic disruptions. Access to recreation areas could be restricted and recreationists could be disrupted by noise and dust. Cultural resources could be exposed during construction and access to traditional areas could be limited. All these impacts would be temporary, limited to the expected three to five-year construction schedules. Implementation of BMPs and required permitting conditions would minimize construction impacts.

Implementation of the Integrated Plan includes a large number of projects throughout the Yakima River basin. Because of funding and the need for additional design and environmental review, implementation of the projects would be phased over time. As a result, construction impacts from the various projects would not occur at the same time.

The Integrated Plan includes several large scale construction projects, such as projects proposed in the Surface Water Storage Element. Those projects would have more substantial construction impacts and would last longer. Short-term impacts of these large scale projects are expected to be greater than anything proposed under the No Action Alternative.

Many of the proposed projects, such as water conservation and habitat enhancement, are similar to those proposed under the No Action Alternative and would have similar impacts. Implementing all of the projects under an Integrated Plan could further reduce short-term impacts by developing a coordinated plan for construction. This could be especially important for resources such as cultural resources for which a coordinated approach could reduce impacts through coordinate cultural resource studies.

Short-term impacts of the Integrated Plan may be somewhat greater than those that would occur under the No Action Alternative because of the number and scale of projects. In particular, construction associated with the new and expanded surface storage projects would be much larger in scale that projects in the No Action Alternative. All construction-related impacts would be temporary and mitigated by implementing BMPs. Development of a coordinated construction plan for the Integrated Plan projects could further reduce those impacts.

4.25 Cumulative Impacts

Cumulative impacts are the effects that may result from the incremental impact of an action when added to other past, present and reasonably foreseeable future actions (40 CFR 1508.7). "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7). Generally, an impact can be considered cumulative if: a) effects of several actions occur in the same locale; b) effects on a particular resource are similar in nature; and c) effects are long-term in nature. Potential areas where short term cumulative impacts might occur as a result of implementation of the Integrated Plan are discussed below. Long term cumulative impacts associated with implementation of the Integrated Plan are discussed in Section 5.25.

The Integrated Plan is intended to address some of the cumulative impacts associated with past projects in the Yakima River basin, including fish passage projects to open up habitat blocked by dam construction, fish habitat enhancement projects to restore habitat damaged by past land use actions, structural and operation changes to improve fish migration and the efficiency of existing irrigation facilities, and new surface and groundwater storage to improve streamflows and water supplies. These improvements are considered long-term cumulative impacts and are described in Section 5.25.

The Integrated Plan includes a number of projects which could generate cumulative construction impacts if they were constructed concurrently. Cumulative construction impacts could include potential impacts to receiving water quality with accompanying effects on fisheries, impacts to vegetation associated with clearing and grading, and

transportation issues associated with construction haul routes. Residents along construction haul routes could experience increased dust, noise, and traffic delays. Potential cumulative impacts to recreational facilities could occur, if facilities are constructed that restrict access to recreational locations. These impacts could result in the need for individuals to travel farther for recreational opportunities for up to five years during the construction window for some projects. This could result in increased crowding at alternate facilities that are not subject to disruption. The potential for inadvertent discovery of cultural sites and artifacts during construction could occur associated with any of the proposed projects and this potential would increase as the number of projects increases.

These cumulative construction-related impacts would be further compounded if other present and reasonably foreseeable projects are constructed concurrently with Integrated Plan projects. These projects would include those identified for the No Action Alternative (Section 2.3), such as conservation projects under YRBWEP Phase II, fish habitat enhancement projects, Yakima County floodplain reconnection projects, and others. Other projects proposed in the basin that are not part of the No Action Alternative include activities that could compound short-term impacts associated with the Integrated Plan. These include wind power development ongoing throughout the area; ongoing activities and facility expansion at the Department of Army's Yakima Training Center; potential hydropower development at existing dams; and ongoing residential, commercial, and agricultural development in the basin, which has been planned for as part of regional land use planning. If construction of these projects occurs concurrently with Integrated Plan projects, short-term construction impacts could be compounded. The Integrated Plan, especially the Keechelus-to-Kachess pipeline project, could also compound cumulative construction impacts in combination with the WSDOT improvements to I-90 in the Snoqualmie Pass area.

Although there could be cumulative construction-related impacts if the Integrated Plan and other reasonably foreseeable projects are constructed concurrently, construction impacts are generally expected to be minor, localized, and temporary. Required BMPs and compliance with permitting requirements would minimize potential cumulative impacts. In addition, projects associated with the Integrated Plan would undergo additional project-level environmental analysis under NEPA and/or SEPA, as would other projects proposed in the Yakima and Columbia River Basins. This would identify specific project impacts and cumulative impacts, as well as appropriate mitigation measures. Implementing the Integrated Plan in a comprehensive manner would allow for better coordination of construction scheduling of projects included in the plan and with other proposed projects. This would help minimize potential cumulative impacts of construction.

In addition to projects and programs within the Yakima River basin, there are several water resource programs and/or projects within the Columbia River Basin with the potential to cumulatively affect or be affected by the Integrated Plan. These include the Odessa Subarea Special Study, Lake Roosevelt Incremental Storage Releases, Walla Walla Pump Exchange, Sullivan Lake Water Supply, and Umatilla Aquifer Recharge

projects. As described above, there may be cumulative short-term impacts if construction for these projects if scheduled concurrently or occurs in close proximity; however, these projects are scattered across eastern Washington and Oregon reducing the potential for short-term cumulative impacts. Overall, the potential for short-term cumulative impacts associated with implementation of these projects is very low. Refer to Section 5.25 for a discussion of potential long term cumulative impacts.

4.26 Unavoidable Adverse Impacts

Unavoidable significant adverse impacts are defined as environmental consequences of an action that cannot be avoided, either by changing the nature of the action or through mitigation if the action is undertaken. Construction-related impacts to water quality have been identified for many of the project elements; however, while some level of impact is unavoidable it is anticipated that mitigation measures would reduce these impacts to an insignificant level.

4.27 Relationship between Short-Term Uses and Long-Term Productivity

NEPA requires considering "the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity" (40 CFR 1502.16). This occurs when short-term negative effects are counterbalanced by a long-term positive effect (and vice-versa). Implementation of the Integrated Plan would involve construction activities that would cause some short-term adverse impacts to water quality, fish, vegetation, wildlife, air quality, noise, transportation, and recreation. These short-term impacts are counterbalanced by long term benefits to fish, wildlife, threatened and endangered species, vegetation, ecosystem productivity, and recreation.

4.28 Environmental Commitments

This section discussed the short-term environmental commitments made in this FPEIS. Reclamation has the primary responsibility to ensure these commitments are met if an action is implemented. Because this a programmatic environmental review of the Integrated Plan elements, specific mitigation measures have not been developed for specific project actions at this time. Additional measures would be developed during project-specific review for each project action when carried forward. Below is a summary of the type of actions that would be undertaken to minimize short-term construction-related impacts.

4.28.1 Erosion and Sediment Control

Construction best management practices (BMPs) would be employed, and temporary erosion and sediment control, isolation, and containment plans would be prepared in

accordance with Federal, State or local requirements, for any construction site to minimize the potential for sediment production and delivery to stream channels. Measures would include timing construction activities to avoid earth disturbances during periods of high precipitation; using appropriate sedimentation control devices; covering exposed soil stockpiles and exposed slopes; retaining vegetation where possible, and replanting as soon as possible following construction to minimize soil erosion; among other measures.

4.28.2 Construction Practices

Measures would be implemented as appropriate to minimize dust from construction sites and haul routes. Emissions from construction vehicles could be reduced by following BMPs to minimize emissions, such as maintaining engines in good working order and minimizing trip distances. Other measures to minimize emissions include coordinating project planning, combining workers' trips, and using local materials.

Construction noise impacts could be mitigated by limiting construction hours, using equipment with mufflers or noise control, and situating noise-generating equipment away from houses or other sensitive receivers.

Mitigation measures to reduce short-term construction impacts to transportation would include maintaining access to properties, installing signs, marking detour routes, flagging, and providing information to the public, including notifications in advance of construction activities. Access to and from recreational facilities may be temporarily closed, or limited, during construction. To the extent possible, alternate access routes would be provided.

Mitigation planning related to utility disruption should include coordination with involved service providers, as well as with potentially impacted local residents/landowners.

4.28.3 Habitat

Project design should incorporate an evaluation of existing wildlife habitats and species in the vicinity, a rare plant survey, and a delineated and well marked clearing boundary to limit disturbance to habitat. Habitat that is determined to be of significant importance (e.g., presence of listed species) should be preserved to the greatest extent possible. Facilities, access roads, and staging areas should be located in areas of disturbed vegetation to minimize the disturbance of intact vegetation as much as possible. Where possible, vegetation that is removed for construction would be replaced with appropriate native plant species. Habitat restoration projects are expected to provide an overall benefit to listed fish and wildlife.

To minimize impacts to fish, construction activities with in-water components should work within appropriate instream fish work windows to avoid critical periods (i.e., breeding/spawning, migration) or include with full containment.

Measures to reduce noise and limit human activity should be incorporated for project activities that are near high quality habitats such as old-growth or riparian zones. Habitat restoration projects are expected to be an overall benefit to wildlife.

4.28.4 Water Supply

To mitigate short-term disruptions in surface water irrigation supply due to construction activities, Reclamation and Ecology would coordinate with water users and construction personnel to ensure that construction activities are scheduled to minimize disruptions. To the extent possible, conveyance construction would occur outside the irrigation season. Mitigation for stream bypasses would be negotiated with fish agencies as part of permitting for individual projects. Reservoir drawdowns would be scheduled to minimize effects on water supplies and fish.

4.28.5 Additional Studies

Large projects such as new surface storage would require site-specific geotechnical studies to identify subsurface and seismic issues, unstable slopes, and other local factors that can contribute to slope instability and increase erosion potential. These studies would be used in the design of project-specific BMPs and temporary erosion and sediment control plans in accordance with Federal, State, or local requirements. Requirements for each construction project would be defined through review by State and local regulatory agencies.

Conduct site-specific hydrogeological studies prior to construction to determine impacts to short-term groundwater levels and quantity from projects that may require dewatering activities.

Additional cultural resources review including field investigations would be required once specific locations for project elements are identified. These inventory investigations would determine if any archaeological sites, historic structures, or TCPs would be affected. Once the inventory and evaluation was complete then mitigation measures could be determined. Mitigation measures for short-term impacts to TCPs would need to be determined in consultation with the appropriate cultural group. Construction contracts would require that if any archaeological material is encountered during construction, construction activities in the immediate vicinity would halt and DAHP and a professional archaeologist would be contacted for further assessment prior to resuming construction activity in that area. Construction contracts may also include specific requirements for working around historic dams.

4.28.6 Property Acquisition

Property acquisition and temporary and permanent easements would be required for most projects. Properties impacted would likely be a mix of public and private lands supporting a variety of uses. To the extent possible, alternate access routes would be provided, and access to private property would be maintained at all times. If individual projects that require the acquisition of land or easements are advanced for

implementation, appropriate compensation would be required in accordance with applicable Federal or State regulations.

Chapter 5

LONG-TERM IMPACTS AND MITIGATION MEASURES

CHAPTER 5.0 LONG-TERM IMPACTS AND MITIGATION MEASURES

5.1 Introduction

This chapter describes the long-term impacts that could result from the alternatives proposed in this FPEIS. Long-term impacts are those that would occur as a result of implementing an element, project, or action. Possible mitigation measures for the impacts are also discussed.

Because this is a Programmatic EIS, the details of project implementation are not well known for many projects and actions. Thus, long-term impacts are discussed based on the level of detail available.

Reclamation and Ecology expect that the projects or actions included as features of the Integrated Plan would be subject to project level environmental review prior to implementation. The process for this environmental review is described in Section 1.2.1. For projects included in the No Action Alternative, the lead agencies would also conduct appropriate environmental review.

Impacts are evaluated for the No Action Alternative and the Integrated Water Resource Management Plan. Long-term impacts of the No Action Alternative are evaluated for ongoing projects related to artificial fish supplementation, habitat improvements, water conservation, and water quality improvements. Long-term impacts of the Integrated Water Resource Management Plan are evaluated for the seven elements of the Plan—fish passage, structural and operational changes, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market-based reallocation of water resources. Because the Integrated Plan would be implemented as a coordinated package phased over time, the effects of the combination of all elements functioning together as a comprehensive plan also are presented. Long-term cumulative impacts are presented at the end of this chapter. The discussion of short-term impacts is presented in Chapter 4.

5.2 Earth

5.2.1 No Action Alternative

Under the No Action Alternative, the existing activities, development patterns, and land use trends in the Yakima River basin would continue. Erosion and sediment delivery to streams likely would continue to occur at about the same rates as under existing conditions or could increase in the future, as past trends have indicated.

Ongoing habitat improvements under the No Action Alternative (described in Section 2.3) would potentially reduce bank erosion and sedimentation to streams, but to a more limited extent than would be provided under the Integrated Plan Alternative.

Under the No Action Alternative, there would be continued and likely increased erosion and sediment delivery to streams related to logging and other land use disruptions on private lands that would have otherwise been acquired and protected under the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan Alternative. Current development patterns on frequently flooded areas would also likely continue, with associated sedimentation caused by periodic flooding.

Without the increased reliability of irrigation supplies through enhanced water conservation and other measures proposed under the Integrated Plan Alternative, there could be reduced viability of some existing agricultural operations in the future. This shift in practices could decrease soil erosion if agricultural land is converted to other agricultural practices or land uses. For example, reduced soil erosion in localized areas could occur if agricultural areas are converted to dryland crops or fallowed land, or if areas are paved or landscaped for urban uses. At the basin-scale, however, the overall trend of increased erosion and sediment delivery to streams are likely to continue.

5.2.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Under the Integrated Plan Alternative, long-term impacts on earth resources are based on the long-term erosion potential associated with each proposed project.

5.2.2.1 Reservoir Fish Passage Element

No major long-term earth impacts are expected from the Fish Passage Element. Some of the fish passage structures would likely provide a limited source of organic materials for downstream beds, banks, and vegetation; however, the potential for impact is minor. Site-scale stream channel erosion and channel modifications are also possible. No major long-term earth impacts are expected from the operation of fish passage facilities because earth disruption would be minimal and the operational changes would not result in increased exposure of sediments.

5.2.2.2 Structural and Operational Changes Element

Earth-related impacts are expected to be minimal during operation of the modified facilities after construction activities have been completed, with the possible exception of erosion and shoreline changes at Cle Elum Reservoir following the pool raise. Increasing the pool elevation at Cle Elum by 3 feet would increase the shoreline erosion for some period as the new shoreline is established. Shoreline protection measures would be installed to minimize potential erosion to less-than-significant levels. A long-term borrow source could be required in order to perform future maintenance of the shoreline protection features. The rock borrow source and haul road could be a long-term sediment source. Bio-engineering would be used rather than rock armor for shoreline protection

wherever possible. There could be benefits to fish and wildlife if riparian vegetation is flooded.

Earth-related impacts are expected to be minimal during operation of the modified KRD facilities, the modified Wapatox Canal, and the Keechelus-to-Kachess pipeline once construction activities and revegetation have been completed. No impacts are expected from subordination of the Roza and Chandler Powerplants.

5.2.2.3 Surface Storage Element

The Surface Storage Element has the greatest potential to cause impacts on earth resources over the long term. Storage facilities, including the expansion of Bumping Lake, have the potential to alter the downstream transport of sediments, resulting in increased deposition in the reservoir and reduced sediment loads to downstream waters. Shoreline erosion may occur along the new shorelines at the proposed Wymer Dam and Bumping Lake Reservoirs. Detailed earth-related impacts for storage facilities would be described in future site-specific geologic investigations. This information would be used to develop facility designs that minimize the potential for earth-related impacts and develop appropriate mitigation measures.

5.2.2.4 Groundwater Storage Element

The shallow aquifer recharge infiltration ponds and conveyance infrastructure are not expected to cause impacts on earth resources once construction is completed. Periodic maintenance of the ponds would be required to maintain infiltration. Erosion control measures would be employed to ensure this maintenance would not increase erosion. The surface infiltration ponds would be dry during some periods of the year and the pond area would be exposed. Because the ponds would be surrounded by berms, the potential for longer term erosion is minor. The ASR facilities are not expected to cause increased erosion following construction because no water would flow over the soil surface.

5.2.2.5 Habitat/Watershed Protection and Enhancement Element

Restoring natural functions to riparian areas and streams would stabilize floodplain function and potentially reduce bank erosion and sedimentation to streams. Changing development patterns on frequently flooded areas could restrict earth-moving and disturbance activities within these areas, lessening the sedimentation caused during periodic flooding. Protecting headwater areas would also lessen the potential for erosion by preventing or limiting land uses such as logging and road building. In general, the Habitat/Watershed Protection and Enhancement Element would likely result in beneficial effects on earth resources by reducing the potential for erosion.

5.2.2.6 Enhanced Water Conservation Element

The Enhanced Water Conservation Element is expected to have similar earth impacts as the No Action Alternative. This alternative would involve changes in conservation

practices by State entities, irrigation districts, and end users, as well as physical changes to some infrastructures elements, such as lining of irrigation ditches. Minimal landscape changes from facility upgrades and piping projects could result in localized soil instability, but this potential would be evaluated in subsequent site-specific investigations. Increased flows in some reaches of the Yakima River would increase transport of sand size material, but channel morphology would not be impacted. Where water conservation causes reduced return flows from irrigated areas, sediment transport to streams through irrigation drains would be reduced.

Long-term impacts on earth resources are not anticipated as a result of the municipal and domestic conservation program.

5.2.2.7 Market Reallocation Element

Reallocation of water resources through water transfers or water banking could potentially cause changes in land use from irrigated cropland to less water-intensive crops, fallowed land, or urban uses. Those land use changes could result in changes in erosion and sediment delivery to streams. Reduced soil erosion could occur if source areas are converted to dryland crops or fallowed land, or if areas are paved or landscaped for urban uses.

5.2.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Implementing the elements as an integrated package would result in a combination of effects including loss of earth-related resources, permanent landscape modifications, new roads, and changes in stream channel and floodplain conditions. Because the Integrated Plan elements would be implemented in a comprehensive, systemic manner, these effects are expected to be less than if the elements or projects were implemented individually. Increased coordination of project elements could help minimize overall impacts by enhancing efficiency in design, construction, and monitoring of projects.

Implementation of the Integrated Plan could disrupt the natural sedimentation process downstream of new storage facilities, as the reservoirs trap and hold sediments. Implementation of the Habitat/Watershed Protection and Enhancement Element would also likely reduce erosion potential as floodplains are reconnected and channel scouring is reduced. The protection of lands under the Habitat/Watershed Protection and Enhancement Element could reduce erosion in the watershed as a whole, as land use practices such as logging and grazing are modified to benefit the watershed.

5.2.4 Mitigation Measures

Mitigation measures to reduce sedimentation are largely related to construction and were included in Section 4.2.3. Dam safety inspections and monitoring of slopes and hydrostatic pressures would help document management strategies that are effective and identify any needed changes over the long term. Managing recharge volumes and pressures in groundwater storage aquifers to limit seepage, inventorying slopes in the

project area, and monitoring pressures in slope areas during recharge and storage would minimize potential slope instability.

Constructing facilities in accordance with applicable design requirements and monitoring to ensure that potential impacts do not develop during operation would minimize the potential for impacts. Implementation of habitat/watershed protection and enhancement projects would help to mitigate earth-related impacts throughout the basin.

5.3 Surface Water Resources

This section analyzes potential changes in timing and/or quantity of streamflows in the mainstem Yakima River and its tributaries, changes in reservoir storage and refill, and changes in deliveries to water users. The impacts were characterized using previous analyses completed as part of the Yakima River Basin Study.

One major aspect of the analysis is the use of the RiverWare model to compare results between the alternatives. RiverWare software was developed by the Center for Advanced Decision Support for Water and Environmental Systems at the University of Colorado. The software is a general river basin modeling tool that simulates operations of complex river and reservoir systems such as the Yakima Project. The software uses an object-oriented modeling approach where objects represent features in the Yakima Project such as reservoirs, streams, river reaches, diversions, and canals. Each object has its own processes and data. The objects are connected in a network that represents water flow between objects. The model is controlled by a set of prioritized rules (Reclamation, 2008f).

The Yak-RW model of the Yakima basin (which uses the RiverWare software) was originally developed as part of the Watershed and River Systems Management Program by the Yakima Field Office and Upper Columbia Area Office (now the Columbia Cascades Area Office) and has been subsequently adapted and used in the Yakima River Basin Water Storage Feasibility Study, completed from 2006 through 2008. The specific version of the model used in the Yakima River Basin Study was obtained from Reclamation's Technical Service Center (TSC), where it had been modified slightly for use in evaluating the effects of potential climate change. HDR Engineering, Inc. further modified the TSC model to incorporate the planned water conservation measures and water demand increases anticipated for the basin. This model was used to estimate water supplies, streamflows, and reservoir levels for water years 1981-2005 associated with scenarios titled "Future without Integrated Plan" (FWIP), which is synonymous with the No Action Alternative, and the "Integrated Water Resource Management Plan" (Integrated Plan).

Additional details regarding RiverWare modeling for this study are described in the *Yakima River Basin Study Modeling of Reliability and Flows Technical Memorandum* (Reclamation and Ecology, 2011k).

5.3.1 No Action Alternative

Under the No Action Alternative, various entities and agencies would undertake individual actions that could result in some positive long-term impacts on surface water resources. Despite these ongoing actions, current conditions and trends related to the timing and/or quantity of streamflows in the mainstem Yakima River and its tributaries, reservoir storage and refill, and deliveries to water users would continue. Surface water needs within the basin would not likely be met, with trends expecting to worsen as a result of continued population growth and climate change.

Ongoing programs such as YRBWEP Phase II (described in Section 2.3) include conservation measures that could include a slight increase in total water supply available (TWSA) and increases in streamflow in various Yakima River mainstem reaches and tributaries. Despite these increases, basin-wide objectives for surface water resources, as outlined in the Purpose and Need for the Action, would not be met under the No Action Alternative.

Projected improvements to instream flow through YRBWEP Phase II actions include an increase in April to September flows at the Parker gage by approximately 73,000 acre-feet, which is an average flow of about 200 cfs. That would be accomplished through water conservation measures on irrigation districts and pump exchange projects to move diversions downstream of Parker. Other projects included in the No Action Alternative could also affect surface water.

The following sections describe the RiverWare modeling that was conducted on the Integrated Plan. The No Action Alternative was used as the baseline in that modeling and the results indicate that the No Action Alternative would not meet the Purpose and Need of the project.

5.3.1.1 RiverWare Modeling Results

The No Action Alternative scenario provides a baseline condition against which the effects of the planned projects can be compared. Table 5-1 summarizes the water resources conditions under this alternative in million acre-feet (maf) (Reclamation and Ecology, 2011g).

Table 5-1 No Action Alternative RiverWare Modeling Results

Resource Indicator	No Action Alternative
Average for water years 1981-2005 (maf)	
April 1 total water supply available (TWSA)	2.79
April-September Parker flow volume	0.64
April-September diversion	1.61
September 30 reservoir contents	0.23
Irrigation proration level	80%
1993 dry-year (maf)	
April 1 total water supply available (TWSA)	2.06
April-September Parker flow volume	0.36
April-September diversion	1.42
September 30 reservoir contents	0.04
Irrigation proration level	44%
1994 dry-year (maf)	
April 1 total water supply available (TWSA)	1.74
April-September Parker flow volume	0.31
April-September diversion	1.23
September 30 reservoir contents	0.05
Irrigation proration level	21%
2001 dry-year (maf)	
April 1 total water supply available (TWSA)	1.76
April-September Parker flow volume	0.25
April-September diversion	1.29
September 30 reservoir contents	0.06
Irrigation proration level	32%
2005 dry-year (maf)	
April 1 total water supply available (TWSA)	1.71
April-September Parker flow volume	0.25
April-September diversion	1.25
September 30 reservoir contents	0.08
Irrigation proration level	28%

5.3.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

An introduction to RiverWare modeling completed for this study was presented in the introduction to Section 5.3. The elements of the Integrated Plan that were modeled together are as follows:

- Structural and Operational Changes Element;
- Surface Storage Element;
- Groundwater Storage Element; and
- Enhanced Water Conservation Element.

5.3.2.1 RiverWare Modeling Results

Table 5-2 summarizes the water resources conditions under the Integrated Plan (Reclamation and Ecology, 2011g). Detailed RiverWare model results, developed as part of the Yakima River Basin Study, are included in Appendix E. The critical conclusions related to water supply are as follows:

- Average April total water supply available would be 3.00 maf, an increase of 0.22 maf;
- Average April to September diversion would be 1.69 maf, an increase of 0.09 maf;
- Average September 30 reservoir storage would total 0.78 maf, an increase of 0.55 maf (includes all reservoirs and Kachess inactive storage); and
- Average prorationing level would be 92 percent, an increase of 12 percentage points.

For the four dry years studied, the worst conditions occurred in the third year of a three-year drought (1994). The critical conclusions related to water supply for this situation are as follows:

- Minimum April total water supply available would be 2.22 maf, an increase of 0.48 maf;
- Minimum April to September diversion would be 1.52 maf, an increase of 0.29 maf;
- Minimum September 30 reservoir storage would total 0.13 maf, an increase of 0.08 maf (includes all reservoirs and Kachess inactive storage); and
- Minimum prorationing level would be 70 percent, an increase of 49 percentage points.

Table 5-2 Integrated Plan Alternative RiverWare Modeling Results

Resource Indicator	Integrated Plan Alternative	Change from No Action Alternative
Average for water years 1981-2005 (maf)		
April 1 total water supply available (TWSA)	3.00	0.22
April-September Parker flow volume	0.60	-0.04
April-September diversion	1.69	0.09
September 30 reservoir contents	0.78[1]	0.55
Irrigation proration level	92%	12%
1993 dry-year (maf)		
April 1 total water supply available (TWSA)	2.24	0.18
April-September Parker flow volume	0.30	-0.06
April-September diversion	1.57	0.15
September 30 reservoir contents	0.46	0.42
Irrigation proration level	70%	26%
1994 dry-year (maf)		
April 1 total water supply available (TWSA)	2.22	0.48
April-September Parker flow volume	0.25	-0.07
April-September diversion	1.52	0.29
September 30 reservoir contents	0. 13[1]	0.08
Irrigation proration level	70%	49%
2001 dry-year (maf)		
April 1 total water supply available (TWSA)	2.45	0.69
April-September Parker flow volume	0.20	-0.05
April-September diversion	1.55	0.27
September 30 reservoir contents	0.42[1]	0.36
Irrigation proration level	70%	38%
2005 dry-year (maf)		
April 1 total water supply available (TWSA)	2.32	0.61
April-September Parker flow volume	0.18	-0.06
April-September diversion	1.53	0.28
September 30 reservoir contents	0.32[1]	0.24
Irrigation proration level	70%	42%

[1] – Inactive storage pool in Lake Kachess (200,000 acre-feet) is accounted for in this quantity.

The Integrated Plan Alternative includes reservoir releases to meet reach-specific target flows. During the development of the Integrated Plan, the YRBWEP Workgroup formed a subcommittee with representation from Yakima River basin fisheries interests to recommend instream flows for specific reaches of rivers and streams affected by the operation of the Yakima Project. The subcommittee recommended flow objectives for those reaches and recommended which of the reaches is the highest priority for flow modification (Reclamation and Ecology, 2011f).

The Integrated Plan operational modeling did not include all of the flow objectives prepared by the subcommittee. The Integrated Plan model also does not use all of the

water stored in new and expanded reservoirs. Increased carryover storage is provided, which would allow flexibility in operations to meet instream flow objectives. It is understood that significant additional instream benefits could be achieved by resource managers, working with Yakima Project operators, to optimize reservoir operations for both instream and out-of-stream purposes.

High-Priority Reach Results

Table 5-3 summarizes the flow objectives for the high-priority reaches and evaluates the level of success achieved in the modeled outcome from the Integrated Plan scenario. The modeling compares the Integrated Plan alternative with the baseline, or No Action Alternative. The level of success of the Integrated Plan in meeting flow objectives has been characterized as: significant improvement, minor improvement, no significant change, or could worsen.

The Yakima River tributaries are not represented in the RiverWare model, and flow improvements for the tributaries could not be modeled. Reaches with significant improvement are shown in shading. The tributaries are shown as unshaded, even though the Integrated Plan would potentially improve flow conditions and passage.

Table 5-3 Yakima River Basin High-Priority Instream Flow Needs and Modeled Outcomes by Reach

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
Yakima River, Keechelus Dam to Lake Easton	*Flow Objectives:* • Reduce flows to 500 cfs during July • Ramp flows down from 500 cfs at August 1 to 120 cfs at the first week of September • Increase base flow to 120 cfs year-round • Provide one pulse flow (500 cfs peak) in early April	High	
	Modeled Outcome: Flows are reduced below 500 cfs in July with the Integrated Plan projects. Flows are also ramped down from about 500 cfs to 120 cfs at the first week of September. From that time through March, 120 cfs is exceeded 99.6 percent of the time under the Integrated Plan compared to 20.2 percent under the No Action Alternative. Winter/Spring pulse flows would be available in most years because Keechelus Reservoir carryover storage is increased by 39,000 acre-feet on average.		Significant Improvement
Yakima River, Easton Reach	*Flow Objectives*: • Increase September and October spawning flows to 220 cfs • Increase minimum flows to 250 cfs all other times for rearing which provides connection to side channels	High	
	Modeled Outcome: November-to-March flows are above 250 cfs 98.6 percent of the time (average = 462 cfs) under the Integrated Plan compared to 64.9 percent under the No Action Alternative (average = 407 cfs). Spawning flows are held at 220 cfs from October 1-10 in 21		Significant Improvement

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
	out of 25 years under the Integrated Plan (the other 4 years are above 220 cfs) compared to 10 out of 25 years under the No Action Alternative.		
Cle Elum River	*Flow Objectives:* • Increase minimum flow to 500 cfs (previous analyses performed for Integrated Water Resource Management Alternative: Final EIS [Ecology, 2009] indicated 300 cfs could be provided so 300-500 cfs would be tested in the hydrologic modeling) • Decrease flows by 1,000 cfs beginning the first of August	High	
	Modeled Outcome: Average fall/winter flows (October-March) increased from 325 cfs for the No Action Alternative to 436 cfs with the Integrated Plan. Higher fall/winter releases up to 500 cfs minimum were tested; however, storage was depleted in most years and a minimum release of 300 cfs was used in the final model runs. Average summer (July-August) flows have decreased from 2,779 cfs in the No Action Alternative to 2,280 cfs under the Integrated Plan. The flow reduction starts earlier (July) than the objective stated by the Subcommittee. Other flow benefits of the Integrated Plan include providing spring pulse flows in nondrought years. Additional pulse flows or flow variability would be available in most years with the Integrated Plan as Keechelus and Kachess reservoir carryover storage is increased by 39,000 acre-feet (not including Kachess Inactive Storage) and Cle Elum Reservoir carryover storage is increased by 84,000 acre-feet on average.		Significant Improvement
Yakima River, Cle Elum to Teanaway River	*Flow Objective*: • Ramp flows down starting July 1 to 1,000 cfs flow rate by August 31	High	
	Modeled Outcome: Average flow in August has been reduced from 4,016 cfs under the No Action Alternative to 3,005 cfs under the Integrated Plan. Average flow on August 31 has been reduced from 3,142 cfs under the No Action Alternative to 2,174 cfs under the Integrated Plan. A flow rate of 1,000 cfs could not be attained under the Integrated Plan, but summer flows are significantly reduced.		Significant Improvement
Yakima River, Teanaway River to Roza Dam (Ellensburg Reach)	*Flow Objectives*: • Reduce flow by 1,000 cfs beginning July 1 • Reach a flow of 1,000 cfs by August 31	High	
	Modeled Outcome: Average summer (July-August) flows have been reduced from 3,204 cfs under the No Action Alternative to 2,471 cfs under the Integrated Plan. Summer flows are significantly reduced, but the objective of reaching 1,000 cfs could not be attained.		Significant Improvement
Yakima River, Roza Dam – Naches River	*Flow Objectives*: • Increase flows in the spring to a minimum of 1,400 cfs • Increase flows in the fall and winter to between 1,000 and 1,400 cfs	High	
	Modeled Outcome: Some small flow benefits accrue to this reach because of increased flow in upstream reaches. However, flows in this reach are primarily affected by diversions for hydropower.		Minor Improvement

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
	Subordination of hydropower was not modeled in this study. Additional flow would be provided and flow objectives met if subordination of Roza Powerplant flows is adopted.		
Tieton River	*Flow Objective:* • Increase minimum flows to 125 cfs from late October to April 1	High	
	Modeled Outcome: The high priority flow objective of 125 cfs in winter (November to March) was met 99.8 percent of the time under the Integrated Plan compared to 28.3 percent under the No Action Alternative.		Significant Improvement
Lower Naches River	*Flow Objectives*: • Increase minimum flow rate to 550 cfs from June 1 to November 1 • Change the ramping rates from spring to summer flows to a more gradual decline • Reduce September flows as much as possible	High	
	Modeled Outcome: Compared to the No Action Alternative, the average summer (July and August) flow has decreased by approximately 157 cfs, resulting in an average flow of 867 cfs under the Integrated Plan. However, since the lower Naches River was not targeted by reservoir operation rules the outcome of reduced summer flow appears to be a result of the model not being able to properly balance storage and flows well in that reach. Carryover storage in Rimrock and Bumping Lake Reservoirs is increased by about 207,000 acre-feet on average which would provide operational flexibility. It is expected that some of the carryover storage could be used to change the ramping rate and increase summer instream flows greater than shown in the model. The objective of reducing September flows (through changing flip-flop operations) was not achieved.		Could Worsen
Yakima River from Parker to Toppenish Creek (Wapato Reach)	*Flow Objectives*: • Provide a spring pulse of 15,000 to 20,000 acre-feet in early May in dry years • Change ramping rate at end of high flows that occur in June-July in average to wet years	High	
	Modeled Outcome: Pulse flows in dry years were not modeled, but system carryover storage is increased by 330,000 acre-feet on average. The additional storage could be used to provide pulse flows during dry years as well as flow to change ramping rates in average to wet years. In addition, storage in Wymer Reservoir is available for fisheries purposes, some of which can be used for pulse flows, although Wymer is lower in the river system. The hydrologic modeling also indicates average spring flow has increased from 3,377 cfs in the No Action Alternative to 3,578 cfs in the Integrated Plan, an increase of 201 cfs.		Minor Improvement

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
Manastash, Taneum, Cowiche	*Flow Objectives:* • Replace current diversions with Yakima or Naches River water; deliver water directly to tributaries if supply replacement is not feasible. No specific flow objectives were identified.	High	
	Modeled Outcome: Tributary flows were not addressed in the model at this time, but the KRD South Branch project included in the Integrated Plan could provide 27 cfs in Manastash and Taneum Creeks. Cowiche Creek is not addressed in the projects at this time.		Modeling not performed for tributaries
Ahtanum Creek	*Flow Objective*: • No flow objectives or augmentation alternatives were identified by the subcommittee; however summer and early fall flow issues are noted.	High	
	Modeled Outcome: Tributary flows were not addressed in the model at this time. No significant change in flow is anticipated in Ahtanum Creek under the Integrated Plan.		Modeling not performed for tributaries

The results in Table 5-3 show that the Integrated Plan would help meet high-priority flow objectives in eight of nine mainstem reaches, including substantial improvement in six of these reaches. While not modeled, it would also significantly improve flows in Taneum and Manastash Creeks. Appendix E contains figures showing flows under Integrated Plan conditions compared to No Action Alternative conditions. In some reaches, unregulated flow hydrographs are available and are plotted with the Integrated Plan and No Action Alternative hydrographs to illustrate the difference between regulated and unregulated conditions.

Lower Priority Reach Results

Flow objectives that are not high priority are shown in Table 5-4 along with a generalized evaluation of the level of success achieved in the modeled outcome from the Integrated Plan scenario as compared to the No Action Alternative. As for Table 5-3, reaches anticipated to have significant improvement in meeting flow objectives are shaded.

Table 5-4 Yakima Basin Lower-Priority Instream Flow Needs and Modeled Outcomes by Reach

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
Kachess River	*Flow Objective:* • No change proposed – Kachess River is a lesser priority for improving river flow because of other objectives	Lower	
Yakima River, Easton Reach	*Flow Objective:* • Provide spring pulse of 1,000 cfs for 48 hours during dry years, occasionally augment spring flow for channel maintenance (5 years for riparian recruitment – bankfull during wet years)	Medium	

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
	Modeled Outcome: Spring pulse flows are provided in 18 of 25 years under the Integrated Plan compared to 12 out of 25 years under the No Action Alternative. Additional storage is available in most years to provide additional pulses; in wet years, sufficient storage should be available to provide channel maintenance flows if not provided in winter.		Significant Improvement
Yakima River, Cle Elum to Teanaway River	*Flow Objectives:* • Provide channel shaping flows about every 5 years • Provide flow variability; see Cle Elum River	Medium	
	Modeled Outcome: Additional September 30 carryover storage of 123,000 acre-feet in upper Yakima reservoirs (Keechelus, Kachess and Cle Elum), on average (not including Wymer Reservoir or Kachess Inactive Storage), would allow additional pulse flow or increases in flow variability. In wet years sufficient storage should be available to provide channel maintenance flows if not provided in winter.		Significant Improvement
Yakima River, Teanaway to Roza Dam	*Flow Objectives:* • Provide channel shaping flows about every 5 years • Provide flow variability, time pulses to match natural events	Medium	
	Modeled Outcome: Pulse flows are provided from upstream reservoirs. Additional system carryover storage of 123,000 acre-feet in upper Yakima basin reservoirs would allow additional pulse flow or increases in flow variability. In wet years sufficient storage should be available to provide channel maintenance flows if not provided in winter.		Significant Improvement
Yakima River, Roza Dam to Naches River	*Flow Objective:* • Provide flow variability	Lower to Medium	
	Modeled Outcome: Subordination was not modeled, so increased flow variability could be provided when desired if subordination of Roza Powerplant flows is adopted.		Minor Improvement
Bumping River, Bumping Dam to Naches River	*Flow Objective:* • Reduce flows by 70-100 cfs from August through October	Medium	
	Modeled Outcome: Average daily flow from August through October decreased from 189 cfs under the No Action Alternative to 165 cfs under the Integrated Plan.		Minor Improvement
Tieton River	*Flow Objective:* • Reduce September flows to as close as possible to unregulated conditions	Medium	
	Modeled Outcome: Average flow in September decreased from 1,534 cfs under the No Action Alternative to 1,166 cfs under the Integrated Plan. Flip-flop could not be eliminated.		Minor Improvement
Yakima River, Naches River	*Flow Objective:* • Reduce high summer flows as much as possible	Lower	

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
to Parker	*Modeled Outcome:* The average summer flow under the Integrated Plan has decreased by approximately 215 cfs, resulting in an average flow of 3,185 cfs.		Minor Improvement
Yakima River from Parker to Toppenish Creek (Wapato Reach)	*Flow Objective:* • Link to habitat needs	No priority assigned	
Yakima River: Toppenish Creek to Prosser Dam	*Flow Objective:* • See Wapato Reach	See Wapato Reach	
Yakima River-Prosser Dam to Chandler Powerplant	*Flow Objectives:* • Need greater than 1,000 cfs in September • Although some subordination occurs to provide 1,000 cfs, need more flow in Spring	Lower	
	Modeled Outcome: Average September flow has decreased from 650 cfs under the No Action Alternative to 492 cfs under the Integrated Plan. Average flow in July increased from 682 cfs under the No Action Alternative to 758 cfs under the Integrated Plan. Average spring flows have increased by 188 cfs, resulting in an average spring flow of 2,490 cfs under the Integrated Plan. The modeling did not include subordination of Chandler Powerplant. Additional spring flow would occur if subordination is adopted. Additional storage is available for spring pulse flows (see high priority flow objective for Wapato Reach) and possibly September flow.		Minor Improvement
Lower Yakima River (Chandler Powerplant to mouth)	*Flow Objectives:* • See Wapato Reach for spring flow objective • Link summer flow objective to habitat needs	Lower	
	Modeled Outcome: Pulse flows in dry years were not modeled, but system carryover storage increased by 330,000 acre-feet on average. The additional storage could be used to provide pulse flows during dry years. In addition, storage in Wymer Reservoir is available for fisheries purposes including pulse flows.		Minor Improvement
Big, Little, Tillman, Spex Arth and Peterson Creeks	*Objective:* Increase summer and early fall flows	Medium	
Ahtanum Creek	*Objective:* Increase summer and early fall flows	Medium	
Wenas Creek	*Objective:* Increase summer and early fall flows	Lower	
North Side Kittitas Valley Tributaries	*Objective:* Improve passage	Lower	

River Reach	Desired Flow Objectives and Modeled Outcomes of Integrated Plan Alternative	Priority	Level of Success
	Modeled Outcome: Tributary flows were not addressed in the model at this time. The KRD South Branch project could improve instream flow in Big, Little and other south side creeks; however, the flow available is also needed to increase flow in Taneum and Manastash creeks, which were rated a higher priority. No change in flow is anticipated in Ahtanum or Wenas Creek with projects under the Integrated Plan. The North Branch Canal has potential to improve flow conditions and passage in the north side Kittitas Valley tributaries by restoring flow or removing irrigation water conveyance through creeks and removing diversion structures.		Modeling not performed for tributaries

The results in Table 5-4 show the Integrated Plan would help meet medium- and lower-priority objectives in 9 of 11 mainstem reaches, and improve flows in some Kittitas County tributaries. In addition, approximately 330,000 acre-feet of additional water left in September 30 carryover storage beyond the No Action Alternative carryover (on average, not including Wymer Reservoir or Kachess Reservoir inactive storage) could be used to provide additional improvement in flows, if desired.

In two reaches, the Yakima River between Roza Dam and the Naches River, and the Yakima River between Prosser Dam and Chandler Powerplant, diversions for hydropower would affect flow in the Yakima River. Flow objectives for those two reaches could be met through additional subordination of hydroelectric generation. Section 5.3.2.3 covers effects on surface water due to power subordination at these two diversions.

5.3.2.2 Reservoir Fish Passage Element

Surface water resource impacts are not expected in the long term as a result of the fish passage facilities, assuming the reservoirs would be operated in the same general manner as they are currently. Some slight modifications to the timing of storage fills and releases may be required to accommodate upstream or downstream fish passage. However, the project is not expected to affect water delivery contracts, TWSA, or flood control operations.

5.3.2.3 Structural and Operational Changes Element

Cle Elum Dam Pool Raise

Raising the pool at Cle Elum Dam is included in the Integrated Plan modeling efforts, and effects on surface water are described in Section 5.3.2.1.

Kittitas Reclamation District Canal Modifications

Lateral piping in the Kittitas Reclamation District (KRD) would conserve water by eliminating seepage and evaporation loss within the laterals (Reclamation and Ecology,

2011h). In addition, pressurized laterals would reduce the volume of water spilled at the end of the laterals, and allow the previously spilled water to be conveyed to Kittitas Valley tributaries through existing infrastructure where flow is needed.

Ecology's EIS (2009) estimated that seepage losses would be reduced by 5,312 acre-feet per year (14.9 cfs) by piping five laterals along the South Branch Canal and five laterals along the Main Canal. The estimated seepage loss reductions represent the water that would be used to supplement flows in tributaries or supplant supply to users that divert water from tributaries. The KRD diversion would not be reduced; the water saved would be conveyed through the KRD system to the water users or tributaries through existing structures. KRD currently has the structures in place to supplement flow to Taneum Creek (via the Taneum Chute) and Manastash Creek (via the Manastash Spill); therefore, no additional structures would be required at these locations.

A reregulating reservoir at Manastash Spill or other site would capture spill and increase the flow in Manastash Creek by several cfs. Pumping water directly to water users or Manastash Creek would increase flows in Manastash Creek by several cfs also.

Wapatox Canal Improvements

Improvements to the Wapatox Canal would allow for reduced diversions from the Naches River by reducing the amount of carriage water diverted to the canal (Reclamation and Ecology, 2011n). While diversions have been reduced from peak flow rates when the canal was used for power generation, records indicate that diversions to the canal (approximately 110 to 130 cfs) still exceed the 50 cfs delivered to ditch users. The current ditch configuration requires carriage water to be diverted and conveyed through the entire length of the canal and discharged at the downstream end to maintain deliveries to irrigators. The project is intended to reduce carriage water diverted to the Wapatox Canal, reduce or eliminate other canal losses, and provide sufficient capacity to allow for consolidation of other surface water diversions with the Wapatox Canal diversion. The improvements would result in reduced diversions from the lower Naches River, increased flows in the river, and opportunities for restoration of floodplain areas.

Keechelus-to-Kachess Pipeline

The Keechelus-to-Kachess pipeline project is included in the Integrated Plan modeling efforts, and effects on surface water are described in Section 5.3.2.1.

Subordinate Power at Roza Dam and Chandler Powerplants

Subordination of Roza Powerplant diversions from April to May would affect surface water. This element of the Integrated Plan Alternative would allow water to remain in the 15-mile Yakima River reach between Roza Canal and the Roza Powerplant return from April to May, the time of spring out-migration of juvenile salmonids. The amount of flow that would remain in the Yakima River is not yet determined, but recommendations for flow subordination would likely be provided by an adaptive management team each spring. The management team would consist of representatives

from Reclamation, the Yakama Nation, major irrigators, and fish agencies. Reclamation would then be responsible for implementing the flow changes.

Subordination of Chandler Powerplant diversion during the spring (April to June) would also affect surface water. This element of the Integrated Plan Alternative would allow additional water to remain in the 11-mile Yakima River reach between the Prosser Diversion Dam and the Chandler Canal return when flow in the Yakima River below Prosser Diversion Dam is below a flow threshold that is yet to be determined. The amount of flow required below Prosser Diversion Dam from April through June is currently set at 1,000 cfs. The flow increase has not yet been determined, and recommendations would be provided each spring by an adaptive management team as described above for the Roza Powerplant subordination.

5.3.2.4 Surface Storage Element

Adding surface storage through Wymer Dam, Bumping Lake Dam, and the Kachess Reservoir inactive storage projects is included in the Integrated Plan modeling efforts. Effects on surface water are described in Section 5.3.2.1 and Appendix E, which contains RiverWare modeling results showing reservoir storage volumes and levels for a long-term simulation period.

The additional surface water storage provided by this element (156,300 acre-feet in Bumping Reservoir, 162,500 acre-feet in Wymer Reservoir and 200,000 acre-feet in Kachess Reservoir) would provide sufficient water to meet water supply needs in drought years, meet high-priority flow objectives in eight out of nine mainstem reaches and meet medium and lower-priority flow objectives in nine out of 11 mainstem reaches. The RiverWare modeling performed did not address all instream flow objectives such as providing additional spring pulse flows in all years throughout the Yakima and Naches arms and shaping flow releases to better suit fisheries needs. Those additional objectives would be made possible by using the additional carryover storage remaining in Yakima Project reservoirs after implementation of this element. The RiverWare modeling demonstrated that an additional 350,000 acre-feet of storage (not including the 200,000 acre-feet of storage in the inactive portion of Kachess Reservoir) is present in Yakima Project reservoirs on September 30 in average years. In single drought years, an additional 40,000 to 160,000 acre-feet is present. That water is available to meet flow objectives not analyzed in the RiverWare modeling. The additional storage available will also provide greater operational flexibility both in the Naches and Yakima Rivers. For example, the flow release from Tieton Dam could be changed for greater fisheries benefit without reducing the reliability of water supply in the Naches River. Fisheries managers will have a much greater capability to manage flows for fisheries benefits in the Naches and Yakima Rivers.

All three reservoirs are needed to provide the flexibility of operations and the ability to meet instream flow objectives described in Tables 5-3 and 5-4. Any decrease in the reservoir capacity from the Surface Storage Element projects would reduce the instream and out-of-stream benefits described in Section 5.3.2.1.

5.3.2.5 Groundwater Storage Element

Shallow aquifer recharge is included in the Integrated Plan alternative modeling efforts, and effects on surface water are described in Section 5.3.2.1.

Aquifer storage and recovery would impact flow in the Naches River from the City of Yakima water treatment plant diversion location at RM 9.7 to its confluence with the Yakima River, and in the Yakima River from its confluence with the Naches River to the mouth.

During the winter months when demand for water is low, approximately 5,000 to 10,000 acre-feet per year would be diverted, causing a reduction in the affected reaches. If it is assumed that the diversions would occur from November to March (150 days), the estimated average decrease in flow in the affected reaches is 17 to 34 cfs.

During the summer months when demand for water is highest, the water stored through aquifer storage and recovery would be recaptured for use in the City of Yakima. The amount of water recovered would reduce the amount of water the City of Yakima needs to divert, and could result in an increase in flow in the amount of the decreased diversion in the affected reaches.

5.3.2.6 Habitat/Watershed Protection and Enhancement Element

This program contains a number of projects that may improve flow conditions in the mainstem Yakima and Naches Rivers and tributaries by providing a more natural floodplain and increased habitat complexity. The projects may reduce flood peaks by providing additional floodplain storage and reduce velocities in stream channels by providing additional off-channel conveyance areas. An increase in floodplain area could result in increased groundwater storage. Land acquisitions, designations on existing public lands, and river corridor designations would preserve or enhance upper watersheds, which would contribute to instream flow improvements.

5.3.2.7 Enhanced Water Conservation Element

Agricultural conservation is included in the Integrated Plan Alternative modeling efforts, and effects on surface water are described in Section 5.3.2.1.

The potential water savings from the municipal and domestic conservation program is 16,000 acre-feet per year in 2030 and 24,100 acre-feet per year in 2060 (Reclamation and Ecology, 2011l). The reduction in demand could result in a slight increase in surface water flow downstream of the point of diversion, for both diversions from mainstem rivers and withdrawal from wells. The effect of the municipal and domestic conservation program was incorporated into long-term demands placed into the RiverWare model. The effects on surface water are described in Section 5.3.2.1.

5.3.2.8 Market Reallocation Element

The water marketing element is designed to facilitate the transfer of existing water rights to help alleviate shortfalls in water supply for both irrigation and municipal uses. No increases in the overall water supply for the Yakima Project would result. Hydrologic conditions described for the No Action Alternative would also represent the overall hydrologic conditions for this element. The operations of the Yakima Project and individual irrigation districts or companies would constrain the amount and location of water transferred. For example, the Yakima Project operates reservoirs in both the upper Yakima River basin and in the Naches River basin. Water supply from both locations feeds the major nonproratable water users in Yakima (Sunnyside Valley Irrigation District, Wapato Irrigation Project). Water cannot be transferred from water users in one arm (i.e., the Naches River) to water users upstream in the Kittitas Valley.

Water supply conditions for certain farmers, irrigation districts, or municipal users could improve with this element. It is assumed with this element that the increase in water supply for some water users and a decrease for others would have a positive economic benefit because farms with higher-value crops or municipal users would want to purchase water from farms with lower-value crops, with the payment covering the foregone revenue from the farms with lower-value crops.

Initially the water reallocation element would continue existing water marketing and banking strategies that involve water users and Ecology, and reduce barriers to water transfers (Reclamation and Ecology, 2011j). When combined with the other elements in the Integrated Plan, approximately 30,000 acre-feet of water would be traded within districts. This could slightly increase surface water flow in the mainstem Yakima River between the point of diversion for the seller and the buyer. The relative effect on flows would be small. If the seller is located on a tributary, the relative effect on surface water could be much greater and beneficial to instream resources on the tributary.

If trading between districts is allowed, it is estimated that 60,000 acre-feet of water would be traded within districts and 60,000 acre-feet of water would be traded between districts. In one scenario described in the *Market-Based Reallocation of Water Resources Technical Memorandum* (Reclamation and Ecology, 2011j), Roza Irrigation District would receive about 20,000 acre-feet from KRD and about 38,000 acre-feet from Sunnyside Valley Irrigation District. If it is assumed that the trading occurs for 60 days during August and September, an additional 168 cfs of water would be in the Yakima River between RM 202.5 (KRD Main Canal diversion) and RM 127.9 (Roza Canal diversion), and a reduction of 633 cfs of water in the Yakima River would occur between RM 127.9 (Roza Canal diversion) and RM 103.8 (Sunnyside Canal diversion). Other water marketing efforts would result in effects similar to those described for the near-term effort.

5.3.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

The major surface water impacts of the Integrated Plan were described in Section 5.3.2. Improvements in water supply are reflected in increases in TWSA, end-of-season reservoir storage, and annual diversions compared to the No Action Alternative. In dry years, the increases in annual diversions are substantial. A prorationing level of 70 percent was achieved throughout an extended drought lasting three years, such as the 1992 to 1994 drought. The Integrated Plan would help meet high-priority flow objectives in eight of nine mainstem reaches, and provide substantial improvement in six of these reaches. Instream flows in 9 of 11 other reaches that are not high priority would improve. Significant improvement in flows in Taneum and Manastash Creeks would also result. Other smaller tributaries would also benefit from increases in instream flow.

5.3.4 Mitigation Measures

More detailed, site-specific studies of the alternatives are required to better determine their impacts and benefits and the amount of mitigation that might be required. Those studies would include:

- Seepage studies on irrigation canals that would be lined or piped;
- Operational studies on irrigation facilities to determine the amount of water that could be conserved;
- Groundwater studies to better characterize the amount of water that would return to surface water from the Groundwater Storage Element; and
- Studies to better estimate the potential for large-scale water transfers to benefit irrigation water supply for some water users.

Additional RiverWare modeling would also be required to better understand the impact on Yakima Project operations. Studies of the impact on return flow from irrigation conservation measures are also recommended to assist Reclamation in modeling the impact of conservation measures.

No additional mitigation measures are proposed because the impacts are not expected to be significant and would be offset by the benefits of the elements within the Integrated Plan.

5.4 Groundwater

Impacts on groundwater quantity could result from changes in recharge to groundwater aquifers, or increased groundwater pumping. Impacts could be significant if they change groundwater levels in aquifers used for agricultural or municipal supply wells enough to change the usability of the wells or the amount of pumping energy needed. Impacts

could also be significant if they greatly increase or reduce the amount of return flows from groundwater to streams. Impacts on groundwater quality could occur if poorer quality water enters groundwater aquifers being used for municipal or domestic supply, particularly if the levels of nitrates or bacterial contamination change.

5.4.1 No Action Alternative

Ongoing habitat improvements (described in Section 2.3) could have a slight positive impact on groundwater resources (quantity and quality) in the immediate area of the affected lands, but to a much lesser extent than provided under the Integrated Plan Alternative. In general, fish habitat improvement projects would improve near-channel groundwater interaction and connectivity between stream channels and shallow/hyporheic groundwater. At the basin-scale, ongoing projects would be limited in scope and geographic influence when compared to those that would occur under the Integrated Plan Alternative.

Overall, existing groundwater levels would likely continue to decline under the No Action Alternative. Deficiencies in irrigation water availability from surface water sources may increase pressure for demand on groundwater. If deficiencies in irrigation water lead to an increase in conversion from agricultural irrigation to residential use, overall net water use may decline (since municipal and domestic use is typically lower than agricultural use, on a per acre basis). However, increased rural residential development may cause an increase in new permit exempt wells, resulting in additional pressure on groundwater resources in some areas. There could be a limit to this groundwater use if temporary moratoria on new groundwater wells are established to address depleted groundwater, similar to the current moratorium in upper Kittitas County. Continued issuance of permits for emergency use of groundwater wells in drought years could also result in overuse of groundwater.

Implementation of agricultural conservation projects under YRBWEP Phase II would lead to changes in the timing and volume of irrigation recharge and subsequent groundwater return flow. In general, conservation projects is expected to decrease groundwater recharge from irrigation and this would result in lowered water tables, reduced water levels in area wells, and reduced discharges to local rivers, creeks and wetlands.

5.4.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Long-term impacts on groundwater may occur during the operation of constructed facilities. More groundwater recharge due to increased water supply deliveries may raise aquifer levels, thus increasing discharge to streams and resulting base flows. Reducing groundwater irrigation withdrawals and increasing infiltration may also increase groundwater levels. Enhanced water conservation systems (including lining canals, converting canals to pipelines, converting to sprinkler irrigation systems, and increasing operational efficiency) would reduce applied irrigation water and reduce groundwater infiltration and shallow groundwater levels. Overall impacts on groundwater at the

project scale may be positive or negative, depending on the specific details of the projects. The groundwater impacts for specific projects would be described in detail in future site-specific investigations.

5.4.2.1 Reservoir Fish Passage Element

No long-term impacts on groundwater are expected from the operation of constructed fish passage facilities because the facilities would not change the amount of water released from reservoirs or streamflows. Therefore, there would be no change in groundwater recharge.

5.4.2.2 Structural and Operational Changes Element

Releasing additional volumes for streamflow augmentation during dry seasons would have a limited long-term impact on regional groundwater conditions. Shallow groundwater in close connection with streamflows could be improved by streamflow augmentation. Improvements in irrigation conveyance facilities would reduce seepage from canals and decrease localized groundwater recharge and shallow groundwater interception, with a resulting decrease in groundwater levels. No significant impacts on groundwater quality are anticipated as a result of the operation of structural changes.

The increased pool elevation at Cle Elum Dam would likely increase seepage locally and slightly raise groundwater elevations in the immediate vicinity of the reservoir. This is not expected to create adverse effects since the change would be small (3 feet) and there are no known high groundwater issues in the immediate vicinity.

Efficiency improvements in KRD canals would reduce leakage that provides recharge to aquifers immediately underlying the canal system. Ancillary effects may include lowered water levels in local wells, and reduced groundwater discharge to local wetlands and creeks. It is anticipated that streamflow impacts would be offset in those creeks that receive enhanced flows.

Efficiency improvements to the Wapatox Canal would reduce leakage that provides recharge to aquifers immediately underlying the canal system. This may result in lowered water levels in local wells and reduced groundwater discharge to local rivers, wetlands and creeks.

No long-term effects on groundwater are expected from the Keechelus-to-Kachess pipeline or power subordination projects because changes would be small compared with the overall water balance in the vicinity of these projects.

5.4.2.3 Surface Storage Element

Operating new storage would permanently increase groundwater levels near new reservoirs. Increased infiltration beneath the reservoir would likely occur. The magnitude of impacts on water levels would depend on the size and depth, the hydraulic head created, and local hydrogeologic characteristics. Additionally, use of borrow

material for construction could locally increase seepage or infiltration rates in the borrow areas. Higher groundwater levels could occur in the immediate vicinity of the reservoir, and larger scale changes in groundwater flow patterns are possible.

Based on geologic testing conducted at the Wymer Dam site, the high permeability of the surficial rock layers and sediments could result in large amounts of seepage to groundwater. Grouting or importation and lining with clay materials may be necessary to avoid excessive infiltration of stored reservoir water. More detailed hydrogeologic studies would be required to estimate the extent of impacts on local groundwater.

The Kachess inactive storage project would result in overall lower water levels in the reservoir during certain years, potentially causing less infiltration of stored water and local groundwater level impacts. More detailed hydrogeologic studies would be required to estimate the extent of impacts on local groundwater.

Because new storage would result in additional surface water deliveries, especially during dry years, increased infiltration and reduced demand on groundwater for irrigation may also increase groundwater levels in certain irrigated areas of the Yakima River basin. However, most large irrigation wells are completed in the deeper basalt aquifer. Therefore, reduced pumping of groundwater would not likely affect shallow aquifer groundwater levels. No significant impacts on groundwater quality are anticipated as a result of the new storage facilities, although increased recharge from higher irrigation deliveries could result in slightly higher return flows and contribute additional, cooler groundwater return flow to streams, especially during dry years.

5.4.2.4 Groundwater Storage Element

Changes in groundwater elevations and groundwater flow directions in shallow aquifers could result from surface infiltration associated with both shallow aquifer recharge and (to a lesser extent) ASR. Groundwater elevations near the surface infiltration sites would have the largest near-term, seasonal change. The impact of these changes would be generally positive, with an increase in shallow groundwater discharge to streams and wetlands. Negative impacts could include waterlogged soils or unwanted shallow groundwater and seepage with the potential to delay spring growth or access to fields for plowing or planting. Impacts to septic systems and drainage facilities are also possible. Long-term groundwater level changes could result from interannual return flows that are stored in the aquifer for a longer period of time. These changes would accrue slowly from year to year, depending on the cumulative amount of water infiltrated to shallow aquifers and the ability of the aquifer to discharge that infiltration to the stream in a given year. Because the quality of the surface water being infiltrated is generally good, no significant impacts on groundwater quality are anticipated as a result of the new storage facilities, although increased seepage could contribute additional cooler water to streams near the storage projects, improving surface water quality. Site-specific investigations conducted as part of the pilot studies would determine the potential for impacts on groundwater. Potential surface infiltration sites found to adversely impact existing land use would be avoided or the impacts would be mitigated.

5.4.2.5 Habitat/Watershed Protection and Enhancement Element

Watershed protection and habitat protection could have a slight positive impact on groundwater resources (quantity and quality) in the immediate area of the affected lands. Projects such as stream channel protection and restoration, wetlands and wet meadows construction, and floodplain enhancements would allow natural riparian functions to return, with resulting improvements in shallow groundwater quantity and quality. Mainstem and tributary enhancement projects could alter floodplain and off-channel storage connectivity, potentially resulting in long-term changes to groundwater interaction with streams. In general, improvements to fish habitat would also improve near-channel groundwater interaction and connectivity between stream channels and shallow/hyporheic groundwater. Slight, positive impacts on groundwater quality are also likely.

5.4.2.6 Enhanced Water Conservation Element

The impacts from irrigation conservation and improved efficiency would include changes in the timing and volume of irrigation recharge and subsequent groundwater return flow. In general, groundwater recharge from irrigation is expected to decrease, and this would result in lowered water tables, reduced water levels in area wells, and reduced discharges to local creeks and wetlands. No impacts on groundwater quality are anticipated.

Impacts from the municipal conservation program would depend on whether total consumptive use is changed and whether future groundwater demand is changed. Ultimately, it is likely that the same amount of municipal and domestic groundwater would be used (up to existing water rights), but conservation efforts may, for example, increase the relative magnitude of consumptive use compared to the current condition. In the near term, water conservation could tend to stabilize groundwater levels in the deeper producing aquifers. No impacts on groundwater quality are anticipated.

5.4.2.7 Market Reallocation Element

Market reallocation could result in less agricultural irrigation in areas transferring water and more irrigation in areas receiving water, especially during drought years when transfers are expected to be the most active. This would reduce groundwater recharge in those years in some areas, and increase recharge in other areas. Market transfers may also reduce the need for emergency pumping of groundwater in some irrigated areas by providing improved access to surface water supply in proratable districts.

5.4.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Groundwater levels and quantity are expected to increase through additional recharge from irrigation deliveries made from storage facilities, groundwater recharge enhancement, riparian enhancements, wetland and wet meadow construction, and floodplain enhancements. Decreases in recharge are expected from enhanced

conservation (improving conveyance facilities and increasing application efficiencies). No impacts on groundwater quality are anticipated.

5.4.4 Mitigation Measures

Long-term impacts on groundwater could be avoided or mitigated by conducting hydrogeological studies and using the knowledge gained in the design, construction, and implementation of projects. The benefit of these studies would depend on the type and magnitude of projects and the extent of study.

The timing of operational activities could be used to reduce the impact on groundwater. Additionally, the use of artificial recharge or withdrawal could be considered as part of the impact management strategy. Monitoring during operations would document the effectiveness of management strategies.

Where local water supply wells are affected by lowered water tables due to conservation projects, mitigation measures could include extending wells to greater depths.

5.5 Water Quality

Long-term potential impacts on water quality were evaluated based on an understanding of local, State, and Federal permits and requirements for regulating water quality in Washington. The Integrated Plan is designed, in part, to improve streamflows in various parts of the Yakima River basin. Improved streamflows generally are expected to improve water quality conditions. However, in localized areas some of the projects included in the Integrated Plan could potentially impair water quality.

5.5.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Ongoing projects would provide some benefits to water quality by improving riparian areas and floodplain habitat in certain areas, but benefits would be expected to be localized and would likely provide only minor overall benefits to the basin. Ongoing programs to improve fish habitat could result in a beneficial increase in nutrient concentrations in those streams if fish populations increase. In the absence of surface water storage projects, current trends related to increased stream temperature conditions on a seasonal basis could continue.

5.5.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Components of the Integrated Plan are intended to provide net water resource and water quality benefits. However, some impacts on water quality could occur. Potential water quality impacts include: modification of water surface and groundwater quality, migration of contaminated soils located in newly inundated areas to surface or

groundwater, and leaching and migration of subsurface natural and artificial contaminants.

In general, the Integrated Plan is not expected to affect 303(d) listings (Table 3-12). Habitat/watershed protection and enhancement projects and increased streamflows may improve stream temperatures. Existing reservoir releases would continue to provide cool water to downstream surface waters. Wymer reservoir may have the potential to increase temperatures of downstream surface waters at certain times of the year (late summer/early fall); however, the dam and reservoir would be designed to be operated to minimize and mitigate temperature impacts.

5.5.2.1 Reservoir Fish Passage Element

Seasonal operation of the constructed fish passage elements is unlikely to result in significant changes in water quality because this element simply routes water through the fish passage facility rather than the existing facilities. Because of this, operation of the bypass facilities is not likely to have any direct effect upon water quality.

Increases in nutrient concentrations could result if fish populations increase and more nutrients are released from decaying fish carcasses. These nutrient releases are anticipated to be beneficial, but excessive releases could have negative impacts. Fish carcasses are an important source of nutrient inputs to streams and increase the biomass available to the benthic invertebrate community. Adult fish carcasses and associated nutrients are beneficial for juvenile salmonid productivity and consistent with the beneficial uses that the surface water quality standards are designed to attain.

However, the introduction of adult salmon above the reservoir would, as intended, indirectly increase the nutrient content of the water, thereby increasing primary productivity. This may ultimately influence water quality characteristics such as water clarity and contribute to algal growth, especially within the reservoir. The decay of algae may reduce dissolved oxygen levels within the reservoir.

None of the other 303(d) water quality parameters are expected to substantially change. New spill gates and outflow structures could potentially influence the entrainment of air into the water and thereby affect total dissolved gas levels.

5.5.2.2 Structural and Operational Changes Element

One of the objectives of the proposed structural and operational changes is to maintain or improve water quality. These projects are designed to improve streamflows in the Yakima River and its tributaries, and they are unlikely to negatively impact stream temperatures and associated dissolved oxygen concentrations. The magnitude of changes to water quality has not been quantified, but would be a function of the location and seasonal timing of flows released as a result of the changes. Minor changes to turbidity, organic debris, sediment, and nutrients may occur, although these changes would reflect an increase in natural system processes.

The Cle Elum pool raise project may increase nutrients and sediment load in the reservoir. However, the shoreline protection measures included in the project and the limited duration of the increased inundation would reduce those impacts.

Keechelus Reservoir is listed on the State's 303(d) list for dioxins and PCBs. The Keechelus-to-Kachess pipeline would transfer water possibly containing these pollutants to Kachess Reservoir and may impact aquatic communities and fisheries. It is anticipated that the amount of water piped to Kachess Reservoir via this pipeline would be a relatively minor contribution to the overall reservoir water volume; thus the impacts to water quality are expected to be minimal.

5.5.2.3 Surface Storage Element

The extent of impacts associated with new storage would depend on the size and location of the facility. Long-term impacts could include seasonal increases in downstream sediment loading, decreased downstream turbidity, increased or decreased downstream temperature, and increased pollutant accumulation in the impounded water.

Water quality can be affected by the impoundment of water, the depth from which water is withdrawn from reservoirs, modifications to the flow regime, and other changes to the natural hydrology. Impounding water tends to increase water temperatures and can reduce dissolved oxygen levels. These adverse effects may be transported downstream. Release of water taken from near the surface of a reservoir tends to transport warm, well oxygenated water downstream. The release of water taken from deeper in the reservoir can transport cooler, low dissolved oxygen water downstream depending on reservoir conditions.

The Wymer Dam project is intended to improve instream flows in the Yakima River and provide drought relief storage. Water would be pumped into the reservoir from the Yakima River during winter, spring, and potentially summer, during high-flow periods from upstream reservoir releases. CE-QUAL-W2 temperature modeling was conducted for the proposed Wymer Dam in the 2008 Yakima River Basin Water Storage Feasibility Study Final PR/EIS (Reclamation, 2008g). The modeling indicated that during June and July in wet, average, and dry years, Wymer Dam release temperatures would be cooler than those of the Yakima River. During late August in wet and average years, Wymer reservoir releases would approach Yakima River temperatures. During late August in dry years, Wymer reservoir releases would be warmer than those of the Yakima River and could cause temperature increases of approximately 1°C in the Yakima River. At low Wymer reservoir elevations during September, warm surface waters could be discharged to the Yakima River; therefore, Reclamation anticipates limiting releases in September in dry years to reduce temperature impacts. The Integrated Plan would provide greater operational flexibility that would allow Reclamation to avoid warm water releases in late summer months (Reclamation, 2008g). Operation of the dam would need to be mitigated through operational strategies and multiple flow release elevations. A small release of water to Lmuma Creek would occur to maintain streamflow and habitat between Wymer Dam and the Yakima River. The impacts on stream temperature would be similar to that described for the Yakima River.

If water from Wymer Reservoir is conveyed through pipelines to the Roza Canal headworks, then effects on Lmuma Creek and/or the Yakima River would be avoided or greatly reduced.

Enlargement of Bumping Lake Reservoir would inundate up to 3,200 acres of land, of which 1,300 acres are in the existing reservoir. The reservoir would extend approximately 5 miles upstream and create approximately 14 miles of shoreline. The overall operation of the reservoir would be maintained, with most of the drawdown occurring in the fall irrigation season. The enlarged reservoir has the potential to cause warmer surface water temperatures in the late summer and fall because of the increased surface area exposed to solar warming and the potentially longer residence time of the impounded water. The majority of the lake volume (middle and deep layers) would probably not warm to a significant level because its decreased density would prevent mixing into the deeper and more dense water strata. Increased water temperatures downstream in the Bumping River could adversely impact native fish which generally prefer cooler water. Warmer stream temperatures could also delay upstream migration. The potential impacts of increased temperature of the water released downstream could be mitigated with dam design and operational practices.

The Kachess Reservoir inactive storage project would modify the outlet to Kachess Reservoir to allow it to be drawn down approximately 80 feet lower than the current outlet. This additional drawdown would only be used during drought conditions. If the inactive storage drawdown occurs late in the irrigation season, the additional exposure of the lake surface to solar warming would presumably result in warmer water being released downstream into the Kachess and Yakima Rivers. Turbidity may increase in reservoir surface waters during inactive storage drawdown from wind-driven entrainment or sloughing of sediments into shallow surface waters. These potential impacts to lake water quality could be transmitted to the Kachess and Yakima Rivers. However, reservoir operation, intake location, flow pattern changes, and the depth of water withdrawn from the reservoir have the potential to mitigate these potential impacts. Furthermore, these potential impacts are only relevant during drought years that would necessitate the use of Lake Kachess inactive storage.

Recreational boating use, if allowed, on the new or enlarged reservoirs could also add oils and greases from watercraft, nutrients, or invasive aquatic species introduced by boats.

5.5.2.4 Groundwater Storage Element

The different types of groundwater storage elements would have different effects on water quality. Potential maintenance activities would require the use of machinery and would increase the potential for spills of hazardous materials including fuel and oils, although these risks could be minimized by conducting maintenance and fueling of the equipment offsite. Additionally, potential ground disturbances would impact water quality.

With shallow aquifer recharge, surface water would be infiltrated in groundwater aquifers for storage and later release. Some potential projects would contribute to shallow

aquifers that may seep into the Yakima River, its tributaries, and the canal system. Changes in groundwater quality in affected shallow aquifers could occur from water from the Yakima River that is infiltrated to groundwater. Although specific locations and sizes of surface ponds have not been identified, a study was done to evaluate the potential effects of using this approach (Ecology, 2007a). The results indicated that the recharge water would tend to increase the concentrations of nitrates along with other water quality constituents, and the magnitude of these increases would depend on the ratio of the seepage rate to streamflow. The temperature of infiltrated water would affect the shallow aquifer groundwater temperatures. The pilot studies would be coordinated with Ecology to ensure no impacts occur to groundwater quality.

With ASR projects, potable water would be pumped into a deep confined aquifer and recovered later by pumping. Since this approach should have negligible effects on the groundwater table outside of the confined aquifer, it should have few effects on water quality beyond the confined area. Aquifer storage recovery studies indicate that metal concentrations could increase slightly while the water is stored in the deep basalt geologic formation, and that the concentration of coliform bacteria, an indicator of human pathogens, could be occasionally increased (Ecology, 2007a).

5.5.2.5 Habitat/Watershed Protection and Enhancement Element

Riparian and wetland habitat enhancements would help remove instream contaminants and cool the water. Conversely, inundation of lands for habitat restoration, wetland or wet meadow creation, and floodplain connectivity could result in the introduction of chemical constituents to surface waters. Contaminated lands would be remediated to protect water quality.

Preserving and enhancing watershed functions through land acquisition, public land designations, and river corridor designations would protect water quality, contribute to cooler water temperatures, and reduce sedimentation. Acquisition and preservation of the upper reaches of the Teanaway, Manastash, Taneum, and Little Naches rivers would help maintain water quality and cool temperatures within those streams.

5.5.2.6 Enhanced Water Conservation Element

The primary focus of this element would be improving the efficiency of irrigation systems in the Yakima River basin. It is possible that the entire amount of conserved water would remain in the source streams during non-drought years. However, much of the conserved flow would be used by parties with proratable water rights during drought years. The amount of water that can be conserved in drought years is less than in non-drought years. Water conservation could increase nutrient concentrations in drains and wasteways as less water is discharged to those drains and wasteways, reducing dilution that currently occurs. Nutrient loading would remain the same or slightly decrease as some of the conservation measures could include on-farm reductions in the volume of water applied, thereby reducing return flow from farms. Less flow in drains and

wasteways could also reduce bank erosion, reducing the amount of sediment transported to the Yakima River.

Water quality impacts from the municipal and domestic conservation program are expected to be minimal. Flow pattern changes resulting from municipal and domestic conservation are expected to have minimal effects on water quality because overall changes in surface and groundwater hydrology are expected to be relatively small.

5.5.2.7 Market Reallocation Element

Implementation of water markets or water banks could alter the use of water and thereby affect water quality in the basin. The water quality effects would depend on the volume of water and its uses and locations. Generally:

- Increases in municipal uses could increase the potential for water quality degradation by supporting increased urban development. The extent and location of any degradation would depend on the type and location of use.
- Increases in instream flows would tend to modify water quality including water temperature, dissolved oxygen, and turbidity. Effects would depend on the location, volumes, and sources of increased instream flows.

5.5.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

The Integrated Plan is designed to provide an overall net benefit to water quality by improving streamflow conditions, riparian areas, and floodplain habitat in the basin. Coordinating these activities under the Integrated Plan would facilitate better overall management of water quality. The Habitat/Watershed Protection and Enhancement Element would protect the headwaters of streams and provide overall water quality benefits.

Localized impacts on water quality may occur, particularly with regard to temperature conditions in late summer and early fall immediately downstream of surface water storage projects. In addition, contamination of soils in some locations could affect water quality if floodplain restoration projects are carried out in those areas.

5.5.4 Mitigation Measures

Local long-term effects on water quality are possible for some of the elements, but they would be mitigated with both local measures and net benefits from changes in the operations of the system. Water quality impacts could further be mitigated through evaluations that consider site-specific characteristics to aid in design and selection of individual projects.

In most cases, the potential for water quality impacts would be mitigated by following the permit requirements for the construction and operation of the project. Project design and

permitting would occur within the existing total maximum daily load (TMDL) implementation framework.

Monitoring reservoir and downstream water quality would document the effectiveness of water quality management strategies. Long-term adaptive management plans and monitoring would be beneficial for maintaining and enhancing water quality. Reservoir operational practices related to the timing and volume of storage releases can be structured to mitigate water quality impacts. All long-term operational activities that relate to individual projects would require monitoring and approval to meet local, State, or Federal regulatory requirements for water quality. Ecology is the lead agency in charge of administering and enforcing the various rules and regulations governing water use and water quality in the State of Washington. Ecology's Water Quality Program is responsible for reviewing plans before construction to ensure all State and local water quality standards and requirements are met.

5.6 Hydropower

5.6.1 No Action Alternative

The No Action Alternative is not expected to have long-term impacts on hydropower because no changes in flow through hydroelectric facilities are currently proposed for the ongoing projects listed in Section 2.3.

5.6.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.6.2.1 Reservoir Fish Passage Element

The fish passage element is not expected to have long-term impacts on hydropower because no changes in flow through existing hydroelectric facilities would occur.

5.6.2.2 Structural and Operational Changes Element

The only proposed project that would affect hydropower is the subordination of power at the Roza Dam and Chandler Powerplants. The other projects would not affect the amount of flow through any hydroelectric facility.

Water is currently diverted from the Yakima River to produce power at Roza and Chandler Powerplants. Power subordination occurs when some or all of the water that could otherwise be diverted for power production is instead left in the river to provide instream flow benefits for fish. Reclamation's Yakima Field Office Manager is responsible for operation of the Yakima Project including the timing and amounts of water released from the Project's storage reservoirs. The Project manager consults with basin interests to determine the appropriate level of power subordination that is needed to maintain adequate fish and aquatic habitat in the Yakima River system. The Integrated

Plan includes a proposal for more power subordination to provide instream flow benefits for fish. The level of this additional subordination is under discussion.

Further power subordination of the Roza and Chandler Powerplants must be assessed relative to the economic and operational impacts for the Roza and Kennewick Irrigation Districts, Reclamation, and the Bonneville Power Administration (BPA). Reduction of power production at the Chandler Powerplant affects the amount of power available for distribution in the power grid, and could affect operation and maintenance of the pump turbines used to deliver water to the Kennewick Irrigation District. The implications for reduction of power production at the Roza Powerplant could include changes in the amount of power being provided from the Roza Powerplant for irrigation district pump stations, and less power available in determination of the irrigation district power rates.

Based on data supplied by Reclamation for power production at both powerplants from 1988 to 2010, which generally represents the current level of subordination, an average of approximately 107,000 megawatt-hours (MWH) of energy is being produced each year. The Roza Powerplant contributes approximately 61,000 MWH to this total and the Chandler Powerplant supplies the remaining 46,000 MWH.

Further subordination for biological benefits would involve reduced operation of the Roza and Chandler Powerplants in the spring. Specifically, Roza would not be used to produce power in April and May, and Chandler would not be used to produce power in April, May, and June.

Based on the historical data supplied by Reclamation, this would result in an average of approximately 82,000 MWH of annual power production from the Roza and Chandler Powerplants – with Roza contributing 47,000 MWH and Chandler contributing 35,000 MWH to that total. This would represent a reduction of 25,000 MWH annually from current conditions. However, a plan for further subordination has not been agreed to by the stakeholders, and the estimate of power production may change based on the final operation schedule for the powerplants, the ability to schedule maintenance or replacement activities (that have historically interrupted power production at other times of the year) during the selected time, and the need for power at the plants while they are not producing power (i.e., the plants become a power consumer rather than a power producer).

The following assumptions were used to determine the amount of subordination required. For subordination at the Chandler Powerplant, target flows in the Yakima River at the Prosser gauging station are as follows:

- April 1 through June 30 – 1,000 cfs
- June 30 through October 20 – 450 cfs
- October 20 through April 1 – 800 cfs

For subordination of the Roza Powerplant, target flows in the Yakima River immediately below the Roza Diversion are as follows:

- Minimum flow – 400 cfs
- Spring flows – 1,200 cfs (the exact timing of this requirement is subject to review and change depending on flow conditions in a specific year)

Table 5-5 provides a summary of the estimated average annual energy production for the Roza and Chandler Powerplants with and without additional subordination.

Table 5-5 Estimated Energy Production for Roza and Chandler Powerplants

Location	Average Head (ft)	Average Flow (cfs)	Max Flow (cfs)	Average Annual MW Hours
Roza Powerplant	158	N.A.	1077	61,000
Chandler Powerplant	118	N.A.	1470	46,000
Total				107,000
Roza Powerplant (without April and May production)	158	N.A.	1077	47,000
Chandler Powerplant (without April, May and June production)	118	N.A.	1470	35,000
Total				82,000

The level of subordination summarized in Table 5-5 may make continued operation of the Roza and Chandler powerplants more costly. The current production costs are approaching market rates for power and could affect the plants' competiveness for capital improvement funds from the BPA. Any further subordination may cause the cost of production to exceed that.

5.6.2.3 Surface Storage Element

The Surface Storage Element could create additional opportunities for hydropower generation in the Yakima River basin at the new Wymer Reservoir, the expanded Bumping Lake Reservoir, the Kachess inactive storage site (if the tunnel option is used), and the Keechelus-to-Kachess pipeline. However, at this time construction of power recovery facilities at these sites is not included as part of the Integrated Plan. It is anticipated the projects would be constructed in a way that allows future addition of power recovery facilities.

Use of increased storage capacity in the basin would result in increased releases of stored water during some years and seasons, and diversion or retention of water to refill the

reservoirs during some years and seasons. This would alter flows somewhat in river reaches downstream of the new storage facilities, including the Kachess, Yakima, Bumping, and Naches Rivers. Alteration of flows could potentially change the flows available for power production at some hydropower facilities, increasing the flows at some times and decreasing them at other times. Since refilling of the new reservoir capacity would offset releases from storage, the net effect over time within the Yakima basin would essentially be zero.

The increased water supply deliveries that occur within the Yakima River basin could cause a slight reduction in the amount of hydropower generated at dams on the Columbia River below the confluence of the Yakima River—McNary, John Day, The Dalles, and Bonneville Dams. Modeling conducted during development of the Integrated Plan indicated that Yakima River flow at the river mouth would decline less than 1 percent on average. Also, because the Yakima River is much smaller than the Columbia River, this average flow change would be insignificant in the context of Columbia River flows. Any impacts due to timing changes would depend on the operation of the new storage, but hydropower generation could decrease slightly in the winter and spring as new reservoirs are filled, and increase slightly in the summer as flow is released out of storage to improve streamflow. Streamflow releases may be higher in dry years, in which case hydropower generation increases would be higher in dry years as well. If the water stored for irrigation is only used during drought years, a reduction in hydroelectric generation may only occur in years when the reservoir is refilling after being used for irrigation water supply. These changes are expected to be small compared to the current amount of hydropower generation occurring at these four dams.

5.6.2.4 Groundwater Storage Element

The Groundwater Storage Element would not have long-term impacts on hydropower because no changes in flow through existing hydroelectric facilities would occur.

5.6.2.5 Habitat/Watershed Protection and Enhancement Element

This project would not have long-term impacts on hydropower as the project would not change flow through any existing hydroelectric facility.

5.6.2.6 Enhanced Water Conservation Element

The operations of the existing hydropower plants in the Yakima River basin may be slightly affected by agricultural water conservation. The potential effects could be a reduced amount of power generation at the powerplants in the Wapato Irrigation Project (WIP) in most years, if water conservation measures reduce the flow in the canals and through the powerplants. If flow rates in the canals are maintained at the levels prior to conservation, then no change in power generation would result. A slightly increased amount of power generation could result at those powerplants during drought years as the reliability of water supply increases with agricultural conservation, and higher flows could occur in the canals.

The municipal and domestic conservation program would have a minimal effect on hydropower. Total municipal savings under the Integrated Plan are approximately 22,000 acre-feet annually, which is less than 1 percent of the annual yield of the Yakima River basin. In addition, municipal and domestic water use is minimally consumptive, and most of the flow returns to the river relatively quickly.

5.6.2.7 Market Reallocation Element

The long-term impacts of increased market reallocation would depend on the location of the lessor and lessee of water. If the transfer of water is to farmers in the WIP during drought years, some increase in hydropower generation is possible for those years. Otherwise, the impacts would not likely be different than the No Action Alternative or the current operation.

5.6.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Implementing the elements under the Integrated Plan Alternative as an integrated package would result in a combination of effects including a reduction of hydroelectric generation at the Roza and Chandler Powerplants and at the Drop 2 and Drop 3 powerplants in the WIP. A slight reduction in hydroelectric generation at dams along the Columbia River would occur when a new reservoir is refilling after the irrigation portion of the water stored is used during a drought year. While power recovery facilities are not included in the Integrated Plan, they could be constructed at several facilities in the future if economic conditions are favorable.

5.6.4 Mitigation Measures

Further power subordination at the Roza and Chandler Powerplants would substantially impact the amount of energy produced by hydropower in the Yakima basin. This reduction in hydropower generation in the basin would likely have substantial economic and operational impacts on the Roza and Kennewick Irrigation Districts, Reclamation, and BPA. Mitigation measures may be required to compensate for these impacts, such as purchase of power to replace the lost power and/or financial compensation to the affected parties. In addition, any changes in hydropower generation would be coordinated with BPA, Reclamation, and other affected agencies.

5.7 Fish

5.7.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. While ongoing conservation programs and habitat improvements would provide some benefits to fish populations in affected streams, streamflow conditions in the basin would likely worsen overall, affecting migration, spawning, and rearing conditions for anadromous fish in the basin. The No Action

Alternative provides little flexibility in operations to meet instream flow needs for anadromous species. Further, this alternative would not result in the benefit of a comprehensive and coordinated program of water resource and habitat improvements.

Ongoing projects, although beneficial, would provide slow and partial progress in addressing the fish habitat and related water resource problems of the basin. Under this alternative, no new water storage would be developed and only minor improvements to existing facilities would occur. Without water storage and modifications to existing water diversion structures and operations, poor streamflow conditions are likely to continue and potentially worsen. Overall, ongoing projects are likely not sufficient to overcome the problems of depleted streamflow conditions needed to support certain fish populations and healthy, functional ecosystems in the Yakima River basin. Piecemeal implementation of individual projects may result in localized improvements, however, broader restoration and enhancement goals are less likely to be achieved than with the Integrated Plan.

Under the No Action Alternative, there would be continued and likely increased sediment delivery to streams related to logging and other land use disruptions on private lands that would have otherwise been acquired and protected under the Integrated Plan Alternative. Current development patterns on frequently flooded areas would likely continue, with associated sedimentation caused by periodic flooding and the loss of spawning areas.

Under the No Action Alternative, there would be no fish passage projects to provide passage at basin reservoirs. As a result, fish populations currently isolated by the dams would remain isolated and no new habitat would be opened up for anadromous fish. In the absence of fish passage, the reintroduction of extirpated species, especially sockeye, would not be possible. In general, current trends would continue under the No Action Alternative with existing threats to resident and anadromous fish related to water availability and habitat quality likely worsening with increased population and climate change.

5.7.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

This section describes the long-term impacts that could be associated with implementation of the Integrated Plan.

5.7.2.1 Reservoir Fish Passage Element

Providing fish passage at six Yakima Project dams would contribute to the recovery of Yakima basin steelhead and bull trout populations listed under the Endangered Species Act, and to the reestablishment of sockeye salmon in the Yakima River basin. It would also provide significant benefits to Yakima basin Chinook and coho salmon, which are not ESA listed (YBFWRB, 2009). There are currently no upstream or downstream fish passage facilities at any of the dams. Section 2.4.3 provides a general description of fish passage options and potential benefits at each of the Yakima Project reservoirs. Restoring ecological connectivity among presently isolated populations of bull trout

would allow for dispersal of fish among local populations, providing a mechanism for supporting weaker populations or restarting those that might become extirpated. It would also allow for gene flow among populations, which would prevent the loss of genetic variation, ensure survival in variable environments, and reduce the probability of local extirpations.

5.7.2.2 Structural and Operational Changes Element

Modifying existing water diversion structures and operations would provide opportunities to improve water supply for irrigation while providing benefits to fish. Improving instream flow conditions and restoring more natural streamflows would enhance habitat restoration benefits in tributary reaches that have been negatively impacted by diversion withdrawals or system operations. This would benefit adult and juvenile salmonid survival by reducing travel times, and decreasing predation exposure, physical injury, and stress at facilities, thereby reducing smolt mortality.

Increasing the Cle Elum Reservoir pool level by 3 feet would provide increased water storage, with the highest water levels typically occurring between April and August. Additional water, if made available during the low-flow fall and winter months downstream of Cle Elum Dam, could be used to improve overwintering conditions in the lower Cle Elum River for juvenile salmonids. Raising the water level is not expected to adversely affect bull trout spawning in tributaries to the reservoir since bull trout spawning has not been documented in the Cle Elum system. The effect on sockeye productivity, once the species is reintroduced, from an increase in the pool elevation would need to be evaluated as part of future site-specific evaluations. There would be some loss and change in aquatic and shoreline habitats as a result of land inundation and fluctuating water levels.

KRD canal modifications would benefit most life stages of spring Chinook, coho, and steelhead in Taneum and Manastash Creeks; adult and juvenile coho and steelhead in Big and Little Creeks; and rearing spring Chinook in Big and Little Creeks. These benefits would result from allowing greater opportunity to augment streamflows in these affected tributaries to the Yakima River during migration, spawning, and rearing periods. The estimated savings of approximately 15 cfs throughout the irrigation season would help address streamflow and water temperature quality problems that negatively affect fish passage and survival in the affected reaches from July to the end of the irrigation season in October. The option of placing a pump station with a pressurized system at the lowest end of the KRD South Branch Canal would provide a slightly greater flow to augment the affected tributaries, thereby further contributing to improved flow conditions. Piping canals would result in the loss of some temporary ponds and wetlands that may have been formed and supported by irrigation seepage and leaks.

Modifying the water conveyance system for the Wapatox Project would free up water owned by Reclamation to augment flow in approximately 7 miles of the lower Naches River. This would benefit adult spring Chinook, coho, and steelhead migration and spawning and juvenile rearing in this reach of the Naches River. If summer Chinook

salmon are reintroduced to the basin, they would also benefit because they are expected to use this reach for spawning and rearing.

Transferring water from Keechelus Reservoir to Kachess Reservoir by pipeline would improve rearing conditions for steelhead and spring Chinook by reducing artificial summertime high flows downstream of the Keechelus Reservoir during summertime releases of flow. The improvement of summertime rearing conditions for juvenile steelhead and spring Chinook would contribute to improving survival and productivity. Additional water in the Kachess Reservoir could improve bull trout migration into reservoir tributary streams, and improve instream flow and habitat quality for salmonids in downstream areas. The effects of changes in operations on fish species using the reservoir (e.g., pygmy whitefish), as well as species downstream of both storage facilities (bull trout and salmon), would need to be evaluated as part of future site-specific evaluations.

Flows diverted to generate power at Roza Dam would instead remain in the Yakima River between Roza Dam and the discharge location 11 miles downstream, benefitting fish use in this mainstem reach. Increasing minimum flows in the reach of the Yakima River affected by operations at the Chandler Powerplant would contribute to improved streamflows in the lower river from Prosser Dam to the powerplant return located 12 miles downstream. Current operations divert water to run the Chandler Powerplant and maintain minimum flows of 1,000 cfs in this reach. An increase in minimum flows in the Yakima River from April through June would contribute to improved Chinook, sockeye, and coho smolt survival and outmigration in this lower river reach.

5.7.2.3 Surface Storage Element

The Surface Storage Element of the Integrated Plan includes expanding existing water storage facilities or constructing new facilities. New storage would support increased flows for anadromous and resident fish passage and survival during drought years, while improving water supply for irrigation and future municipal growth.

Construction and operation of Wymer Reservoir would provide additional storage to assist in meeting high-priority instream flow goals in the upper Yakima River above Lmuma Creek and in the Cle Elum River. It would help meet goals for winter instream flow increases in some upstream reaches and also slightly reduce summer flows in some upstream reaches, which may benefit fish. Long-term operational impacts of a pump station in the Yakima River just upstream of Lmuma Creek would be avoided by including fish screens and ensuring unimpeded upstream and downstream migration for all salmonids. Some shoreline habitat may be unavoidably lost from construction of a pump station on the Yakima River, but this could be mitigated by the enhancement of native vegetation in the reach.

Expanding storage at Bumping Lake Reservoir would contribute to improvements in the Bumping, Naches, and Yakima Rivers by allowing fisheries managers to time the releases from the reservoir and increase spring flows in drought years. The inundation associated with enlargement of Bumping Lake Reservoir would result in the permanent

loss of shoreline habitat and vegetation, although the loss would be offset by the creation of new shoreline habitat along the new operating elevation. The inundation would result in the loss of approximately 18 to 20 percent of redds found annually in Deep Creek (Service, 2009a). Deep Creek supports the only identified Yakima basin population upstream of Bumping Lake and is designated critical habitat for bull trout (Service, 2002). The new dam would include fish passage facilities, thereby providing connectivity between spawning populations for bull trout and other resident salmonid species. The bull trout population previously isolated upstream of the dam would benefit from the reestablishment of historic connectivity to other habitats and from an increased gene flow among other populations in the Yakima basin (Service, 2001).

The increase in storage capacity of the Kachess Reservoir of an additional 200,000 acre-feet of water for downstream beneficial uses would have both beneficial and detrimental effects on salmonids. Detrimental impacts are largely related to the drawdown of as much as 80 feet of inactive storage in the pool elevation, which would only occur during drought years. Additional impacts would include the loss and alteration of some shoreline and aquatic habitats resulting from inundation, water level fluctuations, and construction of a new lake outlet. The drawdown may also permanently change the character and function of shoreline habitats in the event of successive drought years. During drought years, the drawdown has the potential to negatively affect water temperatures and associated dissolved oxygen levels, affecting rearing bull trout, and sockeye, if reintroduced into the reservoir.

Bull trout rearing habitat in the reservoir would be reduced during drawdown, and access into spawning tributaries would be lost during drought years, although passage into tributaries would likely be improved during most years at nondrought operating elevations. Passage into the mouth of Box Canyon during higher operating levels would likely be improved and may also be improved at lower operating elevations with associated fish passage improvements. If the Integrated Plan is fully implemented it is expected that overall benefits would accrue to resident and anadromous fish throughout the basin. Individual projects have the potential to cause negative impacts, but the probability and magnitude of those impacts cannot be determined at this time and would be addressed in project-level analyses.

5.7.2.4 Groundwater Storage Element

In the long term, groundwater storage has the potential to benefit aquatic organisms within the Yakima River system. Water injected or infiltrated into area aquifers may become part of the natural groundwater system that would potentially seep back into the river (surface) system through groundwater seeps. Groundwater seeps are often associated with geological structures, such as faults or fold structures. Recharge of cold surface water during the winter at certain geologic structures may increase cold water entering streams at existing areas of groundwater discharge. The water quality of return flows is expected to be better (i.e., cooler and cleaner) than ambient conditions. This would benefit cold-water fish and other organisms, like salmonids, that utilize the Yakima River system. In addition, groundwater storage may be used to offset surface water diversions and delay reservoir releases early in the irrigation season.

Creating a groundwater storage supply using infiltrated water diverted from the Yakima River in the late winter and early spring (prior to storage control) into designed infiltration systems could contribute to improved instream flows in the affected Yakima River reaches. The concept would be tested in two study areas, the Kittitas Reclamation District near Ellensburg and the Wapato Irrigation Project near Toppenish.

The development of an ASR system would potentially reduce diversions from the Naches River from spring through fall by approximately 5,000 to 10,000 acre-feet. All salmonid species impacted by a municipal surface water diversion would benefit from an ASR system which could contribute to improved instream conditions during low-flow periods.

5.7.2.5 Habitat/Watershed Protection and Enhancement Element

Fish habitat in the Yakima River basin has been significantly altered. The Habitat/Watershed Protection and Enhancement Element would accelerate 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. The proposed habitat actions are expected to improve prospects for recovering ESA-listed fish populations to levels that are resilient to catastrophic events and the potential impacts of climate change. Fish habitat enhancement actions would help create improved spawning, incubation, rearing, and migration conditions for all salmonid species in the Yakima River basin; implement key strategies described in the Yakima Subbasin Plan (YBFWRB, 2005); and complete most of the actions described in the Yakima Steelhead Recovery Plan (YBFWRB, 2009). Habitat enhancement actions would provide greater benefits when integrated with the flow and fish passage improvements described in previous sections. Tributary and mainstem fish passage would be the primary benefits along with floodplain connectivity. Restoring floodplain connectivity leads to increased groundwater storage, which buffers against elevated summer stream temperatures and deteriorating streamflow associated with climate change.

Targeted watershed protections (including land acquisition, public land designations, and river corridor designations) would preserve watersheds and help maintain aquatic habitat complexity. Many of the watershed protection actions proposed are focused on fish habitat and are intended to complement proposed fish passage projects and river and floodplain habitat improvements. These projects support steelhead and bull trout populations, both of which are listed as Threatened under the Endangered Species Act. They would also support spring and fall Chinook salmon and naturally reproducing populations of reintroduced summer Chinook, coho, and sockeye salmon. Fish habitat generally would benefit from improved water quality and stream hydrographs within and downstream of the headwaters and high elevation streams protected by this proposal.

Land acquisition, Wilderness designation, and National Recreation Area designation recommendations target the upper reaches of several important river systems in the basin. The proposed acquisition in the middle and lower Teanaway River basin would preserve a river that provides fish passage and connectivity to high elevation colder water. Areas

proposed for acquisition in the upper reaches of Taneum and Manastash Creeks would protect current or potential salmon and steelhead spawning grounds. Acquisition of the upper reaches of the Little Naches River would protect water quality and help maintain cool temperatures for bull trout protection and restoration. Acquisitions also protect water supply and provide current or potential salmon and steelhead spawning grounds.

The intent of Wild and Scenic River designations is to protect spawning and rearing habitat for salmonids. Bull trout can especially benefit from the cool, clean water that can result from protection of headwaters and high-elevation streams. The reaches proposed in the upper Yakima River basin are designated critical habitat for bull trout and most are critical habitat for steelhead. The Upper Cle Elum, Waptus, and Cooper Rivers would all receive increasing numbers of salmon and steelhead as fish are reintroduced and fish passage is provided above Cle Elum dam. The Teanaway River provides some of the best quality spawning habitat for salmonids in the basin due to exceptionally high quality habitat that is complex, diverse, and capable of supporting bull trout, spring Chinook salmon, and a regionally significant population of steelhead. Bull trout populations in the South Fork of the Tieton and Indian Creek are the strongest remaining in the Yakima basin, and Rattlesnake Creek is also a bull trout stronghold. Wild and Scenic designation for Deep Creek would protect another of the strongest remaining populations of bull trout in the basin. Addition of fish passage at Bumping Lake Dam would connect the Deep Creek population with other populations and habitat, and Wild and Scenic River designation would help preserve this reconnection. Designation of the American River and Rainer Fork would protect steelhead, spring Chinook, and bull trout habitat. The American River spring Chinook are a demographically and genetically distinct stock.

Benefits to Anadromous Fish and Bull Trout Effects

Habitat/watershed protection and enhancement projects would benefit different life history stages of anadromous salmonids. These benefits would improve the growth, survival, productivity, and abundance of salmonids in various ways (McElhaney et al., 2000). For all anadromous salmonids and bull trout, incubating eggs and juveniles would benefit from reduced fines in the stream and cooler water temperatures afforded by ample streamside vegetation and stable banks. Rearing juveniles would benefit from the increased prey availability (terrestrial insects) and increased organic matter input resulting from improvements in riparian vegetation. Growth and survival of juveniles would benefit from increased habitat in reconnected side channels. In addition, juvenile survival would benefit from large woody material or boulder complexes that provide refuge areas, and the increase in quality and quantity of pool habitats formed by these structures.

Survival of all adult life stages would benefit because of increased quality and quantity of holding habitat (pools) for spawners created by in-channel large woody material and boulders. These structures would also benefit spawning adults because they tend to trap and retain spawning-sized gravels in the reach. Off-channel spawners would benefit from an increase in floodplain and off-channel habitats. In addition, spawner condition

would benefit from riparian vegetation enhancement and the related cooler water temperatures.

Habitat enhancement in the upper Yakima River basin from Keechelus Dam to Roza Diversion would benefit spring Chinook, coho, and steelhead, which all migrate, spawn, incubate, and rear in this reach or its tributaries. It would also benefit migrating adult and juvenile bull trout and migrating adult and juvenile sockeye, once reintroduced. In the middle Yakima basin from Roza Diversion to Prosser Dam, spring Chinook, fall Chinook, coho, and steelhead, all of which spawn, migrate, incubate, and/or rear in this reach or its tributaries, would benefit. As in the upper Yakima River basin, migrating adult and juvenile bull trout and adult and juvenile sockeye, once reintroduced, would benefit. For the lower Yakima River from Prosser Dam to the Columbia River confluence, habitat enhancement would benefit fall Chinook which migrate, spawn, incubate, and rear in this reach. It would also benefit spring Chinook, coho, and steelhead, which migrate through as adults and/or rear there as juveniles. Migrating adult and juvenile sockeye, once reintroduced, would also benefit from habitat enhancements in the lower Yakima River.

In the upper Naches River basin from Bumping Dam to the Tieton River confluence, fish habitat enhancement would benefit spring Chinook, coho, steelhead, and bull trout because adult migration, spawning, incubation, and rearing all occur in this reach or its tributaries. Spawning and migrating adult sockeye and sockeye smolts would also benefit from habitat enhancements in this reach. In the lower reach encompassing the Tieton River confluence to the Yakima River confluence, habitat enhancement would benefit spring Chinook, coho, steelhead, and bull trout because adult migration, spawning, incubation, and/or rearing all occur in this reach or its tributaries. Sockeye adults would also benefit because upstream migration and smolt out-migration occur there.

Benefits were estimated quantitatively for anadromous fish with qualitative effects analysis provided for bull trout. The anadromous fish habitat enhancement program was evaluated using the following tools:

- 2004 Ecosystem Diagnosis and Treatment (EDT) model (Reclamation, 2010),
- All H Analyzer (AHA) (Reclamation 2010) ("All H" refers to four conditions that strongly affect fish: habitat, hatcheries, harvest, and hydropower), and
- The Euphotic Zone Depth model (sockeye only) (Ackerman et al., 2002).

Model results characterized improved habitat conditions that could result from implementing the habitat program and how this may increase fish production for anadromous fisheries in the basin, including spring, summer and fall Chinook, steelhead, coho, and sockeye. Improvements would also help with Endangered Species Act (ESA) recovery efforts for steelhead by increasing both production and spatial distribution. A qualitative effects analysis was conducted by Yakima Basin fisheries managers to characterize both positive and negative effects on bull trout populations, also listed under the ESA. Any potential negative effects on bull trout would require appropriate mitigation measures.

Modeling results show significant benefits for spring, summer and fall Chinook, steelhead, coho, and sockeye comparing the baseline to three scenarios. The baseline represents existing habitat conditions and fish population levels in the Yakima basin, and the three scenarios are described below:

- Future without Integrated Plan (FWIP) – Represents fish population increases from habitat improvements that would continue under current programs and funding levels. This represents an average of 18-percent improvement for fish populations over baseline conditions.
- Restoration – Represents fish population increases from habitat improvements that would result from implementing the fish habitat enhancement program. The actions identified in the Yakima Steelhead Recovery Plan were used as a surrogate in the modeling effort to characterize habitat improvements that would result from the Integrated Plan fish habitat enhancement program. (YBFWRB, 2009).
- Restoration with Fish Passage (Integrated Plan) – Represents fish population increases from the Habitat Restoration scenario plus providing fish passage at Cle Elum, Keechelus, Kachess, Bumping, and Tieton dams.

The model results described below and listed in Table 5-6 summarize the expected outcomes under the Integrated Plan for the following anadromous species, both individually and combined, without sockeye. Table 5-7 lists sockeye results. The values provided in these two tables are "recruitment" population values. Recruitment population values are an estimate of the ocean population at the mouth of the Columbia River. Ocean harvest was not included because it was either minimal or not applicable to the species. Other model results for species, such as harvest and escapement, are provided later in this section.

The reason for including results with and without sockeye is due to the large effect sockeye results have on the total estimated population increases that would result from the Integrated Plan. Projected sockeye population increases represent more than 70 percent of the total improvement for all anadromous species and are dependent on the proposed fish passage improvements at the five major reservoirs.

- **Spring Chinook** – Spring Chinook show benefits under both scenarios, with average run sizes increasing 56 percent from FWIP for Restoration, and increasing 87 percent for Restoration with Passage.
- **Steelhead** – For steelhead populations, natural production is not bolstered by hatchery production like spring Chinook in the Yakima Basin. However, steelhead run sizes for the Restoration scenario increased 90 percent from FWIP, and for the Restoration with Passage scenario, the average run size more than doubled the FWIP run size.
- **Coho** – Coho also show improvements in run sizes for modeled scenarios, with a 20-percent average run size increase from FWIP data for Restoration and 26 percent increase under the Restoration with Passage scenario.

- **Fall Chinook** – Fall Chinook runs increased approximately 51 percent from FWIP for both the Restoration and Restoration with Passage scenarios. There was no difference in the abundance numbers between the Restoration and Restoration + Passage scenarios. This is because fall Chinook complete their entire freshwater life cycle downstream of the five Reclamation storage dams and are not affected by the provision of fish passage, which is the only difference in restoration/passage actions between these two scenarios.
- **Summer Chinook** – Summer Chinook show a significant benefit from FWIP to the Restoration and Restoration with Passage scenarios, more than doubling the average run sizes for both. There was no difference in the abundance numbers between the Restoration and Restoration + Passage scenarios. This is because summer Chinook complete their entire freshwater life cycle downstream of the five Reclamation storage dams and are not affected by the provision of fish passage, which is the only difference in restoration/passage actions between these two scenarios.

All Species Combined (without sockeye) – All species combined show benefits with average run sizes increasing 51 percent from FWIP for the Restoration scenario and increasing 65 percent for Restoration with Passage.

Table 5-6 All Species Combined Population Improvements (Without Sockeye)

Species		Baseline	Future Without Integrated Plan	Restoration	Restoration + Passage (Integrated Plan)
Spring Chinook	Max.(1)	33,653	38,434	59,949	72,058
	Ave.	10,153	11,494	17,909	21,503
	Min.(2)	5,109	5,748	9,149	10,905
Steelhead	Max.	8,995	11,954	23,868	27,904
	Ave.	2,871	3,699	7,041	8,198
	Min.	1,263	1,589	3,207	3,646
Coho	Max.	27,926	38,098	46,648	48,791
	Ave.	8,806	11,983	14,396	15,069
	Min.	4,686	6,414	7,671	8,026
Fall Chinook	Max.	29,857	31,082	47,259	47,259
	Ave.	8,385	8,724	13,170	13,170
	Min.	3,198	3,300	4,920	4,920
Summer Chinook	Max.	10,692	11,775	24,877	24,877
	Ave.	3,308	3,694	7,390	7,390
	Min.	1,464	1,529	2,372	2,372
All Species Combined (w/o Sockeye)	Max.	111,122	131,343	202,601	220,899
	Ave.	33,523	39,593	59,906	65,329
	Min.	15,719	18,581	27,318	29,868

(1) Represents the highest recruitment value in a 100 generation simulated run generated by the AHA model.
(2) Represents the lowest recruitment value in a 100 generation simulated run generated by the AHA model.

Sockeye were evaluated through a separate modeling effort. The approach provided a range of potential increases in population abundance from reintroduction efforts associated with passage and restoration actions in the Integrated Plan. This approach relies on the late summer reservoir pool size to estimate reservoir smolt production (Ackerman et al., 2002) and a low and high smolt-to-adult survival rate (NMFS, 2009; NW Fishletter, 2010) to estimate the potential range in adult sockeye abundance. The "low" abundance estimate was based upon median late summer reservoir volume, a 43 percent smolt-to-smolt survival rate and a 3.5 percent smolt-to-adult survival rate. The "high" abundance estimate was based upon median late summer reservoir volume, a 43 percent smolt-to-smolt survival rate and an 8 percent smolt-to-adult survival rate. The low and high sockeye abundance estimates were 170,000 and 380,000 fish, respectively. The mathematical mid-point between the low and high estimates was used to represent medium sockeye abundance.

Table 5-7 Increase in Sockeye Population Abundance from Reintroduction Associated with Integrated Plan Actions

Scenario	Low	Medium	High
Restoration + Passage			
Ocean Recruitment	170,000	275,000	380,000
Columbia R. Harvest	13,599	21,999	30,399
Yakima River Mouth	139,400	225,499	311,599
Columbia R. Migration Loss	17,000	27,499	37,999
Yakima R. Harvest	20,910	33,825	46,740
Yakima R. Migration Loss	6,970	11,275	15,580
Escapement	111,519	180,399	249,279

All Species Combined (with sockeye*)* – Table 5-8 summarizes results for all species by each of these categories. In addition to the recruitment population increases provided in the tables above, additional categories are also characterized in this table to provide a more complete depiction of modeled results:

- **Columbia River Harvest** – Includes Columbia River commercial, sport and Tribal harvest, but not migratory losses.
- **Yakima River Harvest** – Includes Yakima River sport and Tribal harvest but not migratory losses.
- **Yakima River Mouth** – Population that returns to the mouth less Columbia River harvest and migratory losses.
- **Broodstock Removal** – Fish taken for the Yakama Nation hatchery programs for spring, fall and summer Chinook and coho.
- **Sockeye Columbia River Migratory Loss** – Assumed 10 percent loss of the sockeye recruitment estimate.

- **Sockeye Yakima River Migratory Loss** – Assumed 5 percent loss of population estimate at the Yakima River mouth.
- **Total Escapement** – Population that returns to Yakima River spawning grounds after harvest and migratory losses.

These improvements would likely result in a range of total adult salmon recruitment between 200,000 during low survival years and more than 600,000 adults in years of high survival. Harvest would be as much as seven times greater than the FWIP. The number of fish reaching Yakima Basin spawning grounds would grow from a maximum return of 132,000 adults if the plan were not implemented to over 400,000 if the Integrated Plan is implemented.

Table 5-8 All Species Combined Results by Scenario

Scenario	Minimum	Average	Maximum
Baseline			
Recruitment	15,719	33,523	111,122
Columbia R. Harvest	3,443	7,472	24,893
Yakima River Mouth	12,277	26,051	86,229
Yakima R. Harvest	993	2,238	7,610
Broodstock Removal	1,047	1,214	2,030
Escapement	10,236	22,599	76,589
FWIP			
Recruitment	18,581	39,593	131,343
Columbia R. Harvest	4,035	8,739	29,016
Yakima River Mouth	14,545	32,201	106,619
Yakima R. Harvest	1,118	2,546	8,802
Broodstock Removal	1,288	1,480	2,297
Escapement	12,139	26,828	91,580
Restoration			
Recruitment	27,318	59,906	202,601
Columbia R. Harvest	5,671	13,032	44,204
Yakima River Mouth	21,647	46,875	158,397
Yakima R. Harvest	1,884	4,164	14,621
Broodstock Removal	1,330	1,491	2,297
Escapement	18,433	41,220	141,479
Restoration + Passage (Integrated Plan)			
Recruitment	199,868	340,329	600,889
Columbia R. Harvest	36,874	62,917	112,687
Sockeye Columbia R. Migration Loss	15,786	28,556	45,376
Yakima River Mouth	162,995	277,412	488,201
Yakima R. Harvest	28,903	50,804	85,499
Sockeye Yakima R. Migration Loss	6,472	11,708	18,604
Broodstock Removal	1,876	1,258	1,549
Escapement	132,215	225,350	401,154

Minimum values include sockeye low values.
Average values include sockeye medium values.
Maximum values include sockeye high values.

Bull trout were not addressed through the EDT model approach. Instead, a matrix and accompanying narrative was developed discussing population status, limiting factors and current impacts, changes to populations, actions completed in recent years, and information gaps.

The following identifies the Yakima basin fisheries managers' expected changes in bull trout population viability with the Integrated Plan. In most cases, the plan would improve habitat conditions and increase available habitat. For Deep and Box Canyon creeks, and for the Bumping and Kachess rivers, the Integrated Plan would result in adverse impacts

without commensurate mitigation. As previously stated, any potential adverse effects on bull trout would require appropriate mitigation.

Table 5-9 Bull Trout Benefits and Impacts

Stream	Integrated Plan
Ahtanum	+
Indian Creek	++
South Fork Tieton	+++
North Fork Tieton	+++
American	+
Crow Creek	+
Rattlesnake Creek	+
Deep Creek	-
Bumping River	-
Kachess River	-
Box Canyon Creek	-
Gold Creek	+++
Cle Elum/Waptus	+
Upper Yakima	++
Teanaway	+

- = Negative impact (would require mitigation)
+ = Some benefit from habitat actions or Bull Trout Task Force
++ = Additional benefit, either re-connectivity as dam passage is addressed, or another project that addresses a specific limiting factor for a population (e.g. SF Tieton falls, Gold Creek Hydrological Assessment).
+++ = Multiple passage or population specific projects

Benefits to Resident Fish and Aquatic Invertebrates

Resident fish and aquatic invertebrate communities would receive long-term benefits from habitat enhancement. Aquatic invertebrate communities are dynamic and adaptive to changing environmental conditions. High-quality resilient invertebrate communities exist in the upper Yakima River basin under the altered flow regimes associated with flip-flop operations (Cuffney et al., 1997; Stanford et al., 2002; Nelson, 2004; Reclamation, 2008f). The restoration of more normative habitat and flow conditions resulting from habitat/watershed protection and enhancement efforts would likely benefit aquatic invertebrate communities within the Yakima River basin. However, due to the many environmental factors that influence these communities, no definitive impacts can be quantified with available information.

Benefits to fish populations would be improved through the protection and restoration of key landscapes. The Integrated Plan would protect and enhance tracts of land in the basin that provide a high potential for ecosystem and species conservation and restoration, both within and outside of the immediate riparian corridor. The mainstem floodplain and tributary fish habitat enhancement program would significantly improve fish productivity, abundance, and survival to levels that are resilient to catastrophic events and

the potential impacts of climate change. They would accelerate ongoing efforts to protect existing high-value habitats, improve fish passage, enhance flows, improve habitat complexity and functions, and reconnect side channels and off-channel habitat to stream channels. Projects would also restore floodplain connectivity and lead to greater groundwater storage, which buffers against elevated summer stream temperatures and deteriorating streamflow associated with climate change. The program could also reduce flood risk.

Fish habitat enhancement actions would help create improved spawning, incubation, rearing, and migration conditions for all salmonid species in the Yakima River basin; implement key strategies described in the Yakima Subbasin Plan (YBFWRB, 2005); and complete most of the actions described in the Yakima Steelhead Recovery Plan (YBFWRB, 2009).

5.7.2.6 Enhanced Water Conservation Element

Long-term impacts of water conservation are anticipated to be beneficial to fish, potentially resulting in reduced water use and/or more efficient diversion practices with the potential to improve streamflows. Depending on the timing and location of the water savings, benefits to salmonids and resident fish species would be similar to those outlined in Section 5.7.2.5.

Lining canals or piping ditches could result in the loss of some ponds and wetlands supported by leakage. There could also be a reduction in return flows down drainages and into other topographic low areas that might support fish. Such changes are considered a shift toward natural conditions, not a significant impact at the population scale.

The municipal and domestic water conservation program would have impacts on fish similar to those of the agricultural conservation program.

5.7.2.7 Market Reallocation Element

Water rights transfers associated with market reallocation are not expected to have a substantial impact on fish populations or aquatic resources within the Yakima River basin. Any effects would be similar to those described in Section 5.7.2.1. Depending on the timing and location of the increased streamflows, anadromous and resident fish species could benefit from water transfers between irrigation districts. Higher flows would likely improve aquatic habitat conditions for fish and other organisms by increasing overall habitat area and improving water quality conditions (e.g., temperature and dissolved oxygen).

5.7.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Given implementation of the combined elements, the Integrated Plan would contribute to more normative flow conditions and the creation of habitat conditions more capable of

supporting salmonid populations in the Yakima River basin. In particular, the Surface Water Storage Element would improve flow conditions throughout the basin. However, even in combination with modifying existing water diversion structures and operations, these actions are likely not sufficient to support the restoration of sustainable ESA-listed populations and healthy, functional ecosystems in the Yakima River basin. Habitat/Watershed Protection and Enhancement Element, coupled with restoring fish passage into historic habitat, will be a necessary component for meeting fish production and survival targets.

Effects for specific river reaches are characterized below, based upon hydrologic modeling results for instream flows resulting from implementation of water storage and structural and operational changes (Reclamation and Ecology, 2011f). Not all effects were modeled. The Integrated Plan would generally increase carryover storage, providing more flexibility in operations to meet instream flow needs for anadromous species. Additional opportunity for optimizing reservoir operations could yield additional beneficial effects beyond those described for the various geographic areas below.

High summer flows and associated high flow velocities in the Yakima River from Keechelus Dam to Lake Easton would be substantially reduced from July through early September to improve rearing conditions for juvenile Chinook and steelhead (and potentially coho if reestablished). The improved juvenile salmonid rearing conditions would occur in all years, with benefits most significant in wet years. Low winter flows would be increased to improve juvenile rearing and overwintering habitat conditions. Winter and spring flow pulses could be provided in most years to mimic natural conditions, stimulating juvenile steelhead and smolts to move down lower in the basin to rear or out-migrate. All anadromous salmonids would benefit from increased base flows by improved spawning conditions.

Flow pulses would be provided in the Easton Reach to improve out-migration for spring Chinook, steelhead, sockeye, and coho. Increased flows in the fall and winter would improve the area of available spawning, rearing, and overwintering habitat for all salmonid species.

Summer flows in the Cle Elum River would be reduced, improving the amount of suitable rearing habitat through reduced water velocities for juvenile Chinook and steelhead (and potentially coho if reestablished). Average fall and winter flows would increase, providing additional flow variation and access to available side channels when juvenile spring Chinook and steelhead (and potentially coho) are rearing in this reach. Spring pulse flows could also be provided in nondrought years to more closely mimic natural conditions and support juvenile out-migration.

Summer and early fall flows would be reduced on the Yakima River between Cle Elum and Lmuma Creek, improving rearing conditions for juvenile spring Chinook, steelhead, and coho. The improved juvenile salmonid rearing conditions would occur in all years, with benefits most significant in wet years.

Spring flows on the Yakima River from Roza Dam to Naches River would be improved for anadromous salmonid smolt out-migrants as a result of pulse flows and power subordination. On the Tieton River, winter flows would be increased to improve spring Chinook and steelhead rearing, and early adult steelhead migrants. In the fall, flows would still be high as a result of flip-flop operations (reducing flows in the upper arm of the Yakima River and increasing flows in the Naches River with increased water releases from Rimrock Reservoir).

On the lower Naches River, summer and fall flows could be lower than current conditions, negatively affecting rearing conditions for steelhead, coho, and spring Chinook. Lower flows also could affect available spawning habitat. August-September flows in the lower Naches would still be subject to the negative effects of the flip-flop operation which would be disruptive to juvenile rearing salmonids.

High summer flow conditions would be slightly improved (a reduction in flow) in the Yakima River from the Naches River to Parker, when juvenile Chinook, steelhead, and coho are rearing. Increased carryover storage would provide additional flexibility to provide flow pulses in this reach and lower Yakima reaches, to improve out-migration for all salmonid smolts produced upstream in the basin (spring and fall Chinook, steelhead, coho, and sockeye).

5.7.4 Mitigation Measures

As discussed in Sections 5.7.2 and 5.7.3, one of the goals of the Integrated Plan is to provide improved habitat and water conditions for fish and aquatic species and fish passage and distribution throughout their historic range. The long-term impacts on fish and aquatic species would primarily be beneficial. Specific projects would be evaluated through applicable environmental review and permitting processes. This evaluation may include review by Federal or local scientific review panels and Tribal Councils as required by the applicable regulatory processes, and depending on funding source requirements. These requirements may stipulate that actions implemented under this alternative should be consistent with the Federal, Tribal, and regional salmon and steelhead recovery planning and watershed planning efforts. Thus, it is expected that specific mitigation measures would be identified that pertain to long-term impacts from specific proposed activities.

As noted above, impacts associated with storage facilities would in some cases be substantial. The following items are generally considered ways to minimize the influence of dams and reservoirs on local environments:

- Seasonal restrictions on surface water withdrawals from supply reservoirs to the period with the least influence on key species;
- Adult and juvenile fish passage provisions an all in-channel storage sites;
- Construction techniques that minimize work activity and the seasonal timing within the OHWM and in compliance with applicable state and federal permit provisions;

- Diversion screens for reservoir withdrawal;
- Fish barriers in discharge canals;
- Ramping rates for diversions and for initiating or terminating downstream releases to minimize water level fluctuations and adverse effects on aquatic species; and
- Monitoring, periodic review, and adaptive management. For example, one area to focus monitoring efforts would be on improving the understanding between flow releases and smolt outmigration survival rates.

5.8 Vegetation

5.8.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Some of the ongoing projects included in the No Action Alternative would improve vegetation communities such as riparian areas, wetlands and shrub-steppe communities through the removal of nonnative vegetation and planting with native plants. These ongoing habitat improvements, while beneficial, would be completed in a localized, piecemeal fashion, and would provide fewer benefits to vegetation when compared to a program that implements the projects as part of an integrated program.

Under the No Action Alternative, no water storage or other large scale projects are likely to be implemented. As a result, there would be no loss of vegetation from permanent inundation or large-scale project facilities. Under the No Action Alternative, there would be continued and likely increased logging of intact forested habitat, shrub-steppe habitat loss, and other vegetation impacts on private lands that would have otherwise been acquired and protected under the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan Alternative.

Under the No Action Alternative, there would be continued logging and other land use disruptions on private lands that would have otherwise been acquired and protected under the Integrated Plan Alternative. This would have negative impacts on native vegetation in the Yakima River basin.

5.8.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Under the Integrated Plan Alternative, long-term impacts on vegetation are based on the amount of vegetation that would be permanently removed and replaced with project facilities. In some cases, these impacts would be substantial. Some of the elements would improve vegetation communities through activities such as the enhancement of riparian areas or wetlands.

5.8.2.1 Reservoir Fish Passage Element

Construction of fish passage facilities would result in permanent removal of vegetation where it is present at existing reservoirs. Structures placed in the drawdown zone of the lakes would not result in vegetation impacts. Facilities would be located adjacent to existing spillways or dam abutments and embankments, where vegetation is nonexistent or limited to grasses. Although some permanent impacts to vegetation would occur, the construction of fish passage facilities would provide anadromous fish access to historic territories and restore nutrient inputs to streams through spawned fish carcasses. The carcasses would provide important marine-derived nutrients to riparian vegetation.

The fish passage conduit at Cle Elum Lake would permanently replace approximately one-sixth acre of Douglas fir, black cottonwood, lodgepole pine, and chokecherry along with the dirt roadway adjacent to the existing spillway facilities (Reclamation and Ecology, 2011c). The adult fish collection facility downstream, adjacent to the Cle Elum River, would permanently eliminate approximately one-half acre of riparian and second-growth Douglas fir, black cottonwood, lodgepole pine, and chokecherry. About 2,600 feet of existing access roads would be upgraded and 550 feet of new road would be constructed. Based on the limited amount of permanent vegetation removal for facility construction, long-term impacts on vegetation would likely be minor at Cle Elum Dam.

Based on the current level of disturbance at Tieton, Keechelus, and Kachess Dams and the minimal loss of vegetation for fish passage facility construction, impacts on vegetation communities are anticipated to be minimal at these dams. In general, impacts are expected to be similar to those at Cle Elum Dam. The new fish passage facility at Clear Lake Dam would be located mostly on existing infrastructure and is unlikely to result in the removal of much vegetation. Installation of fish passage facilities at the Bumping Lake Dam would occur at the same time as expansion of the reservoir. Impacts of the construction project are described in Section 5.8.2.3.

5.8.2.2 Structural and Operational Changes Element

Most of the proposed modifications would result in no long-term impacts on vegetation because construction would take place in already disturbed areas. Some projects would result in the permanent loss of vegetation associated with the placement of project facilities.

Raising the pool level behind Cle Elum Dam would inundate approximately 60 acres of additional land around the reservoir for approximately 3 to 10 weeks per year (average of 7 weeks). In areas that are inundated, vegetation communities that are present may change over the long term. Where bank protection is installed beyond the inundation zone, minor impacts to vegetation could occur as wind and wave patterns may be altered. Impacts would occur along a relatively narrow strip of shoreline, portions of which lack vegetation; therefore, impacts are expected to be minor.

Canal improvements at the KRD and Wapatox projects could result in the loss of some ponds and wetlands that may have formed along the irrigation canals and ditches. The

loss of water could cause a shift of species composition toward upland or more arid plant community types, but this would be a change toward more natural conditions and would not be considered a substantial impact. Permanent losses of vegetation could also occur depending on the footprint of the Manastash Creek re-regulating reservoir and pump station, but these are expected to be minor because most facilities would be located in an active agricultural area. Site-specific studies would be conducted to evaluate impacts on priority species that use existing ponds and wetlands as part of future environmental review.

The Keechelus-to-Kachess pipeline would result in removal of vegetation (where present) along the 5-mile-long corridor. Assuming a 75-foot-wide pipeline corridor, approximately 40 to 50 acres of vegetation would be removed. Most of these impacts would be temporary because the area would be replanted with native vegetation and allowed to regenerate as grassland and shrub communities. Trees would not be planted within the corridor to avoid damage to the pipe from deep roots. Some areas would need to be maintained for pipeline access, resulting in permanent vegetation impacts. The exact area of impact would be determined when the pipeline corridor and alignment are designed.

No long-term impacts are anticipated from the power subordination projects because no vegetation would be disturbed or removed.

5.8.2.3 Surface Storage Element

The proposed new storage areas would result in long-term impacts where vegetation is permanently inundated or replaced by project facilities. This element has the highest potential for negative vegetation impacts because of the scale of the proposed projects.

The Wymer Reservoir would permanently remove vegetation for access roads and dam facilities. It would inundate approximately 1,400 acres, including substantial areas of shrub-steppe (approximately 80 percent) along with grassland (approximately 15 percent), riparian (approximately 5 percent), and forest (less than 1 percent) vegetation communities (Reclamation 2008f). Although the area has been grazed, the Wymer location is an area of relatively undisturbed shrub-steppe habitat, and permanent vegetation removal would further reduce shrub-steppe habitat in the Yakima basin. Site-specific studies of existing vegetation in the proposed reservoir area would be conducted prior to facility design and construction to minimize impacts. The Habitat/Watershed Protection and Enhancement Element of the Integrated Plan (described in Section 5.8.2.5) would acquire large tracts of shrub-steppe to reduce the threat to remaining vegetation. Although vegetation removal for the reservoir could represent a substantial impact, a net improvement in conditions is anticipated. Under existing conditions, the shrub-steppe habitat area at and around the Wymer dam site is not protected from development and the shrub-steppe habitat could be lost through other development.

Areas of palustrine (freshwater) wetlands would be permanently eliminated as habitat (Service, 2007). The Lmuma Creek channel would be modified to allow passage of higher flows from the dam, making it unlikely that riparian areas could be established.

Fluctuations in the water level in Wymer Reservoir would not be conducive to the growth of a water-dependent shoreline plant community. Thus, no viable lakeshore fringe habitat could be expected around the perimeter of the reservoir (Reclamation, 2008f).

Construction of a new rock-fill dam downstream of the existing Bumping Lake Dam, including fish passage facilities, and enlargement of the reservoir would result in the flooding of forested communities above the current level of Bumping Lake Reservoir. The expansion would increase the current 1,300-acre reservoir to approximately 3,200 acres. The forest communities surrounding the lake are second-growth conifer forest supporting a canopy of lodgepole pine, western hemlock, western red cedar, Englemann spruce, and a dense shrub understory. Some of this forest is late successional (old-growth) habitat. Preliminary estimates developed for the Integrated Plan indicate that impacts on terrestrial habitat would include approximately 980 acres of old-growth habitat. This represents approximately 1.5 percent of remaining old-growth habitat in the Naches River basin.

Forest communities within the expansion zone of Bumping Lake would be cleared during construction or lost over time due to prolonged inundation and replaced by open water. The majority of impacts would occur to forested communities east of the lake and within the Deep Creek drainage area designated areas. The expanded reservoir would likely fragment habitats and create additional edge habitats that would be used by some wildlife species. The expansion of the reservoir could represent a substantial impact to old growth forest; however, under the Habitat/Watershed Protection and Enhancement Element, other mature forested areas that are threatened by development would be acquired and protected.

Minor permanent impacts on vegetation are anticipated under the Kachess Reservoir inactive storage project. Construction of either the tunnel or pump station alternative would likely require some permanent vegetation removal depending on the location of the facility and the size of the construction footprint, which would be determined during site-specific studies if the project is authorized.

5.8.2.4 Groundwater Storage Element

Most of the proposed groundwater storage projects would result in limited impacts on vegetation because the projects would likely be located in already disturbed areas, would rely mostly on existing infrastructure, and would require minimal construction. Some projects would result in the permanent loss of vegetation associated with the placement of project facilities.

For the shallow aquifer recharge projects, permanent losses of vegetation would occur at the infiltration ponds. The initial pilot study would require less than 5 acres of land. To achieve the infiltration capacity goal of at least 100,000 acre-feet, it is anticipated that between 160 and 500 acres of infiltration area would be necessary with infiltration ponds ranging from 2 to 10 acres. Ponds and other elements would be located in already disturbed areas to minimize long-term impacts to the extent possible. Site-specific

studies of existing vegetation in the proposed infiltration areas would be conducted prior to facility design and construction.

Municipal ASR projects would require a water treatment facility and the construction of injection wells, a pump station, and conveyance lines. Long-term impacts on vegetation would be similar to those for shallow aquifer recharge projects.

5.8.2.5 Habitat/Watershed Protection and Enhancement Element

Long-term impacts of the habitat restoration projects are expected to be beneficial to plants and vegetation communities.

Beneficial impacts are anticipated with the acquisition of lands and the protection of large areas. The acquisition of lands containing old-growth forest or shrub-steppe offers greater protection of these high-quality habitats. Old-growth forests are uncommon in the Yakima River basin and shrub-steppe habitat has been significantly reduced. Actions to protect shrub steppe lands will complement ongoing actions by a variety of public and private landowners to protect this vital landscape type. Acquired shrub-steppe lands would be managed for habitat protection and restoration.

Land acquisition would include a 46,000-acre tract in the middle and lower Teanaway River basin comprised of mid to high elevation mixed conifer forest and lower elevation grand fir and ponderosa pine forest. Acquisition of the headwaters of the Little Naches River and adjacent lands in the Manastash and Taneum basins, totaling up to 10,000 acres, would protect mid- to upper-elevation conifer forest, some areas of which including old-growth forest. Acquisition of a 15,000-acre tract in the Yakima River canyon would conserve shrub steppe habitat.

The proposed habitat/watershed protection, restoration, and enhancement projects on the mainstem and tributaries of the Yakima River would improve native plant diversity. The creation of off-channel habitats, stabilization of streambanks, and restoration of riparian areas would revegetate portions of the Yakima River over the long term.

5.8.2.6 Enhanced Water Conservation Element

Most of the conservation projects would result in no permanent impacts on vegetation because the projects would likely be located in already disturbed areas. Some projects would result in the permanent loss of vegetation associated with the placement of project facilities.

Many of the agricultural water conservation projects include lining canals or replacing them with piping, which could result in the loss of some ponds and wetlands that exist because of leakage from irrigation canals and ditches. Lining or piping the canals would remove the water source of these wetlands and could result in a shift of species composition toward upland or more arid plant community types. This shift would be toward more natural conditions.

Long-term impacts from enhanced conservation are anticipated to be minor. Projects would be located in active disturbed agricultural areas or canal rights-of-way which provide limited habitat for native vegetation.

5.8.2.7 Market Reallocation Element

No long-term vegetation impacts are anticipated for the Market Reallocation Element because this element generally does not require removal of vegetation. If water transfers involve the fallowing of land, there is the potential for noxious weeds to invade the fallowed areas. The Market Reallocation Element would include measures to require replanting of fallowed areas to prevent this impact.

5.8.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Although there would be some negative impacts on vegetation, particularly the loss of shrub-steppe and old-growth vegetation at Wymer and Bumping Lake Reservoirs, the overall impact of the Integrated Plan is expected to be positive. Many of the proposed projects under the Enhanced Conservation and Structural and Operational Changes Elements would not impact vegetation because they would be located in areas where vegetation has been previously disturbed. The Habitat/Watershed Protection and Enhancement Element would improve degraded habitat and protect large areas of intact habitat, including threatened mature forest areas in the Teanaway and Naches River basins and shrub-steppe, including the area near Wymer Dam. The integrated implementation of fish habitat enhancement projects and the streamflow improvements would provide greater benefits to riparian and wetland vegetation in comparison to a program that implements the elements separately. Thus, integrated management approaches are more likely to achieve systemwide benefits for vegetation.

5.8.4 Mitigation Measures

The impacts on vegetation caused by the development of the required facilities and infrastructure would be mitigated through site and facility design to minimize the need for vegetation removal. Specific mitigation measures would be developed as part of future project-level environmental analysis. In general, the design should incorporate an evaluation of existing vegetation communities, wildlife habitats and species in the vicinity and a rare-plant survey. Habitat that is determined to be of significant importance (e.g., presence of listed species) should be preserved to the greatest extent possible. Facilities, access roads, and staging areas should be located in areas of disturbed vegetation if possible. If intact vegetation is present, the footprint of the facility should be minimized and situated to result in the least amount of disturbance.

Removal of mature trees should be avoided where possible in all construction areas. Staging and stockpile areas should be revegetated after construction. Native plant species appropriate for the vegetation community (e.g., riparian areas) should be used for all proposed restoration. Vegetation communities, particularly shrub-steppe, should be created, restored, or protected elsewhere in the Yakima River basin to compensate for

habitat losses. Land acquisition and habitat enhancement components included in the Integrated Plan are intended to result in a net improvement in conditions for intact vegetation communities by protecting and enhancing existing high value habitat areas within the Yakima basin.

Mitigation of vegetation and habitat varies in terms of potential certainty of effectiveness. Old-growth forest that is lost to reservoir expansion or facility construction cannot be replaced. Mitigation efforts for shrub-steppe communities have had mixed results, and successful outcomes are not certain. While there is considerable data regarding the success of wetland and riparian habitat because of the extensive number of mitigation projects undertaken, some efforts have been less successful than others. The Integrated Plan will take an adaptive approach that will include monitoring of mitigation efforts to allow ongoing modifications. All available sources will be reviewed to design mitigation efforts with the greatest probability of success, and ongoing monitoring will allow adaptations to occur as needed.

5.9 Wildlife

5.9.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Some of these existing programs involve riparian vegetation improvements. Ongoing projects would improve native plant diversity and habitat for wildlife in the long term. Improved riparian vegetation would result in increased habitat for terrestrial wildlife species. Projects that reconnect side channels or create off-channel habitats would increase breeding habitat for amphibians. Stabilizing streambanks and restoring riparian areas would provide functioning habitats for many species of large and small mammals and birds. Small-scale fish passage improvements would open up new territory for anadromous fish. These ongoing projects, while mostly beneficial, would be limited in scope and geographic influence when compared to those that would occur under the Integrated Plan Alternative. Further, these ongoing projects would provide fewer benefits to wildlife habitat in comparison to a program that implements the projects as part of an integrated program.

Under the No Action Alternative, there would be continued and likely increased loss of high-quality habitats, including intact forested habitat, shrub-steppe habitat, and other vegetation communities on private lands that would have otherwise been acquired and protected under the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan Alternative.

5.9.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Under the Integrated Plan Alternative, long-term impacts on wildlife are based on the area needed for project facilities. Impacts include the amount of wildlife habitat that would be permanently removed and replaced with project facilities and the disruption of

wildlife corridors. Some of the elements would result in the improvement of vegetation communities such as riparian areas or wetlands and are considered beneficial for wildlife. As a result of its review of the proposed programmatic level actions, the Service has concluded that that the Integrated Plan has greater probability of improving fish and wildlife resources beyond what currently exist within the Yakima River basin than the No Action Alternative (Service, 2012c).

5.9.2.1 Reservoir Fish Passage Element

Construction of fish passage facilities could result in displacement of wildlife. However, some of the facilities would be located on existing dam facilities and would not disturb vegetation. Minor effects on habitat could occur through the removal of a few mature Douglas firs or other conifers for construction of the adult fish collection facilities and access roads. Conifer removal would be minimized to the extent possible.

Fish passage would provide anadromous fish access to historic territories and would have overall long-term ecosystem benefits by restoring food web interactions between invertebrates, fish, and mammals. Migrating, spawning and juvenile fish are a vital forage base for many birds, mammals, and other fish. Spawned fish carcasses and eggs are also an important source of marine-derived nutrients to streams, mammals, and birds and they increase the biomass available to the benthic invertebrate community. In general, this element is anticipated to have beneficial impacts on wildlife.

The fish passage conduit at Cle Elum Reservoir would permanently replace about 7,600 square feet of mixed conifer and deciduous forest along with the dirt roadway adjacent to the existing spillway facilities (Reclamation and Ecology, 2011c). The adult fish collection facility downstream, adjacent to the Cle Elum River, would permanently eliminate about 23,700 square feet of riparian and second-growth forest. About 2,600 feet of existing access roads would be upgraded and 550 feet of new road would be constructed, resulting in some habitat losses. Based on the limited amount of permanent habitat removal for facility construction, long-term impacts on wildlife would likely be minor at Cle Elum Dam.

Based on the current level of disturbance at Tieton, Keechelus, and Kachess Dams and the minimal loss of vegetation for fish passage facility construction, impacts on wildlife are anticipated to be minimal at these dams, similar to Cle Elum Dam. Impacts on wildlife would be minor at Clear Lake Dam because the fish passage facility would be attached to existing dam facilities and is not likely to affect wildlife habitat. Fish passage facilities for Bumping Lake Dam would be installed as part of the reservoir enlargement process. Impacts are described in Section 5.9.2.3.

5.9.2.2 Structural and Operational Changes Element

Most of the proposed modifications would result in minimal long-term impacts on wildlife because they are located in areas already disturbed and developed. Some projects could result in permanent removal of wildlife habitat and displacement of wildlife.

Raising the pool level behind Cle Elum Dam would inundate approximately 60 acres of additional land around the reservoir for approximately 3 to 10 weeks per year (average of 7 weeks). Long-term impacts from inundation could be possible where foraging habitat or nesting sites for waterfowl or burrowing wildlife is present along undisturbed portions of the shoreline. Impacts would occur along a relatively narrow strip of shoreline, and some of the affected areas do not contain vegetation or provide wildlife habitat. Improved habitat for perching and roosting birds and cavity nesters could result from live trees being inundated by the elevated pool.

Canal modifications at the KRD and Wapatox projects could result in the loss of some temporary ponds and wetlands that may have formed along the irrigation canals and ditches. These artificial wetlands may provide habitat for amphibians, birds, and other wildlife. The loss of water could cause a shift of species composition toward upland or more arid plant community types, but this would be a change toward more natural conditions and would not be considered a substantial impact.

The Keechelus-to-Kachess pipeline would result in alteration of wildlife habitat where present within along the 5-mile-long corridor. Some forest communities would be removed and replaced by shrub communities, and more edge habitat would be present. This would result in the displacement of wildlife to adjacent suitable habitats and the immigration of other wildlife species. The extent of permanent wildlife habitat removal is unknown at this time because facilities have not yet been designed.

No long-term impacts are anticipated with the power subordination project because no wildlife habitat would be disturbed or removed.

5.9.2.3 Surface Storage Element

The proposed new storage areas have the greatest potential for long-term negative impacts on wildlife due to the extent of wildlife habitat removal for the placement of facilities.

Wymer Dam and Reservoir would have permanent impacts on shrub-steppe vegetation and wildlife within the Lmuma Creek drainage. Impacts include the inundation of shrub-steppe habitat, impacts to movement corridors, possible exotic plant species invasion, possible increase in fire susceptibility, and indirect impacts associated with the construction of facilities.

Shrub-steppe communities in the proposed reservoir area provide core habitat for a number of species, including greater sage-grouse, ferruginous hawk, sage sparrow, Brewer's sparrow, bighorn sheep, mule deer, jackrabbit, and numerous other birds and small mammals (Reclamation, 2008f). Approximately 1,000 acres of shrub-steppe would be permanently inundated. Varying amounts of grassland (150 to 175 acres) and riparian habitats (40 to 60 acres) would also be inundated. The reservoir, dam and access roads could cause some loss of movement corridors and could further isolate some populations. These impacts could contribute to regional declines in these wildlife communities. However, land acquisition and habitat enhancement components included in the

Integrated Plan are intended to result in a net improvement in conditions for greater sage-grouse and other wildlife species by protecting and enhancing existing high value habitat areas within the Yakima basin.

Indirect impacts could occur at the site as a result of some increase in activity associated with operations and maintenance. Indirect adverse effects could include degradation of habitat adjacent to the site through introduction of nonnative invasive plants and increased fire danger. Currently, there is a fairly high level of recreational use occurring in the Yakima River Canyon just downstream from the damsite. Given the existing level of recreational use in the area, these indirect impacts are not expected to be substantial.

Elk movements within the Wymer reservoir vicinity would not be affected. There is migration southward from the Colockum and Quilomene elk herds, but there is little evidence that these herds move into the Wymer area. WDFW has identified the Wymer reservoir site as core wintering habitat for bighorn sheep and core habitat for mule deer. WDFW has also identified the area between the Yakima Training Center and Yakima River as a corridor for priority habitats and species. The area supports a relatively undisturbed and unbroken tract of vegetation used by jackrabbit and possibly amphibians and reptiles. Based on the documented use of these habitats, Wymer dam and reservoir could have an effect on movement of these species of wildlife. The expanded Bumping Lake Reservoir would permanently inundate forest communities and displace wildlife. Construction of a new rock-fill dam downstream of the existing Bumping Lake Dam and enlargement of the reservoir would result in the flooding of forested communities above the current level of the reservoir. Preliminary estimates developed for the Integrated Plan indicate that approximately approximately 980 acres of old-growth forest, would be inundated if Bumping Lake Reservoir were enlarged to a capacity of 190,000 acre-feet (Reclamation and Ecology, 2011d).

Habitats at the lake edge used by wildlife for nesting or foraging would be lost, but could be replaced in the long term once vegetation at the new lake edge stabilizes. Standing dead trees from inundation would provide habitat for several decades. Mobile wildlife species would eventually be permanently displaced to adjacent suitable habitats. Some losses of individual animals could occur if there is not sufficient unoccupied habitat in the adjacent areas. Travel corridors for wildlife would also be impacted by the change in lake level, likely resulting in adverse effects on elk, deer, and small mammals. Loss of forest communities surrounding Bumping Lake Reservoir could also adversely affect some listed and priority species that may occur in the vicinity, including wolverine, western toad, golden eagle, and common loon. As described in Section 5.10, northern spotted owls and their habitat would be impacted by the expansion of Bumping Lake Reservoir. Additional site-specific studies to document wildlife species in the area and potential impacts on those species would be conducted prior to facility design and construction.

Wildlife using wetland habitats along the Kachess Reservoir shoreline are currently affected by existing drawdown operations. The proposed inactive storage drawdown would only occur when the lake levels are already reduced and wildlife are unable to use

wetland habitats along the shoreline. Site-specific studies of existing wildlife species using the reservoir area would be conducted prior to facility design and construction.

5.9.2.4 Groundwater Storage Element

Most of the proposed groundwater storage projects would result in minimal impacts on wildlife because projects would likely be located in already disturbed areas, would rely mostly on existing infrastructure, and would require minimal areas for project facilities. Some projects would result in the permanent loss of wildlife habitat associated with the placement of project facilities.

Because the potential locations of the aquifer recharge facilities would be in agricultural or urban areas with disturbed habitats, few wildlife species are expected to be impacted.

5.9.2.5 Habitat/Watershed Protection and Enhancement Element

Long-term impacts of the habitat restoration projects are expected to be beneficial to wildlife habitat and wildlife. Substantial beneficial impacts are anticipated with the acquisition of lands and the protection of large areas of wildlife habitat. The acquisition of lands containing old-growth forest or shrub-steppe habitat would protect areas of these high-quality habitats that otherwise could be lost due to development under existing ownership. Old-growth forests are uncommon in the Yakima River basin, and shrub-steppe habitat has been significantly reduced. Acquisition of dry site, forest fringe habitat is also expected to benefit terrestrial wildlife in the basin.

The proposed habitat/watershed protection, restoration, and enhancement projects on the mainstem and tributaries of the Yakima River would improve native plant diversity and habitat for wildlife in the long term. Projects that reconnect side channels or create off-channel habitats would increase breeding habitat for amphibians. Stabilizing streambanks and restoring riparian areas would provide functioning habitats for many species of large and small mammals and birds. The extent of construction is unknown at this time because the projects have not yet been designed, and therefore the magnitude of impact is difficult to characterize at this stage. It is anticipated that both small and large projects would be proposed under this element.

5.9.2.6 Enhanced Water Conservation Element

Most of the water conservation projects would be located in already disturbed areas and would not permanently impact wildlife. Some projects would result in the permanent displacement of wildlife associated with the placement of project facilities.

No long-term impacts are anticipated with the municipal and domestic conservation program because no wildlife habitat would be disturbed or removed.

5.9.2.7 Market Reallocation Element

No long-term wildlife impacts are anticipated for the Market Reallocation Element because this element does not generally require construction or change existing land uses and habitats

5.9.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

The overall impact of the Integrated Plan is expected to be positive for wildlife. Although there would be some negative impacts on wildlife habitat, particularly in the areas of new or expanded reservoirs, the combined net effect of the proposed elements would result in improved fish and wildlife habitat over time. Many of the proposed projects under the Enhanced Conservation and Structural and Operational Changes Elements would not impact habitat because they would be located in previously disturbed areas. However, they would provide flow benefits to fish and other aquatic species. Fish passage facilities would open up new territory for anadromous fish and help restore ecosystems upstream of the dams. The Habitat/Watershed Protection and Enhancement Element would improve degraded habitat and protect large areas of intact habitat, including threatened shrub-steppe and old-growth habitats.

The integrated implementation of fish habitat enhancement projects and the streamflow improvements would provide greater benefits to riparian and wetland habitats in comparison to a program that implements the elements separately. Thus, integrated management approaches are more likely to achieve systemwide benefits for fish and wildlife.

5.9.4 Mitigation Measures

The impacts on wildlife caused by the development of the required facilities and infrastructure would be mitigated through site and facility design to minimize the need for wildlife habitat removal. Mitigation measures for wildlife habitat are expected to be the same as those described for vegetation in Section 5.8.4.

The certainty of effectiveness for wildlife mitigation is directly linked to measures outlined in the vegetation section. As described in that section, the highest level of uncertainty relates to species inhabiting old growth forest and shrub-steppe habitat. As described in Section 5.8.4, the adaptive approach employed by the Integrated Plan will help to ensure that mitigation measures function as intended.

5.10 Threatened and Endangered Species

5.10.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Individual actions to improve fish passage would

open up new territory for listed fish at stream barriers and irrigation diversions. However, no fish passage facilities are likely to be installed at Reclamation reservoirs and listed species such as steelhead would continue to be unable to access headwater habitat above the dams and bull trout would continue to be unable to migrate downstream.

While ongoing conservation and restoration projects would provide benefits to listed fish populations in affected streams, streamflow conditions in the basin would likely worsen overall, affecting migration, spawning, and rearing conditions for anadromous fish in the basin. The No Action Alternative provides little flexibility in operations to meet instream flow needs for listed fish and other aquatic species. Further, this alternative would not receive the benefit of a comprehensive and coordinated program of water resource and habitat improvements.

Overall, ongoing projects to restore habitat are likely not sufficient to overcome the problems of depleted streamflow conditions needed to support increases in listed fish populations and healthy, functional ecosystems in the Yakima River basin. Without a comprehensive, coordinated management program, ongoing projects to restore fish passage and provide habitat protection and restoration would be completed in a piecemeal fashion, reducing the potential for positive synergistic effects.

Under the No Action Alternative, there would be continued and likely increased impacts to high-quality habitat on some private lands supporting threatened shrub-steppe and old-growth habitats critical for greater sage-grouse and northern spotted-owl, respectively. Spawning grounds for steelhead and bull trout could also be affected by development on these lands.

Unlike the Integrated Plan Alternative, no large-scale water storage or facilities projects are likely to occur. As a result, the No Action Alternative would have the least displacement impacts to threatened and endangered species related to water storage and facilities projects. In general, current fish population trends would continue under the No Action Alternative with existing problems with water availability and habitat quality likely worsening with increased population and climate change. As a result, the No Action Alternative would have the most impacts to threatened and endangered species.

5.10.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Under the Integrated Plan Alternative, long-term impacts on listed species are based on the amount of habitat for listed fish or wildlife species that would be permanently removed and replaced with project facilities. Some of the elements would result in the improvement of streamflows, riparian areas, forest communities, or wetlands and are considered beneficial for listed species. As a result of its review of the proposed programmatic level actions, the Service has concluded that that the Integrated Plan has greater probability of improving fish and wildlife resources beyond what currently exist within the Yakima River basin than the No Action Alternative (Service, 2012).

5.10.2.1 Reservoir Fish Passage Element

Construction of fish passage facilities could result in displacement of listed fish and wildlife. Minor effects on habitat could occur through the removal of a few mature Douglas firs or other conifers for construction of the adult fish collection facilities and access roads. Conifer removal would be minimized to the extent possible.

Fish passage would provide anadromous fish access to historic territories. The reintroduction of anadromous fish would have overall long-term ecosystem benefits by restoring marine-derived nutrient food web interactions between invertebrates, fish, and mammals. Migrating, spawning, and juvenile fish are a vital forage base for many birds, mammals, and other fish. Spawned fish carcasses and eggs are also an important source of nutrient inputs to streams and increase the biomass available to the benthic invertebrate community. In general, this element is anticipated to have beneficial impacts on listed fish and wildlife species.

Most threatened and endangered species present in the Cle Elum River basin are expected to benefit from the project. Overall, bull trout would benefit from an increased prey base, unrestricted access to available upstream spawning and rearing habitat, return to a more historic distribution throughout its range, and connection to downstream populations that were previously isolated by the dam. Other listed species that may occur in the area, such as gray wolf, grizzly bear, and Canada lynx, would likely benefit from increased ecosystem productivity. A small amount of wildlife habitat would be removed for facility construction at the dam, but long-term impacts on listed wildlife are anticipated to minor. Most listed wildlife species are not likely to use the area adjacent to the dam because of the presence of people and roads.

Impacts on threatened and endangered species are expected to be similar at all the other reservoirs. Fish passage facilities at Bumping Lake Dam would be constructed as part of the proposed enlargement project and impacts are described in Section 5.10.2.3.

5.10.2.2 Structural and Operational Changes Element

The KRD and Wapatox projects are not anticipated to cause long-term impacts on listed species because no fish or wildlife habitat suitable for listed species would be disturbed or removed.

The Keechelus-to-Kachess pipeline could result in permanent removal of wildlife habitat where present along the 5-mile-long corridor. If listed species such as gray wolf, grizzly bear, and Canada lynx are present, this would result in the displacement of wildlife to adjacent suitable habitats. Because the pipeline corridor is near an existing road, it is unlikely that listed species use the area. The extent of permanent wildlife habitat removal is unknown at this time because facilities have not yet been designed. The conversion of habitat from older seral stages to younger forest within the corridor would still provide habitat. The pipeline would improve rearing conditions for steelhead downstream of the Keechelus Reservoir by reducing artificial summer high flows on the Yakima River between Keechelus dam and the mouth of the Kachess River. It is also expected to

increase water levels in Kachess Reservoir most years and improve bull trout passage to tributary streams, including during the additional drawdown in drought years caused by the Kachess Inactive Storage project (Section 5.1.2.3).

The change in operations for the power subordination projects would not cause negative impacts on listed species. Middle Columbia River steelhead would benefit from improved river flows during juvenile migration.

5.10.2.3 Surface Storage Element

Construction of new storage facilities has the greatest potential for impacts on listed fish and wildlife. A new reservoir would permanently remove vegetation and displace wildlife from the reservoir area. The size and location of the facility would determine the degree of alteration to habitats used by threatened or endangered species. Site-specific studies of listed fish and wildlife species using the reservoir area would be completed prior to facility design and construction.

Wymer Dam would have permanent impacts on shrub-steppe vegetation and listed wildlife within the Lmuma Creek drainage. Wymer Reservoir would inundate approximately 1,400 acres of land, over 1,000 acres of which would be shrub-steppe habitat (Reclamation, 2008f). This land is currently privately owned and could be impacted by private development. Greater sage-grouse, a Federal candidate species, use shrub-steppe and, to a lesser extent, grassland and agricultural areas. Loss of this habitat at the Wymer site would exacerbate ongoing losses in the area resulting in potentially substantial impacts to this species.

Movement corridors and habitat for the greater sage-grouse would be affected directly by Wymer Reservoir. A movement corridor runs north to south through the Yakima River Canyon that is about 14 miles wide. The reservoir lies east of the canyon and is oriented east and west so it would obstruct a very small portion of the greater sage-grouse movement corridor. Sage-grouse moving west from the Yakima Training Center to the canyon would be required to migrate to the north or south of the reservoir which would further fragment greater sage-grouse populations (Reclamation, 2008f).

Shrub-steppe habitat in eastern Washington has been altered significantly by agricultural, residential, and urban development over the past century. Most recently, areas of shrub-steppe have been developed for wind energy. Three large areas of shrub-steppe remain in the Yakima River basin; two are on public land (the Yakima Training Center and the Hanford Reach National Monument); the third is on the Yakama Reservation. Shrub-steppe areas on the Hanford Reach National Monument and Yakima Reservation are protected from future residential, urban, and agricultural development. Military activities at the Yakima Training Center continue to disturb and destroy shrub-steppe and sage-grouse habitat.

Management efforts are being implemented at these three remaining sites to preserve, restore, and increase functional shrub-steppe habitat and ecological connectivity. The South-Central Washington Shrub Steppe/Rangeland Conservation Partnership and

Washington's Greater Sage-Grouse Recovery Plan seek to implement these objectives for the remaining tracts of shrub-steppe (Stinson et al., 2004). Outside of these larger protected areas, residual shrub-steppe habitat continues to be threatened by urban and residential development and habitat fragmentation. The Habitat/Watershed Protection and Enhancement Element of the Integrated Plan would acquire large tracts of shrub-steppe habitat to reduce the threat to residual habitat.

Expansion of the Bumping Lake Reservoir would permanently inundate forest communities dominated by lodgepole pine downstream of the existing dam and above the current level of Bumping Lake. As discussed in Section 5.8, approximately 980 acres of old-growth forest would be inundated if Bumping Lake were enlarged to a capacity of 190,000 acre-feet (Reclamation, 2008f). This could adversely affect listed species and their habitats known to occur in the vicinity, such as the northern spotted owl. The northern spotted owl was federally listed as a threatened species in 1990 because of widespread habitat loss and degradation and a lack of effective regulations to conserve the species. Northern spotted owls generally rely on mature and old-growth forests that provide the habitat structures and characteristics required for nesting, roosting, and foraging (Service, 2011b).

As described in Section 3.10, previous habitat mapping efforts have identified northern spotted owl habitat within the area of proposed reservoir expansion at Bumping Lake (WDFW, 2009) as well as late successional (old-growth) forest habitat as defined in the Northwest Forest Plan (USDA and DOI, 1994). The Service has recently revised the recovery plan for the northern spotted owl (Service, 2011b) and the previously designated MOCAs and critical habitat around Bumping Lake Reservoir are no longer part of the recommended strategy. The revised recovery plan relies on the broader framework of habitat conservation, as set forth by the Northwest Forest Plan, across the eastern Washington Cascades. Critical habitat designations will be updated as part of a rulemaking process expected to be completed by December 2012. Federal land managers are expected to adhere to the Northwest Forest Plan and utilize the modeling framework described in the revised recovery plan to guide land management plans and decisions (Service, 2011b). The revised recovery plan and recommendations along with site-specific studies would be considered and incorporated into facility design and construction if this element is authorized. The Habitat/Watershed Protection and Enhancement Element of the Integrated Plan would reduce the threat through acquisition of large tracts of late-successional habitat. Land targeted for acquisition in the Teanaway forest ridge has the potential to improve suitable habitat for northern spotted owl in the long-term.

The enlargement of Bumping Lake Reservoir would affect bull trout and critical habitat by flooding spawning areas and reducing access to suitable habitat. As described in Section 5.7.2.3, the inundation would result in the loss of approximately 18 to 20 percent of redds found annually in Deep Creek (Service, 2009a). However, basin-wide efforts to improve conditions for bull trout, particularly by reconnecting access to habitats through fish passage and restoration as proposed by the Integrated Plan, are anticipated to have a net benefit for bull trout over time. Furthermore, the proposed reservoir elevation was

developed in consultation with the Service, which determined that the amount of inundation was acceptable based on other improvements provided by the Integrated Plan, particularly the reconnection to habitats through fish passage and restoration. While bull trout above Bumping Dam would experience increased competition from introduced fish, they are expected to benefit from an increased prey base and connection to downstream populations. Bull trout juvenile survival could also benefit from inundation of near-shore, complex riparian vegetation and dead trees, as well as reduced predation through increased escape cover.

The Kachess Reservoir inactive storage project is not expected to affect listed species using the shoreline. The area is already subject to substantial drawdowns and is not used by listed species during drawdown periods; however, bull trout would continue to be present. Drawdown during drought years would further reduce habitat available in Kachess Reservoir for bull trout and make two tributary streams at the northern end of the lake inaccessible. However, as described in Section 5.10.2.2, it is anticipated that the Keechelus-to-Kachess pipeline project would increase water levels in the Kachess Reservoir most years and improve bull trout passage during the additional inactive storage drawdown in drought years. The inactive storage project would include improvements to bull trout passage into Box Canyon Creek which would expand and improve available bull trout habitat. Long-term displacement could also occur due to permanent changes to the character and function of the shoreline during successive drought years. The pipeline project is expected to mitigate only some impacts of the inactive storage project on bull trout. Other mitigation measures are discussed in Section 5.10.4. Site-specific studies of existing wildlife species using the reservoir area would be conducted prior to facility design and construction.

5.10.2.4 Groundwater Storage Element

Most of the proposed groundwater storage projects would be located in already disturbed areas that do not provide habitat for listed species. The infiltration of cooler groundwater into the Yakima River or its tributaries could benefit fish including listed bull trout and Middle Columbia River steelhead.

5.10.2.5 Habitat/Watershed Protection and Enhancement Element

Beneficial impacts are anticipated with the acquisition of lands and the restoration of key landscapes. Old-growth forests suitable for northern spotted owl nesting, roosting and foraging are uncommon in the Yakima River basin, and functional shrub-steppe habitat has been significantly reduced, impacting greater sage grouse. The acquisition of lands would occur on a large scale throughout the basin and would preserve old-growth forests and shrub-steppe vegetation. This plan element would offer greater protection from losses of these high-quality habitats on non-Federal lands and is consistent with the overall strategy of protecting high quality habitats at a landscape scale.

Mainstem and tributary habitat enhancement projects would also benefit listed fish species and plant species, including Ute ladies-tresses by increasing suitable habitats.

Historically, fish habitat in the Yakima River basin has been significantly altered. The Habitat/Watershed Protection and Enhancement Element would accelerate ongoing efforts to improve fish passage, improve distribution of fish life to more of their historic range, protect existing high-value habitats, enhance flows, improve habitat complexity, and reconnect side channels and off-channel habitat to stream channels. The proposed habitat actions are expected to improve prospects for recovering ESA-listed fish populations to levels that are resilient to catastrophic events and the potential impacts of climate change. Fish habitat enhancement actions would help create improved spawning, incubation, rearing, and migration conditions for all salmonid species in the Yakima River basin; implement key strategies described in the Yakima Subbasin Plan (YBFWRB, 2005); and complete most of the actions described in the Yakima Steelhead Recovery Plan (YBFWRB, 2010). Specific benefits of the Habitat/Watershed Protection and Enhancement Element for both anadromous and resident fish, including steelhead and bull trout, are previously discussed in Section 5.7.2.5.

5.10.2.6 Enhanced Water Conservation Element

Most of the conservation projects would be located in already disturbed areas that do not provide suitable habitat for listed species. All pumps and diversions would include fish screens.

5.10.2.7 Market Reallocation Element

Water rights acquisitions targeted at instream flow improvements could benefit listed species. Depending on the timing and location of the increased streamflows that could occur, steelhead and bull trout could benefit from water transfers. Higher flows would likely improve aquatic habitat conditions for fish and other organisms by increasing overall habitat area and improving water quality conditions (e.g., temperature and dissolved oxygen).

5.10.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

The overall impact of the Integrated Plan is expected to be positive for listed species. The Surface Water Storage Element would result in negative impacts on listed fish and wildlife using the area of Wymer Reservoir or the proposed reservoir expansion at Bumping Lake Reservoir, including the loss of more than 1,000 acres of shrub-steppe habitat and approximately 980 acres of old-growth habitat and inundation of lower Deep Creek, used by one of the most healthy bull trout populations in the Yakima Basin. Overall, impacts would be positive for listed species along the mainstem and tributaries in the Yakima River basin. Operational and structural changes to existing facilities are not anticipated to result in negative impacts because construction associated with these elements would generally occur in previously disturbed areas or built environments with the possible exception of sections of the Keechelus-to-Kachess pipeline. In addition, the operational and structural changes would provide flow benefits to fish and other aquatic species. Fish passage facilities would open up new territory for anadromous fish, including MCR steelhead and bull trout and help restore ecosystems upstream of the

dams. The Habitat/Watershed Protection and Enhancement Element would improve degraded habitat and protect large areas of intact habitat, including threatened shrub-steppe and old-growth habitats critical for greater sage-grouse and northern spotted owl, respectively. It is expected that the mitigation elements of the project proposal would be implemented prior to, or concurrent with, any storage or infrastructure development to ensure that adverse impacts to fish and wildlife are fully mitigated. The integrated implementation of fish habitat enhancement projects and the streamflow improvements would provide greater benefits to listed fish and wildlife species in comparison to a program that implements the elements separately. Thus, integrated management approaches are more likely to achieve systemwide benefits for listed fish and wildlife.

5.10.4 Mitigation Measures

The impacts on listed fish and wildlife caused by the development of the required facilities and infrastructure would be mitigated through site and facility design to minimize the need for vegetation removal. The design should incorporate an evaluation of existing wildlife habitats and species in the vicinity and a rare-plant survey. Habitat that is determined to be of significant importance (e.g., presence of listed species) should be preserved to the greatest extent possible. If intact native vegetation is present, the footprint of the facility should be minimized and situated to result in the least amount of disturbance.

Specific mitigation for listed fish and wildlife species would be identified during future ESA consultation. The Service has provided a list of conservation measures and recommendations in the *Final Fish and Wildlife Coordination Act Report (CAR)* (Service, 2012). These recommendations would help inform future ESA consultation when elements of the Integrated Plan move to the project planning phase. NMFS would also be part of future consultation and will provide conservation recommendations under Section 7 review. The Service's CAR recommendations, along with Reclamation's response to those recommendations, are included as Appendix F.

As described in Section 5.8.4, the effectiveness of mitigation measures is most uncertain for those species inhabiting old-growth forest and shrub-steppe habitat. Recommendations in the Service's *Final Fish and Wildlife CAR* and the conservation recommendations developed during future ESA consultation along with the adaptive approach included in the Integrated Plan will help to reduce this uncertainty, but will not eliminate it.

5.11 Visual Quality

This section analyzes the long-term impacts on visual quality from implementation of the Integrated Plan and the No Action Alternative. The visual quality analysis conducted as part of this EIS involved a review of existing documents and aerial photos to identify issues relevant to the existing landscape character of the sites, and a determination of the potential for visual impacts that would result from the major components. In determining

the magnitude of visual impacts, the scale, extent, and sensitivity of viewers was considered.

5.11.1 No Action Alternative

The No Action Alternative includes individual actions that could affect visual resources at a local scale. The individual actions would have varying levels of long-term visual impacts. Overall, impacts would likely be minor because of the small scale of ongoing projects. Habitat improvements, including riparian plantings, would create a more natural streambank condition, which would improve visual resources in the immediate area.

Unlike the Integrated Plan Alternative, no large-scale water storage or facilities projects are likely to be implemented. As a result, the No Action Alternative would not result in visual impacts from water inundation of large areas, or from substantial new manmade facilities in the Yakima River Canyon. Further, this alternative would not introduce large-scale facilities or substantial changes to existing facilities, within view of motorists on the Mountains to Sound Greenway, or other State Scenic Byways.

Under the No Action Alternative, there would be continued and likely increased changes to the visual appearance of some private lands that would have otherwise been acquired and protected under the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan Alternative. In some cases, natural or nearly natural appearing lands could change to a logged or developed condition.

5.11.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.11.2.1 Reservoir Fish Passage Element

The proposed Fish Passage Elements would be located in landscape settings where the overall visual character and scenic quality are high. However, the fish passage facilities would be located at existing dams where human activities have reduced the visual character and scenic quality. It is often a challenge to blend or design compatible facilities in such settings without creating a substantial change in visual character or reducing scenic quality. The capacity to visually absorb development is primarily dependent on vegetation cover, landform, and existing structures.

Lake and reservoir shorelines generally have a low ability to visually absorb new development due to the availability of uninterrupted views across water (Reclamation, 2008f) However, a major factor influencing the potential visual impact is the level of visual contrast between the proposed new development and the existing elements in the landscape. The existence of Cle Elum, Bumping Lake, Tieton, Keechelus, Kachess, and Clear Lake Dams, and their related structures, would make new visual intrusions related to implementing fish passage less apparent. Distance is also a strong influence on potential visual impact, and the intrusion often is reduced if the project is viewed from a distance.

At viewpoints above the dams, and on or adjacent to reservoirs, additional intake structures and conduits for fish passage may be visible. Typical viewpoints are from highways, local roads, shoreline campgrounds, and residences adjacent to or overlooking the reservoirs.

At viewpoints below dams, additional outlets for downstream fish passage and structures for upstream fish passage (barrier, fish ladder, loading slab, building, fish lock, and holding pool) would be visible. Typical viewpoints are from highways, local roads, and riverbanks, where public access exists. The views would generally be fleeting for motorists, and inconsequential relative to the existing dams and structures.

Many of the new and modified facilities would be visible from viewpoints, but would be subordinate in character to the dams. In some cases they would be indistinguishable; in other cases they would be more pronounced. Exterior surfaces would be designed to blend with the surrounding landscape. Reclamation has determined that for Cle Elum and Bumping Lake Dams, the upstream fish passage facilities will be indistinguishable from existing dam features (Reclamation, 2008f). At Cle Elum Dam, the downstream barrier may be visible from the riverbank. At Bumping Lake Dam, the top of the fish handling facility building may be visible from the adjacent Forest Road.

Removal of some second-growth conifer forest and riparian vegetation would be necessary to construct fish collection facilities at some dam sites, which would create a more open setting and potentially increase views into the sites. Development of access roads to new trap-and-haul facilities would also have the potential to increase views into the sites. For the most part, the new facilities would be introduced into a visual environment already containing several similar facilities; therefore, long-term visual impacts would be minor.

The visual impact caused by the removal of second-growth forest for construction would gradually be reduced over time as replanted trees reach maturity. Permanent fish passage facilities that would be visible upstream of the dam include the intake structure and access bridge. The intake structure would consist of a multilevel gated structure and concrete intake tower located about 500 feet upstream of the dam. Depending on the elevation of the reservoir, the intake structure would be partially or entirely visible above water.

Permanent fish passage facilities that would be visible downstream from the spillway include the barrier dam and collection facility. Visual impacts of downstream facilities would be minimal given the limited viewpoints of this area.

In general, the fish passage facilities would have minimal visual impacts, remaining subordinate to the existing dam and associated structures.

The fish passage facilities at Tieton, Keechelus, and Kachess Dams are expected to be similar to those at Cle Elum Dam and would similarly alter views of the existing dam. The facilities would be visible to residents and recreationists in the immediate vicinity of Kachess Dam, but largely hidden from view from most visitors because of limited access

to the dam area. The facilities at Keechelus and Tieton Dams would be visible to motorists on I-90 and Highway 410, respectively. Keechelus Dam is visible from the Mountains to Sound Greenway. At both dams, the fish passage facilities would have minimal visual impacts because they would be subordinate to the existing dam. The Clear Lake Dam fish passage facilities would be located on the downstream side of the existing dam and would not be visible to most visitors.

A more detailed analysis of potential impacts on visual resources at the reservoirs would be completed in accordance with the methods described in USFS Scenic Management System (SMS) as part of the future project-level environmental review.

Fish passage facilities at Bumping Lake Dam would be constructed as part of the reservoir enlargement. Impacts are evaluated in the Surface Storage Element section below.

5.11.2.2 Structural and Operational Changes Element

The proposed modifications would have varying levels of long-term visual impacts. Overall, impacts would likely be minor because the modifications would occur to existing facilities at a local scale.

For the Cle Elum Dam pool raise project, flashboards installed on top of the dam would modify its appearance. The flashboards would protrude above the spillway of the historic dam and would be visible to residents and recreationists in the immediate area. It is likely that the flashboards would blend in with the overall dam structure and would not substantially modify views. Shoreline protection measures, such as riprap and bioengineering measures, would alter the appearance of the shoreline on a small portion of the lake shore. The shoreline protection measures would be designed to blend in with the surrounding shoreline and would likely not be noticeable once vegetation is established around them. Land around the reservoir would be inundated to a higher level for 3 to 10 weeks per year. The increased reservoir level would be noticeable during the high water periods, but would only be 3 feet higher than current high water elevations.

Once construction is completed for the KRD and Wapatox projects, there would be little visual difference from current conditions. The open canals would be replaced with pipes. Because they would be located in the same canal rights-of-way, there would be limited views of the pipes. Additional water in the tributary streams during otherwise dry conditions could improve visual quality. The re-regulating reservoir at Manastash Creek and pump station on the Yakima River would be visible to residents of the area and people driving through or boating on the Yakima River. These impacts could be mitigated by careful siting and screening of the facilities.

Keechelus-to-Kachess Pipeline

The Keechelus-to-Kachess pipeline corridor would be visible to visitors, including motorists on the Mountains to Sound Greenway. The pipeline corridor would be vegetated, but would have no trees, similar to powerline corridors and road rights-of-way in the area. Although viewers from the Greenway may be more sensitive to unnatural

views, the views in the vicinity of the pipeline corridor have been previously disturbed by roads and powerlines. The outfall pipe at Kachess Reservoir would be visible to residents and recreationists during low lake levels.

The power subordination projects at Roza Dam and Chandler Powerplants would not cause any changes to visual quality.

5.11.2.3 Surface Storage Element

Construction of new storage facilities would result in substantial long-term visual impacts. The magnitude of the impact would depend on the proposed location of the facility, the existing character of the surrounding landscape, the scale of the project, how visible the construction site would be to the public, the extent to which the scenic quality of the existing landscape has already been modified, the sensitivity of the viewing public, and viewers' expectations based upon the visual character of the setting in which the alterations to views is taking place. The reservoirs would inundate large areas of land and change the landscape from shrub-steppe or forested to open water. Reservoirs would be drawn down during summer months creating a "bathtub ring" of mud around the reservoirs and at Bumping Lake Reservoir exposing tree stumps in the cleared reservoir area. Rivers below the dam would have altered flows during some seasons.

The new dam and reservoir at Wymer would introduce substantial new manmade facilities in the predominantly undeveloped Yakima River Canyon. The most prominent of the facilities would include the pumping plant (approximately 40 feet high) and the switchyard (which would include towers approximately 80 feet in height). These facilities would be on agricultural land east of SR–821 and the river. The outlet channel from the dam would modify the existing Lmuma Creek channel and crossing under SR–821 to the Yakima River. The creek is intermittent and the area near SR-821 is trampled by cattle and bare of vegetation (Reclamation, 2008f).

These facilities, at least prior to mitigation, would represent a substantial visual impact in the context of the largely undeveloped, scenic Yakima River Canyon corridor. While the new facilities may be somewhat similar in character to those at Roza Diversion Dam (located 5 miles to the south), they would be more prominent, visible, and concentrated (Reclamation, 2008f).

Related to the dam and reservoir, the top of 450-foot-high Wymer Dam would be visible to motorists along an approximately 0.5-mile stretch of SR–821, a State Scenic Byway. The view of the dam would be fleeting (available for less than a minute) and would be noticed only if motorists look eastward up Lmuma Creek immediately opposite the site of the pumping plant complex. The dam would be concrete-faced and would be visible to viewers as something distinct and in contrast to the surrounding shrub-steppe vegetation and basaltic cliffs. The only other location from which portions of this alternative would be seen is I-82, where the narrow, easternmost arm of the reservoir pool would be crossed by the highway and would be visible to motorists. The dam would not be visible from any recreation sites or businesses. Nonetheless, this visibility of the dam would add to the intensity of impact on the Yakima River Canyon corridor (Reclamation, 2008f). It is

possible the Bureau of Land Management (BLM) Visual Resource Inventory management objectives would not be met at certain locations. A more detailed analysis of potential impacts on visual resources from Wymer Dam construction would be completed in accordance with the methods described in BLM visual assessment guidelines, and in consideration of planning and design standards related to State Scenic Byways, as part of future project-level environmental review.

The Bumping Lake expansion would increase the current 1,300-acre reservoir to approximately 3,200 acres. The new dam structure would be located approximately 4,500 feet downstream from the existing dam and would likely be taller than the existing dam. The new dam location is currently an area of mature conifer forest with a free flowing (but controlled) river flowing through it. The new dam and expansion of Bumping Lake would substantially affect the visual character of the Bumping Lake valley by removing trees and flooding the area behind the new dam. It is possible the U.S. Forest Service Visual Quality Objectives and Scenic Integrity Levels would not be met at certain locations. A more detailed analysis of potential impacts to visual resources at Bumping Lake would be completed in accordance with the methods described in the U.S. Forest Service Scenic Management System as part of future project-level environmental review.

The new dam and expanded reservoir would be visible from existing viewpoints and from new viewpoints that would be provided surrounding the reservoir. Changes to the reservoir would be particularly evident along the east and southeast areas of the reservoir from the new Bumping Lake Dam, south to the Deep Creek drainage area. This area would be inundated and would change from a low-lying, forested upland lake fringe to open water. During low water levels, a larger area of mud flats and tree stumps would be visible.

These changes would be perceived as either neutral or positive by some and as adverse by others. The degree of positive versus negative viewer reaction would likely vary by the type of user. For example, to boaters and fishermen the sight of the expanded reservoir may be viewed favorably; however, those who prefer an unaltered natural view would likely react negatively. The dam and expanded reservoir would also be visible to trail users from a number of obstructed viewpoints (filtered views through trees) and unobstructed viewpoints in the William O. Douglas Wilderness. Viewpoints include trails and lookout points on American Ridge (north of the lake), Nelson's Ridge (south of the lake), and Miner's Ridge (west of the lake). Many of these trail users are in the Wilderness because they value natural settings, and they may view the new dam and expanded reservoir as negative.

A more detailed analysis of potential impacts on visual resources at Bumping Lake would be completed in accordance with the methods described in USFS Scenic Management System (SMS) as part of the future project-level environmental review.

Under one option for the Kachess Reservoir inactive storage project, the outlet channel and discharge structure from the Yakima River portal to the river would be visible to river users. Under the other option, the pump station at the dam would modify the views

of the dam, but would fit with the character of other dam structures. The outlet pipe would be visible in the area downstream of the dam. Because other dam facilities are located in the downstream area, river users are not likely to view them negatively. The inactive storage project would cause the reservoir to be drawn down to a lower level during drought years. This may be viewed negatively by recreationists and residents. However, the reservoir currently is drawn down and the lower level may not be noticeable to most people. Long-term impacts at Kachess would likely be minor since the new facilities do not represent a substantial change.

5.11.2.4 Groundwater Storage Element

Groundwater storage facilities would change the visual landscape in their immediate areas, but would likely result in only minor long-term impacts given the limited facilities and local scale of visual changes. Infiltration sites would change from dry areas to basins that hold water. Injection facilities would be housed in pump houses similar to wells and have minimal visual impacts. Infiltration ponds, pump stations, and other equipment would be visible, but would likely blend into the surrounding landscape of agricultural uses.

The ASR infrastructure would be located at existing treatment facilities and would generally not be visible to the public. Most conveyance lines would be underground. However, the intake lines would require pump facilities adjacent to the water source. This would consist of a pump house, power supply, and intake pipe. The facilities would be fenced. Depending on the location, the intake facilities could be visible from adjacent roadways and recreational areas, such as the Naches River for the Yakima ASR project. All impacts would be localized and would affect a limited number of individuals, largely those people who live in or travel through the local area. As a result, long-term impacts would likely be minor.

5.11.2.5 Habitat/Watershed Protection and Enhancement Element

The targeted watershed protection program would preserve lands from development, likely protecting existing visual resources in a natural or nearly natural appearing condition. The program would not change the visual appearance of the acquired or designated lands.

Habitat enhancements, including levee setbacks and riparian plantings, would improve the condition of riparian vegetation and change views of the rivers and creeks. These enhancements would create a more natural streambank condition, which would improve visual resources in the immediate area overall.

5.11.2.6 Enhanced Water Conservation Element

Some conservation facilities such as re-regulating reservoirs would be visible in the area, but would likely blend in with surrounding agricultural facilities. Open water canals would be converted to enclosed pipes in some areas, likely drying up adjacent vegetation

and riparian-like areas that are facilitated by leakage from the irrigation system. This would change the visual character of the area, but the change would be a return to more natural arid conditions.

No impacts on visual quality are anticipated from the municipal and domestic conservation program.

5.11.2.7 Market Reallocation Element

The Market Reallocation Element would have no direct effects on visual resources. However, reallocation could result in land use changes that would alter visual landscapes. Water right transfers could result in expanding irrigation to new areas, changing agricultural uses to urban or domestic uses, or fallowing some fields. All would result in changes to the visual landscape, which some people may view as negative. Irrigated agriculture could be expanded into areas that are zoned for agriculture. Visual changes would be limited to changes in crop types and the addition of irrigation facilities, but the overall visual landscape would not be altered. Water transferred to urban or domestic uses would also be applied in areas that are designated for those uses. Some people may view a fallow field as potential wildlife habitat, while others may feel that such areas are unkempt and overgrown. The program would include provisions requiring weed control on fallowed fields.

5.11.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Because the visual impacts of the facilities would be primarily of local scale, no increase or lessening of impacts as a result of the integrated elements is expected. Further, considering the similarity in appearance with existing structures and the fact that the overall complex of facilities at individual project sites would be viewed mainly from a distance, the overall long-term visual resource impact is not expected to be significant. The Habitat/Watershed Protection and Enhancement Element would protect and enhance large areas of native vegetation in the basin, providing overall benefits to visual resources.

5.11.4 Mitigation Measures

Involving an architect in project design would ensure that new facilities and restored areas would meet BLM's Visual Resource Inventory management objectives and the prescribed USFS Visual Quality Objective of Retention and corresponding Scenic Integrity Level of High (see Section 3.11) to the extent practicable.

Disturbed areas below the fish passage facilities would be contoured to blend with adjacent areas to the extent practicable and revegetated with appropriate native plant species. The visual impacts of fish handling facilities would be reduced using the appropriate paint color to blend with the natural landscape. New or modified canals, ditches, tunnels, siphons, and appurtenant facilities would be located to reduce their visibility from public areas.

5.12 Air Quality

Because project details are not known at this time, potential air quality impacts are discussed qualitatively based on the general types of emissions anticipated from different stationary sources proposed for the Integrated Plan elements. This section does not discuss compliance with Federal or State regulations because specific levels of emissions from permanent stationary sources cannot be determined at this time. Additional analysis would be undertaken during project-level review when projects are carried forward to implementation.

5.12.1 No Action Alternative

Under the No Action Alternative, Reclamation and Ecology would not carry out the Integrated Plan Alternative; however, various agencies and other entities would likely continue to undertake individual actions to accomplish some water resources improvements. In some cases, these projects may cause long-term impacts from emissions if they include stationary pollutant sources such as pumping equipment driven by diesel, natural gas, or other fossil fuels. In general, small water resources projects would likely fall below WAC stationary source permit requirements. If the scale or number of pumps triggers permitting requirements, they would be required to incorporate additional emissions controls. Therefore, long-term air quality impacts from the operation of pumping equipment would be relatively minor and unlikely to exceed the National Ambient Air Quality Standards (NAAQS) or Class 1 visibility standards.

5.12.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.12.2.1 Reservoir Fish Passage Element

Long-term impacts for all proposed fish passage projects included under this alternative (i.e., those at Clear Lake Dam, Cle Elum Dam, Bumping Lake Dam, Tieton Dam, Keechelus Dam, and Kachess Dam) would result from emissions from internal combustion engine vehicles used to transport fish upstream in the case of trap-and-haul fish passage programs at the Cle Elum Dam, and at other sites where such programs are implemented.

Long-term air quality impacts from the operation of the fish passage facilities or trap-and-haul programs would not trigger permit requirements and would be minor due to the small number of annual trips required at any one reservoir.

5.12.2.2 Structural and Operational Changes Element

No long-term air quality impacts are anticipated from structural and operational changes at Cle Elum Dam. No new emissions would be generated by operation of the flashboards at the dam or the shoreline protection measures.

The operation of equipment such as pumps or compressors used to pressurize pipes for the KRD and Wapatox Canal modifications could result in long-term emissions if the equipment is driven by diesel, natural gas, or other fossil fuels. The operation of the new pump station used to increase flows to Manastash Creek water users or directly to Manastash Creek could also cause emissions if the pump station is driven by diesel, natural gas, or other fossil fuels. Pump facilities may trigger air quality permitting on a project-by-project basis depending on equipment specifications. In general, facilities would either not trigger permitting thresholds or would incorporate emissions controls and conditions to minimize annual emissions. As a result, long-term air quality impacts from the operation of this equipment are not expected to cause exceedances of air quality standards.

No long-term air quality impacts are anticipated from structural and operational changes associated with the Keechelus-to-Kachess pipeline or power subordination at Roza Dam and Chandler powerplants because the projects would not generate any emissions.

5.12.2.3 Surface Storage Element

Electric pumps are anticipated to be used at the new pump station that would be used to fill Wymer Reservoir, and at the new pump station that could be used to withdraw water from inactive storage in Kachess Reservoir under one of the Kachess Inactive Storage options. Power supply would come from the regional power grid; therefore, air quality effects are not anticipated in the Yakima River basin. The regional power grid draws power from hydropower sources and from some fossil fuel powered electricity generation facilities, so there may be minor air quality effects at other locations where power is generated. However, any additional air quality emissions resulting from the generation of electricity using fossil fuels to run the pump stations under this element would be very minor in the context of the overall emissions from such a power plant. Additionally, facility emissions controls would maintain emissions rates within the limits set under the plant's air quality operating permits. Since pumping for both of these projects would occur only during intermittent periods when Wymer Reservoir is being filled or Kachess Inactive Storage is being used, any air quality effects would also be intermittent.

Emissions of dust and other airborne particulates originating from the drawdown zone of the reservoirs may increase PM_{10} levels in some cases. The Wymer Dam site is slightly more than 10 miles north of the PM_{10} maintenance area boundary, and because of the distance, not likely to cause PM_{10} compliance issues. There are no requirements for conformity analyses for sources outside the boundary, and therefore no additional mitigation measures required beyond standard dust control practices.

5.12.2.4 Groundwater Storage Element

No long-term air quality impacts are anticipated from the Groundwater Storage Element. Any increases in PM_{10} levels are expected to be minor and would occur outside the City of Yakima maintenance area boundary.

5.12.2.5 Habitat/Watershed Protection and Enhancement Element

No permanent stationary sources of air pollutants are anticipated to result from the proposed Habitat/Watershed Protection and Enhancement Elements. Therefore, no long-term air quality impacts are anticipated.

5.12.2.6 Enhanced Water Conservation Element

No long-term impacts are anticipated from the municipal and domestic conservation program because no emissions would be generated.

5.12.2.7 Market Reallocation Element

If the market-based water reallocation results in fallow fields, dust emissions could increase. The program would include requirements that fallow fields must be vegetated to control dust.

5.12.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Long-term air quality impacts associated with the Integrated Plan would be relatively minor and unlikely to cause exceedances of the NAAQS or Class 1 visibility standards.

5.12.4 Mitigation Measures

Dust control plans could be developed to mitigate the impacts of increased dust from fallow fields and dry infiltration basins. Measures to reduce dust could include installing plantings around the infiltration basins and planting drought-tolerant plants in fallow areas.

In some cases, air quality permits may be required for use of non-electric pumping, injection, or treatment equipment. Where permits are required, mitigation in the form of control technology and permit conditions would reduce emissions to acceptable levels. No mitigation measures are required for the temporary emissions from backup generators.

5.13 Climate Change

For purposes of this PEIS, the effect of climate change on proposed projects is discussed as a long-term impact. The potential for proposed projects to generate greenhouse gas emissions was discussed as a short-term impact in Section 4.13.

5.13.1 No Action Alternative

Changes in precipitation, snowmelt, and runoff that may occur as a result of climate change could affect ongoing projects included in the No Action Alternative. There may

be changes in water availability for irrigation, fish, and municipal uses, as discussed in Section 3.13. Without a comprehensive, integrated management program, projects would be completed in a piecemeal fashion, reducing the potential for coordination and increased efficiencies in implementation. An uncoordinated approach may reduce the potential to adapt water management strategies and adjust to changing climatic conditions. The three climate change scenarios evaluated would each affect the projects included in the No Action Alternative and in the Integrated Plan Alternative differently. Two of the three scenarios show that climate change could cause existing water supply shortages and adverse effects on streamflows and fish in the basin to become significantly worse under the No Action Alternative. Because of predicted increased temperatures and decreased summer stream flow, adverse effects on water quality due to climate change are also likely under the No Action Alternative.

5.13.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

As discussed in Section 3.13, the effects of climate change could alter temperature and precipitation in the Yakima River basin and affect water management throughout the region. Changes in runoff and precipitation would require Ecology, Reclamation, and other agencies to adapt water management to respond to changing conditions as they occur.

Improvements to storage, water supply, and fish habitat that are proposed under the Integrated Plan Alternative are expected to improve the ability of water agencies, the agriculture sector of the economy, and fish and wildlife to better withstand and adapt to changing conditions, including the changes associated with climate change.

5.13.2.1 Reservoir Fish Passage Element

Current predictions of the effects of climate change in the Yakima River basin indicate a potential increase in winter streamflow and decline in snowpack and spring and summer streamflow, with resulting changes in reservoir storage.

The predicted changes in runoff and reservoir storage could affect operation of the Yakima Project. Specifically, it could affect how the fish passage facilities at Cle Elum Dam are operated. The downstream passage facilities would allow release of fish passage flows any time the reservoir water surface is in the upper 50 feet (2,190 feet at the forebay) of full pool (about 224 thousand acre feet (KAF) or 51 percent full). The proposed downstream fish passage facilities were designed to maximize passage for the majority of the season when smolts are migrating in early March to June. The combined climate change modeling results for the Integrated Plan show that average maximum Cle Elum Reservoir levels under the Moderately Adverse scenario are 65,000 acre-feet (16.5 percent) lower than under historically based hydrology. Three additional years out of 25 fail to reach the minimum level for fish passage release. To the extent less water is available in Cle Elum Reservoir throughout the migration period, fish passage facility operations could be adversely affected.

It is anticipated that climate change impacts would be similar for the other fish passage facilities. Increased temperatures are predicted to affect fish by interfering with salmon migration, elevating the risk of disease, and increasing mortality. Providing fish passage facilities at all six dams would expand the habitat available to anadromous fish, increasing the abundance and productivity of fish. The changes produced by the passage facilities (improved health of fish populations and access to cooler tributary streams above the reservoirs) should help fish withstand the impacts of climate change, including lower flows and warmer temperatures in the spring and summer.

Fish passage facilities for Tieton, Keechelus, Kachess, and Clear Lake Dams have not yet been designed. It is anticipated that climate change impacts on the projects would be similar to those for Cle Elum Dam, although individual differences could be notable due to hydrologic and operational differences between the reservoirs. Fish passage facilities for Bumping Lake Dam would be constructed as part of the reservoir enlargement project. Impacts from climate change at Bumping Lake Reservoir are discussed in the Surface Storage Element below.

5.13.2.2 Structural and Operational Changes Element

Modifying existing structures and facilities would allow the Yakima Project to be operated in a more efficient manner that would improve irrigation deliveries and reduce impacts on fish. These improvements could improve the adaptability of the system to future climate changes. The potential impacts of climate change on the proposed Structural and Operational Changes projects (in combination with the other elements of the Integrated Plan Alternative) have been estimated using hydrologic modeling.

The predicted changes in snowpack and runoff would alter Cle Elum Reservoir operation by producing larger and more frequent drawdowns, and would result in more frequent years (five out of 25) when the reservoir fails to re-fill completely. These changes could reduce the effectiveness of the pool raise project somewhat. However, the changes associated with climate change would increase water supply shortages and thereby increase the need for the extra storage produced by the proposed Cle Elum pool raise project. In this way, some of the effects of the potential reduction in operational effectiveness would be offset.

Based on the hydrologic modeling conducted for the combined Integrated Plan Alternative, minor impacts due to climate change are expected for deliveries through KRD and Wapatox canals, flows through the Keechelus to Kachess pipeline, and operation of the Roza Dam and Chandler Powerplants, because of the relatively small size of these projects or their flexibility to respond to hydrologic variations.

5.13.2.3 Surface Storage Element

Predicted climate changes are estimated to have an adverse effect on irrigation deliveries and streamflows (in the summer). However, the reservoir storage improvements could improve the adaptability of the system to future climate changes by providing a more reliable water supply for proratable irrigation districts and improving streamflows for fish.

To a major extent, the effectiveness of the storage projects under climate change conditions depends on the ability of the projects to refill, as well as the relationship between the volume of increased storage and the volume of increased water supply needs. The proposed storage facilities would not be as full under climate change conditions compared to conditions without climate change. For example, the average maximum spring storage in the combination of all five reservoirs under climate change is 290,000 acre-feet (23.5 percent) less than under historically based hydrology. Nevertheless, even with climate change, the storage projects would still be effective in improving water available for irrigation and instream flows in accordance with the Purpose and Need. Specific quantitative results provided here represent the Moderately Adverse climate change scenario. More detailed results, and results for the other climate change scenarios, are included in the *Modeling of Reliability and Flows Technical Memorandum* (Reclamation and Ecology, 2011k).

Operation of the proposed Wymer Dam has been simulated under the effects of potential climate change using hydrologic modeling. The modeling results show that, when combined with the other proposed elements associated with the proposed Integrated Plan, the project would still deliver approximately 82,500 acre-feet per year of streamflow augmentation during all years, and approximately 80,000 acre-feet of irrigation water supply during heavily prorationed water supply years, just as it would without climate change effects. The difference is that there would be more years needing supply augmentation under climate change, because of reduced snowpack and the altered timing of runoff.

Hydrologic modeling of the proposed Bumping Lake Reservoir enlargement project shows that, when combined with the other proposed elements of the Integrated Plan Alternative, the project would be needed to make major water supply deliveries in an additional 10 out of 25 years, compared with operations not impacted by climate change.

Modeling results for the proposed Kachess Reservoir inactive storage project indicate that, when combined with the proposed Integrated Plan elements, the reservoir would be drawn down below the existing minimum pool level in an additional 10 out of 25 years, compared with operations not impacted by climate change.

5.13.2.4 Groundwater Storage Element

As described in Sections 5.3, 5.5, and 5.7, groundwater storage could improve streamflow, improve water supplies, and provide beneficial impacts for aquatic organisms. Groundwater storage could be used to store higher winter flows which would be subsequently pumped from wells or allowed to discharge naturally to offset some of the effects of lower summer flows predicted under climate change scenarios. Enhanced groundwater storage could provide a reliable supply of water for municipalities and residential developments. Stored groundwater that returns to surface water through seeps would provide a source of cooler water to benefit water quality and fish and other organisms. These benefits would likely be localized, but would improve the ability to adapt to climate change.

The operation of the proposed shallow aquifer recharge project (in combination with the other elements of the Integrated Plan Alternative) has been simulated under the effects of potential climate change using hydrologic modeling. Because of the earlier snowmelt under warmer, climate-impacted conditions, it is likely that somewhat more water would be available for infiltration compared with historically based hydrologic conditions. Additional hydrologic analysis would be required during subsequent study of this element of the Integrated Plan.

The operation of the ASR project was not included in the hydrologic simulations performed to estimate the effects of climate change. This is because the volume of water used in the ASR project would be small compared with the available water supply in the Yakima system. Climate change would not be expected to affect the operation of the ASR project.

5.13.2.5 Habitat/Watershed Protection and Enhancement Element

Fish habitat enhancements would create a healthier habitat for fish in the Yakima River basin by reconnecting and reestablishing floodplains and side channels, enhancing and restoring riparian habitat conditions, and increasing channel complexity. This should improve the growth, survival, and abundance of both anadromous and resident fish and help the populations withstand the impacts of climate change. Restoring floodplain connectivity would also buffer against elevated summer stream temperatures by increasing groundwater storage.

Acquisition and protection of watersheds would also benefit anadromous and resident fish by providing improved habitat conditions. This should help them withstand the impacts of climate change. As climate change places new stresses on water resources and aquatic habitats in the future, the Yakima River Basin's upper watersheds would become even more vital to ecosystem health and water supply. Acquisition of a 46,000-acre tract in the middle and lower Teanaway River basin including ponderosa pine forest would be particularly significant due the limited range and vulnerability to climate change of this forest type.

5.13.2.6 Enhanced Water Conservation Element

The effects of the Enhanced Water Conservation Element on surface water, groundwater, and anadromous and resident fish are described in Sections 5.3, 5.4, and 5.7 respectively. The expected small improvements in streamflow that would result from enhanced water conservation could improve the ability to adapt to climate change.

The proposed agricultural water conservation program (in combination with the other elements of the Integrated Plan Alternative) has been simulated under the effects of potential climate change using hydrologic modeling, but no element-specific results are available. Climate change is estimated to increase future agricultural water demands by approximately 8 percent (Reclamation and Ecology, 2011o). As water demands increase, water conservation is generally more important in balancing needs with supplies. When

combined with the other elements of the Integrated Plan Alternative, agricultural conservation would help provide additional water supply for instream flows and a more reliable water supply to individual users.

The operation of the municipal and domestic conservation program was not included in the hydrologic simulations performed to estimate the effects of climate change. This is because the volume of water affected by this program would be small compared with the available water supply in the Yakima system. However, climate change is estimated to increase municipal and domestic water demands by 5 percent, making conservation even more critically important (Reclamation and Ecology, 2011o). Climate change is not expected to affect the operation of the municipal and domestic conservation project, although depending on the severity of climate change, it could make the water savings more important. The conservation program project would help ensure the reliability of municipal and domestic supplies under climate change conditions.

5.13.2.7 Market Reallocation Element

A market reallocation system could improve the flexibility to adapt to climate change by allocating water where it is needed to improve water supplies, streamflows, and conditions for fish. The water supply fluctuations predicted to result from climate change may increase the need for and benefits from the Market Reallocation Element.

5.13.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

As an integrated package, the Integrated Plan would provide multiple benefits to water supply, agriculture, and fish while improving the ability of water managers to adapt to future climate changes. Approaching management on a basin-wide level could provide additional consistency in water management. Additional water storage and improved irrigation operations would provide a more reliable water supply for agriculture during dry periods. Improved streamflows and fish habitat, along with access to upper river tributaries, would produce healthier fish populations that would be better able to withstand habitat changes caused by climate change. This alternative embodies many of the methods for adapting to the adverse effects of climate change that are recommended in the University of Washington Climate Impacts Group and University of Oregon studies discussed in Section 3.13.

5.13.4 Mitigation Measures

Changes in water availability in the Yakima River basin would require the managing agencies to adaptively manage the river to respond to changing conditions. Ecology and Reclamation would coordinate with other water, fish, agriculture, energy, forest and public health managers to adapt to climate change. The Integrated Plan on the whole would improve the ability of water and fisheries managers to mitigate the effects of climate change.

5.14 Noise

The State imposes limits on the allowable environmental noise levels from a variety of sources in any 1-hour period (WAC 173-60, *Maximum Environmental Noise Levels*). The maximum allowable levels depend on the classification of the property receiving the noise and the noise source. The classification system is called the Environmental Designation for Noise Abatement (EDNA) and is used to assess long-term impacts from stationary noise sources associated with the Integrated Plan elements.

5.14.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Ongoing projects that would be implemented under the No Action Alternative have the potential to generate noise during long-term operation. No long-term noise impacts are anticipated from ongoing habitat improvement projects because no noise would be generated after construction. Long-term noise impacts could result if use of vehicles is required for regular operations or maintenance, and from stationary equipment, such as pumps or compressors, if required for ongoing projects. WAC 173-60-050 exempts sounds created by traffic on public roads. Stationary equipment would need to meet the requirements of WAC 173-60 and would therefore not create noise impacts at the nearest adjacent properties. In some cases, equipment such as pumps may be audible in the vicinity of specific project sites and may change ambient noise levels, especially where isolated areas have low existing ambient levels. Those impacts would be evaluated separately from this EIS by the agencies or entities implementing the projects.

5.14.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Under State regulations, the maximum allowable noise levels from sources associated with activities under the Integrated Plan would depend on the classification of the property receiving the noise and the noise source (see Section 3.14.3).

5.14.2.1 Reservoir Fish Passage Element

Long-term noise impacts would be minor and similar at each site (Cle Elum, Bumping, Tieton, Keechelus, and Kachess Dams). Minor noise impacts would result from the one to two additional onroad vehicles trips per day to transport fish upstream in the case of trap-and-haul fish passage programs at the Cle Elum Dam and at other sites where such programs are implemented. No trap-and-haul system would be used at Clear Lake Dam. Noise created by traffic (including trap-and-haul vehicles) on public roads is exempt from regulation under WAC 173-60-050.

5.14.2.2 Structural and Operational Changes Element

No long-term noise impacts are anticipated from structural and operational changes at the Cle Elum Dam, Keechelus to Kachess pipeline, or Wapatox projects. Beneficial long-

term impacts would result from lower noise emissions from turbines and centrifugal pumps at the Roza Powerplant in April and May, and at the Chandler Powerplant in April, May, and June when power is subordinated.

The KRD canal modifications could require equipment, such as pumps or compressors and the new pump station used to increase flows to Manastash Creek water users or directly to Manastash Creek. Pumping would involve smaller pumping facilities (likely up to a maximum of approximately 8 cfs) than would be required under other project elements, which would produce relatively less noise, and the units would be contained within a pumphouse structure. Pumps would be operated primarily in the summer months, when required to provide water to local creeks during low-flow periods.

The facilities would be located in a rural area outside of Ellensburg, about 4,000 feet from the nearest existing developed part of the city, but within a few hundred feet of some rural residents. Other ambient sources of noise in the vicinity include I-90, which is approximately 3,000 feet from the site. Facility equipment selected for use under this alternative would be required to comply with WAC 173-60. Long-term impacts are anticipated to be localized and minor provided the standards in WAC 173-60 are met.

5.14.2.3 Surface Storage Element

Long-term impacts would result from noise from the new pump station used to pump water from the Yakima River to the new Wymer Reservoir. Equipment to provide pumping capacity of up to 1,000 cfs to skim high flows during the winter and spring would be selected for use under this alternative, and would be required to comply with WAC 173-60 at the nearest regulated land use. Pump facilities at Wymer Reservoir would be housed within a pumphouse structure which would reduce noise levels outside the pump station. This pump facility would have the largest capacity of all the Integrated Plan pump facilities elements.

The location of the proposed Wymer Dam pump station is a rural area in the Yakima River Canyon. Other sources of ambient noise in the vicinity include the Yakima River and SR-821. Long-term impacts are anticipated to be localized and minor provided the standards in WAC 173-60 are met. However, these noise effects may be audible within the area designated as a Scenic Byway during periods of operation where visitors typically value the absence of mechanized noise.

No noise effects would result from the operation of an enlarged Bumping Lake Reservoir.

Long-term impacts would result from noise emissions under the new pump station option of the Lake Kachess inactive storage project. Pumping operations would be active primarily during the irrigation season (typically April through September) in drought years only. An enclosed pump station structure would contain up to six 200 cfs pumps and would be required to comply with WAC 173-60 at the nearest regulated land use.

5.14.2.4 Groundwater Storage Element

Groundwater storage projects could cause increased noise emissions from pumping equipment used to pump water used for infiltration by water users and groundwater during the irrigation season. Specifications for pumping equipment for use under this alternative have not been determined, but would be required to comply with WAC 173-60. Precise locations for pump facilities would be determined at a later date, but would likely be in rural areas with limited residential use. Long-term impacts are anticipated to be localized and minor provided the standards in WAC 173-60 are met. Pumps for municipal ASR projects would be enclosed in a structure and would have noise characteristics similar to other urban utility pump stations in the Yakima area.

5.14.2.5 Habitat/Watershed Protection and Enhancement Element

No long-term noise impacts are anticipated from habitat/watershed protection or enhancement projects because no noise would be generated after construction.

5.14.2.6 Enhanced Water Conservation Element

Long-term impacts would result from noise emissions associated with non-electric equipment, such as pump stations, used to facilitate specific water conservation projects. Facility equipment would be selected for use under this alternative at a later date on a project-by-project basis, and would be required to comply with WAC 173-60. Long-term impacts are anticipated to be localized and minor provided the standards in WAC 173-60 are met. The surrounding environment includes mechanized agricultural activity during seasons when pumping equipment would be used.

No long-term impacts are anticipated from the municipal and domestic conservation program.

5.14.2.7 Market Reallocation Element

No long-term noise impacts are anticipated from the transfer of water rights.

5.14.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Long-term noise impacts associated with proposed elements of the Integrated Plan would result from the use of vehicles for trap-and-haul programs and from stationary equipment, such as pumps or compressors, used for moving water. WAC 173-60-050 exempts sounds created by traffic on public roads. Stationary equipment would need to meet the requirements of WAC 173-60 and would therefore not create noise impacts at the nearest adjacent properties. In some cases, equipment such as pumps may be audible in the vicinity of specific project sites and may change ambient noise levels, especially where isolated areas have low existing ambient levels.

5.14.4 Mitigation Measures

Facility equipment selected for use would be required to comply with WAC 173-60. Assuming that specifications for selected equipment allow the standards set forth in WAC 173-60 to be met, no additional mitigation would be required.

5.15 Recreation

5.15.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Ongoing projects included in the No Action Alternative would not result in long-term negative impacts on recreation in the Yakima River basin. Recreational activities would be expected to generally continue as they are currently occurring. However, on large tracts of land currently in private ownership such as forested lands in the Teanaway Basin, recreational access may be reduced if land is subdivided for residential development. Many of the ongoing projects would improve riparian and fish habitat. This would potentially have a beneficial impact on recreation by improving fishing and wildlife viewing opportunities.

Unlike the Integrated Plan Alternative, no large-scale water storage projects are likely to be implemented. As a result, the No Action Alternative would not result in recreation impacts at Bumping Lake Reservoir from water inundation of recreational areas.

5.15.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.15.2.1 Reservoir Fish Passage Element

In general, the goal of all projects proposed as part of the Fish Passage Element is to increase the amount of habitat available to fish species within the Yakima River basin by providing passage into areas currently blocked. This, in turn, could benefit recreational resources by increasing the number of areas available for fishing, as well as improving the amount of stock available within the basin. This would be a long-term beneficial impact.

5.15.2.2 Structural and Operational Changes Element

Although elevated water levels resulting from the Cle Elum Dam pool raise project would only occur 3 to 10 weeks out of the year, this is considered a long-term impact because it would reoccur from year to year for the foreseeable future. Recreational facilities on the east bank of the reservoir could be affected by the increased reservoir elevation. Higher reservoir levels could flood dispersed camping and fishing access areas. However, the increased inundation would be of limited duration and would occur in the spring when recreational use is lower. Therefore, no major impacts are anticipated.

Modification of the KRD and Wapatox irrigation facilities would be located in agricultural areas and not near any public facilities. The exception would be the new Manastash Creek pump station located along the Yakima River shoreline. The pump station would be visible to recreational users on the river; however, no major impacts on recreation are anticipated.

The Keechelus-to-Kachess pipeline and subordination of power at Roza Dam and Chandler powerplants are not expected to cause long-term impacts on recreation.

5.15.2.3 Surface Storage Element

The only recreation currently occurring at the Wymer Dam and reservoir site is hunting on private land. The reservoir would displace this activity, but is not expected to be a major impact on recreation because of the limited current use. No long-term impacts are expected to occur in the vicinity of the pump station on the Yakima River. Reclamation does not plan to provide recreation facilities at the completed Wymer Dam.

The proposed Bumping Lake Reservoir expansion would eliminate all of the current shoreline recreational facilities and restrict access to trails upstream of the dam. All of the lakeshore access and associated facilities (e.g., boat launches and parking), several developed and dispersed campsites, leased summer cabins, trails and trailheads, access roads, and other recreational facilities would be inundated by the expansion of the lake. This would be a significant adverse impact.

While it is unlikely that comparable replacement locations for the residences could be provided on Bumping Lake Reservoir, given the steepness of the topography on the north and the proximity of the William O. Douglas Wilderness, new recreational facilities such as campgrounds, boat launches and a marina would be constructed where possible. Enlarging the reservoir would create an additional 3 miles of shoreline, increasing opportunities for shoreline-based recreation. The enlarged reservoir would also increase the area available for boating activities from about 1,300 acres to approximately 3,200 acres. Fishing opportunities may also be increased. Reclamation would coordinate with the USFS to determine appropriate mitigation for the impacts on recreation facilities.

The project would also eliminate approximately 11 miles of roads that currently provide access to recreational sites and facilities above Bumping Lake (see Section 5.18.2.3). Opportunities to construct new access roads to trailheads could be limited; however, the construction access roads built for the project could be used to connect to existing roads and provide permanent access to most areas. Reclamation would coordinate with the USFS to retain as much access as possible.

The Kachess Reservoir inactive storage project would allow lower drawdown of Kachess Reservoir in drought years. This could affect recreational use, including fishing and boating. However, the reservoir is currently drawn down annually, and the additional drawdown would have little additional impact on recreation.

5.15.2.4 Groundwater Storage Element

No long-term impacts on recreation resources are expected as a result of groundwater storage because it is not anticipated that the groundwater facilities would be located in recreational use areas.

5.15.2.5 Habitat/Watershed Protection and Enhancement Element

Fish habitat enhancement projects would be designed to increase overall habitat area and fish survival rates within the affected reaches. This could be a long-term beneficial impact on recreational fishing opportunities.

Some of the proposed fish habitat enhancement projects would require the acquisition of land, or the placement of land in restrictive easements. This would not necessarily preclude the use of these lands for public access or recreational uses; however, the specific uses allowed within each area would be defined as conditions of project implementation.

The targeted watershed protection and enhancement program would acquire property for watershed and habitat protection and place that land in protective management. A principle for forest land acquisition laid out in the Watershed Land Conservation Subcommittee Proposal (Reclamation and Ecology, 2012) is to maintain and, where possible, improve access to lands and enhance opportunities for a variety of recreational uses, where this is consistent with protection of key watershed functions and aquatic habitat (Reclamation and Ecology, 2012). Specific management guidelines would be developed in coordination with local governments and interests including recreationists.

Recommendations for Wilderness, National Recreation Area (NRA), and Wild and Scenic River designations would need to be implemented by Congress (Section 2.4.7.1). The proposals would undergo separate environmental analysis by the administering Federal agency (likely the USFS) to determine impacts on recreation and other environmental considerations. Because the Wilderness designation includes restrictions on uses of the areas, it is possible that recreational uses would be limited. For example, no motorized recreation or bicycles are permitted in Wilderness areas, although hunting, fishing, and hiking are permitted. The boundaries of proposed new Wilderness designations in the vicinity of Bumping Lake are anticipated to accommodate road access to recreation uses above the lake and facilities for recreational boating on the reservoir. Management plans would be developed for each designated Wild and Scenic River area by the administering agency to determine appropriate uses of the river corridor. These could change how the land is managed along the river corridor. Those plans would be developed with input from local interests to determine appropriate uses, including recreational use.

Recommendations for the two NRA designations would preserve and improve existing recreational uses in the basin, including both non-motorized and motorized uses. In the 100,000-acre Upper Yakima NRA 21,000 acres would be designated Wilderness. The

remaining area would be designated for recreation activities consistent with existing uses. In the 41,000-acre Manastash-Taneum NRA and the remaining acres in the Upper Yakima NRA, the recreation and resource management objectives for the remaining acres would be determined following additional study and coordination with the USFS and other interested parties. However it is anticipated that future management would not limit any current recreational uses of the area, including both existing motorized and non-motorized uses. Instead, designation would protect and potentially expand current recreation uses.

5.15.2.6 Enhanced Water Conservation Element

The Enhanced Water Conservation Element is not expected to appreciably affect recreational opportunities because the facilities would be located away from recreational areas. Conservation may result in minor increases in streamflows in some reaches, but it is not expected to affect streamflows to the extent that boating or shoreline recreation would be impacted. Depending on the timing and volume of increased streamflows, they may improve the health of streams and riparian zones and provide increased opportunities for wildlife watching. Increased flows may also improve fish habitat and increase fishing opportunities. Municipal water conservation projects could benefit municipal recreation facilities, for example, by providing additional water for irrigating playfields.

5.15.2.7 Market Reallocation Element

Because the extent and location of water transfers is unknown, it is not possible to quantitatively evaluate changes in streamflows. However, water transfers are not expected to result in streamflow changes that would affect recreation.

5.15.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Implementation of most of the projects and elements of the Integrated Plan would not result in long-term negative impacts on recreational resources. The exception is recreational facilities at Bumping Lake Reservoir, which would be significantly impacted. It is anticipated that some of the recreational facilities that would be eliminated could be replaced over time. However, it may not be possible to replace all impacted facilities at or near Bumping Lake Reservoir. Reclamation will coordinate with the USFS to determine appropriate mitigation for impacted recreational facilities.

Many of the proposed projects in the Integrated Plan would improve riparian and fish habitat. This would have a beneficial impact on recreation by improving fishing and wildlife viewing opportunities. Proposed National Recreation Areas and other watershed protection actions would significantly enhance recreation.

5.15.4 Mitigation Measures

Since most projects under the Integrated Plan would have no long-term impacts on recreation, no mitigation measures are required for those projects. Recreational facilities

at Bumping Lake Reservoir would be relocated or replaced to the extent possible. Mitigation for impacts at Bumping Lake Reservoir, including for those facilities that could not be replaced, would be coordinated between Reclamation and the USFS.

5.16 Land and Shoreline Use

5.16.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. The No Action Alternative could result in long-term land use impacts in the Yakima River basin if ongoing projects require property acquisition. Although the extent of future property acquisitions for habitat protection is unknown, they are likely to be smaller than those proposed for the Integrated Plan and would likely be compatible with surrounding land uses.

The 46,000-acre parcel of private forest in the Teanaway River basin that is identified for acquisition under the Integrated Plan has been considered previously for subdivision to enable residential development. While economic conditions and challenges related to water rights and zoning have not yet led to this outcome, it is possible that residential or other types of development could occur at some time in the future under the No Action Alternative. This would be a significant change in land use affecting a large area in the Teanaway River Basin.

The No Action Alternative could also result in long-term land use changes as a result of reduced water reliability. Without the increased reliability of irrigation supplies as provided under the Integrated Plan Alternative through enhanced water conservation and other measures, there could be reduced viability of some existing agricultural operations. This reduced viability would increase the potential for conversion of agricultural land to other land uses.

In the future, the projected population and/or employment growth for some communities in the basin would likely exceed available water supply for municipal and domestic use based on current rates of water use. It is likely that water use efficiency will increase in the future, reducing this water demand to some extent. Despite these water use efficiency gains, it is possible that limited water supplies could reduce the ability of some communities to accommodate planned growth. Approval of additional development within the basin could potentially be slowed in some communities, especially if temporary moratoriums on new groundwater wells are established, similar to the current moratorium in upper Kittitas County.

Under the No Action Alternative, there would be continued logging and other land use disruptions on private lands that would have otherwise been acquired and protected under the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan Alternative.

5.16.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.16.2.1 Reservoir Fish Passage Element

All of the fish passage facilities at Cle Elum Dam would be constructed on Federal land, so there is no need to acquire property. Some vegetated riparian areas would be converted to fish collection facilities or other fish passage facility use. The area that would be converted is small and the uses are compatible with other uses of the dam. Because all land involved with the project is Federal, local zoning regulations do not apply; however, the project would be compatible with the existing land uses.

Because the Cle Elum River and Reservoir are regulated under the Shoreline Management Act (SMA), shoreline permits may be required from Kittitas County. While the construction of new fish passage facilities would require alteration of a small area of natural habitat, the benefits of providing additional fish habitat in Cle Elum Lake and the upstream segments of the Cle Elum River would be consistent with the intent of the shoreline master program (SMP) Conservancy designation.

For the reasons described above, the proposed fish passage facilities at Cle Elum Dam would not have significant long-term impacts on land use.

For fish passage facilities at Tieton, Keechelus, Kachess, and Clear Lake Dams, land acquisitions are not expected to be necessary. Long-term impacts on land use from these fish passage projects are expected to be similar to those for Cle Elum Dam.

Because fish passage is included in the enlarged Bumping Lake Reservoir project, those potential land use impacts are described in the Surface Storage Element section below.

5.16.2.2 Structural and Operational Changes Element

The Cle Elum Dam pool raise project would require an approximately 300-foot strip of land surrounding the entire reservoir to be available for the 3-foot rise in water level and for shoreline protection measures. Much of the land surrounding the reservoir is owned by the Okanogan-Wenatchee National Forest where property acquisition would not be required. Reclamation would coordinate the project with the USFS to determine what permits or actions are required for temporarily inundating the shoreline. There is additional privately-owned land that would need to be acquired fee simple or by easement. Property or easement acquisition would be conducted on a case-by-case basis, with negotiations occurring between Reclamation and the individual property owners according to Federal or State law.

The property required for acquisition or easement is within Kittitas County's shoreline jurisdiction. In addition, Cle Elum Reservoir is a Shoreline of Statewide Significance under the State of Washington's Shoreline Management Act (RCSW 90.58.030(2)(e). The Shoreline Management Act determined that the interest of all people of the state should be considered in the management of Shorelines of Statewide Significance. In

these designations, specific priority uses are preferred. Any potential change in land use resulting from property acquisition or encumbrance by an easement would not be considered significant because it does not substantially alter the nature of existing land use around the reservoir.

The KRD and Wapatox Canal modifications projects have not yet been designed. However, the canal modification would not constitute a change in land use from existing conditions. No long-term impacts on land use are expected to result from these projects.

Property acquisition and permanent or temporary easements would be required for the Keechelus-to-Kachess pipeline. Preliminary estimates conducted as part of the Integrated Plan recommended a 50-foot permanent easement and a 100-foot temporary construction easement in open areas, and a 25-foot temporary easement on each side of the road and no permanent easements where parcels run parallel to Kachess Lake Road (Reclamation and Ecology, 2011g). Easement acquisition would be conducted on a case-by-case basis, with negotiations occurring according to Federal or State law. Because the area is not currently developed, the acquisition of easements and construction of the pipeline would not constitute a significant impact on land use.

No long-term impacts on land use are expected to result from projects that would only change the flows to the powerplants.

5.16.2.3 Surface Storage Element

The Wymer Dam project would require the acquisition of approximately 4,000 acres of private land, with negotiations occurring between Reclamation and the individual property owners. The pump station would affect the Yakima River which is a Shoreline of Statewide Significance. Reclamation would comply with all applicable existing and future regulatory requirements for the property acquisition and shoreline use.

This project would entail a change in land use from open habitat and rangeland to water storage and associated infrastructure. The area that would be converted constitutes approximately 14 percent of the area zoned as Forest and Rangeland in Kittitas County. This conversion of land would be a potentially significant impact on land use. However, in addition to Forest and Rangeland, there are currently almost 500,000 acres of land zoned for other agricultural uses in Kittitas County (Kittitas County, 2010). Land use trends in the Yakima River Canyon have been toward recreation and residential uses in recent years.

It is estimated that the enlarged Bumping Lake Reservoir would inundate up to 3,200 acres of land, of which 1,300 acres are in the existing reservoir. The reservoir would extend approximately 5 miles upstream from the new dam and create a total of 14 miles of shoreline (Reclamation and Ecology, 2011b). The area needed for reservoir expansion has been reserved for Reclamation for the purpose of expanding the reservoir; therefore, no property would have to be acquired. Reclamation would comply with all applicable existing and future regulatory requirements for locating the reservoir.

Although the change in land use may be evident in most areas around the lake after completion of the project, it would conform to the designations and uses of Yakima County and the USFS. Therefore, no long-term land use impacts would be expected from the Bumping Lake enlargement project.

The Kachess Reservoir inactive storage project would require property and easement acquisition. Preliminary estimates for the Integrated Plan recommended a 50-foot permanent easement and a 100-foot temporary construction easement on parcels where the pipeline or tunnel would cross open space. The conceptual alignment for the pipeline and pump station would require easements from private landowners and coordination with the Okanogan-Wenatchee National Forest (Reclamation and Ecology, 2011i). Long-term impacts from this project would be similar to those described for the Kachess to Keechelus pipeline project, except the permanent change in land use may be slightly greater in magnitude due to the greater amount of development in this area.

5.16.2.4 Groundwater Storage Element

The specific areas proposed for shallow aquifer recharge have not yet been selected. As such, the potential long-term impacts on existing land uses cannot be determined at this time. The projects would require land for infiltration. The land or easements would be purchased from willing sellers or obtained through acquisition following applicable State and Federal regulations. Long-term impacts on land use would not be expected from the pilot study projects which would require less than 5 acres for infiltration areas. If the project proves feasible and is implemented on a larger scale, additional land would be required. The larger project could cause long-term land use impacts, but the impacts would be minor since the land would represent a small fraction of agricultural land in the Yakima basin and would not cause a change in land use from agriculture.

Impacts for ASR projects would be similar to those for shallow aquifer recharge except on a smaller scale. Most ASR projects would use existing city facilities to the extent possible, thus minimizing the need for property acquisition.

5.16.2.5 Habitat/Watershed Protection and Enhancement Element

The targeted watershed protections and enhancements proposal would direct acquisition of 70,000 acres of private property. The agencies sponsoring the acquisitions could work with property owners to place all or portions of their property in conservation easements. The lands would only be purchased from willing sellers.

Either acquisition of property fee-simple or purchase of restrictive conservation easements would likely lead to changes in land use. Some acquired lands would be maintained as working lands so they would continue to support the local economy. It is anticipated that some land would be taken out of current uses, in most cases commercial forest, and placed into more preservation oriented uses. These changes in land use, although not specifically known at this time, could constitute a substantial impact. However, a principle laid out for forest land acquisitions in the Watershed Land

Conservation Subcommittee Proposal is to maintain economic uses where lands have historically been used as working lands and where the uses are consistent with protection of key watershed functions and aquatic habitat (Reclamation and Ecology, 2012). Reclamation and Ecology will work with the YRBWEP Workgroup and other interested parties to reconcile these potentially conflicting objectives.

This program also recommends Wilderness, NRA, and Wild and Scenic River designations. Wilderness designations would result in restrictions on activities such as logging and motorized activities on lands within the Wilderness boundary. These designations would restrict some existing economic uses of the public lands, but overall are expected to provide economic benefits to surrounding communities. Numerous studies have shown that Wilderness designations provide economic to an area by attracting recreational users (Wilderness.net, 2012; ECONorthwest, 2009; Haefele et al., 2007; Loomis and Richardson, 2000). The NRA designations would raise the profile of designated recreational lands and could be a marketing feature that would attract more users who would contribute to local economic activities.

Recommendations for these designations would be implemented through processes separate from the Integrated Plan. The proposals would undergo separate environmental analysis by the administering Federal agency (likely the USFS) to determine impacts on recreation and other environmental considerations. Management plans would be developed for each designated Wild and Scenic River area by the administering agency to determine appropriate uses of the river corridor. Those plans would be developed cooperatively, working with the county with jurisdiction over local land use regulations along with public and private landowners.

Habitat enhancement projects would be located on property acquired from willing participants or through acquisition of easements. The enhancement projects are expected to be compatible with existing land uses.

5.16.2.6 Enhanced Water Conservation Element

Although conservation may allow the irrigation of additional lands, those lands are expected to be in areas that are zoned agricultural. Some existing irrigation facilities may be demolished and replaced. By increasing the reliability of irrigation supplies, it is expected that enhanced water conservation would improve the viability of existing agricultural operations and reduce the potential conversion of agricultural land to other uses.

Some new or replaced irrigation facilities such as intakes and conveyance infrastructure may be located within shoreline areas and could require shoreline permits from counties or cities. The long-term impacts are not anticipated to be substantial.

No long-term land use impacts are anticipated from the municipal and domestic conservation program.

5.16.2.7 Market Reallocation Element

In the long term, transfers of water rights may result in changes in land use, both in the areas where the water rights originated and in the recipient areas. These transfers may influence development in urban and rural areas and contribute to the conversion of farm uses to urban or domestic uses. Transfers of water from agricultural lands may increase fallow lands that otherwise would have supported irrigated crops and accelerate their conversion to more developed uses. On the other hand, transfers that improve the reliability of an irrigation water supply may help keep some properties in agricultural use that otherwise would be converted to other uses. Transferred water rights may be used to irrigate different areas and expand agricultural land uses. This expansion is expected to occur in areas already designated for agricultural use.

5.16.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Elements

Implementation of the elements under the Integrated Plan Alternative would result in long-term impacts on land use in some cases. However, the integrated projects are not expected to have disproportionately larger land use impacts than the individual projects described above.

5.16.4 Mitigation Measures

If individual projects that require the acquisition of land or easements are advanced for implementation, appropriate compensation would be required in accordance with applicable State or Federal regulations.

5.17 Utilities

Long-term impacts on utilities were determined by estimating the amount of power or other utilities that would be required by a project once it is in operation and comparing the amount to overall power demand in the basin. Impacts are considered minor if the increased demand would not affect regional supplies.

5.17.1 No Action Alternative

Under the No Action Alternative, the existing activities, programs, and trends in the Yakima River basin would continue. Agencies would continue to implement conservation-oriented water supply system improvements, including pumping plants and pipelines, at various locations in the Yakima Valley region (Kittitas, Yakima, and Benton Counties). These improvements are associated with existing approved programs and orient predominantly to existing facilities; none are being or would be constructed under the auspices of the Integrated Plan. Though pumping plants would require electricity, there would be no substantial impact on the supply of electric power from any of the ongoing projects. Increased uncertainty about reliable water supplies could increase in the future, potentially affecting those utilities with increasing water supply needs

(schools, emergency service providers, wastewater utilities, etc.) Other utilities are not likely to be impacted.

5.17.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.17.2.1 Reservoir Fish Passage Element

Electricity would need to be provided on the right side of the Cle Elum dam for the fish ladder and adult collection facilities. Power poles would most likely be used to supply electricity to these two structures. Power would be provided to the intake structure via a buried cable. The minor increased demand for power would not affect regional power supplies. No other increases in utilities would be required.

Impacts of installing fish passage facilities at the other dams are anticipated to be similar to those described for the Cle Elum Dam. Since Bumping Lake fish passage facilities would be installed as part of the reservoir enlargement project, those impacts are described in the Surface Storage Element below.

5.17.2.2 Structural and Operational Changes Element

Operation of the Cle Elum Dam after modifications would not require an increase in electricity or other utilities.

Power would need to be provided to new pump stations for the KRD and Wapatox projects. The minor increased demand for power would not affect regional power supplies.

The Keechelus-to-Kachess pipeline would require power for new elements, including self-cleaning fish screens, motor-operated butterfly control valves, and metering and controls. The pipeline would be gravity operated and no power would be needed to pump water through the pipeline. The increased power demand is expected to be minor and is not expected to affect regional power supplies.

The reduction in regional power supplies caused by subordinating power at Roza Dam and Chandler powerplants could be substantial and is covered in Section 5.6, Hydropower.

5.17.2.3 Surface Storage Element

Development of the Wymer Dam and Reservoir would result in a long-term increase in demand for electrical power, associated with the pumping plant and other intake/outlet facilities along the Yakima River. Power supply to these facilities, including the pump station, is expected to be drawn directly from an existing BPA transmission line. No constraint on the availability of necessary power has been recognized to date (Reclamation, 2008f).

Other perspectives on long-term utility service demand at or from Wymer facilities include the following:

- Telecommunication system connections would be required at facility sites. Where land-line connections are not readily available, wireless systems could be used.
- Water supply and wastewater management would be via independent, onsite systems (e.g., water supply wells, septic tank/leach field, or other independent wastewater management system).
- If gas energy is needed, onsite systems (i.e., propane) would be used (Reclamation, 2008f).

Impacts on utilities at Bumping Lake Reservoir would be similar to those described for Wymer Dam, except no power would be required for pumping water to fill the reservoir. Additionally, if utilities are inundated by the expanded reservoir, they would be relocated in coordination with local utility companies and the USFS.

Under the Kachess Reservoir inactive storage project option that includes a pump station, increased electrical power would be required, but the increase would be minor and would not affect regional power supplies.

5.17.2.4 Groundwater Storage Element

Additional power would be required for pumping, injection, and treatment, but this minor increase would not affect regional power supplies. Groundwater storage may provide a source of water to increase the reliability of public water supplies.

5.17.2.5 Habitat/Watershed Protection and Enhancement Element

No impacts on utilities are anticipated from projects to protect and enhance habitat. Any habitat restoration projects occurring within the service area or in the vicinity of existing facilities, such as riparian restoration projects in the vicinity of wastewater facilities, would be closely coordinated with the potentially affected utility to avoid impacts.

5.17.2.6 Enhanced Water Conservation Element

Conservation measures could reduce energy consumption in some areas over time by reducing the volume of water that needs to be pumped to irrigate a given area. However, some of the conservation measures entail construction of new pumping plants to allow water to remain instream in the Yakima River. Those plants would increase the overall amount of energy consumed.

On-farm conservation measures would have minimal impacts on utilities. Some measures, such as conversion to sprinkler irrigation or automated systems, may consume additional electricity. Conservation measures, such as more efficient irrigation

application rates that result in less return flow, could reduce water reaching lakes and rivers as return flow, which could affect other water users' ability to provide adequate water.

The municipal and domestic conservation program could require additional investments by local utilities and increased rates in the short term. However, over the long term, conservation programs could reduce costs of providing municipal water as the cost of new water supplies increases. Enhanced water conservation may improve the reliability of public water supplies.

5.17.2.7 Market Reallocation Element

Transfers from irrigation uses to domestic uses may cause increased demands for municipal services if development increases. Water right transfers may create a source to improve the reliability of public and domestic water supplies.

5.17.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Though many elements of the Integrated Plan would cause an increased demand in electricity, only power subordination at the Roza and Chandler Powerplants would cause a substantial impact on the supply of electric power. If subordination of power were to be implemented as part of the Integrated Plan, the increase in demand for electricity would add to the deficit caused by power subordination and potentially increase electrical costs to the irrigation districts and the Reclamation Project office. Other utilities would not be impacted by the Integrated Plan.

5.17.4 Mitigation Measures

Several elements of the Integrated Plan, including the Wymer Reservoir, the Keechelus-to-Kachess pipeline, Lake Kachess inactive storage, and the enlargement of Bumping Lake Reservoir, would have the potential for added hydropower in the future which could offset the reduction in electric power. Mitigation measures for impacts from power subordination are covered in Section 5.6.4. As noted above, all potentially affected utilities, including local wastewater utilities, stormwater utilities, and other service providers will be coordinated with during project level evaluations for the specific projects.

5.18 Transportation

Long-term effects of the No Action and Integrated Water Resource Management Plan Alternatives on transportation were determined by assessing long-term operations of proposed project elements. Long-term operations would involve trips to facilities for routine maintenance and operations.

5.18.1 No Action Alternative

The No Action Alternative would not change roads or highways or affect their use. The operational requirements of the ongoing projects would be expected to require infrequent trips by maintenance vehicles and would likely have no impact on transportation systems. The No Action Alternative would have no long-term impacts on transportation.

5.18.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.18.2.1 Reservoir Fish Passage Element

The operational requirements of some fish passage projects would require infrequent trips by maintenance vehicles and would have no impact on transportation systems. Adult fish would be hauled past dams in trucks on service roads. The hauling operations would last a few weeks each year and would not prevent use of the same roads by other users.

5.18.2.2 Structural and Operational Changes Element

No long-term impacts on transportation are anticipated from proposed structural modifications. The operational requirements of some canal, pipe, or pump station projects would require infrequent trips by maintenance vehicles and would have no impact on transportation systems.

5.18.2.3 Surface Storage Element

No long-term impacts on transportation are anticipated from the proposed Wymer Dam and Kachess Reservoir inactive storage projects. The operational requirements of new storage projects would require regular trips by a small number of maintenance vehicles and would have no appreciable impact on transportation systems. New access roads may be developed at new storage facilities. Those roads would be maintained by Reclamation and would not affect the surrounding roads.

The proposed Bumping Lake Reservoir expansion would have a major, long-term adverse effect on the local road system around the lake. Enlarging the reservoir would eliminate some lakeshore access and associated facilities (e.g., boat launches and parking), and access roads that provide access to recreational sites and facilities. Access roads that would be inundated include Forest Roads 1800 (from a location south of the Bumping Crossing Campground), 1808, 1809, and 1800-394. These roads provide access to several trailheads and recreational sites. Expansion of Bumping Lake would limit the ability of the USFS to construct new access roads to trailheads that access the William O. Douglas Wilderness. These long-term impacts would be unavoidable due to the raised water levels in the lake. As mitigation, Reclamation would work with the USFS to identify potential reconstruction options for affected Forest Roads.

5.18.2.4 Groundwater Storage Element

No long-term impacts on transportation are anticipated from the Groundwater Storage Element. The infiltration and injection facilities would require only infrequent trips by maintenance vehicles.

5.18.2.5 Habitat/Watershed Protection and Enhancement Element

No long-term impacts on transportation are anticipated. The operational requirements of some fish habitat enhancement projects may require infrequent trips by maintenance vehicles and would have no impact on transportation systems.

5.18.2.6 Enhanced Water Conservation Element

No long-term impacts on transportation are anticipated. Operation of conservation projects would require only infrequent trips by maintenance vehicles and would have no impact on transportation systems.

5.18.2.7 Market Reallocation Element

The Market Reallocation Element is not expected to affect transportation.

5.18.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

No long-term impacts on transportation are anticipated beyond those that would occur if the elements were implemented individually.

5.18.4 Mitigation Measures

For most alternatives there would be no long-term impacts on transportation, and therefore no mitigation would be necessary. Reclamation would coordinate with the USFS to determine appropriate mitigation for Forest Roads inundated by the expanded Bumping Lake Reservoir.

5.19 Cultural Resources

Long-term impacts on belowground cultural resources were considered based on the level of ground disturbance anticipated and knowledge about general patterns of Native American and Euro-American land use throughout time. Long-term impacts on aboveground cultural resources were considered based on the level of disturbance to the setting and knowledge about general patterns of land use throughout history. Because the exact locations of many elements are not known, specific impacts are not yet identified. The significance of the impacts is based on the criteria for inclusion on National, State, or local historic registers.

5.19.1 No Action Alternative

Under the No Action Alternative, ongoing projects have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities. These impacts could be substantial where habitat improvements projects are located in areas with a high likelihood for significant Native American cultural resources.

Projects undertaken by other agencies would include separate NEPA or SEPA analysis, as appropriate, and would comply with Federal and State regulations that consider impacts on historic and cultural resources. The net impact on cultural resources is expected to be substantially lower under the No Action Alternative compared to the Integrated Plan Alternative because fewer large-scale projects are likely to be constructed.

5.19.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

Many of the impacts on cultural resources would occur during ground disturbing activities related to construction. Although these impacts are construction related they would be permanent, and therefore they are considered long-term impacts. Construction impacts would include access and staging areas as well as any offsite mitigation areas. Upgrades to existing historic infrastructure would also have a long-term impact, although replacement of materials with like materials could minimize this impact. Other long-term impacts on buried cultural resources would largely be related to operation of new or altered facilities or changed water drainage patterns (such as meandering channels, or increased/decreased flow). The main long-term impact for most elements would be erosion of cultural deposits.

For most elements of the Integrated Plan, additional cultural resources studies would be required during site selection. These efforts would include consultation with Tribes and other concerned stakeholders, background research, field survey, and potentially more in depth investigation of specific cultural resources. This level of effort would potentially require substantial time and coordination, particularly if significant cultural resources are identified.

5.19.2.1 Reservoir Fish Passage Element

Projects undertaken as part of the Fish Passage Element have the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities, including but not limited to: modification of historic dams and their appurtenances, access roads, and staging areas. Other potential disturbance of archaeological deposits could occur around the dam and in downstream areas where fish collection facilities are constructed.

Operational long-term impacts would likely include increased erosion of cultural deposits, inundation, chemical weathering, and vandalism or artifact collecting of cultural

resources in reservoirs. Depending on the area and the potential for avoidance, the impacts could be substantive. All of the dams proposed for fish passage facilities are historic structures. The fish passage facilities could detract from the historic appearance of the dams; however, the dams have all undergone other modifications since construction.

It is anticipated that long-term impacts would be similar for all the dams, although those at Clear Lake Dam would be smaller because of the smaller scale of the project. Installation of the fish passage facilities at Bumping Lake Dam would be included in the enlargement of Bumping Lake Reservoir. Impacts are described in the Surface Storage Element below.

5.19.2.2 Structural and Operational Changes Element

The Structural and Operational Changes Element has the potential to cause long-term impacts on cultural resources located within the footprint of any new ground-disturbing construction activities, including but not limited to: modification of historic dams and their appurtenances, conveyance, access roads, staging areas, vegetation removal, canal improvements, and pipelines. Long-term impacts could include erosion, inundation, chemical weathering, and vandalism or artifact collecting of cultural resources in reservoirs. Also, increased inundation could change access and availability of traditional plant resources at Traditional Cultural Properties (TCPs) if present. Depending on the area and the potential for avoidance, the impacts could be substantive.

Long-term construction impacts on cultural resources for the Cle Elum Dam pool raise project could include modification of the historic Cle Elum Dam, ground disturbance associated with removing vegetation, and erosion or flooding impacts on historic structures behind the storage pool. Long-term impacts could include erosion, inundation, chemical weathering, and vandalism or artifact collecting of cultural resources in reservoirs. Also, increased inundation could change access and availability of traditional plant resources at TCPs.

Long-term construction impacts on cultural resources from the canal modifications in the KRD and Wapatox projects could include modification of historic infrastructure or disturbances to archaeological deposits adjacent to canals, in areas of new construction, or stockpile and staging areas. Long-term operational impacts could occur related to maintenance access and changes to access and availability of traditional plant resources at TCPs.

Long-term construction impacts on cultural resources could include disturbances to the historic Keechelus Dam and buried and aboveground cultural resources along the 5-mile-long pipeline alignment from the northwest shore of the Keechelus Dam outlet to Kachess Reservoir including in stockpile and staging areas. Long-term operational impacts may occur related to maintenance access and changes to access and availability of traditional resources at TCPs.

No long-term impacts are expected for the power subordination projects because no construction would be involved.

5.19.2.3 Surface Water Storage Element

New or expanded storage facilities could adversely impact cultural resources over the long term. Long-term construction impacts would be possible with any ground disturbing activity, including removal of vegetation prior to inundation, earthmoving, and use of heavy equipment, as well as in staging areas and construction access areas. Other impacts would include removal of historic structures prior to inundation. Within the reservoirs themselves, impacts on cultural resources could include destruction or damage of archaeological sites, historic structures, or TCPs located in three zones of impact: the inundation zone, the direct impact (fluctuation or drawdown) zone, and the indirect impact (backshore) zone.

Archaeological sites in reservoir settings can be damaged or destroyed through erosion, inundation, chemical weathering, vandalism or artifact collecting, and land development. These impacts often occur in combination. Of these, erosion by wind and water is the most predominant impact (Lenihan et al., 1981). Erosion impacts vary based on the site type, land form, severity of wind and water action, soil structure, and type of cultural resource. Depending on the fluctuation zone of the reservoir (the area between normal high and low water levels), the frequency of fluctuation, and the angle of the landform slope, sites can slump, be washed out, or suffer bank calving. Inundation impacts cultural sites by making them inaccessible. The site may become covered with sediment, although there is some speculation that the sedimentation provides protection to the site. Artifacts and features may be damaged by long-term inundation due to changes in the chemical composition of the surrounding geologic matrix. The impacts of sedimentation on fragile archaeological deposits have not been well studied.

Chemical weathering impacts on archaeological sites could include damage to organic remains through repeated wetting and drying of archaeological deposits, leading to a loss of scientific potential of sites along reservoir boundaries. This impact is often linked to irrigation-related reservoirs (Galm and Masten, 1988).

Vandalism and artifact collecting could be expected, especially if a new reservoir provides recreational areas. Vandalism includes a range of activities from intentional looting of sites, to off-road vehicle use in culturally sensitive areas, to extended recreational use that destabilizes soils. With increased boat use, more sites could be accessible and become vulnerable to vandalism. Increased boat use is also likely to increase erosion due to wake action. Rock art is often the target of graffiti. Site erosion often makes sites more susceptible to vandalism by increasing site exposure.

In general, any historic-age structures in the inundation and fluctuation zones of surface water projects would likely be removed prior to inundation; further efforts are needed to identify and evaluate the significance of any historic-age structures. Historic structures in the backshore zone could have increased access, which often leads to increased

vandalism. The increased proximity of water may adversely impact the significance of the historic structure by altering the integrity of its setting.

If present, TCPs in the inundation zone would become permanently inaccessible. TCPs in the fluctuation zone would likely be so altered that even when exposed, they would lose their characteristics (such as isolation or resource availability), which provide their integrity of setting, feeling, or association. TCPs in the backshore zone may suffer adverse effects due to alteration of the integrity of setting, feeling, or association as well.

Long-term construction impacts on cultural resources at the Wymer Dam site could include disturbances to buried cultural resources and removal of historic structures related to preparing the reservoir as well as in areas used for construction staging and access. Long-term operational impacts on cultural resources could include erosion, inundation, chemical weathering, and vandalism/artifact collecting of cultural resources in the reservoir. These impacts have the potential to be substantive. Enlargement of Bumping Lake Reservoir would cause similar impacts. In addition, the leased recreational cabins which are considered eligible to the National Register of Historic Places would be demolished or relocated. Decreased access to areas upstream from the reservoir could reduce access to TCPs, if present.

Long-term impacts on cultural resources within the reservoir at the Kachess inactive storage project would be similar to current conditions although the increased drawdown of the reservoir would potentially expose more cultural resources (approximately 180 additional acres could potentially be exposed during an additional 80-foot drawdown). Construction of the outlet outside the reservoir has the potential to disturb cultural resources, if present.

5.19.2.4 Groundwater Storage Element

The Groundwater Storage Element has the potential to impact cultural resource properties located within the footprint of any new ground-disturbing construction activities, including but not limited to: surface infiltration reservoirs, subsurface injection sites, water treatment sites, conveyance lines, access roads, electrical transmission corridors, and staging areas. Groundwater storage infrastructure would likely be located away from significant streams and rivers that are typically associated with cultural resources. Only intake facilities are proposed at rivers. If alternative site locations are feasible, then complete avoidance of significant cultural resources may be possible.

Long-term operational impacts could adversely modify traditional cultural landscapes. This could have a negative impact on the integrity of setting and feeling of nearby archaeological sites and could also interfere with TCPs. Overall, the impact on cultural resources from the Groundwater Storage Element is expected to be low to moderate. Long-term operational impacts on cultural resources could include erosion, inundation, chemical weathering, and vandalism or artifact collecting of cultural resources in infiltration areas. These impacts have the potential to be substantive if infiltration areas cannot be located to avoid cultural resources.

5.19.2.5 Habitat/Watershed Protection and Enhancement Element

Long-term construction impacts on cultural resources from habitat enhancement projects could include disturbances to buried cultural resources in areas along the Yakima River as well as in areas used for construction staging and access. Long-term operational impacts on cultural resources could include erosion due to channel migration and vandalism or artifact collecting of cultural resources due to increased recreational access. These impacts have the potential to be substantive because the restoration projects are anticipated to be located in areas with a high likelihood for significant Native American cultural resources. Tributary enhancement locations would be expected to have less likelihood of significant cultural resources.

Acquisition and protection of properties would not cause adverse impacts on cultural resources and could protect such resources from disturbance.

5.19.2.6 Enhanced Water Conservation Element

Any on-farm conservation which involves ground disturbing activities has the potential to impact cultural resources. These include any new construction, such as ponds and conveyance lines. Overall, the impact on cultural resources from enhanced water conservation efforts is expected to be low to moderate, depending on the scale of the conservation measures.

Improvements to agricultural infrastructure have the potential to impact cultural resources in two ways. The first potential impact involves the replacement or modification of historic farm infrastructure, that is, any building or modified landscape greater than 50 years old. Disturbed or modified farm infrastructure would have to be evaluated as to its age and potential historical significance depending on State or Federal involvement. For example, projects on private property supported by grants from the Natural Resources Conservation Service, Reclamation, or local reclamation districts would be subject to the National Historic Preservation Act and would likely require at least archival review of the project for cultural resources and probably fieldwork as well.

Secondly, any new construction associated with this alternative has the potential to impact both aboveground and underground cultural resources located within their footprint. Large changes to existing farm infrastructure would have the potential impact of diminishing the integrity of setting and location for historic age cultural resources in the vicinity.

The long-term operational impacts of the Enhanced Water Conservation Element could include modified patterns of modern human activity, and potentially altered stream or spring flows. If modern patterns of human activity are substantially changed, then surficial cultural resources within these areas are prone to impact from relic collecting and site disturbance.

No impacts on cultural resources are anticipated through the municipal and domestic conservation program.

5.19.2.7 Market Reallocation Element

By transferring water from lower value to higher value uses, this alternative may result in more intensive agricultural activity in some areas. There also may be increased pressure to transfer water to higher value residential or commercial uses. All land use changes would take place consistent with adopted land use plans and zoning codes. Any shift to a more intense activity that would result in excavation would be subject to site-specific evaluations to determine the potential to affect cultural resources.

5.19.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Long-term impacts of integrating the elements of the alternative are not expected to differ from implementing the elements individually. Projects that are implemented as part of a coordinated process might require more scrutiny of cultural resources because of State or Federal funding.

5.19.4 Mitigation Measures

As a Federal agency, Reclamation would be required to develop mitigation measures for cultural resources in consultation with the SHPO, ACHP, Native American Tribes, other Federal agencies, and public entities on historic properties that are eligible for the NRHP. In order to determine if historic properties are present in the project areas, additional cultural resources review including field investigations would be required once specific locations for project elements are identified. These inventory investigations would determine if any archaeological sites, historic structures, or TCPs would be affected. Once the inventory and evaluation was complete then mitigation measures could be determined.

The first level of mitigation is designing the project to avoid or minimize impacts on cultural resources. If a project cannot avoid or minimize impacts, the mitigation of adverse effects would be in accordance with regulations. Existing reservoirs within the region have ongoing programs for the life of the project to ensure that operational changes, continuing erosion, and new project elements address cultural resources issues. Similar programs should be established at new or expanded reservoirs.

Specific mitigation measures that could be implemented include archaeological remote sensing during planning to allow avoidance; excavation of archaeological sites that would be adversely affected by the projects; documentation of historic structures; site protection/stabilization, including site burial, use of filter fabrics, revegetation, site armoring, and other measures; efforts to reduce vandalism through public education, fencing, or site surveillance; and archaeological monitoring during construction (Draper, 1992; Lenihan et al., 1981). Construction contracts would require that if any archaeological material is encountered during construction, construction activities in the

immediate vicinity would halt and the Department of Archaeology and Historic Preservation, Reclamation, and a professional archaeologist would be contacted for further assessment prior to resuming construction activity in that area.

Mitigation measures for TCPs would need to be determined in consultation with the appropriate cultural group. Because TCPs contribute to the maintenance of a culture, mitigation efforts may include documentation of the significance of the place through oral histories or recording traditional storytellers. It is not always possible to come to agreement with the appropriate cultural group on how to mitigate adverse effects to TCPs.

Specific mitigation measures cannot be developed and implemented until after a preferred alternative has been selected, and in-depth survey has been conducted and reported. The survey for any of the Integrated Plan projects can reasonably be estimated to take at least one year. If any significant cultural resources are identified and cannot be avoided, Section 106 of the National Historic Preservation Act requires a resolution of adverse effect. Mitigation of historic resources might include data recovery or archeological excavation, preservation, conservation, and interpretation of significant historic properties.

A typical scenario for mitigation of a group of historic resources to meet the requirements of Section 106 of the NHPA would be as follows:

- Identify the significant historic properties that cannot be avoided during project construction and development.
- Consult with the State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), Native American Tribes, other Federal agencies, and public entities on historic properties that are eligible for the National Register of Historic Places.
- Depending on the number and range of historic properties to be treated through mitigation, develop either a Programmatic Memorandum of Agreement (PMOA) or Memorandum of Agreement (MOA) among Reclamation, SHPO, and ACHP over mitigation measures. PMOA or MOA signatories may also include Tribes, other Federal agencies, and public entities.
- The MOA for an archaeological site would include a research and data recovery plan, stipulations for permanent storage and curation of recovered material, and provisions for sharing the results of the data recovery phase with the public (e.g., interpretive facilities). An MOA could also include plans to document historic structures or conduct ethnographic research. The goal is to identify and implement a range of measures to record and preserve, in some manner, the record of historic resources affected by the project. Mitigation of historic properties can involve data recovery, large-scale archeological excavations, a program of monitoring of project effects, development of interpretive facilities and public educational opportunities, or a mix of those measures.

- The MOA may also include development of treatment plans in which goals for long-term historic properties management and monitoring are identified.
- The period for developing, implementing, and completing mitigation measures could take an estimated five years for any of the Integrated Plan elements. However, certain activities could last for many years, if not decades, beyond completion of the alternative. Museum storage and curation costs, monitoring activities, and management of historic resources in the development footprint not impacted directly by project construction are examples of some common, long-term activities which have attendant costs.
- The MOA may also include provisions for long-term management and protection of cultural resources that remain under Federal control, such as through the development of a cultural resources management plan (CRMP).

5.20 Indian Sacred Sites

Because details of specific Integrated Plan projects have not yet been identified, Reclamation has not begun consultation with the Yakama Nation or the CTUIR to identify Indian Sacred Sites. Reclamation will consult with the Yakama Nation, the CTUIR, and the Bureau of Indian Affairs to determine the presence of sacred sites as part of project-level environmental review when specific projects are carried forward to implementation. The process for consultation is described in Chapter 6. Long-term impacts to sacred sites are expected to be those in which access to sacred sites, if they are extant, is being permanently denied to Tribal members because of construction or inundation impacts, or because of land-use restrictions.

5.21 Indian Trust Assets

Because details of specific projects have not yet been identified, Reclamation has not begun consultation with affected Tribes to identify Indian Trust Assets. Reclamation would consult with affected Tribes and the Bureau of Indian Affairs to determine the presence of Indian Trust Assets as part of project-level environmental review when specific projects are carried forward to implementation. The process for consultation is described in Chapter 6.

5.22 Socioeconomics

The assessment of long-term socioeconomic impacts and mitigation measures considers potential effects on the supply and value of goods and services derived from the basin's water and related resources, resource-related jobs and incomes, resource-related uncertainty and risk, the distribution of resource-related costs and benefits, and the structure of the economy associated with operation of the Integrated Plan facilities. This assessment examines the Integrated Plan from a programmatic perspective. As the

implementing agencies propose specific projects, they will complete a detailed determination of the potential socioeconomic effects, including the assessments required by the *Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies* (U.S. Water Resources Council, 1983).

5.22.1 No Action Alternative

Under this alternative, the current patterns and trends in the relationship between the basin's natural resources and the state's economy would likely continue into the foreseeable future. Over a long period of time, the socioeconomic characteristics of the basin's water and related resources, and their interaction with the regional and statewide economies, would reflect future changes in the ecosystem and the economy, such as changes in climate and the ecosystem's responses to the changes, increases in human population and wealth, and adjustments in the demands for water-related goods and services arising from shifts in consumers' preferences.

5.22.1.1 Value of Goods and Services

Section 3.22.1 describes the goods and services potentially affected under the No Action Alternative. Changes in the value of goods and services likely would occur in accordance with ongoing and expected trends.

5.22.1.2 Jobs and Incomes

The future supply of water and related resources under the No Action Alternative would likely influence future levels of jobs and incomes via the three mechanisms identified in Section 3.22.2. Current trends in jobs and incomes related to the basin's water and related resources likely would continue. In the next decade, nonagricultural employment in Washington is projected to increase at a rate of 1.6 percent annually (Office of Financial Management, 2011), while agricultural employment is expected to increase at a 0.6 annual rate for the same time period (Washington Employment Security Department, 2011a). Jobs and incomes related to municipal/industrial uses of water and related resources as well as those related to water recreation would likely grow, roughly parallel to population and overall economic growth.

5.22.1.3 Uncertainty and Risk

Risk and uncertainty associated with the basin's water and related resources would likely worsen over the long term under the No Action Alternative. The risk of financial losses associated with potential shortfalls in the supply of water for irrigated agriculture would likely increase, as anticipated changes in climate increase the likelihood of low streamflows in late summer (Scott et al., 2007). Expected changes in climate could also increase the risk of winter and spring flooding, heat waves, and diminished fish habitat (Casola et al., 2005). Reductions in the quality of fish habitat could impose tighter restrictions on commercial and recreational fishing and increase the risk of extirpation for some species whose continued existence is valued by many.

Under the No Action Alternative there might also be increased risk and uncertainty associated with potential future conflict over water and related resources. Reductions in fish habitat and in populations of salmon and steelhead, for example, might lead to increased pressure to restrict withdrawals of water for irrigation and to restrict land and water uses likely to have an adverse impact on habitat.

5.22.1.4 Distribution of Costs and Benefits

Both the benefits and costs derived from the basin's water and related resources likely would increase in the long term under the No Action Alternative, but the overall distribution of water-related costs and benefits under the No Action Alternative likely would remain similar to what exists today. Groups currently enjoying benefits and experiencing costs likely would remain more or less unchanged.

5.22.1.5 Socioeconomic Structure

In many respects, the future structure of the regional, state, and national economies would likely resemble what exists currently. The basin likely would continue to produce commercial products, especially crops, derived from its water and related resources. These resources would also likely contribute to the economy by providing amenities that attract households and businesses, and by providing environmental services, such as natural filtration that lessens the costs municipal and industrial users would incur otherwise to obtain high-quality water. Adverse environmental changes could lead to changes in the economic structure. Reductions in fish habitat and populations could lead to the curtailment or elimination of commercial and recreational fishing, for example.

5.22.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

The individual elements of the Integrated Plan have the potential to increase the value of the goods and services society derives from the basin's water and related resources in the long term. Some of the individual elements would likely have a beneficial impact on jobs and incomes related to the basin's water and related resources, but the impacts on the overall economy are likely to be mixed. In general, shifting water from lower-value to higher-value uses would boost the economy, but some sectors and individuals associated with goods and services whose supply would decline might be adversely affected. The plan elements could affect the distribution of costs and benefits associated with the basin's water resources and alter the relationships between resources and the economy, with the actual effects determined by how the plan elements would be implemented. The plan elements would likely reduce uncertainty and risk associated with the basin's water resources, by improving the supply of water available to produce higher-value goods and services.

5.22.2.1 Reservoir Fish Passage Element

Value of Goods and Services

Improving fish passage would increase the long-term value of goods and services to the extent that it would lead to larger or more stable fish populations. Larger fish populations would likely increase the value of goods and services for those who place a value on the continued existence of the fish species; for those who harvest fish commercially, recreationally, or for cultural purposes; or for those who derive recreational value from watching salmon or other species in the water. Other effects would materialize to the extent that additional anadromous fish would increase the amount of nutrients delivered to the upstream ecosystem, stimulating growth in trees, birds, and other economically important species.

Jobs and Incomes

Improvements in fish passage would have long-term impacts on jobs and incomes through several mechanisms. Reclamation (2008a) estimated that the direct impact of long-term expenditures associated with a potential fish passage project at Cle Elum Dam would be an increase of 5 to 12 operation and maintenance jobs. Any increase in jobs may be offset if the new jobs drew workers away from jobs elsewhere in regional or statewide economies.

Expected increases in fish populations resulting from improved fish passage could potentially increase jobs and incomes associated with recreational and commercial fish harvest. Jobs and incomes with no direct relationship to fish or the fish passage facilities would increase if households and businesses perceive that the resulting impacts on fish populations and the overall natural environment are significant enough to alter their location decisions. These impacts would also likely be offset, more or less, by indirect impacts. On balance, the Fish Passage Element would likely have a minor and beneficial long-term effect on jobs and incomes.

Uncertainty and Risk

Improving fish passage would reduce risk and uncertainty associated with salmon and steelhead to the extent that it would diminish the likelihood of severe future reductions in fish populations.

Distribution of Costs and Benefits

The long-term costs and benefits of improvements in fish passage would likely not be distributed equally among the same groups. This is especially the case to the extent that the costs would be borne by taxpayers and certain benefits would be realized by a subset: those who would enjoy seeing greater fish populations, or catching more fish, for example. Both costs and benefits would be realized as taxpayers pay the costs and realize the benefits as nutrients delivered by anadromous fish improve the health of ecosystem

resources owned by all citizens. Overall, the Fish Passage Element would have both beneficial and adverse minor long-term effects depending on the group affected.

Socioeconomic Structure

Improvements in fish passage and resulting increases in fish populations would likely boost the recreational fishing industry and other components of the economy related to fish populations.

5.22.2.2 Structural and Operational Changes Element

Value of Goods and Services

This element of the Integrated Plan would likely change the long-term supply of financial resources, land, and other resources dedicated to the structures as well as the supply of water for irrigation, instream flows, and other goods and services derived from the structures. Overall, these changes would be expected to have a minor long-term effect on the value of resource-related goods and services in the region.

Jobs and Incomes

Long-term increases or decreases in expenditures on a modified structure or facility would increase or decrease related jobs and incomes. Similarly, increases or decreases in goods and services derived from the structure or facility, such as fish populations, recreational opportunities, and water for irrigation, would likely have a corresponding impact on jobs and incomes in associated commercial activities. In addition, any improvements or deterioration in natural resource amenities that affect the location decisions of households and businesses, or affect the cost of living and doing business, would also have long-term impacts on related jobs and incomes.

The initial impacts on jobs and incomes would be dampened to the extent that they trigger offsetting impacts. An initial increase in jobs might, for example, draw workers from other jobs, which may remain unfilled if other skilled workers do not fill those jobs. As a result, the Structural and Operational Changes Element would likely have only a minor long-term effect on jobs and incomes.

Uncertainty and Risk

Projects to modify existing structures and facilities would reduce long-term risk and uncertainty to the extent that they increase the reliability in the supply of water for irrigation or instream flow. If this element of the Integrated Plan increased the reliability of water for irrigators during periods when water supplies otherwise would be uncertain or less than irrigators' demands, for example, it would likely reduce the costs they otherwise would incur to compensate for risk and uncertainty and induce them to adjust production decisions that result in higher net earnings.

Distribution of Costs and Benefits

Long-term impacts on the distribution of costs and benefits associated with structural and operational changes would be similar to those described in Section 5.22.1.4.

Socioeconomic Structure

Modifications to structures and facilities would alter the structure of the regional economy to the extent that resultant changes in the supply of water-related goods and services lead to long-term changes in household spending patterns, business production, or governmental activities. If the modifications result in higher production of crops and larger fish populations, for example, the regional economy likely would experience expansion in related sectors that otherwise would not occur.

5.22.2.3 Surface Storage Element

Value of Goods and Services

This element would likely change the long-term supply of several goods and services derived from the basin's water and related resources. Increased supplies of irrigation water to some lands when they otherwise would not receive their full entitlement would likely increase the production of irrigated crops from those lands. Changes in fish habitat and fish populations resulting from storage-related changes in streamflow may increase the output of the commercial fishing industry. The Surface Storage Element may affect recreational opportunities at Bumping Lake but the actual effects and their magnitude are uncertain.

Jobs and Incomes

Long-term expenditures on a new storage facility would likely increase the demand for labor and generate new job opportunities and higher incomes for some workers. The impact of these expenditures on the regional economy is expected to be small. Similarly, increases in the supply of goods and services derived from the new storage structure, such as fish populations and water for irrigation, would likely have a corresponding impact on jobs and incomes in associated commercial activities. The positive or negative impacts on the basin's natural resource amenities that affect the location decisions of households and businesses would have corresponding long-term impacts on related jobs and incomes. Any increase in jobs may be offset if the new jobs drew workers away from jobs elsewhere in regional or statewide economies. Overall, this element would be expected to have beneficial long-term effects on jobs and incomes.

Uncertainty and Risk

The development of new storage would reduce uncertainty and risk to the extent that it would increase the reliability of water to meet specific demands. Increases in reliability would yield economic benefits by enabling households, businesses, and governments to avoid costs they otherwise would incur to offset the higher uncertainty and risk.

Distribution of Costs and Benefits

Long-term impacts on the distribution of costs and benefits associated with surface water storage would be similar to those described in Section 5.22.1.4.

Socioeconomic Structure

The development of new storage would likely boost those elements of the economy that would enjoy increased supply of specific goods or services relative to those that would not. For example, the affected parts of the agricultural sector would be reinforced if new storage were to increase the reliability of water supplies for irrigation. Long-term changes in economic structure would also likely occur to the extent that new storage alters the supply of amenities that affect the location decisions of households and businesses.

5.22.2.4 Groundwater Storage Element

Value of Goods and Services

Several factors would determine the costs and benefits of storing water underground. The future prices of electricity and labor associated with operating the facilities would likely have a major effect on long-term costs. The opportunity costs of the water, land, and other resources that would be used by this alternative, such as the lost value of the water-related goods and services that otherwise would be produced when water is injected underground, also would have a major influence.

The willingness of users to pay for the goods and services derived from the stored water would determine the economic benefits. The water might provide services similar to insurance when it lies underground available to satisfy demand that otherwise would be unmet. It also might flow to the surface and/or be retrieved and produce goods and services, such as aquatic habitat, irrigation, or water for municipal and industrial uses.

Jobs and Income

Increases in the supply of goods and services derived from the Groundwater Storage Element, such as water for irrigation and increased fish populations, would likely boost jobs and incomes in associated commercial activities. Similarly, long-term expenditures on storing surface water in the ground would likely increase the demand for labor and generate new job opportunities and higher incomes for some workers. The positive or negative impacts on the basin's natural resource amenities that affect the location decisions of households and businesses would have corresponding long-term impacts on related jobs and incomes. Any increase in jobs may be offset if the new jobs drew workers away from jobs elsewhere in regional or statewide economies. Overall, this element would be expected to have beneficial long-term effects on jobs and incomes.

Uncertainty and Risk

The greater the uncertainty regarding the ability of surface water flows to meet future demands, the greater the potential benefits of storing water underground. The greater the uncertainty regarding the availability of water to be stored and, once stored, its availability to be retrieved, the greater would be the costs and smaller would be the benefits.

Distribution of Costs and Benefits

Long-term impacts on the distribution of costs and benefits of groundwater storage would be similar to those above.

Socioeconomic Structure

The development of groundwater storage would likely boost those elements of the economy that would enjoy increased supply of specific goods or services relative to those that would not. For example, some agricultural sectors would be reinforced if new groundwater storage were to increase the reliability of water supplies for irrigation during periods of surface water shortages. Long-term changes in economic structure would also likely occur to the extent that new groundwater storage alters the supply of amenities that affect the location decisions of households and businesses.

5.22.2.5 Habitat/Watershed Protection and Enhancement Element

Value of Goods and Services

Enhancing fish habitat and acquiring and protecting sensitive lands would have a long-term effect on the value of goods and services derived from the basin's water and related resources to the extent that these actions would affect the mix and level of goods and services derived from the habitat and lands. Section 3.22.1 discusses values associated with increased fish populations and related activities. Protection of lands might also affect the supply and value of goods and services not directly related to water, such as upland recreational opportunities.

Jobs and Incomes

Changes in commercial fishing, recreational fishing, sightseeing, and other activities that might result from this element would likely lead to changes in the levels of jobs and incomes associated with these activities. Any changes in natural resource amenities that affect the location decisions of households and businesses would have additional long-term impacts on related jobs and incomes.

Habitat/watershed protection and enhancements would increase or decrease long-term maintenance expenditures on the affected land, water, and other resources and, therefore, would lead to a long-term increase or decrease in related jobs and incomes. Targeted watershed protection and enhancements would likely have only minor effects on jobs and

incomes if uses, such as forestry and grazing, of acquired lands continue. Numerous studies have shown that Wilderness provides economic benefits to surrounding communities (Wilderness.net, 2012; ECONorthwest, 2009; Haefele et al., 2007; Loomis and Richardson, 2000). National Recreation Area designation would raise the profile of designated recreational lands and could be a powerful marketing feature to attract more users to these lands, who in turn will contribute to local economic vitality.

The overall impacts on jobs and incomes would be dampened to the extent that they would trigger offsetting impacts. For example, an initial increase in jobs might draw workers from other jobs, which might remain unfilled by other workers.

Uncertainty and Risk

Enhancing fish habitat and protecting sensitive lands are intended to reduce risk and uncertainty associated with the habitats' ability to yield salmon and steelhead and with the lands' ability to provide various goods and services.

Distribution of Costs and Benefits

The distribution of long-term costs and benefits from actions to enhance fish habitat and protect sensitive lands likely would resemble that of actions to improve fish passage, discussed in Section 5.22.2.1.

Socioeconomic Structure

Protecting and enhancing habitat would likely boost those elements of the economy that would enjoy increased fish populations relative to those that would not. Changes in commercial fishing, recreational fishing, sightseeing, and other activities that might result from any newly designated Wild and Scenic Rivers, Wilderness, and National Recreation Areas would likely lead to changes in the levels of jobs and incomes associated with these activities. These designations could place restrictions on land use in the designated areas, which could limit development. Designation of Wild and Scenic Rivers does not create new mandates on private land; therefore, no major shifts in development activity would be expected on private lands within the river corridors. There could be a minor adverse impact on the fiscal resources of Yakima and Kittitas Counties from lower property tax collections as a result of acquiring private lands and placing them in public ownership.

Conserving large tracts of ponderosa pine forest in the Teanaway River basin as part of the targeted watershed protection and enhancements could produce future ecologically-derived economic benefits given the tree species' limited range and vulnerability to climate change impacts.

These resources would likely also contribute to the economy by providing amenities that attract new households and businesses, increase the quality of life of the existing households, or influence the cost of living or the cost of doing business in the region.

5.22.2.6 Enhanced Water Conservation Element

The scope and design of specific demand-management programs and investments in infrastructure would determine their costs, benefits, and net benefits (or net costs); their impacts on jobs and income; the distribution of costs and benefits; their interaction with the economy; and the levels of risk and uncertainty they would generate for affected parties. With enhanced water conservation, an existing set of goods and services would be produced with less water, and the conserved water would be used to produce a new set of goods and services, whose value would depend on the circumstances of each specific conservation project or program.

Enhanced conservation projects and programs would have distributional effects if their benefits would accrue to one group while their costs would be borne by another. General taxpayers might incur some or all of the costs of a project, for example, but the benefits would accrue to the farmer(s) who would realize an increase in the supply of water for irrigation, and to anglers and others who would enjoy the benefits of increased streamflows and improved habitat for salmon. Enhanced conservation projects and programs would likely not alter the general structure of the economic activity and social organization linked to the basin's water resources. They might reduce uncertainty and risk associated with the movement of water resources through the basin by reducing the amount of irrigation runoff that would infiltrate into the ground and later appear somewhere else and, instead, increase the likelihood that the water would be more directly controlled by water managers. Enhanced conservation would also increase the reliability of water for irrigators during periods when water supplies otherwise would be uncertain or less than irrigators' demands, inducing irrigators to increase crop production, and reduce the costs they would incur to compensate for risk and uncertainty.

5.22.2.7 Market Reallocation Element

Market-based transfers would likely increase the value of goods and services directly derived from water resources because the net benefits that the buyer would derive from the water would exceed those that the seller would forgo. The market reallocation technical memo (Reclamation and Ecology, 2011j) concludes that "by itself, the market-based element of the Integrated Plan has the potential to offset much, but not all, of the irrigation-related economic losses from a future severe drought. It also has the potential to totally offset the losses when working in conjunction with other components of the plan."

Trends and patterns in the number, type, and location of future water transfers will be influenced by numerous factors that shape the demand for and supply of water. These include the incidence and severity of drought, the reliability of drought forecasts, population and economic growth in the basin and among outside groups with an interest in the basin's water resources, and trends in the population of salmon and other species dependent on instream flows. The evolution in transfers will be influenced by social and institutional factors that affect parties' willingness to participate in transactions. Growth in the number of transactions would occur only as more parties see that participating in

them is likely to yield sufficient economic gain that it warrants the time and effort required to make them work.

5.22.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

The long-term socioeconomic effects of the Integrated Plan may differ from the sum of the effects of the individual elements. Differences would arise to the extent that implementing the elements as a package would cause interactions that would influence the impacts on the supply of goods and services derived from the basin's water and related resources, on resource-related expenditures, on resource-related risk and uncertainty, on the distribution of resource-related costs and benefits, or on the structure of the regional and statewide economies. If they reinforce one another, then the overall effect would be greater than the sum of their individual effects. If they interfere with one another, it would be smaller.

5.22.4 Mitigation Measures

The type of mitigation needed would be determined by future socioeconomic conditions and the specific steps that would be taken to implement the actions. Mitigation typically would be warranted only if an action would reduce the supply of one set of goods and services and the reduction harmed one or more individuals, businesses, landowners, or other interest groups.

5.23 Environmental Justice

Environmental justice issues arise when a project disproportionately impacts minority or low-income populations. If a project will not cause significant adverse impacts, there will not be environmental justice impacts. If significant impacts are anticipated, demographic information for the project area is compared to the Yakima basin as a whole and the State of Washington to determine if minority populations would be disproportionately impacted.

5.23.1 No Action Alternative

Under the No Action Alternative, other agencies and entities would undertake projects to improve water supply and fish habitat. These projects are expected to have similar impacts to those in the Integrated Plan; therefore no significant adverse impacts would occur and there would be no environmental justice impacts. If the projects trigger NEPA analysis, the proposing agencies or entities would conduct environmental review, including environmental justice impacts, separately from this EIS.

5.23.2 Integrated Water Resource Management Plan Alternative – Impacts of Individual Elements

5.23.2.1 Reservoir Fish Passage Element

Members of the Yakama Nation and other Tribes outside the immediate geographic area may currently use natural resources in the Cle Elum Reservoir area and would be expected to do so in the future. They may use these resources disproportionately more compared to the total population. The subsistence use of renewable natural resources (such as fish, wildlife, and vegetation) by Tribes or other populations in the construction area and downstream has not been quantified. Improvements to fish abundance from access to habitat above the dam may increase the long-term potential for subsistence use of these resources.

None of the other fish passage projects are expected to cause significant adverse impacts; therefore, no disproportionate impacts on minority or low-income populations are anticipated.

5.23.2.2 Structural and Operational Changes Element

None of the projects under the Structural and Operational Changes Element are expected to cause significant adverse impacts; therefore, no disproportionate impacts on minority or low-income populations are anticipated.

5.23.2.3 Surface Storage Element

The significant adverse impacts at the Wymer Dam project include the loss of shrub-steppe habitat and the acquisition of agricultural property for conversion to a dam site and reservoir. Impacts on shrub-steppe habitat would be lessened by the proposed Habitat/Watershed Protection and Enhancement Element that would acquire important habitat, including shrub-steppe areas. Impacts of property acquisition would be mitigated by compliance with State and Federal laws during the negotiation process. Neither of these impacts are expected to have disproportionate impacts on minority or low-income populations since all people would be impacted similarly.

The enlarged Bumping Lake Reservoir would cause adverse impacts by inundating recreational facilities and forest access roads. Recreation will coordinate with the USFS to provide replacement recreational facilities and access. The recreational impacts are not expected to disproportionately impact minority or low-income populations since all people would be impacted similarly.

The Kachess Reservoir inactive storage project is not expected to cause significant adverse impacts; therefore, there would be no disproportionate impacts on minority or low-income populations.

5.23.2.4 Groundwater Storage Element

The Groundwater Storage Element would not cause significant adverse impacts; therefore, no disproportionate impacts on minority or low-income populations would occur.

5.23.2.5 Habitat/Watershed Protection and Enhancement Element

The Habitat/Watershed Protection and Enhancement Element would not cause significant adverse impacts; therefore, no disproportionate impacts would occur to minority or low-income populations.

5.23.2.6 Enhanced Water Conservation Element

The Enhanced Water Conservation Element would not cause significant adverse impacts; therefore, no adverse impacts would occur to minority or low-income populations.

5.23.2.7 Market Reallocation Element

Enhanced water markets are not anticipated to create impacts that could accrue disproportionately to minority or low-income populations.

5.23.3 Integrated Water Resource Management Plan Alternative – Impacts of Integrated Plan

Implementing the Integrated Plan as a coordinated program instead of as individual elements is not expected to result in greater environmental justice impacts. As demonstrated above, most of the projects are not expected to cause disproportionate impacts on minority or low-income populations.

5.23.4 Mitigation Measures

Since most projects are not anticipated to cause significant adverse environmental impacts, significant environmental justice impacts are not anticipated. The Wymer Dam and Bumping Lake Reservoir enlargement projects could cause significant adverse impacts, but since all populations would be affected equally, no disproportionate impacts on minority or low-income populations are anticipated. Therefore, no mitigation would be required.

5.24 Overall Long-term Impacts and Benefits of Integrated Plan

Implementation of the Integrated Plan is expected to result in greater benefits to resident and anadromous fish and water supplies for agriculture and municipal and domestic uses as well as greater flexibility to respond to climate change than implementing a series of

independent or individual projects. This comprehensive approach to water resources in the Yakima basin is the only action that has been shown to meet the Purpose and Need. Neither the No Action Alternative nor any of the seven elements of the Integrated Plan implemented independently would meet the Purpose and Need. The Integrated Plan has been developed in collaboration with a multi-stakeholder interest group based on over 30 years of studies and planning in the Yakima River basin. The proposed Integrated Plan projects were modeled using Reclamation's modeling system to determine effects on water supply and streamflows. The modeling incorporated potential climate change impacts. The results indicate that all these water uses would benefit from the Integrated Plan even under projected climate change scenarios. The following discussion summarizes the impacts and benefits of each element of the plan, then provides an overall summary of the Integrated Plan impacts and benefits.

The Reservoir Fish Passage Element would provide fish passage at dams constructed in the early 1900s without passage. This would open up habitat for anadromous fish including the threatened Middle Columbia River steelhead and is a prerequisite for long-term reintroduction of the extirpated sockeye. Improved passage would also benefit the threatened bull trout by providing connectivity between populations currently isolated by the dams. Fish passage facilities would be designed so there would be no impacts to existing water delivery contracts, total water supply available, or flood control operations.

The Structural and Operational Changes Element would improve the efficiency of existing irrigation systems, allowing for improved water delivery and streamflows, and reducing impacts to fish. Raising the elevation of Cle Elum Reservoir during spring and early summer would inundate a strip of land around portions of the reservoir for several weeks. The additional water would benefit streamflows in the Cle Elum and Yakima Rivers. Reclamation would acquire easements for the inundated land and would install shoreline erosion protection to compensate for the higher water levels.

The Surface Water Supply Element is intended to provide additional water to meet the needs of irrigators and to improve streamflows in the mainstem rivers. New reservoirs or enlarged existing reservoirs would substantially increase the amount of available water for instream and out-of-stream uses. Increased water storage would help meet some of the identified flow targets or move flows in the direction of meeting the targets. In addition, increased storage allows for more water to be carried over at the end of the irrigation season, increasing flexibility of operations in drought years to meet irrigation and streamflow demands. Modeling indicates these benefits would be provided under the less adverse climate change scenarios and improved over No Action in moderate and more adverse scenarios.

New reservoirs would inundate additional land, potentially affecting habitat for terrestrial species. If a storage project is constructed at the Wymer site or enlarged at Bumping Lake Reservoir, shrub-steppe and old-growth forest, which are already declining in the Yakima River basin, would be inundated. This could affect the northern spotted owl (threatened species) and greater sage-grouse (candidate species). An enlarged Bumping Lake Reservoir would also inundate existing recreational facilities, be closer to the William O. Douglas Wilderness, and inundate some access roads to trailheads.

Reclamation and the USFS would coordinate to provide replacement recreational facilities and access, but some may not be able to be replaced in a similar location. The Integrated Plan includes measures to protect other shrub-steppe and old-growth habitat in the basin, however, the potential effectiveness of these measures to attenuate impacts is uncertain. Ongoing monitoring and adaptive response will be needed to ensure that these measures are as effective as possible.

The pilot projects included in the Groundwater Storage Element explore the potential for using aquifer storage to improve water supplies and streamflows. Surface water would be infiltrated into aquifers during high-flow periods and stored for later pumping or passive release back to surface water. Both shallow aquifer recharge and ASR are new concepts in the Yakima River basin and their potential is unknown. The pilot studies would evaluate whether the concepts would work in the basin and the potential water that could be stored. Storage in aquifers would have fewer impacts than surface storage and could reduce the amount of surface storage needed to meet irrigation demands, improve streamflows, and discharge cooler water to improve stream temperature conditions.

Under the Habitat/Watershed Protection and Enhancement Element, additional high-quality habitat would be acquired and protected, and degraded stream conditions would be improved to provide better habitat for resident and anadromous fish. Specifically, shrub-steppe and forested habitat currently in private ownership and susceptible to development would be acquired and protected. The element also recommends additional Wilderness, National Recreation Area, and Wild and Scenic River designations to provide additional watershed protection and increase recreation opportunities. These protection mechanisms would provide an overall benefit in habitat protection. An aggressive program to enhance mainstem floodplains and tributary stream conditions would provide improved habitat conditions for fish and help meet the goals of steelhead recovery in the basin.

The Enhanced Water Conservation Element expands on the ongoing YRBWEP conservation programs. It includes conservation measures for irrigation district infrastructure improvements, on-farm conservation and irrigation efficiency improvements, and a program to encourage municipal, domestic, commercial, and industrial conservation. The aggressive conservation program is expected to improve the reliability of irrigation supplies and provide localized streamflow benefits. The municipal and domestic conservation program would improve the reliability of existing supplies, reducing the need to obtain new supplies.

The Market Reallocation Element facilitates the transfer of water rights to allow irrigators to improve the reliability of their water supply, and municipal and domestic users to acquire water rights to meet municipal demands or to mitigate for new domestic wells. In addition, water rights could be more easily acquired to enhance streamflows in key areas. Market reallocation is expected to cause few environmental impacts. The proposed amendments to water transfer laws would include measures to mitigate for third-party impacts such as weed invasions on fallowed lands.

Most of the adverse impacts associated with the Integrated Plan elements are construction-related and there would be few long-term adverse effects excepting habitat losses at the enlarged Bumping Lake Reservoir and new Wymer Reservoir. Modeling indicates that integrated implementation of the plan elements would benefit water supplies for irrigation and municipal and domestic uses and streamflows for fish, meeting the targets for both. Fish passage and habitat enhancements would provide further benefits for fish and wildlife in the basin. The Habitat/Watershed Protection and Enhancement Element would help protect substantial areas of existing habitat from future losses due to development-related habitat impacts. The Groundwater Storage, Enhanced Conservation, and Market Reallocation Elements provide opportunities to improve the reliability of water supplies without requiring surface storage. However, additional surface storage is needed in the basin to provide adequate water to meet the instream and out-of-stream needs of the Integrated Plan. Overall, the Integrated Plan would provide long-term benefits to water supplies for agricultural and municipal and domestic uses and improve habitat conditions for resident and anadromous fish.

5.25 Long-Term Cumulative Impacts

Cumulative impacts are the effects that may result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions (40 CFR 1508.7). "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7). Generally, an impact can be considered cumulative if: (a) effects of several actions occur in the same locale; (b) effects on a particular resource are similar in nature; and (c) effects are long-term in nature. Potential areas where long-term cumulative impacts might occur as a result of implementation of the Integrated Plan are discussed below.

The overall long-term effects of the Integrated Plan are expected to be beneficial, although some localized impacts could occur associated with individual projects. The integrated approach to resolving water resource issues in the Yakima basin is expected to provide greater basin-wide benefits than would result from implementing projects on a piecemeal (or individual) basis. A comprehensive program that includes habitat/watershed protection and enhancement, fish passage, systemwide structural and operational modifications, and water supply components including surface water storage, groundwater storage, enhanced water conservation, and market reallocation is expected to provide greater benefits to resident and anadromous fish and irrigation and domestic water supply than would occur under the No Action Alternative. The Integrated Plan addresses water resource issues from a systemwide approach, which would avoid developing localized solutions that may address one problem, but exacerbate another, which could result if projects are implemented individually.

5.25.1 Past, Present, and Reasonably Foreseeable Future Actions: Yakima River Basin

Individual elements of the Integrated Plan would contribute to cumulative impacts when combined with other past, present, and reasonably foreseeable future actions. The

Integrated Plan is intended to provide habitat improvements that would help reverse environmental damage from the early 1900s. Effects of the Reservoir Fish Passage and Habitat/Watershed Protection and Enhancement Elements are expected to be beneficial to fish, wildlife, and listed species. The water supply elements would improve streamflows, further benefiting fish populations. Fish passage would contribute to the restoration of salmon populations in the Yakima River basin. Improved conditions for fish, increased abundance and productivity of fish populations, and improved vegetation communities would provide additional food sources and nutrients and cumulatively benefit aquatic species, including resident and anadromous fish as well as terrestrial animals and plants. Other ongoing fish habitat improvements and fish enhancement projects in the Yakima basin are expected to further improve conditions for fish, which cumulatively could improve the ability of fish to withstand climate changes.

There are a number of ongoing or proposed water resource projects, included in the No Action Alternative (Section 2.3), that could contribute to cumulative impacts in the Yakima River basin. Overall these cumulative impacts are expected to be positive for water supply and fish habitat. Reclamation's Yakima River Basin Water Enhancement Project Phase II project, including the Water Conservation Project and the Interim Comprehensive Basin Operating Plan, as well as Reclamation's ongoing improvements to existing facilities, are expected to contribute to cumulative improvements in water management and water supply. The habitat enhancement projects included in the No Action Alternative (Section 2.3) are expected to provide improvements to fish habitat. These ongoing, related projects are not included in the Integrated Plan, but combined with the Integrated Plan are expected to provide substantial improvement to habitat as well as water supply within the Yakima River basin.

Expanding existing reservoirs or building new water storage facilities would add to existing impacts on fisheries in a river basin that has already been extensively dammed, and has been impacted by development, climate change, and other modifications to the system. Additional storage facilities could exacerbate the impacts of existing facilities, including increased migration times and impaired downstream water quality. The additional storage would be used to improve streamflow conditions for fish as well as improved water supplies. Hydropower facilities could be expanded in the future by utilities as well as private developers, resulting in water quality impacts, altered reservoir operations, and other detrimental effects that could affect fisheries. The Integrated Plan has been developed in a comprehensive manner to offset these cumulative impacts, by including new fish passage, and retrofitting existing reservoirs with improved fish passage, and by including measures to enhance habitat, maintain flows, reduce water temperatures, and offset climate change-induced impacts.

5.25.2 Past, Present, and Reasonably Foreseeable Future Actions: Related Projects

There are other projects proposed for the Yakima River basin that are not part of the Integrated Plan and not directly related to water resource management, but include activities that could affect terrestrial and aquatic habitat in the basin, and compound impacts accompanying the Integrated Plan. Several projects could contribute to losses of

shrub-steppe habitat in the basin beyond those proposed for the Wymer Dam project. These include wind power development ongoing throughout the area, and ongoing activities and facility expansion at the Department of Army's Yakima Training Center. These additional losses of shrub-steppe habitat could further contribute to the decline of the greater sage-grouse. Continued logging in the forested areas in the basin could reduce forest habitat, including old growth, and impact declining forest species such as the threatened northern spotted owl.

Ongoing residential, commercial, and agricultural development in the basin, which has been planned for as part of regional land use planning, would be facilitated by improvements in water supply that would occur under the Integrated Plan. These developments could further encroach upon wildlife habitat, including shrub-steppe and forest habitat. The Integrated Plan is not intended to expand the amount of irrigated acreage in the Yakima River basin. However, it would provide a more reliable water supply for prorationed users which could encourage farmers to shift to more permanent crops. These changes in agriculture are not expected to contribute to further decline in shrub-steppe habitat, because the areas affected are already in agricultural use.

The Habitat/Watershed Protection and Enhancement Element of the Integrated Plan is intended to help protect these habitats from further losses. Habitat improvements and land acquisition and other conservation programs, including designations of Wild and Scenic Rivers and Wilderness, would help to reduce future losses of shrub-steppe and forest habitat. Actions proposed in the USFS Okanogan-Wenatchee Forest Planning Process could provide cumulative benefits to watershed health.

5.25.3 Past, Present, and Reasonably Foreseeable Future Actions: Columbia River Basin

In addition to projects and programs within the Yakima River basin, there are several water resource programs and/or projects within the Columbia River Basin with the potential to cumulatively affect or be affected by the Integrated Plan, including the Odessa Subarea Special Study, the Lake Roosevelt Incremental Storage Releases, the Walla Walla Pump Exchange, the Sullivan Lake Water Supply Project, the Umatilla Aquifer Recharge Project in Oregon, and the potential renegotiation of the U.S.-Canada Columbia River Treaty.

The Odessa Subarea Special Study proposes to use Columbia River water to replace groundwater currently used for irrigation in the Odessa Groundwater Management Subarea (http://www.usbr.gov/pn/programs/ucao_misc/odessa/index.html). The Lake Roosevelt Incremental Storage Releases Project would release additional water from Lake Roosevelt behind Coulee Dam to benefit municipal and industrial supply, the Odessa Subarea interruptible water right holders, and instream flows (http://www.ecy.wa.gov/programs/wr/cwp/cr_lkroos.html). The Walla Walla Pump Exchange (http://www.ecy.wa.gov/programs/wr/cwp/wallawalla.html) currently being studied would pump water from the Columbia River to replace Walla Walla River irrigation water to address restoration of streamflows in the Walla Walla River. The Sullivan Lake Water Supply Project

(http://www.ecy.wa.gov/programs/wr/cwp/sullivan.html) would benefit streamflows in Sullivan Creek, and the Pend Oreille and Columbia Rivers. The project would also help meet demands for irrigation and domestic use. The State of Oregon is studying a project to divert water from the Columbia River to replenish depleted aquifers in the Umatilla basin.

The potential renegotiation of the U.S.-Canada Columbia River Treaty and the expiration of the flood control project have the potential to require that reservoirs in the U.S., including those in the Yakima basin, be operated differently. The treaty has no specified end date, but it allows either Canada or the United States the option to terminate most of the provisions of the Treaty on or after September 16, 2024, with a minimum of 10 years advance written notice. If the Treaty is not terminated or modified, its provisions continue indefinitely. If the Treaty is terminated or modified, it could require unknown changes in the operation of U.S. reservoirs. Regardless of whether the Treaty continues, the purchased flood control space project expires in 2024. After 2024, the Treaty calls for a shift to a flood control operation under which the U.S. can call upon Canada for flood control assistance. The U.S. can request this “called upon" assistance as needed, but only to the extent necessary to meet forecast flood control needs in the U.S. that cannot adequately be met by U.S. projects. This new operational plan could require the U.S. to increase the draft on its reservoirs to provide additional flood control storage.

Some of these projects would improve streamflows and benefit fish in the Columbia River basin. When these projects are combined with the fish enhancement aspects of the Integrated Plan, overall benefits are expected for Columbia River Basin fish populations. However, all of these projects represent increased demand on water in the Columbia River. Several projects in the Integrated Plan would increase consumptive use and decrease the amount of water discharged to the Columbia River. All of the proposed Columbia River projects have the potential to reduce water that could be available for an exchange of water between the Columbia and Yakima Rivers included as the Columbia River study in the Integrated Plan (Section 2.4.5.4).

In addition to representing an increased demand on water, these projects all include opportunity costs. Social opportunity costs refer to the opportunities foregone by society whereby choosing one alternative would preclude the possibility to implement others. All of the projects proposed would be relatively high cost and would reduce the amount of funding available to address other water needs in eastern Washington. The social opportunity cost of one of these projects would include the projects that could not be developed if funds and other resources are allocated to that project.

Impacts of Lake Roosevelt Incremental Storage Releases Project and preliminary impacts of the Odessa Subarea Special Study were evaluated in Ecology’s Columbia River Water Management Program EIS and Lake Roosevelt Incremental Storage Releases EIS. Reclamation further evaluated the impacts of the Lake Roosevelt storage releases in an Environmental Assessment (EA). Ecology has adopted these documents as part of this EIS under its SEPA regulations (Section 1.12).

Impacts of the other projects will be evaluated in separate environmental documents by the agencies proposing them. Those documents will further evaluate cumulative impacts associated with the proposed projects.

The Integrated Plan is itself an effort to manage water resources on a systemwide basis, to identify and evaluate impacts at a comprehensive level, thus reducing the potential for unintended cumulative impacts. Potential impacts associated with specific projects would undergo additional project-level review prior to implementation, which would identify specific impacts as well as cumulative impacts. Reclamation and Ecology and their partners would continue to coordinate closely to manage the resources in the Yakima River basin to avoid long-term cumulative impacts.

5.26 Unavoidable Adverse Impacts

Unavoidable significant adverse impacts are defined as environmental consequences of an action that cannot be avoided, either by changing the nature of the action or through mitigation if the action is undertaken. Long-term impacts related to forest and shrub-steppe habitat loss have been identified associated with the Surface Water Storage Element. Smaller losses of habitat would occur under the Reservoir Fish Passage and Structural and Operation Changes Elements. These impacts would be permanent and long-term; however, positive impacts associated with the Habitat/Watershed Protection and Enhancement Element, which would improve degraded habitat and protect large areas of intact shrub-steppe habitat and old-growth forests, are expected to result in a net improvement for spotted owls and bull trout.

5.27 Relationship between Short-Term Uses and Long-Term Productivity

NEPA requires considering "the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity" (40 CFR 1502.16). This occurs when short-term negative effects are counterbalanced by a long-term positive effect (and vice-versa). Construction of components of the Integrated Plan would cause some short-term adverse impacts on water quality, fish, vegetation, wildlife, air quality, land use, recreation, and noise. These short-term impacts are counterbalanced by the long-term benefits to fish, threatened and endangered species, ecosystem productivity, and increased recreational opportunities.

5.28 Irreversible and Irretrievable Commitments of Resources

Irreversible commitments are decisions affecting resources, such as wetlands and vegetation, where the resource is lost and replacement can only occur over a long period of time, or at great expense, or cannot be replaced at all (for example, minerals).

Irretrievable commitments refer to loss of production or use of resources as a result of a decision, such as removal of trees which eliminates another harvest until a new stand grows. They represent opportunities foregone for a period of time that a resource cannot be used.

Implementation of the Integrated Plan would result in the irreversible and irretrievable commitment of wetlands, forests, including old growth and shrub-steppe habitat that is used by Federal and State listed fish and wildlife species, especially with construction of projects under the Surface Water Storage Element.

5.29 Environmental Commitments

This section discusses the long-term environmental commitments made in this FPEIS. Reclamation has the primary responsibility to ensure these commitments are met if an action is implemented. Because this a programmatic environmental review of the Integrated Plan elements, specific mitigation measures have not been developed for specific project actions at this time. Additional measures would be developed during project-specific review for each project action when carried forward. Below is a summary of the type of actions that would be undertaken to minimize long-term operational impacts.

5.29.1 Surface Water and Habitat

One of the goals of the Integrated Plan is to provide improved habitat and water conditions for fish and aquatic species. The long-term impacts on fish and aquatic species as a result of the Integrated Plan would primarily be beneficial to these species and their habitats. Specific projects would be evaluated through applicable Federal, State, and local environmental review and permitting processes. Project-specific mitigation measures would be identified that pertain to long-term impacts from each specific proposed activity.

In most cases, the potential for water quality impacts would be mitigated by following the required regulatory permits for the construction and operation of the project. Implementation of long-term adaptive management and monitoring would be beneficial for maintaining and enhancing water quality. Reservoir operational practices related to the timing and volume of storage releases can be structured to mitigate water quality impacts.

5.29.2 Earth

Dam safety inspections and monitoring of slopes, hydrostatic pressures and seismicity would help document management strategies that are effective and identify any needed changes to management strategies over the long term. Managing recharge volumes and pressures in groundwater storage aquifers to limit seepage, inventorying slopes in the project area, and monitoring pressures in slope areas during recharge and storage would minimize potential slope instability. Constructing facilities in accordance with all

applicable design requirements, and monitoring to ensure that potential impacts do not develop during operation, would minimize the potential for earth related impacts.

5.29.3 Groundwater

More detailed, site-specific studies of the Integrated Plan projects are required to better determine their impacts and benefits and the amount of mitigation that might be required. Those studies would include seepage studies on irrigation canals that would be lined or piped, operational studies on irrigation facilities to determine the amount of water that could be conserved, groundwater studies to better characterize the amount of water that would return to surface water from the Groundwater Storage Element, and studies to better estimate the potential for large-scale water transfers to benefit irrigation water supply for some water users. Long-term impacts to groundwater could be avoided or mitigated by conducting hydrogeological studies prior to the design and using the knowledge gained in the design, construction, and implementation of projects.

Additional RiverWare modeling would also be required to better understand the impact on Yakima Project operations. Studies of the impact on return flow from irrigation conservation measures are also recommended to assist Reclamation in modeling the impact of conservation measures.

The timing of operational activities could be used to reduce the impact on groundwater. Additionally, the use of artificial recharge or withdrawal could be considered as part of the impact management strategy. Monitoring during operations would document the effectiveness of management strategies implemented.

Where local water supply wells are affected by lowered water tables due to conservation projects, mitigation measures could include extending wells to greater depths.

5.29.4 Hydropower

Further power subordination at the Roza and Chandler Powerplants would substantially impact the amount of energy produced by hydropower in the Yakima basin. Mitigation measures would be required to compensate for these impacts. Developing mitigation measures and any changes in hydropower generation would be coordinated with Bonneville Power Administration, Reclamation, and other affected agencies.

5.29.5 Visual Resources

Involving an architect in the design of facilities and restoration of disturbed lands would ensure they meet BLM's Visual Resource Inventory management objectives and the prescribed USFS Visual Quality Objective of Retention and corresponding Scenic Integrity Level of High to the extent practicable.

5.29.6 Air Quality

Dust control plans could be developed to mitigate the impacts of increased dust from fallow fields and dry infiltration basins. Measures to reduce dust could include installing plantings around the infiltration basins and planting drought-tolerant plants in fallow

areas. In some cases, air quality permits may be required for use of non-electric pumping, injection, or treatment equipment.

5.29.7 Climate Change

Changes in water availability in the Yakima River basin would require the managing agencies to adaptively manage the river to respond to changing conditions. Ecology and Reclamation would coordinate with other water, fish, agriculture, energy, forest and public health managers to adapt to climate change. The Integrated Plan on the whole would improve the ability of water and fisheries managers to mitigate the effects of climate change.

5.29.8 Property Acquisition

If individual projects that involve acquisition of land or easements are advanced for implementation, appropriate compensation would be required in accordance with applicable State or Federal regulations. Any lands acquired under the Habitat/Watershed Protection and Enhancement element would be purchased only from willing sellers.

5.29.9 Cultural Resources

Additional cultural resources review including field investigations would be required once specific locations for project elements are identified. These inventory investigations would determine if any archaeological sites, historic structures, or TCPs would be affected. Once the inventory and evaluation was complete then mitigation measures could be determined.

Mitigation measures for short-term impacts on TCPs would need to be determined in consultation with the appropriate cultural group. Construction contracts would require that if any archaeological material is encountered during construction, construction activities in the immediate vicinity would halt. The Department of Archaeology and Historic Preservation and a professional archaeologist would be contacted for further assessment prior to resuming construction activity in that area. Construction contracts may also include specific requirements for working around historic dams.

Chapter 6

CONSULTATION AND COORDINATION

CHAPTER 6.0 CONSULTATION AND COORDINATION

This chapter describes the public involvement, consultation, and coordination activities undertaken by Reclamation and Ecology to date, plus future actions that will occur during the processing of this document. Public information activities will continue through future development of this project.

6.1 Public Involvement

Public involvement is a process where interested and affected individuals, organizations, agencies, and governmental entities are consulted and included in the decisionmaking process. In addition to providing information to the public regarding the FPEIS, Reclamation and Ecology solicited responses regarding the public's needs, values, and evaluations of the proposed alternatives. Both formal and informal input was encouraged and used.

6.1.1 Scoping Process

Both Reclamation and Ecology sought comments from the interested public, including individuals, organizations, and governmental 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 the following activities:

- 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 scope of the PEIS. Also, Ecology distributed a total of 747 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*. Reclamation and Ecology issued a joint press release to local media on April 6, 2011, announcing a scoping meeting. A meeting notice was mailed to interested individuals, Tribes, groups, and governmental agencies which described the project, requested comments, and provided information about the public scoping meeting.

On May 3, 2011, Reclamation and Ecology jointly 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 joint 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.

Following the scoping meetings, Reclamation and Ecology prepared a *Scoping Summary Report* (Reclamation and Ecology, 2011m). This report summarizes the comments received during the four public scoping meetings and is available upon request or can be accessed from the Yakima River Basin Water Enhancement Project (YRBWEP) 2011 Integrated Plan website: http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html.

6.1.1.1 Comments and Other Information Received from the Public

The scoping period began April 2, 2011, and concluded June 15, 2011, during which time 79 comment letters were received. Reclamation and Ecology used the comments received to assist in the following activities:

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

The comments and questions are summarized below:

Elements/Alternatives/Projects

- **General Comments**: Concern that the Integrated Plan would not add any more water to the basin but merely reregulate the snowpack, contribution of proratable water right holders, generation of electric energy whenever possible and financially feasible, need for major emphasis on conservation, and the need to include specific proposed sequencing/phasing of elements.
- **Elements and Alternatives and Projects**: Consideration of Pine Hollow Reservoir, formulation of a nonstructural alternative, formulation of an alternative that would combine irrigation districts and eliminate the distinction between "proratable" and "nonproratable" water right holders, potential removal of Roza Dam, encouragement of small-scale water storage projects, consideration of Black Rock Reservoir, the suggestion to raise all reservoirs 3 feet or more or lower outlet tunnels, a potential channel between upper and lower Lake Kachess, potential investigation of monomolecular films to reduce evaporation of water, suggested focus on sustainable agriculture, formulation of an alternative which results in minimum instream impacts, potential consolidation of irrigation diversions, the potential replacement of dams for the benefit of species, subsurface microdrip, the

potential Mabton Trestle replacement, restoration of beavers to mountain streams in northeast Washington, and the suggestion that Keechelus, Kachess, and/or Cle Elum Reservoirs be dredged to increase water storage.

- **Storage Projects**: Opposition to storage projects, concern that large-scale projects transfer wealth from poor farmers in northeast Washington to rich farmers in the Columbia Basin, the site of the Wymer pump station, cost and lack of benefit from large storage projects, suggestion that Bumping Lake enlargement should be dropped from consideration for reasons noted in the 2008 Storage Study FEIS, schedule of drilling at Bumping Lake, support for expansion at Bumping Lake, whether there is a link between funding of storage projects and of habitat improvement projects, suggestion that new storage should be used to the benefit of the river ecosystem, whether Wymer Dam would replace Roza Dam, and the flood impacts of living near a reservoir.
- **Keechelus-to-Kachess Pipeline**: Need to coordinate with work on I-90, impact on property values, disruption to the Kachess Campground, and impact on area wells.
- **Reservoir Fish Passage**: Lack of clarity on what will be installed at Clear Lake Dam, the specific location and design of fish passage at Clear Lake, Bumping, and Cle Elum Dams, the lack of progress on fish passage at Tieton, Keechelus, and Kachess Dams, and whether fish passage will be paid for by taxpayers or irrigation users.
- **Water Resources and Water Quality**: Evaporation rates and refill times for reservoirs, the possibility of a charge for water diverted from the river, consumption of water from wells, the implications for increased water rights to support housing and urban development, emergency response for spills of contaminants, impact of construction on water quality, riparian/wetland restoration, and water quality impacts from new storage reservoirs.
- **Water Conservation**: Cost of conservation, on-farm conservation, permit exempt well provisions, setting specific targets, assessing past conservation projects, and the possibility of maximizing water conservation in place of new storage.
- **Water Marketing**: Water marketing related to the potential imbalance in ability to pay between municipal and agricultural users, undesired growth, legal and institutional barriers, setting specific targets, whether it makes sense to separate the value of water rights from the land, and whether this alternative alone could meet irrigation goals.
- **Habitat/Watershed Protection and Enhancement Program**: Impact of Wilderness and Wild and Scenic Designations, need for specific priorities and goals, critical habitat for listed species, roadless acreage, the potential for levee setbacks to reduce flooding in other areas, disparate economic impact on Kittitas County, impact on recreation, and impact of studies and enhancement on current property owners.
- **Land Acquisition**: Ownership and management objectives for purchased properties, alternative techniques such as Transfer of Development Rights or

Community Forest Projects, and the impact of acquisition on the tax rolls of Yakima and Kittitas Counties.

- **Cultural Resources**: Interbasin transfer of water from the Columbia River and the potential future preemption of irrigation water to meet treaty water rights.
- **Power**: Cost of electricity to operate the project, the power source for pumping water into reservoirs, and mitigation for power subordination.
- **Economics**: How the elements of the project will be funded, how funding could impact existing funding for projects in the basin, concern that the benefits estimate is too high or too low, benefits for individual projects, the true cost of irrigated crops using market rates for water and power, the timeframe for economic impacts, the cost of mitigation, impacts on specific economic factors (demand for hotel rooms, wage levels, property values and taxes, impacts to existing restaurants and hotels, and quality of life), expected beneficiaries, and discount rates.
- **Recreation and Tourism**: Impact of Bumping Lake Reservoir expansion on the William O. Douglas Wilderness and on recreational cabins, impacts on recreational fishing, the impact of Wymer Dam on the Yakima River Canyon Scenic Byway, effects of the Integrated Plan on tourism, and the need to include river-based recreation such as rafting when assessing instream flows.
- **Groundwater**: Creation of wetlands, potential impacts of continued proliferation of permit exempt wells, the 1945 Consent Decree and reallocation of aquifer water to instream flows, potential groundwater adjudication, and the U.S. Geological Survey groundwater study.
- **Crops**: Potential future cropping patterns, the conversion of cropland to other uses, specific crops grown in the Yakima Project, and the sustainability of vineyards.
- **Climate Change**: Impacts from the Pacific Decadal Oscillation and El Nino/Southern Oscillation weather patterns, the need to analyze each water supply element independently in regard to climate change, and concern that climate change is not addressed properly.
- **Fish and Wildlife**: Impacts of project elements on bull trout, native steelhead and salmon, sage-grouse, old-growth trees, migratory birds, and spotted owl habitat, the estimate of fish benefits, historic variability of salmon runs, independent analysis of each major water supply element, prioritization of fish recovery and fish passage actions for immediate implementation, the U.S. Fish and Wildlife Service bull trout recovery plan, compliance with various regulations, and impacts on fish from construction.
- **Visual and Noise**: Visibility of projects, the need for landscaping or buffers, and the effects of light, glare, noise, and vibration from construction.
- **Transportation**: Transportation impacts and mitigation.

- **Public Services and Utilities**: Additional public safety and emergency services during dam construction, housing for employees, and impacts on local school systems.
- **Geology**: Geotechnical studies, earthquake faults and instability in the Bumping Lake Dam area, and seismic issues.
- **Environmental Justice**: Comments related to potential adverse impacts on low-income and people of color communities.
- **System Operations**: Operations at Rimrock, reducing flow in the Tieton and Naches Rivers, flood hazard management, management of reservoirs when fish passage facilities are in place, potential increase in or reactivation of acreage in the Wapato Irrigation Project, instream flow management, the 2002 Interim Comprehensive Basin Operating Plan, and the need to confirm water availability sooner in the calendar year.
- **Process and Scope**: Exclusion of affected individuals and organizations in the process, cost/benefit review of large storage projects, the length of comment periods, the need to include the City of Roslyn on all maps, the need for more detail on municipal needs and growth projections, the need for an overall mission for the Integrated Plan, the process of the Workgroup, better-defined standards for accessing new domestic water supplies, inclusion of empirical data, whether Reclamation is obligated to undertake fish passage at the large storage reservoirs regardless of further action on the Integrated Plan, the relation of the Cle Elum FEIS to the Integrated Plan, the dependence of some elements on voluntary participation, and consultation with Tribes, communities, and school districts.
- **Other Impacts/Issues**: Hazardous materials, withdrawals from the Columbia River, the relation to the 2009 Ecology EIS, air quality impacts, legal mechanisms by which water could be transferred to instream flows, and the Supreme Court's May 2, 2011 decision in *Montana v. Wyoming*.

6.1.2 DPEIS Comment Period

Reclamation and Ecology released the Draft Programmatic Environmental Impact Statement (DPEIS) in November 2011. The public comment period began November 16, 2011, when notice was published in the *Federal Register* and extended to January 3, 2011. Reclamation and Ecology held open house meetings throughout the basin during the month of December. All open house meetings were held from 1:30 to 3:30 p.m. and again from 4:00 to 6:00 p.m. Open houses were held in Cle Elum, Washington on December 5, 2011; in Ellensburg, Washington on December 6, 2011; and in Yakima, Washington on December 14, 2011. Two people each provided comments to the court reporter at the afternoon meeting in Cle Elum and at the afternoon meeting in Yakima. Those comments are included in the Comments and Responses section of this FPEIS. The meetings in Cle Elum were attended by 23 people, 13 people attended the meetings in Ellensburg, and 28 people attended in Yakima.

During the comment period, Reclamation and Ecology received 2,285 comment letters on the DPEIS in the form of letters, emails, and handwritten comments submitted at the open

house meetings. Three letters were from Tribes, one was from a Federal agency, five were from State and local agencies, two were from irrigation districts, 17 were from organizations, and the rest were from individuals, including 613 submissions of a form email message written by the National Wildlife Federation and 1,585 submissions of form email messages and postcards written by the Sierra Club. The 90 individual comment letters, the four transcripts of testimony, and responses to them are included in the Comment and Responses section of this FPEIS.

6.2 Agency Coordination and Consultation

6.2.1 Cooperating Agencies

Reclamation and Ecology were responsible as joint lead agencies for developing this joint NEPA/SEPA PEIS.

Though many agencies are involved and interested in the Integrated Plan, only Bonneville Power Administration (BPA) and U.S. Forest Service (USFS) have assumed the role of cooperating agencies in regard to this PEIS. As cooperating agencies, BPA and the USFS have agreed to perform the following duties:

- Participate in the NEPA process;
- At the request of Reclamation and/or Ecology, provide information on portions of the PEIS on which the cooperator has specific expertise; and
- Review the Draft and Final PEIS.

6.2.2 Endangered Species Act, Section 7

Reclamation has concluded that consultation under Section 7 of the Endangered Species Act is not required at this time because preparation of the PEIS and selection of a preferred alternative would have no effect on listed species in the action area. Reclamation has discussed this conclusion with both the Service and NMFS, and neither agency found any fault with Reclamation's reasoning which led to the no effect determination. See Appendix G for a summary of the correspondence. Consultation would be conducted for individual projects that may affect listed species or critical habitat and that Reclamation would fund, authorize, and/or carry out under the Integrated Plan in the future.

6.2.3 Fish and Wildlife Coordination Act

Reclamation has consulted with the Service under the Fish and Wildlife Coordination Act. The Final Coordination Act Report (CAR) was completed in February 2012 and is posted on the Yakima River Basin Water Enhancement Project 2011 Integrated Plan website at http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html. Appendix F contains the Service's recommendations from the CAR and Reclamation's responses to those recommendations.

6.2.4 U.S. Forest Service

Reclamation will continue coordinating project activities with the U.S. Forest Service throughout the project.

6.2.5 U.S. Army Corps of Engineers

Reclamation will coordinate with the U.S. Army Corps of Engineers (Corps) in conjunction with their interests and responsibilities for wetlands. When specific projects are carried forward under the Integrated Plan, Reclamation will make application to the Corps for permits under Section 404 of the Clean Water Act as stated in the "Environmental Commitments" section.

6.2.6 U.S. Environmental Protection Agency

Coordination activities are ongoing with the U.S. Environmental Protection Agency because of its role in the NEPA review process.

6.2.7 Washington Department of Archaeology and Historic Preservation

The National Historic Preservation Act (NHPA) of 1966, as amended in 1992, requires that Federal agencies consider the effects that their projects have upon historic properties. Section 106 of this act and its implementing regulations (36 CFR Part 800) provide procedures that Federal agencies must follow to comply with NHPA on specific undertakings. These regulations encourage Federal agencies to combine NHPA public outreach efforts with the public outreach mandated by the NEPA process. Public outreach efforts for this FPEIS are described in the first part of this chapter.

To comply with Section 106 of NHPA, Federal agencies must consult with the State Historic Preservation Officer (SHPO), Native American Tribes with a traditional or religious interest in the study area, and the interested public. Federal agencies must show that a good faith effort has been made to identify historic properties in the area of potential effect for a project. The significance of historic properties must be evaluated, the effect of the project on the historic properties must be determined, and the Federal agency must mitigate adverse effects the project may cause on significant resources.

Other Federal legislation further promotes and requires the protection of historic and archeological resources by the Federal Government. Among these laws are the Archeological Resources Protection Act of 1979 and the Native American Graves Protection and Repatriation Act of 1990.

Because this EIS is programmatic and specific project details are not known at this time, additional cultural review and consultation will be undertaken as part of the additional environmental review required when projects are carried forward. That will include site-specific cultural resource studies and determination of appropriate mitigation in coordination with the Washington SHPO, the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the USFS, and other interested parties.

6.3 Tribal Consultation and Coordination

Executive Order (EO) 13175 establishes "regular and meaningful consultation and collaboration with Tribal officials in the development of Federal policies that have Tribal implications, to strengthen the United States Government-to-Government relationships with Indian Tribes, and to reduce the imposition of unfunded mandates upon Indian Tribes."

Reclamation will initiate Government-to-Government consultation with the Yakama Nation and the CTUIR when specific projects in the Integrated Plan are carried forward to implementation. Appropriate personnel at the Bureau of Indian Affairs (BIA), Yakama Nation, and the CTUIR will be contacted via letter and telephone to determine the potential presence of Indian Trust Assets (ITAs) within the project area. The letter will request that BIA, the Yakama Nation, and the CTUIR identify ITAs or any other resources of concern within the area potentially impacted by proposed projects. In addition to the formal consultation, the Yakama Nation has worked closely with Reclamation and Ecology to develop the Integrated Plan. The Yakama Nation has been an active participant in the YRBWEP Workgroup from its inception.

6.3.1 National Historic Preservation Act

As described in Section 6.2.6, the NHPA requires Federal agencies to consult with the SHPO and Native American Tribes with a traditional or religious interest in the study area, and with the interested public. Reclamation has identified the Yakama Nation and the CTUIR as Tribes with a potential traditional or religious interest in the study area. Reclamation will consult with the Yakama Nation and CTUIR as provided under the NHPA, Native American Graves Protection and Repatriation Act (Section 6.3.2), and EO 13007 (Section 6.3.3) when specific projects are carried forward as part of the project-level environmental review.

6.3.2 Native American Graves Protection and Repatriation Act

Reclamation will include a stipulation and protocol in construction contracts in the event of inadvertent discovery of human remains that are determined to be American Indian.

6.3.3 Executive Order 13007: Indian Sacred Sites

Executive Order 13007 (1996) instructs Federal agencies to promote accommodation of access and protect the physical integrity of American Indian sacred sites. A sacred site is defined as any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian Tribe (or Indian individual determined to be an appropriately authoritative representative of an Indian religion) as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion. A sacred site can only be identified if the Tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of a site.

6.4 Compliance with Other Federal Laws

In addition to the laws, EOs, and regulations described above, Reclamation will comply with the following EOs when specific projects are carried forward.

6.4.1 Executive Order 11988: Floodplain Management

Executive Order 11988 requires Federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities." Reclamation will comply with EO 11988 as projects are moved forward to implementation.

6.4.2 Executive Order 11990: Protection of Wetlands

Executive Order 11990 requires Federal agencies to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, the EO requires Federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. Reclamation will comply with EO 11990 to minimize disturbance, loss, or degradation of wetlands as projects are moved forward to implementation.

6.4.3 Executive Order 12898: Environmental Justice

Executive Order 12898 established environmental justice as a Federal agency priority to ensure that minority and low-income groups are not disproportionately affected by Federal actions. Reclamation will evaluate the potential for disproportionate adverse impacts to minority or low-income populations as part of project-level environmental review when specific projects are carried forward.

COMMENTS AND RESPONSES

COMMENTS AND RESPONSES

The Draft Programmatic Environmental Impact Statement (DPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) was filed with the Environmental Protection Agency (EPA) and the Washington State Environmental Policy Act (SEPA) Register on November 16, 2011. A Notice of Availability and Public Hearings appeared in the *Federal Register* on November 16, 2011. Reclamation sent a news release announcing the availability of the DPEIS and the date, time, and location of the public meetings to area media, and Ecology published a Notice of Availability in area newspapers. The 45-day comment period ended January 3, 2012.

Reclamation and Ecology distributed 192 copies of the DPEIS to Federal, State and local agencies; Native American Tribes; irrigation districts; interested members of organizations and entities; and the general public. The DPEIS and supporting materials were also available online at Reclamation's website.

A total of 90 unique letters and four transcripts of public testimony were received during the public comment period. From those letters and transcripts a total of 729 individual comments were identified and addressed.

Public meetings were held in Cle Elum, Ellensburg, and Yakima to receive comments on the DPEIS. The meetings were held on December 5, 6, and 14, 2011 respectively. The Cle Elum meeting was attended by 23 people and two people provided comments to the court reporter. In Ellensburg, 13 people attended. In Yakima 28 people attended the meeting and two people provided comments to the court reporter.

The comment letters and the public hearing transcripts are reproduced in this section of the FPEIS. Responses to the individual comments follow.

The following table provides a list of those who commented on the DPEIS, the number of the comment letter, and the page number where the comment letter and the responses appear.

Table CR-1 List of those commenting

Letter Number	Commenter	Page Number	
		Comment	**Response**
Tribes			
1	Confederated Tribes and Bands of the Yakama Nation	17	189
2	Confederated Tribes and Bands of the Yakama Nation Cultural Resource Program	22	191
3	Confederated Tribes of the Umatilla Indian Reservation	23	191

Responses to Common Issues

Several commenters identified themes or issues that were repeated in numerous comments. The most commonly-raised issues are summarized below, with an accompanying response.

Programmatic EIS

ISSUE: Numerous comments stated that the DPEIS analysis did not contain enough detail to evaluate potential impacts. Comments also stated that the projects were not sufficiently developed to allow for adequate analysis and requested additional details in the analysis of the projects.

RESPONSE: As described in Section 1.2, Reclamation and Ecology prepared the environmental review for the Integrated Plan as a Programmatic EIS in accordance with both the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA).

This programmatic evaluation complies with NEPA and SEPA rules and also the NEPA and SEPA guidance for "tiered" or "phased" review. Tiering refers to the coverage of general matters in a broader environmental impact statement to be followed by subsequent narrower statements or environmental analyses (40 CFR 1502.20 and 1508.28). Tiering is appropriate when it helps the lead agency focus on the issues that are ripe for decision and exclude from consideration issues already decided or not yet ripe. The question before decisionmakers at this time is whether or not to advance the overall Integrated Plan for implementation, not to determine the specific effects of each project and action contained within the Integrated Plan. Under NEPA guidelines, agencies are encouraged to tier their EISs to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (40 CFR 1508.28).

A SEPA phased review is similar to NEPA tiered review, using a "broad to narrow" approach to evaluate environmental impacts (WAC 197-11-060(5)). SEPA rules provide additional guidance about the appropriateness of phased review. WAC 197-11-060(5)(a) states that "Lead agencies shall determine the appropriate scope and level of detail of environmental review to coincide with meaningful points in their planning and decision making processes." WAC 197-11-060(5)(g) states: "Any phased review shall be logical in relation to the design of the overall system or network…"

Both NEPA and SEPA require that environmental analysis be conducted at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified (40 CFR 1501.2 and WAC 197-11-060(2)). Consistent with this guidance, Reclamation and Ecology have prepared this PEIS at a time when the principal elements of the Integrated Plan have been identified and the broad effects of implementation can be reasonably identified.

However, some elements, such as habitat enhancement and agricultural and domestic conservation are being conducted as programs that will include numerous smaller projects yet to be specified. All elements include projects that will require further definition and analysis before implementation. Therefore at this early stage of planning and decisionmaking, the PEIS was prepared at a broad, comprehensive level of analysis, acknowledging that additional, more detailed analysis will be conducted on specific projects later if the plan is authorized and funded.

Reclamation and Ecology have determined that the programmatic approach is appropriate for the Integrated Plan because the environmental analysis is being conducted on the Integrated Plan as a whole, along with its elements, to evaluate the comprehensive, basin-wide effects of the Plan, including potential cumulative impacts. The Federal action that decision makers are evaluating in the PEIS is Congressional authorization of the Integrated Plan for implementation and authorization for funding. The programmatic analysis is intended to frame the potential range of impacts, so that the broad implications and tradeoffs associated with implementing the Integrated Plan can be understood, and the future with and without the Integrated Plan can be evaluated. The general types of potential impacts are described, along with a general assessment of the likelihood of occurrence and the magnitude of potential impacts. It is anticipated that the project-level impacts will fall within the range of impacts described.

In response to comments on the DPEIS, the analysis of the No Action Alternative (the future without the Integrated Plan) has been expanded, to provide a better understanding of the comparative impacts of implementing the proposed action relative to no action. This analysis will help to determine whether the Integrated Plan is appropriate for authorization and further design, and subsequent project-level environmental review. If the Integrated Plan is authorized, the various projects and actions proposed under the Integrated Plan will undergo further refinement of project features and designs to provide the more specific information needed for project-level analysis.

Reclamation and Ecology have acknowledged throughout the PEIS that additional environmental review would be conducted as specific projects are further developed. The programmatic impact evaluation is based on currently available information and published reports, and does not include detailed site-specific investigations, which are more appropriately conducted during project or construction level evaluations. Similarly, mitigation measures are broadly framed to give an understanding of the potential range of mitigation responses. Site specific investigations will include development of specific mitigation measures that fall within the general categories of mitigation discussed in this document.

Additional information about expected future environmental review has been added to Section 1.2 of the Final PEIS. These future evaluations would be appropriately characterized as “narrow” in accordance with WAC 197-11-060(5). Any potential significant adverse impacts associated with those facilities that have not currently been identified will be comprehensively discussed as part of those subsequent documents.

Alternatives

ISSUES: Several commenters raised issues about the alternatives that were evaluated in the PEIS. Frequently raised comments included the following:

- The Purpose and Need is too narrowly defined to allow for evaluation of a range of alternatives as required by NEPA and SEPA.
- The EIS should evaluate a range of reasonable alternatives, including an alternative without storage projects, an alternative including only water marketing and conservation, and other alternatives that would meet the Purpose and Need.
- The No Action Alternative is not clearly defined.
- Some projects included in the Integrated Plan, such as fish passage and conservation projects, should be in the No Action Alternative because they will be undertaken without the Integrated Plan.

RESPONSE: In developing this programmatic EIS, Reclamation and Ecology carefully considered the Purpose and Need for the proposed action, options for "reasonable" alternatives to the proposed action, and the reasonably foreseeable future under the No Action Alternative, absent the proposed action. These responses are outlined below.

Purpose and Need

Reclamation and Ecology identified the Purpose and Need for the Proposed Action following years of working to address a number of water management problems in the Yakima Basin. These problems, as described in Section 1.3 of the FPEIS, include:

- Anadromous and resident fish populations are seriously depleted from historic levels;
- Demand for irrigation water cannot always be met in years with below average runoff, leading to reduced (prorationed) irrigation water for junior water rights holders;
- Demand for municipal and domestic water supplies is difficult to meet; and
- Climate change predictions indicate that there will be less runoff available from reservoirs, increasing the need for prorationing and reducing flows for fish.

Reclamation and Ecology, working collaboratively with the YRBWEP Workgroup identified the needed water to address those problems. Water needs for irrigation supply, municipal and domestic growth, and fish habitat enhancement were identified. The amount of water recommended for irrigation was an amount of water that would supply irrigators in prorationed irrigation districts (see Section 1.3) with 70 percent of their proratable water rights during drought years. Reclamation and Ecology felt that this level was consistent with the threshold level used in other studies evaluating water management options in the basin. In addition, meeting the 70 percent level would lead to fewer years that would meet the State trigger for drought (defined in RCW 43.83B400 as the condition when water supply for a significant portion of a geographic area falls below 75 percent). A drought declaration places significant restrictions on water use and would seriously impact the economy of the basin and could jeopardize the supplies of municipal

and domestic users. Some municipalities in the Yakima basin have already experienced this. The City of Roslyn's water supply was shut off three times between 2001 and 2007.

The amount of water needed for future municipal and domestic uses was estimated based on data compiled on existing water uses and population growth predicted in County comprehensive plans. This estimate was used in the modeling analysis of basin water needs and helped define the Purpose and Need for the proposed action. Water needs for maintaining instream habitat were developed considering the need for increased flows in some areas as well as the need for reduced flows in other areas. The variation in need by season was also considered. The identified instream flows are listed in Tables 5-3 and 5-4 of the FPEIS.

This Purpose and Need was considered by Reclamation and Ecology to be appropriately broad to address the range of identified needs in the basin, yet narrow enough to provide a framework for developing a reasonable plan.

Development of Reasonable Alternatives

After more than 30 years of discussions and studies about individual actions to address specific problems in the basin and in response to requests from basin stakeholders, Reclamation and Ecology determined that in order to meet the Purpose and Need for the proposed action, an integrated approach to water management was needed that would include measures to improve water supply for irrigation and municipal and domestic uses and fish passage and habitat improvements for fish.

The elements of the proposed Integrated Plan grew out of Reclamation's 2008 Yakima River Basin Water Storage Feasibility Study Final Planning Report/EIS (PR/EIS) and Ecology's 2009 Yakima River Basin Integrated Water Resource Management Alternative EIS (described in Sections 2.2.1 and 2.2.2 of the PEIS). Reclamation and Ecology have worked collaboratively with the Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup, which includes the Yakima Nation and key stakeholders such as State and Federal fish and wildlife agencies, local governments, Yakima Project irrigation districts, and environmental groups, to develop the Integrated Plan. Water needs for agriculture and municipal uses and habitat needs were identified, and Ecology's Integrated Water Resource Management Alternative was refined to create the Integrated Plan, containing a combination of projects, programs, and resource allocations that could feasibly meet the identified water and habitat needs.

The resulting Integrated Plan includes seven elements—reservoir fish passage, structural and operational changes, surface water storage, groundwater storage, habitat/watershed protection and enhancement, enhanced water conservation, and market reallocation. It is intended that the Integrated Plan would be implemented in a coordinated manner, incorporating all elements of the proposed plan.

Reclamation and Ecology worked with the Workgroup to identify projects and programs for each element of the Integrated Plan intended to meet the identified needs. Those projects were extensively modeled and analyzed as part of the Yakima River Basin Study

(April 2011). The modeling used for the Yakima River Basin Study is the same model that Reclamation uses for reservoir operations and water allocations. The modeling determined that none of the elements on their own could meet the identified instream flow and water needs, and that a combined or integrated approach is essential to meeting all of the identified needs. For example, the Integrated Plan without the Water Storage Element falls short of achieving the 70 percent prorationing level, and also cannot achieve the desired instream flow enhancements. Section 5.3.2 describes the results of the modeling and how much water can be provided by different projects and elements.

In response to scoping comments received on the PEIS, Reclamation and Ecology discussed potential alternatives in addition to the Integrated Plan, but determined that the Integrated Plan is the only reasonable alternative that would meet the Purpose and Need for the Proposed Action. After careful consideration of the NEPA and SEPA requirements that an EIS consider "all reasonable alternatives" to the proposed action (40 CFR 1502.14, RCW 43.21C110(1)(d)), Reclamation and Ecology evaluated alternatives to the Plan such as revisiting inclusion of the Black Rock Reservoir and other storage projects, reliance on conservation and water marketing, and operational changes at existing reservoirs, and determined that there were no other reasonable alternatives that meet the Purpose and Need.

As noted in the Council on Environmental Quality's (CEQ) *Forty Most Asked Questions Concerning NEPA* (Federal Register Vol. 46, No. 55, 1981), what constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case. In evaluating the Integrated Plan and the No Action Alternative, Reclamation and Ecology developed alternatives that set forth a "reasonable range" of alternatives that capture the range of potential impacts, and would facilitate a reasoned decisionmaking process. Consideration of alternatives is deemed sufficient if it examines a range of alternatives, even if it does not consider every available alternative (Reinke and Swartz, 1999).

After considering all these factors and working collaboratively with basin stakeholders to develop the Integrated Plan, Reclamation and Ecology have concluded that the Integrated Plan is the only reasonable alternative for improving water supply for irrigation and domestic and municipal needs and enhancing fish habitat. The Integrated Plan is a comprehensive, adaptive approach to resolving water issues. Many of the suggestions and proposals contained in the comments on the DPEIS are included as components of the plan. Because of the multipurpose needs for water in the basin and the need to proceed with an integrated approach, alternatives that were understood to have a single purpose were not considered reasonable or viable. More than 30 years of study and evaluation contributed to this determination. The past studies included evaluations of a number of storage options and other proposals. The PEIS includes an evaluation of some of these past proposals in the category of alternatives considered but eliminated from detailed study in Section 2.5. That discussion has been expanded for the FPEIS. The eliminated alternatives include storage projects that were evaluated in Reclamationn's 2008 PR/EIS and in other Reclamation evaluations, and included sole reliance on nonstorage options such as water marketing and conservation. These projects by themselves could not meet the water supply and habitat needs in the basin, and were

found to make a meaningful contribution only within the comprehensive framework of the Integrated Plan where the seven elements exhibited a synergistic effect.

No Action Alternative/Inclusion of Ongoing Projects

A key part of developing alternatives for the PEIS was development of the No Action Alternative. According to NEPA and SEPA regulations, the No Action Alternative is not "doing nothing," but includes future programs, projects and actions that are expected to be implemented in the absence of the proposed action.

Over the years a number of options have been proposed to resolve water supply problems and fish declines in the basin (see Sections 1.6, 1.7, 1.8 and 1.9 of the FPEIS). Options have included new and expanded storage facilities, agricultural water conservation, fish screening of irrigation diversions, and fish habitat enhancement. Many of these options are included in ongoing projects and are described as part of the No Action Alternative (Section 2.3). These ongoing projects have resulted in incremental improvements in water supply and fish habitat conditions. However, as described in Section 1.5, many water supply and fish recovery problems remain to be addressed and conflicts over the limited water resource are increasing.

Funding for the YRBWEP Phase II conservation projects has not allowed implementation of all qualifying conservation projects. Reclamation has agreed to evaluate fish passage on all its Yakima Project reservoirs, but there is no authorization or funding for design and construction of facilities. Funding for fish enhancement projects has been inconsistent and not adequate to fully fund large-scale projects such as the Yakima Steelhead Recovery Plan. Because of these funding uncertainties, some projects that have been evaluated or partially implemented in the past do not meet the criteria for the No Action Alternative and are included as part of the Integrated Plan Alternative. These include enhanced conservation projects that are not funded under YRBWEP Phase II and installation of fish passage facilities at major reservoirs. Section 2.3 of the PEIS describes the criteria used to determine whether projects were included in the Integrated Plan or as part of the No Action Alternative. In response to comments received on the DPEIS, the evaluation of impacts resulting from the No Action Alternative has been expanded in the FPEIS.

Conservation

ISSUE: Several commenters stated that the Enhanced Water Conservation Element targeted too small an amount of water. Key questions and comments included:

- Why does the Integrated Plan not include proposals for conserving more water than the estimated 170,000 acre-feet? The Ecology Final EIS on the Integrated Water Resource Management Alternative identified potential conservation of 223,596 acre-feet on the Yakima River, 20,003 on the Naches River, and 84,700 on the Wapato Irrigation Project (WIP). Why are the numbers smaller in the Integrated Plan and why is WIP not included?

- The 170,000 acre-feet estimate is for "good" water years. How much would be expected in drought years?
- Why is the conservation program voluntary? How much more water could be conserved if the program were mandatory?

RESPONSE: As described in Section 2.5.4, the amount of water that could be saved using water conservation as a stand-alone alternative is not adequate to meet the needs of water users in the basin. Sections 2.4.8.1 and 2.5.4 of the FPEIS have been revised to provide additional discussion about the analysis that led to this determination.

The Enhanced Water Conservation Element is voluntary because Reclamation and Ecology do not have the legal authority to require water conservation measures. The Integrated Plan proposes funding and other incentives to increase the rate of participation in the conservation process.

Bumping Lake Reservoir Expansion

ISSUE: Reclamation and Ecology received numerous comments on the DPEIS questioning the inclusion of the expansion of Bumping Lake Reservoir in the Integrated Plan.

RESPONSE: Reclamation and Ecology acknowledge the many comments received in opposition to expansion of Bumping Lake Reservoir. As discussed in Responses to Common Issues on Alternatives, Reclamation and Ecology have undertaken extensive analyses in developing the Integrated Plan and have determined that additional surface water storage is needed to provide adequate water to meet the water supply and habitat needs in the Yakima River basin as described in the Purpose and Need section of the Final PEIS (Section 1.3).

Reclamation has advanced the consideration of expanding the Bumping Lake Reservoir several times. In Reclamation's 2008 Yakima River Basin Water Storage Feasibility Study PR/EIS, the expansion of Bumping Lake Reservoir was found to be technically viable, but was not carried forward for further study at that time (Reclamation 2008f). Congress has not taken action on Bumping Lake enlargement in the past. Unlike the Storage Only alternatives evaluated in the 2008 study, modeling by Reclamation and Ecology has determined that additional storage provided by an enlarged Bumping Lake Reservoir when integrated with other storage and non-storage projects provides needed flows in the Naches River basin (where Bumping Lake is located). These flows provide adequate water to meet instream flow targets and to provide flexibility in reservoir operations to improve conditions for fish and other water supply needs. Refer to Section 5.3.2.4 for additional discussion of the evaluations conducted that led to this determination.

The annual runoff in the Bumping River basin is much greater than the current storage in the existing Bumping Lake Reservoir. By storing additional runoff in an expanded

reservoir, the reliability and flexibility of operations of the entire Yakima Project would be greatly enhanced. The operations of Bumping Lake and Rimrock Reservoirs (also located in the Naches River basin) would be coordinated with reservoirs in the upper Yakima River basin to assist in meeting both instream flow and water supply needs. This potentially would improve summer and fall flows, and provide for more gradual changes in reservoir water release rates.

As described in Section 2.5.2 (Table 2-1) of the FPEIS, Reclamation has evaluated several potential storage locations throughout the Yakima River basin, including the Naches basin, and determined that these other sites would not be carried forward for further evaluation at this time, but that the Bumping Lake expansion is viable, and supports the Purpose and Need for the Proposed Action.

Reclamation and Ecology acknowledge that expanding the Bumping Lake reservoir would cause potentially significant impacts to late successional forests that provide habitat for the northern spotted owl, bull trout spawning areas in tributary streams, recreation facilities adjacent to the existing reservoir, and Forest Service roads that access areas upstream of the reservoir. The proposed reservoir expansion has been designed to reduce inundation of forest and bull trout spawning areas to the greatest extent possible, but some level of impact is unavoidable. Reclamation and Ecology are coordinating with the Okanogan-Wenatchee National Forest to determine specific mitigation for anticipated impacts, and to assess the potential for their effectiveness in minimizing the impacts to a level of non-significance. The project-level evaluation will include more detailed information on the potential impacts, proposed mitigation, and anticipated effectiveness of mitigation measures, to provide decision makers with an understanding of the full range of impacts associated with the project, and the level of expected effectiveness of proposed mitigation.

Some comments state that Reclamation has previously determined that expansion of Bumping Lake Reservoir is not feasible. As noted above, Reclamation found that the project was technically viable, but did not carry it forward. The expansion proposed in the Integrated Plan is substantially different than the project that was not carried forward in the past. The proposed expansion includes a much smaller reservoir than was evaluated in the 1979 EIS (Reclamation, 1979) and in the 2008 PR/EIS (Reclamation, 2008g). The reservoir evaluated in those documents would have had a capacity of approximately 450,000 acre-feet while the expansion in the Integrated Plan would have a capacity of approximately 190,000 acre-feet. The smaller expansion would inundate less land, including late successional forest (down from 1,900 acres to 980 acres under the current proposal). The smaller expanded reservoir would also inundate shorter lengths of tributary streams and has been specifically designed to avoid inundating the most significant bull trout spawning area on Deep Creek.

The smaller expansion would fill in most years and would provide habitat and water supply benefits, especially during drought periods. The smaller expansion would also provide substantial opportunities for adapting to climate change by providing additional flexibility in basin-wide reservoir operations to deliver water for fish, habitat, and water users throughout the Yakima River basin.

Wymer Dam

ISSUE: Reclamation and Ecology received numerous comments on the DPEIS requesting an explanation for why Wymer Reservoir is included in the Integrated Plan, since Reclamation determined in the PR/EIS (Reclamation, 2008) that the project should not be carried forward because it did not have a positive benefit cost ratio. In addition, comments were received expressing overall opposition to the construction of Wymer reservoir.

RESPONSE: Reclamation and Ecology acknowledge the comments in opposition to construction of Wymer Reservoir. As discussed in the Response to Common Issues regarding Alternatives, Reclamation and Ecology have undertaken extensive analyses in developing the Integrated Plan and have determined that additional surface water storage is needed to provide adequate water to meet the water supply and habitat needs identified in the Yakima River basin, as described in the Purpose and Need of the FPEIS (Section 1.3). As part of these analyses, Reclamation and Ecology revisited the concept of the Wymer Reservoir. The Wymer Reservoir project, while not demonstrating a positive benefit cost ratio as a stand alone project, is more effective when part of a comprehensive program that includes other elements, and contributes substantially toward meeting the Purpose and Need for the Integrated Plan. The Wymer Reservoir site provides the opportunity to meet irrigation needs and instream flow targets. Wymer Reservoir can allow flows from upper Yakima reservoirs (Cle Elum, Kachess, and/or Keechelus) to be released to increase instream flow in the upper Yakima basin during the non-irrigation season without losing that water for irrigation use by capturing the water at Wymer and re-releasing it during the irrigation season. Additionally, storage at Wymer can be used to provide pulse flows downstream of Wymer in dry years to encourage anadromous fish outmigration, and to improve flows and ramping rates in average and wet water years. This additional flexibility in reservoir operations improves conditions for fish and increases water supply reliability.

Reclamation and Ecology acknowledge that construction of the reservoir would cause potentially significant impacts to shrub-steppe habitat in the Yakima River basin and would reduce habitat for the greater sage-grouse. The impacts identified in the PEIS would be evaluated in detail during project level environmental review of the new reservoir. At that time, Reclamation and Ecology would refine the programmatic mitigation identified in the FPEIS to develop specific mitigation measures for the identified impacts. Because there are impacts currently identified that have uncertainty regarding the potential level of effective mitigation, Reclamation and Ecology will determine during subsequent site specific evaluations whether the impacts can be mitigated to a level of non-significance. This information will be included in subsequent project level evaluations. Sections in the FPEIS have been revised to identify those mitigation measures that have the highest levels of uncertainty, for example, mitigation of shrub-steppe habitat. The project level environmental analysis would inform decisionmaking about carrying forward with individual projects such as construction of Wymer Reservoir.

The Integrated Plan with its seven interrelated elements represents a significant departure from prior analyses that examined stand alone features such as Wymer Reservoir and an enlarged Bumping Lake Reservoir. The Integrated Plan has been designed as a coordinated set of seven elements providing benefits that cannot be achieved with stand alone projects. Therefore analysis of costs and benefits will be conducted for the Integrated Plan as a whole, to capture the economic value of the combined benefits and the costs of the overall combination of elements. Economic analysis is not included in the PEIS, but will be presented in other documents supporting consideration of the Plan for authorization, including the Framework for Implementation (Section 1.2.2 of the FPEIS).

Comment Letters

Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
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Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901

January 3rd, 2011

Subject: Draft Programmatic Environmental Impact Statement, Yakima River Basin Integrated Water Resource Management Plan, Benton, Kittitas, Klickitat, and Yakima Counties, Washington – Further response

Dear Ms. McKinley:

This document contains staff level comments from the Yakama Nation Department of Natural Resources.

This is a supplemental response to above document. The Yakama Nation Cultural Resource Program (CRP) had provided comments in November on this document.

The proposed project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855, between the Yakama Nation and the United States Government. The treaty set forth that Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources. 1-1

The Yakama Nation has received and reviewed the *Draft Programmatic Environmental Impact Statement, Yakima River Basin Integrated Water Resource Management Plan, Benton, Kittitas, Klickitat, and Yakima Counties, Washington*. As an active participant in the working group, the Yakama Nation has indicated its significant interest in activities within the Roslyn, Kittitas, Selah, Yakima, and Toppenish Basins.

Yakama Nation staff has actively participated in the development of the Integrated Plan and the Yakama Tribal Council has adopted resolutions supporting its continued development. The comments that follow should be taken as an attempt to improve the document.

The Yakama Nation has the following comments in addition to those submitted earlier.

First, any actions taken under this document must be done subject to the same savings and contingencies clauses under which Yakima River Basin Enhancement Project act has operated since 1994. See, Yakima River Basin Water Enhancement Project, Title XII, 108 Stat. 4550, 4564, section 1212, P.L. 103-434, Act of Oct. 31, 1994. The Integrated Plan is being prepared by the YRBWEP Workgroup and others operating under the 1994 YRBWEP Act. Under that Act there are specific provisions that, inter alia, make it clear that no action under the Act can "alter, diminish, or abridge the rights …of…the Yakama Indian Nation… "among others. Section 1212 (a)(6). The Nation objects to any action, including any report done thereunder, to the contrary that would be interpreted in any way to limit the Nation's rights. Any final EIS must expressly indicate that actions taken is subject to these YRBWEP provisions from 1994. 1-2

The legislation authorizing the integrated plan will also need to define quantities of newly available water supply that will be dedicated to fish and other aquatic life. 1-3

Sec 1.5.5: Comment: The Yakama Nation's Treaty is also a constraint separate from and senior to all statutory constraints as well as being senior to all water rights issued under state law. The Yakama Nation's instream flow right is also senior to all rights to use water referenced in the 1945 Consent Decree as later modified and limited in *Acquavella* described in this section and should be added to this section. 1-4

Sec 1.6.4: Comment: This section omits the Quackenbush decision, a major federal court decision that required Reclamation to manage reservoir releases so as to maintain fish life and led to the creation of SOAC and flip flop. Please correct. 1-5

Sec 1.6.4.3: Comment: We object to the discussion of the "water rights adjudication" on pages 1-15 of the draft EIS as unnecessary, incomplete and, in places, not accurate. It is not necessary to try to summarize almost 35 years of litigation. This section inaccurately and inappropriately addresses the Yakama Nation's Treaty Rights and their confirmation in federal court decisions. Multiple U.S. Supreme Court decisions including *Winans* and *Passenger Fishing Vessel* as well as the Quackenbush decision firmly establish the validity of these treaty rights. The DEIS omits all this history in favor of a limited discussion of decisions in *Acquavella*. This is unacceptable.

Among other problems, we also note that the draft fails to mention that the Treaty right included water for not only anadromous fish but also resident fish and other aquatic life. *Ecology v. Acquavella*, Report of the Court, Vol.25A (June 21, 1996) at pp. 27-30. The draft also incorrectly summarizes the State Supreme Court ruling which only partially summarized the 1990 superior court order: *Ecology v. Yakima Reservation Irrigation District*, 121 Wn. 2d 257, 286 (1993) (*Acquavella II*). 1-6

Equally conspicuous is the near total omission of discussion of the myriad limitations on all other water rights adjudicated on *Acquavella*, which are limited by numerous actions including relinquishment, settlement agreements, and other rulings of the court. There is for example no mention of post May 10th, 1905 water rights and the court ruling that curtails them during periods

of prorationing. The final paragraph in the section is also inaccurate. Currently one subbasin remains in active litigation, and until this is completed there will be no final decree.

Whatever the reason for this one-sided presentation, one overriding fact remains: The Yakama Nation's Time Immemorial Treaty instream flow rights are the senior water rights in the basin, a fact that the reader would not likely discern from reading the DEIS.

1-6

In this case less is probably more. Simply stating that the adjudication, still in progress, is adjudicating surface water rights in the basin would be preferable to either an extremely lengthy presentation that detailed the full scope of decisions in Acquavella or the unacceptable selective presentation offered in the DEIS. The presentation here is incomplete and not accurate and should be eliminated.

1-7

ESi: "The Integrated Plan includes seven elements…"
Comment: Realistically the plan now includes eight elements. The Lands component is properly viewed as an integral element in its own right, not just as mitigation. Same comment applies to Sec 1.1.

1-8

ESi: "Dams and other obstructions block fish passage…"
Comment: Change to "Dams, dewatering, and other obstructions block fish passage…". Same comment applies to p.1-2.

1-9

ESi: "Irrigation operations have altered streamflows, 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 for all life history stages and outmigration flows.
Comment: Underlined change. Also applies to p.1-2.

1-10

ESii: "Pumping groundwater for irrigation and municipal uses may reduce surface water flows…"
Comment: Change to "Pumping groundwater for irrigation and municipal uses ~~may~~ has been shown to reduce surface water flows…". Comment also applies to p.1-3.

1-11

ESii: "Hydraulic continuity between groundwater and surface water in the basin creates uncertainty over the status of groundwater rights and permit 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."
Comment: This sentence has several problems and should be rewritten or perhaps discarded. Comment also applies to p.1-3.

- Groundwater use is not "potentially" junior to surface water use. It is either junior or not depending on its priority date.
- In 1999, Ecology cited the need for additional information regarding the capture of surface water by current and proposed groundwater pumping, which led to the USGS groundwater study. Any lingering uncertainty was definitively resolved by that study.
- Third, the Project for which this EIS is being prepared does not directly address that issue raised in this bullet. Indirectly the project would be expected to greatly reduce drought-related pumping of supplemental irrigation wells. A component of the program addresses domestic supply. There is as yet no link between this program and primary irrigation pumping (or unpermitted stockwater use), making discussion of this as a need for the project inappropriate.

1-11

- Demand for municipal and domestic supply is difficult to meet, not because of uncertainty about "hydraulic continuity" but because of full appropriation and certainty about hydraulic continuity.

1-12

ESii: "Develop an adaptive approach for implementing these initiatives…"
Comment: The meaning of this is not clear in the context of the integrated plan.

1-13

ESiii: (No Action): "Reclamation and Ecology would not develop new water storage in the Yakima River basin or expand programs to protect or enhance fish habitat. In addition, Reclamation and Ecology would not implement enhanced water conservation, market reallocation, or groundwater storage."
Comment: These statements overstate the case and are contradicted by the following sentences. In addition some of these things are already authorized under existing law, (e.g. additional storage at Cle Elum). Deleting these two sentences would make the paragraph more correct.

1-14

ESvi, Earth, Integrated Plan Alternative: "Implementation of the Surface Water Storage Element of the Integrated Plan would result in increased disruption of the natural sedimentation process downstream of new or expanded storage facilities, as the reservoirs trap and hold sediments."
Comment: Expanding existing reservoirs would not likely alter downstream sediment transport because the existing reservoirs already capture all but the finest sediments and this would not change. Suggest striking "or expanded".

1-15

ESviii Fish, No action: Comment: Strike the word "artificial".

ESix, Wildlife No Action: Comment: Strike the word "artificial".

1-16

ESix Wildlife, IP Alternative: "Fish passage facilities would open up new territory for anadromous fish and help restore ecosystems upstream of the dams."
Comment: Correct to read "Fish passage facilities would ~~open up new~~ reopen historic territory for anadromous fish and help restore ecosystems upstream of the dams.

1-17

ESxi: Strike "artificial"

1-18

p. 1-5: "Reintroduction of coho began in the mid-1980s and summer Chinook reintroduction is currently being undertaken."
Comment: Insert sockeye. Sockeye have been reintroduced in Cle Elum Lake as of 2009.

1-19

p.1-6: " Land development, including road construction, diking, gravel mining, and agriculture, has degraded riparian habitat and increased sediment in streams and rivers."

1-19 Comment: Add railroad construction and forest practices including splash damming and log rafting to the list.

1-20 P.1-24 First release of Sockeye was in 2009

1-21 Fig 1.1: Comment: The map incorrectly excludes the southwest corner of the Yakama Reservation. Please correct this error. Alternatively, given that the map error is in the Klickitat basin, the map could be truncated at the boundary of the Yakima Basin.

1-22 1.7 and 1.8 - These sections and the descriptions in Section 2 could better describe the efficacy of existing programs and plans by including a description of past funding levels. This helps evaluate the potential impacts under No Action to the preferred option. It may be best to compare no action funding levels to the preferred option funding request elsewhere in the document.

1-23 1.7.4: Comment: Due to systemic failures by the Tri-county Water Resource Agency, many entities including the Yakama Nation ceased participation in developing the "Watershed Plan". It was not adopted by all basin counties. It has no basis in the formation of the current plan and reference should be dropped from the EIS.

1-24 Section 1.8.2: Existing language with suggested edits underlined:

> This project was initiated in 1997 and is ongoing. It is comanaged by the Washington Department of Fish and Wildlife (WDFW) and the Yakama Nation under the Yakima/Klickitat Fisheries Project (YKFP). The Yakima River Side Channels Project is funded on a biennial basis through the NPCC Fish and Wildlife Program administered by BPA, and has received expanded funding through the Accords Agreement between BPA and Yakama Nation. Objectives include habitat protection and restoration in the most productive reaches of the Yakima River basin. The geographic focus includes Easton, Ellensburg, Selah, and Union Gap reaches on the Yakima River and the Gleed reach in the lower Naches River, with some recent activities in productive tributaries, including Taneum, Reecer and Swauk Creeks. The mainstem areas were identified through the Reaches Project (Stanford et al., 2002). See Section 1.7.2.4 of this document for additional information on the Reaches Project. Active habitat restoration actions include reconnecting structurally diverse alcoves and side channels, introducing large woody debris, fencing, and revegetating riparian areas.

1-25 1.8.5 Kittitas Conservation Trust: Comment: Add :Cle Elum River Engineered Log Jams to list of projects.

1-26 1.8.5: Comment: The North Fork Teanaway Conservation Easement has not been finalized because the owner dropped out of negotiations.

1-27 Section 2.4.2 First Paragraph: The second sentence in the first paragraph should read "would restore access". The reconnected habitat is not "new habitat". Fish could get there historically, until the artificial barriers were built, enlarged and in at least one case, rebuilt.

1-28 Sec 2.4.6: "The water yield from a fully implemented program is estimated to be 5,000 to 10,000 acre-feet per year."
Comment: It is not clear where these estimates came from or whether they refer to ASR or shallow recharge. Shallow recharge would likely yield much higher numbers considering the annual fluctuation in groundwater storage volumes under existing conditions. The next section discusses 100,000 acre feet. Please clarify.

1-29 P2-22: "The two proposed pilot-testing areas would be located in the KRD in the Badger Pocket area south of Ellensburg and in the WapatoIrrigation Project near Wapato and Toppenish."
Comment: Suggest this section be rewritten to be more flexible with regard to location and scale of pilots. The Badger Pocket site, for example, would likely be dependent on a pump plant at Thorp given the difficulties of operating the KRD canal pre-irrigation season. Also, there are several other possible areas including the Moxee Valley and South Slope Rattlesnake Ridge that may on further analysis merit pilot testing.

1-30 2.4.10 Adaptive Approach pg 2-31
Comment: We support the use of an adaptive framework to increase the long-term effectiveness of the program. However the approach outlined in the document, which appears to consist solely of a pre-scheduled progress review, would be strengthened by including other elements that are commonly recommended for adaptive management programs. The most important change is that the review should focus on very specific questions or statements that link tightly to the management goals. For example, "Increases in summer flow in the lower Naches River due to Wapatox improvements will result in cooler water temperatures, enhanced riparian recruitment, and increased abundance of steelhead habitat", posits assumptions that can be monitored and verified. If progress towards the goal is being made, then no changes would be made in the project, otherwise managers would develop new hypothetical statements and change the project accordingly.

1-31 Sec 2.5.4: Comment: This section should make clear that much of the 170,000 acre feet of water cited would be non-consumptive savings and does not therefore represent 170,000 acre feet of new supply.

1-32 Table 3-4: Comment: Please clarify what is meant by NA for Tillman Creek water rights. There are diversions in the Tillman watershed.

1-33 3.3.4.6: Comment: "Mountain Star Resort" should be changed to Suncadia.

1-34 3.3.5.4 Target Flows
Historical Target Flows Developed through System Operation
Advisory Committee
Comment: This section should note that the reservoir releases recommended by SOAC are necessary to meet the obligation to maintain fish life under the Treaty of 1855 and subsequent court orders. They are distinct from the Title XII flows.

1-35 p.3-39 "Coho (reintroduced) spawn and rear primarily in the Wapato and Ellensburg reaches of the Yakima River and in the lower Naches River downstream from the Tieton River. Some coho spawning and rearing is known to occur in Ahtanum, Cowiche, Taneum, Wilson, Reecer, and Big Creeks in the Yakima River basin. Coho spawning and rearing also occur in the Nile and Pileup Creeks and the North Fork of the Little Naches River in the Naches River subbasin (Reclamation and Ecology, 2008)."
Comment: There are also spawning and rearing Coho in Cowiche Creek and Buckskin Slough.

1-36 p. 3-40, Table 3-14
Comment: Bruton diversion is no longer a barrier
Comment: Include South Fork Tieton
Comment: Naches River tribs should include and Rattlesnake
Comment: Cowiche andLittle Naches are Naches tribs.
Comment: Durham barrier on Toppenish Creek has been removed
Comment: Satus Creek should be added to list
Comment: This table should have Naches, Upper Yakima, and Mainstem Yakima sections.
Comment: Have Joel Hubble go over this list and add omissions.

1-37 p.3-60: Comment: Steelhead numbers should be updated (e.g. 6793 in 2010) See YKFP website for current numbers.

1-38 3.4.1.1 "The most important hydrogeologic formation with respect to groundwater is the Ellensburg Formation…"
Comment: No basis is offered for this statement. The Ellensburg Formation is the main aquifer for providing municipal groundwater supply in the basin, but both the basalts and alluvial aquifers are important for irrigation and single domestic supply. Likewise the groundwater recharge component of the Integrated Plan would likely utilize all three aquifers. Suggest striking the "most important" clause.

1-39 3.4.1.2 "The thickness and extent of basalt flows and the occurrence or absence of fine-grained sedimentary interbeds also influence groundwater movement. At the distal ends of the basalt flows or where erosion has interrupted the continuity of flows, interbedded sediments are able to commingle and may serve as a vertical conduit between previously separated flow systems."
Comment: This paragraph seems to suggest that vertical leakage only occurs at pinchouts and erosional windows in the basalts, an outdated and discarded concept. Although vertical hydraulic condutivities in the basalts are much less than lateral conductivities, the basalts leak pervasively where vertical hydraulic gradients are present to drive vertical flow.

"Shallow groundwater flow is usually vertically downward from the surface to the underlying basalt units. However, because of the geologic structure of the basins, there are a number of areas that have upward flow and artesian wells in the lower valleys."
Comment: Inaccurate. Vertical leakage is downward beneath recharge areas and upward beneath discharge areas which are generally along the Yakima River and its tributaries. This general pattern is driven by topography as well as structure.

1-40 3.4.2 Groundwater Recharge Pilot Projects
Comment: As stated above, this section should be more flexible and incorporate the possibility of groundwater recharge projects elsewhere in the basin. A technical committee to guide this component would be advisable.

1-41 Table 5-3: Comment: The table is not very clear. It is not clear what the "No Significant Change" in the level of success column refers to.
Comment: It is not clear whether the flow increase due to the WIP Priority Measures Plan are included in this analysis.

1-42 p.5-42 Table 5-7: Comment: Table is duplictated top and bottom apparently in error.

1-43 5.7.2.4 "In addition, groundwater storage may be used to offset surface water diversions and delay reservoir releases early in the irrigation season."
Comment: The groundwater storage component would be intended to offset late season reservoir releases (post storage control) and increase carry over storage. Early season flows below the reservoirs during good water years would be closer to natural flow regimes due to reservoir fill and spill.

1-44 3.3.4.5 Existing language with suggested edits underlined:

> The Teanaway River has a drainage area of 244 square miles and flows into the Yakima River at river mile (RM) 176.1. Although in the past there were problems with low flows during the summer and fall in the lower mainstem and in the Middle and West Forks, flows in the lower mainstem have been addressed. Although Middle and West Fork flows are low, they do not go dry and are passable (Johnston, personal communication, 2008b). High flow variation also exists naturally and has increased due to extensive logging in the upper watershed. Water uses include diversions for seasonal irrigation, stock water, and domestic water supply. Low flows in the later summer and early fall do not allow access for salmon spawning most years (comment: this is not consistent with language above – "flows in the lower mainstem have been addressed" . Summer flows are adequate for 15 miles of the North Fork and 9 miles of the Middle Fork of the Teanaway River (Haring, 2001). Jack Creek is a tributary to the North Fork of the Teanaway River.

1-45 5.3 Surface Water Resources pg 5-4 to 5-19
Comment: The hydrological modeling would benefit from a greater depth of analysis, focusing specifically on the shaping and timing of flow components in the entire river. The modeling appropriately focuses on priority concerns for salmonid species, however it does not address several important questions about the flow regime under the preferred alternative. First, Table 5-2 shows that April-September flow volume at Parker is reduced under the integrated plan by 20 to 30% in dry years. Since minimum flows in this reach are protected by law, most of the flow deficit would presumably come from the spring freshet; in turn, since the peak of the freshet is less regulated than the falling limb of the freshet hydrograph, presumably much of the flow volume decrease would be manifested in the falling limb. The freshet in the middle and lower river provides important benefits for fish and riparian vegetation, e.g. spring flow volume is

negatively correlated with maximum water temperature and a slower recession rate is associated with increased cottonwood seedling survivorship.

1-45 Thus, while decreasing early summer flow volume in the upper Yakima has obvious benefits to salmon production, it would be helpful to further analyze the downstream consequences for impacts to valuable species. The reintroduction of summer Chinook, for example, could benefit from enhancing the spring freshet in the mid to lower Yakima River.

1-46 Second, the possible geomorphic effects of flow changes were seemingly not analyzed at all. This important aspect of river system function should be addressed with some depth in the hydrological section.

1-47 5.7.2.5: First sentence, first paragraph: Delete "historically".

1-48 5.9.2.5: This section should include language describing terrestrial wildlife benefit through anadromous fish passage restoration into headwater areas. Specifically, food web benefits gained by recovery of marine-derived nutrients contained in salmon carcasses and direct consumption of adult and juvenile fish should be included. Also, benefits gained through protection of 45000 acres of dry site, forest fringe habitat should be emphasized.

General comments:

1-49 1. Change "Large Woody Debris" to "Large Woody Material" to be consistent with the latest restoration vocabulary.

1-50 2. Public acquisitions allow broader scope of habitat restoration over the short and long term. For example, acquiring and protecting miles of habitat on the mainstem Teanaway allows for miles of instream, floodplain and upland restoration (where appropriate) in areas that otherwise could be segregated into multiple private ownerships. Each private owner would have differing opinions and goals for land management which in some cases would preclude watershed restoration.

1-51 3. Restoring floodplain connectivity leads to greater groundwater storage, which buffers against peak summer stream temperatures and deteriorating streamflow associated with climate change. This should be emphasized where appropriate.

Thank you for the opportunity to comment on this important initiative.

Sincerely,

Phil Rigdon
Yakama Nation Department of Natural Resources

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Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

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DEC 19 2011

Yakima, Washington

Candace McKinley
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November 30, 2011

Subject: Draft Programmatic Environmental Impact Statement, Yakima River Basin Integrated Water Resource Management Plan, Benton, Kittitas, Klickitat, and Yakima Counties, Washington

Dear Ms. McKinley,

The Yakama Nation Cultural Resource Program (CRP) has been contacted regarding the proposal listed above. The proposed project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855, between the Yakama Nation and the United States Government. The treaty set forth that Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

2-1

The Yakama Nation CRP has received and reviewed the *Draft Programmatic Environmental Impact Statement, Yakima River Basin Integrated Water Resource Management Plan, Benton, Kittitas, Klickitat, and Yakima Counties, Washington.* As an active participant in the working group, the Yakama Nation has indicated its significant interest in activities within the Roslyn, Kittitas, Selah, Yakima, and Toppenish Basins.

All of the water systems within these basins are culturally important and include: Cle Elum River and Reservoir, Kachess and Keechelus Reservoirs, Teanaway River, Swauk Creek, Teanaway River, Taneum Creek, Wilson Creek, Naneum Creek, Manastash Creek, Bumping River, Teiton River, Bumping Lake, Rimrock Lake, Cowiche Creek, Yakima River, and Toppenish Creek. Each of these systems provided diverse and rich habitat communities which supported the Native peoples that occupied these lands. The ancestral and traditional use of these waterways is evident in the numerous legendary stories that tell the history and significance of each of these resources and the overall landscape. Further, ethnographic records and archaeological sites corroborate Yakama oral histories and traditional knowledge and stand as witness to the cultural richness of these areas.

2-2

The Yakama Nation CRP is requesting to be an active participant in the archaeological and cultural resource surveys. The Yakama Nation CRP retains qualified and professional Archaeologists and Cultural Specialists who are trained to identify such

2-3

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resources. Furthermore, the YN CRP is interested in conducting Traditional Cultural Property studies of these areas. As projects are implemented, please contact me at 1-509-865-5121 ext. 4737 or CRP archaeologist Jessica Lally at ext. 4766, or CRP archeologist Corrine Camuso at ext. 4755 or ccamuso@yakama.com regarding project details.

2-3

Sincerely,

Johnson Meninick, Program Manager
Cultural Resources Program

CC: Elizabeth Sanchey, Yakama Nation Environmental Management Program Manager
Kate Valdez, Yakama Nation Tribal Historic Preservation Officer
Rob Whitlam, State Archeologist, Washington State DAHP

Confederated Tribes *of the*
Umatilla Indian Reservation

Department of
Natural Resources

46411 Timine Way
Pendleton, OR 97801

www.ctuir.org email: info@ctuir.org
Phone: 541-429-7223 FAX: 541-276-3095

January 3, 2012

Ms. Candace McKinley
Environmental Program Manager
Columbia-Cascades Area Office
U.S. Department of the Interior, Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901-2058
E-mail: yrbwep@usbr.gov

Dear Ms. McKinley:

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Natural Resources (DNR) offers the following comments on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Plan). We recognize and appreciate the substantial amount of time and effort, by many parties, that has been devoted to this process, and consider the Plan to be a positive step in the right direction toward prudent, comprehensive management of the Basin's resources. However, it should be noted that the Plan reflects a fundamental error or misconception that may or may not drastically affect its overall merits, but nevertheless should be addressed and corrected.

3-1 The CTUIR and its member tribes—the Cayuse, Umatilla, and Walla Walla—have rights and interests in the Yakima River Basin—primarily but not exclusively in the lower reaches of the River near Tri-Cities. These rights and interests were reserved and secured in the Treaty of 1855 between the CTUIR and the United States, 12 Stat. 945, and continue to this day. They are based on practices and traditions that pre-date the Treaty, extending back to time immemorial. A portion of the six-million-plus acres that the CTUIR ceded to the United States as part of the basis for the Treaty is located in the lower Yakima River.

The DPEIS and the Plan itself, on the other hand, mistakenly seem to assume that the Yakama Nation is the only sovereign Indian tribe with such rights and interests in the area. While it is true that the majority of the area covered by the Plan is within the purview of the Yakama Nation, the entire Basin is not exclusively within their domain, as the documents would suggest. The CTUIR asks that you correct this mistake in future versions of the Plan and PEIS and in the ongoing planning process itself.

The following are several sections of the DPEIS that are flawed by mischaracterization of the nature and scope of the CTUIR's rights or interests in the affected area and beyond:

3-2 The DPEIS Executive Summary, p. xiii, discusses "cumulative impacts":

> "There are projects and programs outside the Yakima River basin that could potentially cumulatively affect or be affected by the Integrated Plan, including the Odessa Subarea Special Study, Lake Roosevelt Incremental Storage Releases, Walla Walla Pump Exchange, Sullivan Lake Water Supply Project, Umatilla Aquifer Recharge project in Oregon, and potential renegotiation or

> termination of the Canadian Treaty, among others. Some of these projects would improve streamflows, most represent increased demand for water in the Columbia River. All these projects include opportunity costs. The Integrated Plan is an effort to evaluate the full range of impacts on a systemwide basis, to avoid both short term and long term adverse cumulative impacts."

3-2 The CTUIR will be affected by, and is thus closely involved in, many of these projects and programs

3-3 The DPEIS Executive Summary, p. xiv, mentions that:

> "Reclamation has conferred with the U.S. Fish and Wildlife Service (Service) and National Marine Fisheries Service (NMFS) and the agencies have reached agreement that Reclamation will not conduct consultation under Section 7 for the PEIS. Reclamation will carry out compliance in accordance with the Endangered Species Act, National Historic Preservation Act (NHPA) of 1966, and Clean Water Act Consultation for individual projects that are carried forward under the Integrated Plan in the future. Reclamation will initiate Government-to-Government consultation with the Confederate [sic] Tribes of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, and Bureau of Indian Affairs regarding cultural resources, Indian trust assets, and Indian sacred sites. Most of this consultation will take place when individual projects proposed under the Integrated Plan are carried forward to implementation."

Consultation between the federal government and the CTUIR should occur not merely when cultural resources are at issue, but at any point when CTUIR rights and interests will or could be affected by any proposed projects in the area.

3-4 The DPEIS beginning on p. 1-15 describes the history of "Water Right Adjudication" in the area. According to the account:

> "An order of the Superior Court was entered on July 17, 1990, regarding the rights of the Yakama Nation. This Partial Summary Judgment defined the treaty-reserved rights of the Yakama Nation, and the rights to flow in the mainstem Yakima River were unanimously affirmed by the Washington Supreme Court on appeal. The treaty rights were divided into separate rights for fish and agriculture. The Court determined that various acts of Congress, agency actions, and decisions of various tribunals had defined and limited the treaty irrigation rights of the Yakama Nation. . . . The treaty right for fish had likewise been limited by various acts of the Congress and agency actions and had been compensated in the proceeding before the Indian Claims Commission (ICC), Docket No. 147. The flow right was held to be the 'specific minimum instream flow necessary to maintain anadromous fish life in the river, according to the annual prevailing conditions as they occur and determined by the Yakima Field Office Manager in consultation with the Yakima River Basin System Operations Advisory Committee, Irrigation Districts and Company managers and others.' This decision was later extended to include all tributaries that support fish at the Yakama Nation's usual and accustomed fishing locations. The priority date for the treaty fishing right is 'time immemorial.'"

CTUIR is not mentioned in this section. The CTUIR did not participate in the various court proceedings described; thus they did not and could not address or determine our rights or interests. There may be additional flow or other considerations necessary to support enough fish for *all* tribes, including the Yakama Nation, the CTUIR and others, that have rights to them.

Similarly, on p. 3-22, the DPEIS discusses water right transfers, noting that:

3-5

> "Transfers were subject to Reclamation's responsibility to protect and maintain resources (including water, fisheries, wildlife, and cultural) held in trust by the United States for the Yakama Nation."

Reclamation's Trust Responsibility in this instance did not and does not extend to just the Yakama Nation; it also has the same duty and obligation to the CTUIR with respect to the lower Yakima River.

The DPEIS, p. 3-89, discusses "Current Land Use," stating in part that:

3-6

> "Rangelands (2,900 square miles) are primarily used and managed for grazing, military training, wildlife habitat, and Tribal cultural activities. The 2,200 square miles of forested areas in the northern and western portions of the basin are primarily used and managed for timber harvest, water quality, fish and wildlife habitat, grazing, Tribal cultural activities, and recreation."

The "Tribal cultural activities" that occur in the Basin should include those of the CTUIR.

Pages 3-94 to 3-96 of the DPEIS discuss "Cultural Resources" at length, including a brief history of aboriginal use and occupation, but specifically mention only the Yakama Nation regarding ceded territory:

> "The federally recognized Yakama Nation consists of 14 Tribes and Bands that were combined socially and politically following the Walla Walla Treaty of June 9, 1855. The areas affected by the Integrated Plan are in the territory ceded in the 1855 Treaty."

Again, a portion of the Plan area (lower Yakima River) includes territory ceded by the CTUIR in our 1855 Treaty (see attached map showing approximate CTUIR ceded area boundaries). In fact, the CTUIR DNR has continued to establish fishing seasons for tribal members in the Yakima River (see attached example CTUIR fishing regulations). This section goes on to say:

3-7

> "At least as early as 11,500 years ago, the ancestral inhabitants of today's Yakama Nation, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Umatilla Indian Reservation, and the Wanapum Band, developed a thriving economy based on the natural richness and bounty of the Columbia Plateau."

This is true, but other tribes were similarly situated and engaged throughout the Plateau. The section continues:

> "Today the Yakama people continue to have access to their "usual and accustomed places" within the Yakima River basin for a variety of traditional uses, including areas outside of the reservation boundaries. Additionally, within the boundaries of the reservation, the Yakama Nation and its Tribal Historic Preservation Office manage cultural resource concerns including traditional cultural properties, sacred sites, hunting and gathering locations, archaeological resources, historic resources, places related to legends, and ancestral sites."

The "Yakama people" are not the only tribal members that "continue to have access to their 'usual and accustomed places' within the Yakima River basin for a variety of traditional uses, including areas outside of the reservation boundaries." CTUIR members do, and the CTUIR government, beyond the boundaries

3-7

> of our reservation (in portions of the Plan area), "manage cultural resource concerns including traditional cultural properties, sacred sites, hunting and gathering locations, archaeological resources, historic resources, places related to legends, and ancestral sites."

The DPEIS on p. 4-61 continues discussing "Indian Sacred Sites," stating that:

3-8

> "Because details of specific Integrated Plan projects have not yet been identified, Reclamation has not begun consultation with the Yakama Nation to identify Indian Sacred Sites. Reclamation will consult with the Yakama Nation to determine the presence of sacred sites as part of project-level environmental review when specific projects are carried forward to implementation. The process for consultation is described in Chapter 6. Short-term impacts to sacred sites are expected to be those in which access to sacred sites, if they are extant, is being temporarily denied to Tribal members because of construction-related activities."

Consultation on sacred sites with the Yakama Nation alone may be seriously insufficient, depending on the location of the site in question (i.e., in the lower Basin). Similarly inadequate language is found on p. 5-101.

On p. 6-7 of the DPEIS this theme continues:

3-9

> "Because this EIS is programmatic and specific project details are not known at this time, additional cultural review and consultation will be undertaken as part of the additional environmental review required when projects are carried forward. That will include site-specific cultural resource studies and determination of appropriate mitigation in coordination with the Washington SHPO, the Yakama Nation, the U.S. Forest Service, and other interested parties."

Specifically listing only the Yakama Nation in this context is inappropriate. Depending on the location of a site, consultation and coordination with the CTUIR may also be warranted. In addressing "Tribal Consultation and Coordination," the DPEIS on p. 6-7 does correctly include the CTUIR where government-to-government consultation is likely to be necessary.

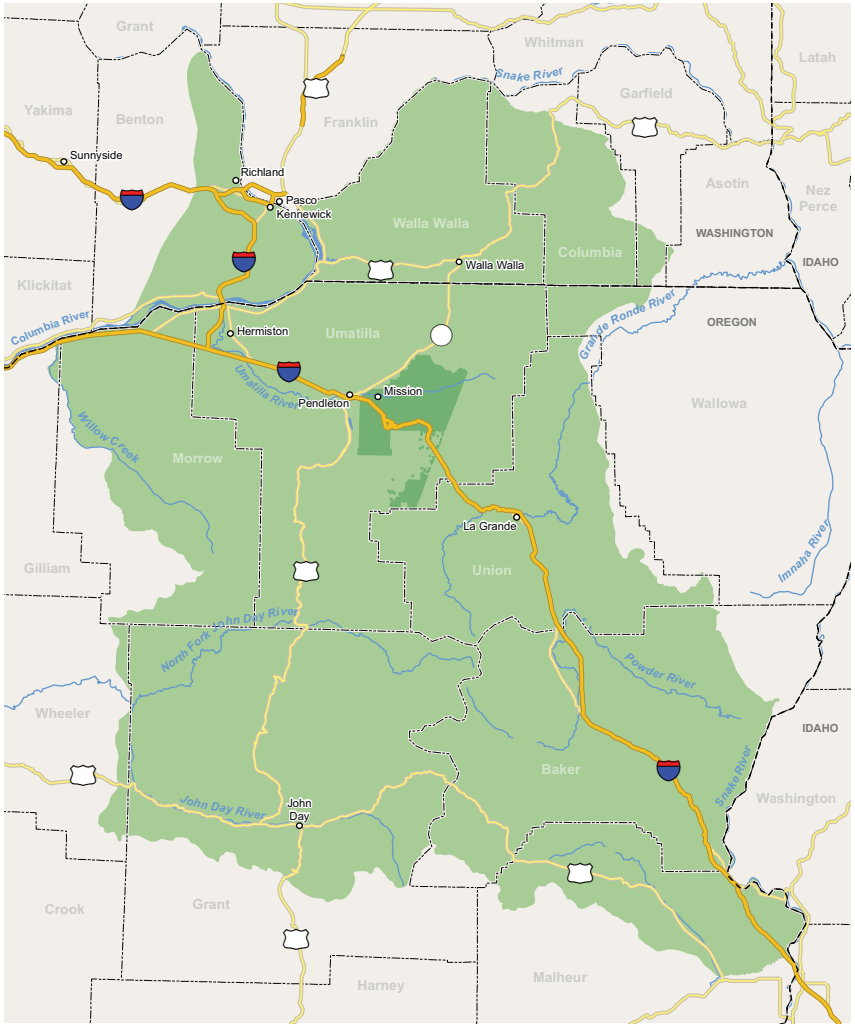
Thank you for your consideration of our comments. Please do not hesitate to contact Carl Merkle, Acting Manager, First Foods Policy Program, at (541) 429-7235, should you have any questions.

Sincerely,

Eric Quaempts
Director, Department of Natural Resources

Cc: Derek Sandison, Washington Department of Ecology

Attachments



DEPARTMENT of
NATURAL RESOURCES

Tribal Fisheries
Program

CONFEDERATED TRIBES
of the
Umatilla Indian Reservation
P.O. Box 638
PENDLETON, OREGON 97801
Area code 541 Phone 276-4109 FAX 276-4348

Emergency Regulations
Tributary Spring Chinook Fishing for Tribal Members
In the Umatilla, Grande Ronde and Yakima Rivers

Pursuant to Chapter 2 of the Wildlife Code of the Confederated Tribes of the Umatilla Indian Reservation, the Fish and Wildlife Committee has the authority to regulate ceremonial, subsistence, and commercial fisheries for CTUIR tribal members within the ceded boundary and at usual and accustomed sites. Pursuant to that authority, a quorum of the Fish and Wildlife Committee met on May 29, 2001, and adopted the following emergency regulations for subsistence spring chinook salmon fishing by tribal members in the Umatilla, Grande Ronde, and Yakima, Rivers. These regulations shall become effective immediately. A 30-day comment period is hereby established for these regulations and comments can be directed to the Fish and Wildlife Committee or Department of Natural Resources Tribal Fisheries Program. The Fish and Wildlife Committee will meet in 30 days to consider all comments received.

FISHING GEAR

Unless otherwise specified, all legal subsistence gear, as specified and defined in Section 35 of the Wildlife Code of the Confederated Tribes of the Umatilla Indian Reservation shall be lawful. This includes dip net, bag net, hoop net, spear, gaff, club, fowling hook, or angling gear (hook & line). **Exception: Snagging with rod and reel and weighted treble hook type riggings shall be prohibited. Traditional gaffing method with single hook attached to a pole is allowed.**

1

'REATY JUNE 9, 1855 + CAYUSE, UMATILLA AND WALLA WALLA TRIBES

UMATILLA RIVER

Run Status: The estimated return of spring chinook to the Umatilla River in 2001 is 3,700. Similar to last year's run, these will represent the largest returns since the program was initiated in the 1980's. About 600 will again be taken for broodstock at Threemile Dam facility and transported to the South Fork Walla Walla facility for holding and spawning. Indian and non-Indian harvest have been managed by the tribe and state based on a 10% of the run harvest guideline for each. The harvest goal for this year will be 300 fish each for Indian and non-Indian fishers. The state set a non-Indian fishery from April 16 through June 30, 2001 below the reservation.

Season: Open to spring chinook fishing. The tribal harvest target shall be 300 fish. Open starting 6:00am, May 29, 2001 until harvest target is met, or until further notice.

Location: Umatilla River and tributaries above the Hwy 30 bridge at Umatilla, except for natural production sanctuary areas above the reservation. Sanctuary areas closed to fishing are: 1) the upper mainstem Umatilla River and its tributaries above paved county road bridge one mile above mouth of Meacham Creek (near Betty Gray home); and; 2) Meacham Creek and tributaries above the paved county road bridge about ¼ mile up Meacham Creek from its mouth. ***NOTE***: Above sanctuary areas are slightly expanded from last year to better protect salmon in primary spawning habitat, particularly in this expected low-flow year. Also, 200 foot area (markers posted) above and below the outlet of the Imaques-C-Mem-Ini-Kem fish facility and all irrigation diversions dams/ladders will be closed to fishing.

Note: An emergency closure will occur if and when the harvest targets are met. To preserve harvest opportunity for the traditional gaffing method upriver, no more than 150 of the total 300 harvest target shall be caught downriver (primary gear anticipated to be dipnet and rod and reel).

GRANDE RONDE

Spring chinook returns destined to Lookingglass Creek (from CTUIR Rapid River stock supplementation efforts) are returning in excess of program needs (likely to be over 1,000). This will create an opportunity for a fishery in lower Lookingglass Creek in 2001.

Season: Spring chinook salmon fishing **CLOSED** in 2001 in the Grande Ronde, and all tributaries **except** lower Lookingglass Creek. The Lookingglass Creek fishery will occur from Lookingglass Hatchery Pump House weir down to the Highway Bridge just above the mouth of Lookingglass Creek (about two stream miles). There shall be no trespass/walking on/fishing from hatchery facilities such as fish ladder, fish weir, etc. The fishery will occur seven days a week in daylight hours starting Saturday, May 19,

Comment Letter 3

2001.

YAKIMA RIVER

Season: Subsistence fishing for spring chinook salmon will be allowed in the Yakima River from Prosser Dam downstream to the mouth. Fishing is allowed daily through July 28, 2001.

Specific Restrictions: It shall be unlawful to place fishing platforms, or to take, molest, injure, or fish for salmon and steelhead within 30 feet of any fish ladder, fishway, or fish bypass pipes associated with irrigation canal fish screening structures. Fishing is not allowed from boats or any other floating devices.

****

Information on the tribal spring chinook harvest and ability and success of spring chinook to remain and spawn in these rivers are important to the Tribe and ODFW. Tribal harvest monitors will be out monitoring catch and obtaining other biological data. The Fish and Wildlife Committee requests that tribal fishers cooperate with call-in catch reporting and in the field with tribal harvest monitors regarding catch information tagged fish, etc. This information will help provide a database which fishery managers can utilize for the enhancement of the ceded area populations. Your cooperation is appreciated. Please contact Jay Minthorn, Chairman, Fish and Wildlife Committee (276-3165) or Gary James, Fisheries Program Manager (276-4109) for questions or concerns regarding the above regulations or data presented.

FISH AND WILDLIFE COMMITTEE APPROVAL:

Jay Minthorn
Chairman, Fish and Wildlife Committee

Ken Hall
Member, Fish and Wildlife Committee

Filename:TRIB.02

DEPARTMENT of
NATURAL RESOURCES

Tribal Fisheries
Program

CONFEDERATED TRIBES
of the
Umatilla Indian Reservation
P.O. Box 638
PENDLETON, OREGON 97801
Area code 541 Phone 276-4109 FAX 276-4348

Emergency Regulations
Tributary Spring Chinook Fishing for Tribal Members
In the Umatilla, John Day, Grande Ronde, Imnaha, Tucannon, and Yakima Rivers

Pursuant to Chapter 2 of the Wildlife Code of the Confederated Tribes of the Umatilla Indian Reservation, the Fish and Wildlife Committee has the authority to regulate ceremonial, subsistence, and commercial fisheries for CTUIR tribal members within the ceded boundary and at usual and accustomed sites. Pursuant to that authority, a quorum of the Fish and Wildlife Committee met on May 3, 2002, and adopted the following emergency regulations for subsistence spring chinook salmon fishing by tribal members in the Umatilla, John Day, Grande Ronde, Imnaha, Yakima, and Tucannon Rivers. These regulations shall become effective immediately. A 30-day comment period is hereby established for these regulations and comments can be directed to the Fish and Wildlife Committee or Department of Natural Resources Tribal Fisheries Program. The Fish and Wildlife Committee will meet in 30 days to consider all comments received.

FISHING GEAR

Unless otherwise specified, all legal subsistence gear, as specified and defined in Section 35 of the Wildlife Code of the Confederated Tribes of the Umatilla Indian Reservation shall be lawful. This includes dip net, bag net, hoop net, spear, gaff, club, fowling hook, or angling gear (hook & line). **Exception: Snagging with rod and reel and weighted treble hook type riggings shall be prohibited. Traditional gaffing method with single hook attached to a pole is allowed.**

Comment Letter 3

UMATILLA RIVER

Run Status: The estimated return of spring chinook to the Umatilla River in 2002 is 5,000. Similar to last year's run, this will represent one of the largest returns since the program was initiated in the 1980's. About 600 fish will again be taken for broodstock at Threemile Dam facility and transported to the South Fork Walla Walla facility for holding and spawning. Indian and non-Indian harvest have been managed by the tribe and state based on a 10% of the run harvest guideline for each. The harvest goal for this year will be 500 fish each for Indian and non-Indian fishers. The state set a non-Indian fishery from April 16 through June 30, 2002 below the reservation.

Season: Open to spring chinook fishing. The tribal harvest target shall be 500 fish. Fishing is allowed daily until harvest target is met, or until further notice.

Location: Umatilla River and tributaries above the Hwy 30 bridge at Umatilla, except for natural production sanctuary areas above the reservation. Sanctuary areas closed to fishing are: 1) the upper mainstem Umatilla River and its tributaries above paved county road bridge one mile above mouth of Meacham Creek (near Betty Gray home); and; 2) Meacham Creek and tributaries above the paved county road bridge about ¼ mile up Meacham Creek from its mouth. ***NOTE:*** Sanctuary areas are to protect salmon in the basins primary spawning habitat. Also, 200 foot area (markers posted) above and below the outlet of the Imaques-C-Mem-Ini-Kem fish facility and all irrigation diversions dams/ladders will be closed to fishing.

Note: An emergency closure may occur if there is a change in the predicted run size or if the harvest targets are met. Fishers are encouraged to harvest fish early while flesh quality is high and before increasing temperature create more stress on fish. Also, fishing for Pacific lamprey (susceptible during spring chinook low water fishery period) shall be closed in the Umatilla River. The CTUIR Fisheries Program is outplanting adults to initiate lamprey restoration. Lamprey fishing closure signs will be posted in the field.

YAKIMA RIVER

Season: Subsistence fishing for spring chinook salmon will be allowed in the Yakima River from Prosser Dam downstream to the mouth. Fishing is allowed daily through July 27, 2002.

Specific Restrictions: It shall be unlawful to place fishing platforms, or to take, molest, injure, or fish for salmon and steelhead within 30 feet of any fish ladder, fishway, or fish bypass pipes associated with irrigation canal fish screening structures. Fishing is not allowed from boats or any other floating devices.

Grande Ronde, Tucannon, John Day and Imnaha River

Spring Chinook tribal subsistence fisheries may be opened later this spring when more information is gathered. Another emergency regulation notice will be forthcoming as soon as pending details are finalized. Until further notice, the Grande Ronde, (Including Lookingglass Creek), Tucannon, the John Day and Imnaha Rivers and tributaries are ***Closed*** to spring Chinook Salmon Subsistence fishing.

****

Information on the tribal spring chinook harvest and ability and success of spring chinook to remain and spawn in these rivers are important to the Tribe and ODFW. Tribal harvest monitors will be out monitoring catch and obtaining other biological data. The Fish and Wildlife Committee requests that tribal fishers cooperate with call-in catch reporting and in the field with tribal harvest monitors regarding catch information tagged fish, etc. This information will help provide a database which fishery managers can utilize for the enhancement of the ceded area populations. Your cooperation is appreciated. Please contact Jay Minthorn, Chairman, Fish and Wildlife Committee (276-3165) or Gary James, Fisheries Program Manager (276-4109) for questions or concerns regarding the above regulations or data presented.

FISH AND WILDLIFE COMMITTEE APPROVAL:

Chairman, Fish and Wildlife Committee

Member, Fish and Wildlife Committee

Filename:TRIB.02

Comment Letter 3

Confederated Tribes
Of the
Umatilla Indian Reservation
P.O. Box 638
Pendleton, OR 97801
Fish & Wildlife Committee

Emergency Regulations
Tributary Spring Chinook Fishing for Tribal Members
In the Umatilla, John Day, Grande Ronde, Imnaha,
Tucannon and Yakima Rivers

Pursuant to Chapter 2 of the Wildlife Code of the Confederated Tribes of the Umatilla Indian Reservation, the Fish and Wildlife Committee has the authority to regulate ceremonial, subsistence, and commercial fisheries for CTUIR tribal members within the ceded boundary and at usual and accustomed sites. Pursuant to that authority, a quorum of the Fish and Wildlife Committee met on April 30, 2004, and adopted the following emergency regulations for subsistence spring Chinook salmon fishing by tribal members in the Umatilla, John Day, Grande Ronde, Imnaha, Yakima, and Tucannon Rivers. These regulations shall become effective immediately. A 30-day comment period is hereby established for these regulations and comments can be directed to the Fish and Wildlife Committee or Department of Natural Resources Tribal Fisheries Program. The Fish and Wildlife Committee will meet in 30 days to consider all comments received.

FISHING GEAR

Unless otherwise specified, all legal subsistence gear, as specified and defined in Section 35 of the Wildlife Code of the Confederated Tribes of the Umatilla Indian Reservation shall be lawful. This includes dip net, bag net, hoop net, spear, gaff, club, fowling hook, or angling gear (hook & line). Exception: Snagging with rod and reel and weighted treble hook type riggings shall be prohibited. Traditional gaffing method with single hook attached to a pole is allowed.

UMATILLA RIVER

Run Status: The estimated return of spring Chinook to the Umatilla River in 2004 is about 3,000. About 560 will again be taken for broodstock at Threemile Dam facility and transported to the South Fork Walla Walla facility for holding and spawning. Also, about 250 will be transported to the South Fork Walla Walla facility for holding and outplanting in the Walla Walla River. Indian and Non-Indian harvest have been managed by the tribe and state based on a sliding scale which is tied to run size. The harvest goal at this years predicted run size will be 450 fish each for Indian and non-Indian fishers. The state set a non-Indian fishery from April 16 through June 20, 2004 below the reservation. The actual run size and both fisheries will be closely monitored to enable managers to recommend harvest regulation changes if necessary.

Season: Open to spring Chinook fishing. The tribal harvest target shall be 450 fish. Fishing is allowed daily until the harvest target is met, or until further notice.

Location: Umatilla River and tributaries above the Hwy 30 bridge at Umatilla, except for natural production sanctuary areas above the reservation. Sanctuary areas closed to fishing are: 1) the upper mainstem Umatilla River and its tributaries above paved county road bridge one mile above mouth of Meacham Creek (near Betty Gray home); and; 2) Meacham Creek and tributaries above the paved county road bridge about ¼ mile up Meacham Creek from its mouth. *NOTE*: Above sanctuary areas are slightly expanded from last year to better protect salmon in primary spawning habitat, particularly in this expected low-flow year. Also, 200 foot area (markers posted) above and below the outlet of the Imaques-C-Mem-Ini-Kem fish facility and all irrigation diversions dams/ladders will be closed to fishing.

Note: An emergency closure will occur if there is a change in the predicted run size or if the harvest targets are met, fishers are encouraged to harvest fish early while flesh quality is high and before increasing temperature create more stress on fish. Also, fishing for Pacific Lamprey (susceptible during Spring Chinook low water fishery period) shall be closed in the Umatilla River. The CTUIR Fisheries Program is outplanting adults to initiate lamprey restoration. Lamprey fishing closure signs will be posted in the field. Also Note: Non- Indian trout fishing in the Umatilla River and tributaries on the Umatilla Indian Reservation (except McKay Creek system) is CLOSED through September 9, 2004 to provide increased protection to Spring Chinook.

Comment Letter 3

YAKIMA RIVER

Season: Subsistence fishing for spring Chinook salmon will be allowed in the Yakima River from Prosser Dam downstream to the mouth. Fishing is allowed daily through June 26, 2004.

Specific Restrictions: It shall be unlawful to place fishing platforms, or to take, molest, injure, or fish for salmon and steelhead within 25 feet of any fish ladder, fish way, or fish bypass pipes associated with irrigation canal fish screening structures. Fishing is not allowed from boats or any other floating devices.

GRANDE RONDE, TUCANNON, JOHN DAY AND IMNAHA

Spring Chinook tribal subsistence fisheries may be opened later this spring when more information is gathered. Another emergency regulation notice will be forthcoming as soon as pending details are finalized. Until further notice, Grande Ronde, Tucannon, the John Day and Imnaha River and tributaries are CLOSED to Spring Chinook Salmon subsistence fishing.

Information in the tribal spring Chinook harvest and ability and success of Spring Chinook to remain and spawn in these rivers are important to the Tribe and ODFW. Tribal harvest monitors will be out monitoring catch and obtaining other biological data. The Fish and Wildlife Committee request that tribal fishers cooperate with call-in catch reporting and in the field with tribal harvest monitors regarding catch information tagged fish, etc. This information will help provide a database which fishery managers can utilize for the enhancement of the ceded area populations. Your cooperation is appreciated. Please contact Jay Minthorn, Chairman, Fish and Wildlife Committee (276-3176) or Gary James Fisheries Program Manager (276-4109) for questions or concerns regarding the above regulations or data presented.

FISH AND WILDLIFE COMMITTEE APPROVAL:

Chairman, Fish and Wildlife Committee

N. Kathryn Brigham 4-30-04
Member, Fish and Wildlife Committee

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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Seattle, WA 98101-3140

Received in Mailroom
JAN 06 2012
OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

January 3, 2012

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

Re: Comments on the proposed Yakima River Basin Integrated Water Resource Management Plan and Draft Programmatic EIS (EPA Project Number: 11-4131 BOR).

Dear Ms. McKinley:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Bureau of Reclamation (Reclamation) and Washington State Department of Ecology (Ecology) Draft Programmatic Environmental Impact Statement (DPEIS) for the proposed Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) in Washington State.

3A-1 The DPEIS analyzes potential environmental impacts associated with a plan integrating various approaches to water resources and ecosystem restoration improvements, including reservoir fish passage, changes to existing facilities, surface and ground water storage, enhanced water conservation, habitat/watershed protection and enhancement, and market reallocation. Analysis of impacts resulting from these strategies considered two action alternatives, a No Action and Integrated Plan. Under the No Action, there would be no implementation of the proposed Integrated Plan and current water demands in the Yakima basin would remain. The Integrated Plan would meet the water needs using three water management components i.e., Habitat, Systems Modification, and Water Supply; and incorporating seven elements (p. iv-v) in the Plan to improve water resources in the basin. The DPEIS does not identify a preferred alternative.

3A-2 The EPA supports Reclamation's efforts to develop the proposed Integrated Plan, which can serve as a guide for development of future individual plans and projects. We agree that individual plans and projects included in the Integrated Plan should be subject to further NEPA analysis prior to their implementation. Section 1.7 of the DPEIS also discusses how the Integrated Plan builds on projects previously analyzed under NEPA. We note with appreciation that the PDEIS includes responses to public scoping comments on the project. We also appreciate that the Integrated Plan results from a Workgroup (YRBWEP) established to assist with planning on a range of issues, including measures to reduce potential impacts of the proposed program.

3A-3 Overall, the DPEIS includes a good description of resources within the project area, analysis of anticipated environmental impacts, measures to offset the impacts, and an adaptive approach to review and adjust the Plan commensurate with changed conditions and new information. Our concerns with

Implementing the Integrated Plan as proposed relate to its potential impacts to water quality, wetlands and riparian areas, and habitat as explained below. We recommend that Reclamation continue to work with Ecology to ensure that the project would meet State water quality standards. As there are fish bearing streams in the project area, including species that are listed as endangered, threatened, sensitive and candidate for listing, Reclamation should also coordinate with Washington State Department of Fish and Wildlife to define water management practices that would be protective of fisheries within streams in the project area, especially those that are water quality limited. Based on our review and concerns
3A-3 about water quality, we have assigned a rating of EC-2 (Environmental Concerns – Insufficient Information) to the DPEIS. For your reference, a copy of the rating system used in conducting our review is enclosed.

We appreciate the opportunity to review and comment on this PDEIS. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov or contact Theo Mbabaliye of my staff at (206) 553-6322 or by electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,

Eli Peterson for

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure:
Detailed EPA Comments on the Yakima River Basin Integrated Water Resource Management Plan and Draft Programmatic EIS

cc: EPA Washington Operations Office
Washington State Department of Fish and Wildlife

Detailed EPA Comments on the Yakima River Basin Integrated Water Resource Management Plan and Draft Programmatic EIS

Surface Water Impacts and Wetlands

The DPEIS identifies impaired waters in the project area and provides information about the status of applicable Total Maximum Daily Loads (TMDLs). Many streams and rivers in the project area are on the State of Washington's most current 303(d) list of impaired water bodies for a variety of water quality parameters, including temperature, dissolved oxygen (DO), turbidity, nutrients, total suspended solids (TSS), and toxins such as pesticides. Under the Wymer Dam and Pump Station, for example, there is a possibility that during dry years, releases of surface waters from the reservoir could result in warmer water temperatures in Yakima River, especially in August and September, and that releases of bottom waters may adversely affect DO and nutrient levels. The reservoir would inundate palustrine wetlands, resulting in permanent loss of habitat. 3A-4

Similarly, the Bumping Lake Reservoir Enlargement activities would inundate additional new wetland areas and cause decaying vegetation to increase the availability of nutrients in the reservoir and downstream waters. The Kachess Reservoir storage project would also require work on the reservoir bed, which would potentially disturb sediments and cause increased erosion and sedimentation. Other impacts related to construction of new reservoirs and renovation of others would include potential spills of hazardous materials used during construction and resultant discharge of pollutants in nearby waterways.

Recommendations:

- *The final PEIS should include information regarding the status of the Clean Water Act Section 401 certification process and conditions, and more specifics about the Water Quality Monitoring Plan to address water quality problems within impaired water bodies.* 3A-5

- *The final PEIS should include maps identifying wetlands and riparian areas, describe impacts to those areas in quantitative and functional terms and discuss proposed mitigation in similar terms.* 3A-6

Vegetation and Wildlife Impacts

The proposed Integrated Plan would result in adverse impacts to shrub-steppe habitat, which has low resilience to further environmental disturbance. With construction of reservoirs, significant areas could be disturbed, inundated and shrub-steppe habitat lost. These impacts would result from not only construction and use of the dam and reservoirs, but also access roads and realignment of others, and recreational developments. 3A-7

Loss of shrub-steppe vegetation would also affect wildlife habitat, especially greater sage-grouse, which is a State-threatened species and candidate for listing under the Endangered Species Act (ESA). Another species that would be affected is the Ferruginous Hawk, which is listed as State-threatened and as an ESA species of concern. Wildlife would also be affected due to increased noise and traffic during

construction and maintenance of the dam and the reservoir. Access roads, pipelines, and utility corridors would serve as obstacles to animals migrating through the area such as deer or elk. Cleared corridors and roads deter terrestrial animals from crossing due to lack of cover, reduced forage and browsing opportunities, changes in wildlife migration patterns, and occasional human activity in these areas. While we note that some of the impacts would be indirect, others would be direct, cumulative and unavoidable. 3A-7

Recommendation:

- *The final PEIS should discuss in greater detail the effect of corridors created as a result of construction of the dams, reservoirs, and pipelines on habitat fragmentation and the creation of edge effects favoring some species, including mitigation measures.*

Seismicity

Because the Yakima River basin lies within the Yakima Fold Belt that has experienced tectonic folding and faulting in the past, the potential for landslides and slope movement at Wymer site and potentially at other sites exists. Slopes can be inherently unstable due to weak underlying materials, or due to oversteepening or loading of existing stable slopes. Seepage from reservoirs may infiltrate both stable and unstable areas. The resultant increased pore pressures could reactivate landslides or initiate new ones along reservoir rims and abutments. A full Wymer Reservoir, for example, would result in groundwater seepage, which is expected to involve substantial volumes and high hydraulic conductivity, all of which could cause a rise of pore pressures and instability of low strength materials in the reservoir basin. Such seepage from Wymer has the potential to infiltrate currently stable areas and may increase pore pressures such that slopes could become unstable and slide, particularly during earthquakes. 3A-8

Recommendations:

- *The final PEIS should include results of a seismic analysis for reservoirs, information about how seismicity was evaluated, and how it will be monitored and managed to minimize seismic impacts. A seismic map should either be referenced or included in the final PEIS along with information about appropriate seismic design and construction standards and practices that would be used to reduce seismic risks.*

- *The final PEIS should identify and map areas that are susceptible to landslides and slope movement in the project area, particularly where reservoirs would be constructed along with assessment of slope stability, and determination of factors of safety and appropriate mitigation measures.*

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

3A-9

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.

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January 3, 2012

Bill Gray
Area Manager
U. S. Bureau of Reclamation
1917 Marsh Road
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Candace McKinley
Environmental Program Manager
Columbia-Cascades Area Office
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Derek I. Sandison
Director, Office of Columbia River
Washington State Department of Ecology
303 S. Mission Street
Wenatchee, WA 98801

RE: WDFW Comments on the Yakima River Integrated Water Resource Management Plan PEIS

Dear Mr. Gray, Ms. McKinley, and Mr. Sandison,

4-1 The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments to the November 16th, 2011 Draft Programmatic Environmental Impact Statement (PEIS) issued for the Yakima River Integrated Water Resource Management Plan in accordance with the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA). Collaboration among WDFW, the Washington Department of Ecology (Ecology), the U. S. Bureau of Reclamation (Reclamation), the Yakama Nation, and other local, state, and federal resource and planning agencies has remained a crucial element throughout development of the PEIS.

Comment Letter 4

4-1 WDFW recognizes it is a priority of the state to improve water supply for irrigated agriculture and future municipal demands throughout the Yakima basin. Since 2009, WDFW has actively participated as a committee member of the Yakima River Basin Water Enhancement Program (YRBWEP) workgroup to assure solutions developed to address the basin's inadequate water supply incorporate fish, wildlife, and habitat protection and enhancement measures; consistent with the WDFW mandate to

> *"... preserve, protect, perpetuate, and manage the wildlife and food fish, game fish, and shellfish in state waters and offshore waters ... in a manner that does not impair the resource...consistent with this goal, the department shall seek to maintain the economic well-being and stability of the fishing industry in the state. The department shall promote orderly fisheries and shall enhance and improve recreational and commercial fishing in this state."*[1]

WDFW believes that the seven elements that define the Action Alternative within the PEIS provide protection to habitat, fisheries, and wildlife that may not be afforded in the absence of the Action Alternative; particularly the fish passage and habitat and tributary protection and enhancement elements. However, there are several significant resource concerns that were not adequately addressed in the PEIS. WDFW looks forward to working with Ecology and Reclamation to resolve these issues for the Final PEIS and successive project-level EIS documents.

Particular resource concerns include:

4-2
- Bull trout and bull trout Critical Habitat within the Yakima Basin will be impacted as a result of implementing the Integrated Plan. WDFW acknowledges that several activities will benefit bull trout populations by reconnecting access to habitats through fish passage, habitat restoration, and future land acquisitions. However, the enlargement of Bumping Lake will have permanent, adverse effects to bull trout and bull trout Critical Habitat by flooding spawning and rearing habitats in Deep Creek. In addition, habitat within the Yakima River basin that was historically known to bear bull trout should be protected where possible, as these areas may be critical to restore declining bull trout populations if access is restored or a supplementation program is implemented.

  WDFW strongly encourages Reclamation and Ecology to continue to work closely with the scientific community, local, state, and federal resource agencies, private landowners, and irrigation districts to ensure that the integrated plan does more good than harm to bull trout. The bull trout action plan is in the final stages of development and will be a key addition to ensure that bull trout are better off with the integrated plan than without.

1 Title 77.04.12 Mandate of the department and commission.

4-3

- The Northern spotted owl and their Critical Habitat will be adversely impacted from the enlargement of Bumping Lake, which would inundate 982 acres of spotted owl forest habitat. WDFW supports acquisition of key lands in the Teanaway, Little Naches, Manastash and Taneum watersheds, to protect and restore habitat for spotted owls in the Yakima Basin. It is unclear at this time the full extent of impacts that will be realized by spotted owls in the Bumping Lake area, as well as how spotted owls will respond to habitat improvements in the Little Naches, Manastash, Taneum and Teanaway. A vigorous analysis will be required at the project-level EIS stage to further evaluate impacts to spotted owls, and if feasible, evaluate the effectiveness of forest acquisitions and restoration of spotted owl habitat in the Yakima Basin. As in the case of bull trout, the goal is to achieve a net improvement in conditions for spotted owls in the Yakima Basin as a result of the integrated plan.

4-4

- Shrub-steppe habitat is one of the most imperiled habitats in the state, and the construction of Wymer Reservoir is expected to inundate up to 1,055 acres of upland shrub-steppe habitat; further reducing the acres of intact shrub-steppe habitat available. The reservoir may displace greater sage-grouse that use this area to move north and south through the Yakima Canyon and could have serious impacts to sage-grouse populations by further reducing/eliminating suitable habitat. Though lands targeted for acquisition under the Habitat Protection and Enhancement Element may provide relief and additional protection for sage-grouse within the Yakima Basin, further analysis of impacts will be necessary at the project-level EIS stage.

  The WDFW/Ecology mitigation agreement relative to permanent losses of shrub-steppe is a good starting point for appropriate shrub steppe conservation actions but the presence of at risk species like sage grouse and golden eagles make the need for conservation actions greater than it might be otherwise. Once again, the goal should be that shrub steppe habitat and species will be better off as a result of the integrated plan than they would have been without. Impacts to sage grouse, golden eagles, and other shrub steppe obligates will require further analysis during project-level environmental review.

4-5

WDFW continues to support the intent of the Integrated Plan to concurrently provide gains in water for agriculture and municipal water supplies with fish, wildlife, and habitat conservation efforts within the Yakima River basin. We appreciate and support that the stated purpose of the integrated plan is as much about environmental protection as it is about improved water supply. That overarching policy statement cannot be stated too often. Without an equal balance between water supply and the environment, success of the plan is unlikely.

4-5

There is no doubt that an undertaking of the magnitude of the Integrated Plan will require countless hours of planning, consultation, research, and compromise throughout each implementation phase. WDFW has been and remains encouraged by the amount of energy the state, the work group, and others have dedicated to finding solutions to some very difficult water issues in the basin! WDFW looks forward to working with Ecology, Reclamation, the Yakama Nation, and other state, federal, and local agencies and stakeholders to assure natural resource costs and benefits remain balanced as implementation of the Yakima Integrated Plan unfolds.

Sincerely,

Jeff Tayer
Region 3 Director

cc: John Easterbrooks
Perry Harvester
Ted Clausing

Retention Code : ENV-6.00

Washington State Department of Transportation
Paula J. Hammond
Secretary of Transportation

Received in Mailroom
DEC 07 2011
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December 2, 2011

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Re: Yakima Basin Integrated Water Resource Management Plan DPEIS Comments

Dear Candace,

5-1 On behalf of the Washington State Department of Transportation (WSDOT) South Central Region Environmental Office, I commend your continued development of Water Resource Management in the Yakima River Basin, and I would like to provide feedback for the recently compiled Draft Programmatic Environmental Impact Statement in this letter.

5-2 To begin, Section 1.8.8 generally describes the work of our office. In recent years however, our program and the services delivered have continued to evolve, and we would like certain elements within the excerpt to reflect this. Our habitat connectivity and wetland mitigation programs continue to collaborate with other agencies and organizations including the Kittitas Conservation Trust and Yakima County Flood Control Zone District. These collaborative projects may or may not include funding of land acquisitions and conservation easements intended to promote wildlife connectivity and improve floodplain functions. Our Region is also very active in continuing to identify and prepare for fish passage barrier removal projects, as well as conduct reach assessments in support of the WSDOT Chronic Environmental Deficiencies Program.

5-3 We are pleased to see the development of fish passage facilitation at the Cle Elum Reservoir Dam, and encouraged by [illegible] to implement a similar program at the Lake Keechelus Dam as well. As part of the I-90 Snoqualmie Pass East Project, WSDOT has invested heavily in ecological connectivity and habitat improvement for fish and wildlife, most notably the isolated fluvial population of bull trout in Keechelus Lake. Both the Yakima River and Keechelus Lake sub-populations of bull trout would benefit greatly from the elimination of the barrier at Keechelus Dam, and this effort by your agency would support the WSDOT investments in connectivity within the upper Yakima River.

5-4 The Keechelus-Kachess pipeline is another project we are interested in and we strongly encourage you to coordinate further with Brian White, WSDOT South Central Assistant Regional Administrator in charge of the I-90 Snoqualmie Pass East Project Design and Construction at (509) 577-1700. The new bridges at Bonny Creek should provide an excellent opportunity to facilitate the I-90 corridor pipeline crossing, and through this coordination, we want to ensure that any potential conflicts with connectivity or transportation objectives are minimized.

5-5 On both the Keechelus-to-Kachess pipeline as well as the prospective Kachess gravity-flow pipeline (Option 1) for inactive storage, we want to maintain continued consultation as they will parallel the I-90 corridor. On the former project, the Federal Highways Administration easement from the US Forest Service as well as utilities agreements must be recognized to ensure that regulations are maintained.

5-5 Provided that the latter project is implemented under "Option 1," we will want to avoid any conflicts with the Easton State Airport.

5-6 For the previously mentioned projects that occur along I-90, as well as others in the vicinity of designated Scenic Byways, we want to express our interest that, to the greatest practicable extent, Scenic Byway Planning and Design Standards are upheld as specified in RCW 49.39, including prevention of egregious visual disturbances. Other projects to be considered are the Wymer Dam and Reservoir Project as well as the Cle Elum Reservoir developments. State Route 821 in the Yakima River Canyon was Washington State's first Scenic Byway and several recent efforts have gone towards further conservation of this corridor's scenic, cultural, and ecological integrity.

5-7 The reinforcement element of the Umuma Creek Bridge footings within the prospective Wymer Reservoir will also require coordination with WSDOT's Bridges and Structures Office located in Olympia.

5-8 Aside from visual impacts associated with the Swift Water Scenic Cooridor, we maintain concerns in regard to raising the Cle Elum Reservoir pool elevation for State Route 903. We ask that further investigation go into any comprehensive impacts as well as implementation of the shoreline protection designs detailed in the Technical Memorandum from March, 2011.

5-9 We encourage open lines of communication through all projects and environmental analyses to ensure that State Routes used during project activities are properly managed and that traffic is directed in a safe and efficient manner. All hauling exceeding legal size and load limits will require appropriate permits and all traffic control must be accompanied by a traffic control plan. Further inquiries should be coordinated through WSDOT South Central Region Traffic Engineer Rick Gifford at (509) 577-1985.

5-10 Finally, in response to the continued interest indicated for the Black Rock Reservoir, we would like to reference comments made in our response letter dated March 31, 2008 (attached).

We greatly appreciate the opportunity to comment on this document, and please feel free to contact me with any further inquiries at (509) 577-1750. I look forward to our continued cooperation on future projects.

Sincerely,

Jason W Smith
Environmental Manager
WSDOT South Central Region

JWS:df:cb:ea

Attachments: Yakima River Basin Water Storage Feasibility Response Letter

Cc: Brian White PE, WSDOT Asst. Regional Admin.
Rick Gifford PE, Traffic Engineer
Paul Gonseth PE, Planning Office
File

Washington State Department of Transportation
Paula J. Hammond
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March 31, 2008

U.S. Bureau of Reclamation
Upper Columbia Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Attention: David Kaumheimer, Environmental Programs Manager

Subject: Yakima River Basin Water Storage Feasibility Study - Draft
U.S. Department of Interior, Bureau of Reclamation &
Washington State Department of Ecology

We have reviewed the Yakima River Basin Water Storage Feasibility Study. WSDOT recognizes the importance of agriculture to the central Washington region. Our naturally arid region would benefit from additional water storage for irrigation, fish, recreation, and tourism. We have the following comments.

1. The study proposes several alternatives. Depending on which alternative is selected, a number of state highways could be impacted. These include State Highway 24, State Highway 821, Interstate 82, Interstate 182, State Highway 224, State Highway 225, State Highway 240, and State Highway 241. The proponents are encouraged to utilize local roads for access to any construction and maintenance sites whenever possible.

   I-82 and I-182 are fully-controlled limited access facilities for their entire length, and access is restricted to interchanges. Portions of SR 24, SR 224, SR 240 and SR 241 are partially-controlled limited access. Access along these segments is restricted to public roads and deeded approaches. The remaining portions of SR 24, SR 224, SR 225, and SR 241 are access managed. Access is available within the access managed segments in accordance with state law and as agreed to by the Department.

5-11

2. As stated in our comments dated January 31, 2007 regarding the EIS scope, the greatest potential impact to the state highway system would be to SR 24 if Black Rock Reservoir is constructed. The new reservoir would completely inundate a portion of SR 24. The proponent would need to construct a replacement facility on new alignment for the flooded segment of SR 24. The new segment will need to be constructed to current design standards. As stated in the EIS, we would like to continue discussions with the proponent whether a northern or southern alignment is the best location. WSDOT will need to be included in all discussions and analysis regarding the new alignment for SR 24 and approve the alignment location. Access rights will also need to be acquired to retain the limited access nature of the highway. WSDOT is the approving authority for any proposed access location on the new or existing alignment.

3. A franchise agreement is required for any installation and maintenance of longitudinal utility lines within WSDOT rights-of-way. Utility crossing permits are required for all locations where utilities cross the highway, including any tunnels. If a utility line is to be placed on any bridge, it will be subject to approval by our Headquarters' Bridge and Structures Office. All work must be coordinated with the South Central Region's (SCR) Utilities Engineer, Jamil Anabtawi, prior to beginning any work. He can be reached at (509) 577-1785. No open cutting of the highway will be allowed to cross the highway. Any utility line crossing the highway will need to be done by jacking and/or boring underneath it.

4. For traffic control needed on any state highway, the proponent must submit a traffic control plan to the WSDOT South Central Region Traffic Office for review and approval. Please contact Rick Gifford at (509) 577-1985 for specifics.

   Once approved, traffic control implementation on the highway(s) should be coordinated with our Area Maintenance Superintendent. Please contact this office to determine which superintendent should be contacted.

5. As stated in section 4.16.2.4, if Wymer Reservoir is created, the proponent will need to ensure that the I-82 Lmuma Creek bridge piers (milepost 14.96 to 15.11) are protected and reinforced as necessary.

5-11

6. The draft EIS contained general information that certain state highways would be used during construction. The haul routes, the amount and type of materials, the location of source materials, and the estimated number of truck trips need to be specified. All loads transported on WSDOT rights-of-way must be within the legal size and load limits, or have a valid oversize and/or overweight permit.

7. Stormwater and surface runoff generated by this project must be retained and treated on site in accordance with regulating agencies' standards, and not be allowed to flow onto WSDOT rights-of-way.

8. Any outdoor advertising or motorist signing considered for this project will need to comply with state criteria. Please contact Rick Gifford of the WSDOT South Central Regional Office at (509) 577-1985 for specifics.

Thank you for the opportunity to review and comment on this study. If you have any questions regarding our comments, please contact me at (509) 577-1630.

Sincerely,

SOF

Bill Preston, P.E.
Regional Planning Engineer

BP: rh/jjg
cc: File #1, State_USA (2007)
Jamil Anabtawi, Utilities Engineer
Rick Gifford, Traffic Engineer
George Hilsinger, Assistant Regional Administrator for Project Development
Terry Kukes, Area 1 Maintenance Superintendent
Tom Lenberg, Area 3 Maintenance Superintendent
Les Turnley, Area 2 Maintenance Superintendent

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ENV-6.00
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11093240

December 15, 2011

Ms. Candace McKinley
Environmental Program Manager
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1917 Marsh Road
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Re: Response to the Yakima River Basin Study, Mainstem Floodplain Restoration Technical Memorandum; dated February 2011

Dear Candace,

On behalf of the Washington State Department of Transportation (WSDOT) South Central Region Environmental Office, I would like to supplement our recent Programmatic EIS response letter dated 12/2/11. The following comments focus on the Mainstem Floodplain Restoration Technical Memorandum of the Yakima River Basin Study, dated 2/1/11. We support collaborative development of mutually beneficial multi-agency floodplain enhancement projects both locally and regionally. My hope is to ensure open communication throughout these interdependent projects for the benefit of public interests and infrastructure.

Within the listed Tier II Elements, there are several goals to update and widen bridges, including those conveying State Routes. Our program has supported these actions in past projects for the benefit of hydrologic connectivity, riparian health, and aquatic habitat. Potential coordination has been identified in the following reaches:

6-1

Easton Reach – Upgrades and widening of I-90 bridges 90/120N and 90/120S at milepost (MP) 71.26, as well as, 90/132N and 90/132S at MP 78.81

Cle Elum Reach – Upgrades and widening of I-90 bridges 90/142N and 90/142S at MP 86.2, as well as relocation of the SR-10 Teanaway River Bridge (10/142) at MP 89.33

Kittitas Reach – Widening of two unspecified bridges, potentially inclusive of I-90 bridges 90/154N and 90/154S at MP 102.49

Wapato Reach – Widening of six unspecified bridges, potentially inclusive of I-82 bridges 82/1531N and 82/131S at MP 38.48, SR-22 bridge 22/6 at MP 1.1, SR-223 bridge 223/5 at MP 2.47, and SR-241 bridge 241/5 at MP 1.34

6-1

As projects develop, I encourage continued interface with myself at (509) 577-1750, as well as with Brian White, WSDOT South Central Assistant Regional Administrator for Design, at (509) 577-1700.We greatly appreciate the opportunity to comment on this document, and please feel free to contact me with any further inquiries. I look forward to our cooperation on future projects.

Sincerely,

Jason W Smith
Environmental Manager
WSDOT South Central Region

JWS:ea

Cc: Brian White PE, WSDOT Asst. Regional Admin
File

BOARD OF YAKIMA COUNTY COMMISSIONERS

★ District One
Michael D. Leita

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★ District Three
J. Rand Elliott

January 3, 2012

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia –Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

RE: Comments on Yakima River Basin Integrated Water Resources Management Plan (IWRMP) Draft Programmatic Environmental Impact Statement (DPEIS)

Dear Ms. McKinley;

Yakima County appreciates the opportunity to comment on the DPEIS.

General Comments

7-1 Overall, the document reflects the elements and issues discussed in formulation of the plan with the YRBWEP Workgroup. A DPEIS however serves a purpose broader than discussion of the issues and possible outcomes. The document lacks any certainty in regards to future environmental effects. The text of the document repeatedly uses words like "should", "could", "may", or "is expected to" when discussing both positive and negative environmental effects. We feel that this is largely due to the lack of discussion of who will oversee plan implementation, and what sets of goals or procedures will be used to "guide" future management. Without such delineation of structure for plan implementation, a Programmatic EIS lacks any certainty for determination of the overall environmental effects of the proposed plan, or the individual environmental effects of elements or actions.

In short, the formulation and release of the DPEIS is a step that does not move the implementation of the plan forward in any concrete, practical sense.

7-2 For example, as new storage projects come on-line, Total Water Supply Available (TWSA) for participating pro-ratable districts will change as well. Literally millions of dollars of investment hinge on the TWSA estimates, integrating what storage is available and where it can be used and the effect on storage control date and impacts on junior water rights holders will be a necessity. Until some guidelines are developed for how TWSA will be apportioned and administered, the benefits or negative environmental impact of that water distribution are entirely speculative. Similarly, while the recent modeling exercise does show it is possible to meet the 70% threshold in the period modeled for the Integrated Plan, we are not aware of any formal rule sets for when and how much water can "skimmed" for storage, maximum rates of water release from storage, and maintenance of the flood disturbance

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Comment Letter 7

regime, independent of meeting the 70% target. For example, the graphic for storage in Rimrock Reservoir displayed at the October 2010 IWRMP Workgroup meeting (these model runs were used as a basis for the tables in the DPEIS)shows a large amount (120 kaf) of carryover storage maintained in Rimrock in 1993, the second year of the three-year drought. While such carryover storage may be needed to meet the 70% threshold in 1994, without a rule set that specifies how carryover storage will be managed during back-to-back or longer sequential drought years, it is difficult to understand how such a
7-2 large carryover could actually occur in a reservoir that is not managed for carryover storage. There is a need on both the in-stream and demand sides to jointly develop a rule set that takes into account (a) the status of carryover storage in the basin; (b) water supply available for that year; and (c) maximum/minimum flow and flood targets, to improve confidence that model results reflect actual decisions that would be made in the future, where knowledge of future supply conditions and demands will be non-existent. Without such rule sets that are applicable to future years, the benefits or impacts of the IWRMP are not quantifiable or disclosable, and the intent of Programmatic EIS is not met.

Specific Comments

7-3 In several locations the DPEIS states that flood control operations will not change. We do not understand this statement. Is the intent that the same amount of flood control storage will be used, or that new storage will not be used for flood control, or that the current means of evaluation of the relationship between flood control storage and TWSA will be held constant? Certainly the flood regime of the basin will change with additional storage capacity. This in turn will have environmental effects on in-stream and riparian habitat, land use and floodplain extent, and water level fluctuation in existing and proposed new reservoirs. While the IWRMP does not anticipate operational changes for flood control, change in the physical ability to store water will alter the flood regime of the basin. The DPEIS should discuss the types of changes in flood regime and related environmental effects associated with proposed plan actions.

7-4 The effects of the proposed Groundwater Storage element are also not fully analyzed. Recharge of shallow aquifers will have effects on the local groundwater table, not just on adjacent stream flows. Raising groundwater levels in the spring in local areas can be expected to have effects on the economics of land use – delay spring growth or the ability for local farmers to get into the field for plowing or planting, extension of the high water table season which can affect existing infiltration systems such as septic or stormwater infiltrators, and the need for expansion or increased maintenance of existing drainage facilities for private and public agencies. These effects, and means to mitigate or minimize these effects, are not discussed in the DPEIS.

In addition, we would like the sections describing the Yakima County Flood Control Zone District and Comprehensive Flood Hazard Management Plans to be modified to conform with the language supplied below for Sections 1.8.7 and 2.3.18:

7-5 **1.8.7 Yakima County Comprehensive Flood Hazard Plans**

As part of its Comprehensive Flood Hazard Management Plans, the Yakima County Flood Control Zone District (District) is currently implementing floodplain restoration projects that reduce flood risk and provide habitat restoration. These projects were identified in three Comprehensive Flood Hazard Management Plans (CFHMPs) that are adopted by the County and communities affected. The Upper

Yakima CFHMP was completed in 1998 and updated in 2007. The Naches River CFHMP was completed in 2005, while the Ahtanum – Wide Hollow CFHMP was completed in 2011. The District plans to develop a CFHMP for the lower Yakima River in cooperation with the Nation.

The Upper Yakima CFHMP includes the floodplain of Yakima River from the mouth of Yakima Canyon to Union Gap and the Naches River from its mouth to Twin Bridges. Actions currently being implemented under the CFHMP include floodplain restoration projects at several locations in the lower Naches River and in the Gap-To-Gap reach of the Yakima River through partnerships. A main focus is levee setbacks and floodplain reactivation. The District brings the ability to influence infrastructure placement (bridges, levees and diversions) and replacement in floodplains to further natural river functions. The District has provided projects at Eschbach Park, levee setback at SR24, infrastructure modifications at Ramblers Park, wrecking yard removal from the Wapato-Yakima River floodplain plus a number of actions already implemented in Ahtanum Creek and Lower Yakima River ahead of completion of the plans. In order to mitigate impacts the District is also implementing a study of stream channel functions and how infrastructure has altered the functions of the Yakima River "gaps" which are geological control points in the river.

7-5

2.3.1.8 Yakima County Comprehensive Flood Hazard Management Plans

Yakima County will continue to implement floodplain restoration projects that benefit river and habitat function under the No Action Alternative as part of its Comprehensive Flood Hazard Management Plans. See Section 1.8.7 for additional information on the plans. These projects are expected to benefit fish habitat as well as provide improved flood management, as they restore more natural dynamic river function.

Once again, we would like to thank you for the opportunity to comment on the Draft PEIS.

Sincerely,

Michael D. Leita
Board of Yakima County Commissioners

CC: J. Rand Elliott, Yakima County Commissioners
Kevin J. Bouchey, Yakima County Commissioners
Vern Redifer, Yakima County Public Services
Donald Gatchalian, Yakima County Public Services
Terry Keenhan, Yakima County Public Services

CITY OF YAKIMA
WASTEWATER DIVISION
2220 East Viola
Yakima, Washington 98901
Phone: 575-6077 • Fax (509) 575-6116

December 29, 2011

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Dear Ms. McKinley,

8-1 Thank you for the opportunity to comment on the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) Draft Programmatic Environmental Impact Statement (Draft EIS). The City of Yakima Wastewater Division supports implementation of the Integrated Plan. The Integrated Plan identified substantive actions for moving forward with water conservation and storage. It also provided a large list of potential habitat restoration actions that if implemented, would help restore many other benefits of our communities' water resources: clean water; fisheries; resilience to flooding; and other benefits.

8-2 Implementation of the Integrated Plan, in general, will benefit the City of Yakima and its surrounding communities. At the same time, the Draft EIS did not mention the major impacts that some of the projects could have on the City of Yakima's wastewater utility.

The Draft EIS for the Integrated Plan identified general impacts of the plan on utilities. It did not mention the impact of floodplain habitat restoration on the City of Yakima owned regional wastewater treatment facility's outfall into the Yakima River. The City of Yakima treats wastewater from Yakima, Union Gap, Moxee, Terrace Heights and some areas of Yakima County. On average, 10 million gallons per day of municipal and industrial wastewater is treated to meet water quality standards and discharged to the Yakima River in the Gap to Gap reach.

The DRAFT EIS states, in section "4.17.2.5 Habitat/Watershed Protection and Enhancement Element" that

> Construction for restoration projects could cause minor temporary disruption of utilities, but could be coordinated with local services and utilities and scheduled to minimize impacts.

8-2 The completion of floodplain habitat restoration in the Gap to Gap reach could cause a major disruption in service at the Yakima Wastewater Treatment Plant if the effects on the outfall and mixing zone of the WWTP are not mitigated.

8-3 The Draft EIS mentions that individual projects, such as the Gap to Gap Habitat Restoration will have specific Environmental Review completed before the projects are started. Please include the following language in the final Programmatic EIS:

> Completion of habitat restoration activities in the Gap to Gap reach of the Yakima River could have major impacts on the City of Yakima Regional Wastewater Treatment Plant's infrastructure. This has the potential to influence human health and safety related to discharge of treated wastewater from the treatment plant. Future environmental review for projects related to Gap to Gap restoration will identify mitigation costs and funding necessary to insure continued National Pollutant Discharge Elimination System Permit compliance and provision of safe, reliable wastewater treatment for over 100,000 customers.

This language should be reflected in each section where utilities are mentioned regarding the effected environment, short term impacts and long term impacts.

Sincerely,

Ryan Anderson

Ryan Anderson, Utility Engineer
City of Yakima Wastewater Division

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Folder # : 1194952

AHTANUM IRRIGATION DISTRICT

P.O. Box 563 Yakima, Washington 98907-0563
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Received in Mailroom
JAN 03 2012
Yakima, Washington

January 3, 2012

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

RE: Written comments regarding the Draft PEIS Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan)

Dear Ms. McKinley:

9-1 It is true that for years the Yakima River Basin has needed a master plan of some kind. However, the proposed Yakima River Basin Integrated Water Resource Management Plan that is now on the table is flawed and should not be considered in its current form for several reasons.

9-2 It is inaccurate to call it a Yakima River Basin plan when the entire Ahtanum Watershed has been excluded. The irrigation needs of the Ahtanum Irrigation District, the John Cox Ditch, and the northern portion of the Wapato Irrigation Project were ignored. Also ignored were all the benefits of Pine Hollow Reservoir, which would provide for irrigation, fish enhancement, fire protection, flood control, enhanced surface and ground water, and the economic benefits to landowners who would have a more reliable source of water throughout the entire irrigation season. Another benefit would be the possibility of hydropower production.

9-3 Another tremendous concern that was not adequately addressed is the government acquisition of 71,000 acres of private property. The taxpayers will have to fund this purchase. The Counties cannot afford this, and the State and Federal government cannot afford this. Taking this land out of production and off the tax rolls means everyone left on the tax roll will have to pay more to cover the deficit. The taxpayers will also have to pay for the management of this land, and it will not be managed any better than it is right now under private ownership.

9-4 This is a multi-million dollar "plus" project. Until a proposed Yakima River Basin plan truly includes the entire Yakima River Basin, and until the taxpayers know where this money is

9-4 coming from and how every single dollar is going to be spent, and until they are shown the benefit of every aspect of this plan, the Ahtanum Irrigation District is opposed to the proposed Draft PEIS Yakima River Basin Integrated Water Resource Management Plan.

Sincerely,

AHTANUM IRRIGATION DISTRICT

Kenneth P. Bates, Jr.
President

Cc: U. S. Representative Doc Hastings
Senator Jim Honeyford
Senator Curtis King
Rep. Bruce Chandler
Rep. Bill Hinkle
Rep. Norm Johnson
Rep. Charles Ross
Rep. David Taylor
Yakima County Commissioners

Comment Letter 10

From: Roger Satnik
To: BOR YRBWEP, sha-UCA
Cc: Ken Hasbrouck
Subject: comments draft EIS
Date: Thursday, January 12, 2012 1:22:24 PM

Candace,

10-1 Here are the Kittitas Reclamation District's comments on the Yakima River Basin Integrated Water Resource Management Plan Draft Programmatic Environmental Impact Statement. Sorry they are late.

10-2 Pg. 2-15, section 2.4.4.2, first paragraph : "The KRD system delivers irrigation water to more than 59,000 acres in the Kittitas Valley."

10-3 Pg. 2-15, section 2.4.4.2, first bullet point in second paragraph : "Piping of irrigation laterals along the KRD Main, North Branch, and South Branch Canals;"

10-4 Pg. 2-15, section 2.4.4.2, third bullet point in second paragraph : "Construction of a pump station on the Yakima River to deliver flows to tributaries in the Kittitas County."

10-5 Pg. 3-40, table 3-14 : Several entries on this table do not reflect recent fish passage projects. On Taneum Creek, the Bruton diversion was removed and Taneum Ditch fish ladder fixed. The KCCD has removed the barriers listed on Jack, Indian, Reecer, and Cherry Creeks. Maybe Coleman too. Contact Anna at 509-925-7888 ext4 for current information.

If you have any questions, let us know. Thanks.

Roger Satnik
Kittitas Reclamation District
509-925-6158

American Rivers * Conservation Northwest * National Wildlife Federation * Trout Unlimited
The Wilderness Society

January 3, 2012

Candace McKinley
U.S. Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901-2058

Derek Sandison
Washington State Department of Ecology
303 South Mission Street, Suite 200
Wenatchee, WA 98801

Dear Ms. McKinley and Mr. Sandison:

Our organizations appreciate the opportunity to provide comments on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Plan). Representatives of our groups have worked collaboratively with others for the past two years in the development of the Plan. We consider the issuance of a DPEIS an important milestone to help ensure the restoration of the Yakima Basin ecosystem, restoration of its fisheries (including all four anadromous fish species native to the basin, and three different runs of chinook salmon), and long-term protection of key landscapes.

The Plan, if implemented, will guide water and watershed management throughout the Yakima Basin and could act as a model for other watersheds around Washington State and the United States in terms of identifying and meeting instream and out-of-stream water demand and combining water management improvements with large-scale watershed restoration and protection. The Plan represents a shift from what is normally a reactive management of our water supplies to one that encompasses conservation and water efficiency, ecosystem restoration and protection and new in-basin water supplies. In the past century, coho and sockeye salmon have been extirpated from the rivers and streams in the Yakima Basin and both steelhead and bull trout are now listed under the Endangered Species Act. Thousands of members, staff and representatives of our organizations utilize the lands and rivers in the Yakima Basin for both work and play and a healthy, functioning ecosystem and healthy, fishable native fish runs are a high priority for each of our organizations.

11-1

While we support the Plan conceptually, there are many details that must be addressed both in the DPEIS and the political process moving forward for the Plan to be successful. These comments spell out the ways in which we believe the DPEIS needs: A) a comprehensive statement of Purpose and Need; B) an examination of a wider range of alternatives and a more broadly defined purpose on the water management side; C) more specific information to guide phasing and sequencing of plan projects and elements; D) more specific and detailed information about the targeted watershed protections and enhancements component of the Habitat Protection and Enhancement element; and E) an analysis of benefits and costs as required by federal policy. Finally, we detail in section F a number of specific comments and requests for more detailed changes.

A) The DPEIS Purpose and Need should better reflect the plan's ecological protection and restoration components

The addition of the Targeted Watershed Protections and Enhancements component of the Plan's Habitat Protection and Enhancement element, which includes land protection and land acquisition actions, was vital to earning support from our groups for the Plan. Section 1.3, Purpose and Need for the Action is virtually silent on the importance of the lands piece to enhancing healthy ecosystems in the basin. Land protection and acquisition ensure the protection of sources of water and habitat, provide spawning grounds for fish, and provide important floodplain functions. Language that addresses the importance of this piece to the success in meeting the stated goals, purpose and need for the plan needs to be included in the final EIS.

11-2

B) Purpose and Need is too narrowly defined in terms of water management goals and the DPEIS does not contain an adequate range of alternatives

Page 2-1 of the DPEIS claims that the Integrated Plan alternative "represents the only combination of programs, projects and resource allocations that could feasibly meet the objectives in the Purpose and Need statement. Therefore, only one action alternative is presented in this DPEIS." This would seem to indicate that the Purpose and Need is written too narrowly on the water management side to allow for analysis of a range of alternatives. For a project at the level of an EIS, much less such an expansive PEIS, examination of only one alternative is unacceptable. While this problem may be mitigated somewhat by the existence of past studies such as the Yakima River Basin Storage Feasibility Study EIS on Black Rock and Wymer dams from 2009, which considered a "storage only" alternative of sorts, the examination of other alternatives, as suggested below in more detail, is necessary.

Agencies have discretion regarding how they define the purpose and need of a project, but "an agency cannot define its objectives in unreasonably narrow terms." *City of Carmel-By-The-Sea v. United States Dep't. of Transp.*, 123 F.3d 1142, 1155 (9th Cir.1997). As the U.S. Court of Appeals for the D.C. Circuit stated, "[a]n agency may not define the objectives of its action in terms so unreasonably narrow that only one alternative from among the environmentally benign ones in the agency's power would accomplish the goals of the agency's action, and the EIS would become a foreordained formality." *Friends of Southeast's Future v. Morrison,* 153 F.3d 1059, 1066 (9th Cir.1998). The Integrated Plan may well be the option that will best and most closely meet the purpose and need envisioned by the Yakima Workgroup and this PEIS, but it makes sense from a legal and policy perspective to compare the Integrated Plan to other alternatives, such as alternatives without storage and without the Targeted Watershed Protections and Enhancements element.

11-3

The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA requires an agency to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. *See* 40 C.F.R. §§ 1502.14(a), 1508.25(c). "An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action." *Nw. Envt'l Defense Center v. Bonneville Power Admin*., 117 F.3d 1520, 1538 (9th Cir. 1997). An agency

violates NEPA by failing to "rigorously explore and objectively evaluate all reasonable alternatives" to the proposed action. *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. § 1502.14).

NEPA requires that an actual "range" of alternatives is considered, such that the Act will "preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished by only one alternative (i.e. the applicant's proposed project)." *Col. Envtl. Coal. v. Dombeck*, 185 F.3d 1162, 1174 (10th Cir. 1999), citing *Simmons v. U.S. Corps of Engineers*, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the environmental impact statement (EIS) from becoming "a foreordained formality." *City of New York v. Dep't of Transp.*, 715 F.2d 732, 743 (2nd Cir. 1983). *See also Davis v. Mineta*, 302 F.3d 1104 (10th Cir. 2002).

We appreciate that the Integrated Plan is complex and is the result of years of discussions amongst multiple stakeholders, including some of our organizations. However, we assert that any number of permutations on the themes presented in the seven elements could meet both the existing and an
11-3 expanded (as requested in this section and the preceding one) Purpose and Need or at least illustrate alternative approaches worth comparing in detail to the Integrated Plan. Despite the 2009 study of Black Rock and Wymer dams, we request that the Purpose and Need be expanded as discussed above to include watershed and lands protection and that two or three alternatives be added and evaluated in a Supplemental PEIS that is released for further public review and comment. As suggested above, one alternative should be the Integrated Plan without the new water storage components (Bumping expansion, Wymer dam, Kachess inactive storage, and the Keechelus-Kachess pipeline). Another alternative might be the Integrated Plan without the watershed land conservation subcommittee proposal and/or a less expensive version of the plan that is strategically scaled back across the seven elements to minimize overall cost.

Finally, what is meant by the "no action" alternative is unclear. For instance, is Cle Elum fish passage considered part of the "no action" alternative? It is hard to predict which smaller pieces of the Integrated Plan might gain adequate funding and political support to be implemented in the future without being part of a larger package of actions, but the final PEIS should better explain how it defines "no action."

C) The PEIS should provide more information to guide the phasing and sequencing of the YBIP's implementation

When it comes to the implementation phase of the YBIP, the plan will face significant challenges due to its high price tag. These challenges will likely become apparent when the plan is taken to Congress for
11-4 authorization and funding, as well as in negotiating the specific congressional request(s) from the Yakima Workgroup.

Almost inevitably, the Workgroup will need to prioritize certain projects ahead of others within each of the plan's elements. And it is of course possible that some projects envisioned in the YBIP will never be accomplished due to funding shortfalls, legal challenges, lack of adequate environmental mitigation, or

political resistance. To best judge which projects make sense to pursue first and most vigorously, the Workgroup and the public will need more information than is contained in the DPEIS with respect to 1) the cost of the projects (especially the larger ones, such as storage and fish passage); 2) the environmental and economic benefits of each project; 3) cost allocation for each project among the federal and state governments and private/irrigation district dollars; 4) information regarding how certain projects could work together to maximize benefits for fish and wildlife, recreation, instream
11-4 flow, and/or out of stream water supply improvements; and 5) a clear commitment to working with the U.S. Fish and Wildlife Service to ensure protection and recovery of species affected by the Integrated Plan. This much needed information, described in more detail below, will provide critical guidance in determining how to phase funding and authorization requests. A strong commitment to working with USFWS and other federal agencies such as NMFS and the U.S. Forest Service to protect and restore all Endangered Species Act-listed and candidate species affected by the plan will help ensure the durability of existing support for the Integrated Plan from our organizations.

1) Cost of projects

The Final Yakima Basin Integrated Plan from April 2011 lays out some initial cost estimates for various
11-5 projects, but it would be useful for the PEIS to refine those estimates. Even assuming that Congress would entertain authorizing projects prior to feasibility level analysis of major federal projects, Congress and the public will want and deserve a clearer idea than exists in the DPEIS of what it is being asked to commit to.

2) Benefits of projects

Good decision making in advance of an authorization and appropriations request, as well as potential further refinements in Congress, will require more information on the environmental and economic benefits of the various projects and elements of the YBIP, as well as how different configurations or
11-6 operations of the various projects could maximize these benefits. While the Plan lays out a general vision for reservoir operation and water supply, it is possible that project operations could be tweaked in a way that would help fishery restoration and/or recreation without affecting water supply reliability or otherwise benefit out-of-stream water users by reducing the size of their financial contribution to the project. It is also possible that one fish passage system design may prove more effective than another, and the magnitude of that benefit could be weighed against any increased costs. Further, the DPEIS fails
11-7 to analyze and understates the likely economic benefits associated with designation of land as Wilderness or National Recreation Area and rivers as Wild and Scenic. The final PEIS should include more information on these benefits (and any costs). We have attached or provided links below to numerous studies on the economic benefits of these designations.[1] Similarly, the final PEIS should look

[1] See:
http://wilderness.org/files/Dollars-and-Sense-Factsheet.pdf
http://www.wilderness.net/index.cfm?fuse=NWPS&sec=valuesEconomical
http://wilderness.org/files/Natural-Dividends-Wildland-Protection.pdf
http://www.americanrivers.org/assets/pdfs/wild-and-scenic-rivers/the-economic-value-of-rogue.pdf
See also the following documents, attached:

11-7 at the water supply (instream and out-of-stream) and water quality benefits from an environmental and ecosystem services perspective of protecting and/or restoring healthy forested watersheds, as is being considered for 46,000 acres of land in the Teanaway River watershed.[2]

3) Cost allocation

11-8 The DPEIS does not discuss even preliminary estimates of cost allocations among federal, state, and local governments or private entities. More guidance on federal expectations on cost allocation for various projects will be necessary to know what to request of various governments, and for private entities and other stakeholders to make decisions on which projects to prioritize given limited funds.

4) Analysis of how projects can be combined to magnify habitat and water benefits

11-9 More information is needed on which projects might be combined to achieve the most immediate bang for the buck for the various purposes and needs identified by the PEIS and the Integrated Plan. For instance, if Congress says only a portion of the funding needed to implement the entire YBIP is available for a first round of funding and authorization, which projects from each of the plan's elements ought to be pursued to make the most progress toward achieving the plan's ecosystem restoration and water supply goals? For instance, which of the three major water storage projects would provide the most benefit for farmers and fish? Which have the biggest negative environmental effects? Which fish passage projects provide the most fish restoration potential? What type of habitat restoration projects would be most effective with which fish passage projects? How and where can water conservation efforts and irrigation conveyance improvements best enable a more robust water market? It should be apparent from this preliminary list of questions that the ordering of projects will impact the ability of this plan to begin meeting its goals when it becomes clearer that some projects will be funded sooner than others. Better results with initial projects will create more momentum for funding the full plan over time.

5) Clearer commitment to working with the U.S. Fish and Wildlife Service to ensure protection and recovery of affected species

11-10 Finally, the final PEIS should explicitly commit to following the recommendations of the U.S. Fish and Wildlife Service regarding the environmental impacts of the Integrated Plan (particularly the water storage projects). As the Integrated Plan moves toward implementation and phasing and sequencing decisions, it is vital that the Bureau and Ecology to highlight a strong commitment to fulfilling the letter and spirit of the Endangered Species Act and other environmental laws for terrestrial species as well as

Final Okanogan-Wenatchee forestplan twscomments in a Word document;
Final TWS OWNF Proposed Action Comments in a Word document;
NFMA Rule DEIS Comment Letter;
"Economic benefits of wilderness";
"Economic Values of Protecting Roadless Areas in US" by Loomis;
Economic benefits of protected lands.

[2] See: http://www.fs.fed.us/ccrc/files/CC%20and%20Water%20In%20Brief.pdf

listed salmonids. The Fish and Wildlife Service's key concerns are highlighted as follows in the draft Fish and Wildlife Coordination Report for the Integrated Plan:

> 11-10 The major concerns with elements of the Integrated Plan include: (1) impacts to bull trout and their critical habitat, (2) loss of occupied northern spotted owl habitat and designated critical habitat, (3) removal of shrub-steppe lands to build a proposed reservoir, and (4) ensuring current and future habitat connectivity for aquatic species.....In addition, the Service strongly recommends that the conservation measures and recommendations within this document be incorporated into the Final Programmatic EIS and project level actions.[3]

We fully agree that the final PEIS should incorporate all of the USFWS conservation measures and recommendations.

11-11 In addition, the final PEIS, and certainly future project-level analyses, should include the species and habitat survey information that we requested in our scoping comments on this PEIS in June 2011 (see attached).

D) Include and Integrate the more detailed Watershed and Lands Component

1) *Include Watershed and Lands goals in the Purpose and Need*

11-12 The Targeted Watershed Protections and Enhancements component of the Habitat Protection and Enhancement element of the Integrated Plan (discussed in section 2.4.7 of the Integrated Plan) was adopted in concept by the Yakima River Basin Water Enhancement Project Workgroup in March of 2011. This adoption recognized that this component is integral to meeting the goals of the Integrated Plan. As such, and as discussed above, an augmented Purpose and Need of the DPEIS needs to clearly encompass this component of the Integrated Plan.

2) *Include the detailed Watershed and Lands Component in the FPEIS and provide more time for public comment on it*

11-13 The Watershed Lands Conservation subcommittee of the Yakima River Basin Water Enhancement Project Workgroup developed a robust proposal of watershed and lands protections that was adopted by the Workgroup on December 14, 2011 (see attached "Watershed Land Conservation Subcommittee Proposal dated December 5, 2011). The DPEIS fails to represent the entirety of this proposal and adequately integrate it into the analysis. We recommend the following actions to address this oversight:

- Include the adopted proposal and associated analysis in a supplemental PEIS (SEIS) for public review

11-14
- Include the Wilderness Act and the Wild and Scenic Rivers Act in the list of related permits, actions and laws (Section 1.10, page 1-31 and 1-32)

[3] http://www.usbr.gov/pn/programs/yrbwep/reports/DPEIS/findrftCAR.pdf, at pp. 52-53.

11-15
- Include National Recreation Area designation information

- Provide additional time for public comment on the details of the Watershed Land Conservation Subcommittee report, since this was not included (or ready) at the time of the release of the DPEIS.

11-16 Since some of our organizations have been active members in the subcommittee where discussion of National Recreation Areas has figured prominently, we are particularly disappointed that the DPEIS fails to mention National Recreation Area designation. We are aware that the DPEIS was written prior to the final adoption of the lands subcommittee proposal. The public needs an opportunity to know and understand that this designation is proposed at a significant level.

- Include background information on federal designations

11-17 The SEIS should include background information on National Recreation Area designation and management as well as the existence and associated designation and management for the Wilderness Act and the Wild and Scenic Rivers Act. For the Wilderness Act, we suggest including a link to the Wilderness Act Handbook, which can be found at: http://wilderness.org/files/Wilderness-Act-Handbook-2004-complete.pdf. For the Wild and Scenic Rivers Act, see: http://www.americanrivers.org/our-work/protecting-rivers/wild-and-scenic/what-it-means.html.

- Include all preferred river reaches for Wild and Scenic Designation, including the Teanaway River system

11-18 The list of rivers on page 2-25 of the DPEIS being recommended for Wild and Scenic Designation is seriously incomplete. A major omission that the public should be aware of is the entire stretch of all forks of the Teanaway River system found on public lands as well as the stretch included on the 46,000 acres of private lands in the lower part of the Teanaway valley. Based on the criteria for Outstandingly Remarkable Values for designation per the Wild and Scenic Rivers Act, the Teanaway offers outstandingly remarkable fish values due to the presence of a regionally significant population of steelhead, bull trout (both are ESA listed species), and depressed stocks of spring Chinook salmon. The Teanaway also possesses exceptionally high quality habitat that is complex, diverse, and capable of supporting steelhead, bull trout, and spring Chinook salmon. In addition, Wild and Scenic rivers can be managed consistent with a need for river and stream restoration activities to take place, which will be necessary in parts of the Teanaway system for it to reach its full potential as salmon and steelhead habitat. Please see attached letter for a detailed analysis of the values of the Teanaway River system that meet the threshold for designation (September 28, 2011 joint letter American Rivers et al.). Equally importantly, the Cooper River, Rattlesnake Creek, S. Fork Tieton River, Indian Creek, Rainier Fork, and Deep Creek are recommended for designation and should be incorporated in the final PEIS.

11-19
- Integrate the watershed and lands component throughout the SPEIS

11-19 The integration of the Targeted Watershed Protections and Enhancements component needs to be done throughout the SPEIS – in the description of the Integrated Plan alternative, in the affected environment, and in both the short- and long-term impacts analyses. The analysis needs to demonstrate the link between the proposed protections in the Targeted Watershed Protections and Enhancements component and the Purpose and Need. Given that National Recreation Area designation is managed as described in enabling legislation, the description in the DPEIS must be clear that the NRA designations must include stated protections of the watershed values for water quality and quantity for fish, human consumption, and irrigation. The Wilderness Act ensures that wilderness designation will accomplish these protections. Specific to the impact analyses, the watershed and lands component clearly has significant impacts (primarily positive) on earth, vegetation, fish, wildlife, recreation, climate, air quality, noise, and socioeconomics and must be integrated as such.[4]

- Incorporate the Kittitas County land use and economic impacts study in the FPEIS

11-20 The Yakima Basin Study is supporting a Kittitas County Citizen's Advisory Committee (the Integrated Water Resources Management Plan CAC) which is specifically charged with analyzing the land use and economic impacts of the watershed and lands component on Kittitas County and recommending mitigation measure to address any negative impacts that may result. We are pleased by the diverse make-up of the committee and the work underway. Due to the fast timeline of the DPEIS, the analysis from the CAC will not be complete by the January 3rd comment deadline. However, the results must be incorporated into the FPEIS. In this incorporation, it should be noted that the land use and economic impacts to Kittitas County are a segment of the overall land use and economic impacts of the Integrated Plan and cannot be construed as a comprehensive accounting of the economic impact on all parties (both within and beyond the Basin).

- Ensure the Adaptive Approach supports watershed and lands actions

11-21 We understand the need for and support the "Adaptive Approach" described in section 2.4.10 of the PDEIS (p. 2-31) for plan implementation. The associated Adaptive Approach document should support and implement actions that are part of and consistent with the watershed and lands component. It should be emphasized that the series of preferred and alternate watershed and lands actions presented in the proposal developed by the Watershed Land Conservation Subcommittee should be pursued first and foremost.

The DPEIS states that "[t]he adaptive approach would be formalized with written protocols and standards in an Adaptive Approach document, to be developed within the first three years of

[4] Due to the project's impacts (positive and negative) on terrestrial habitat connectivity for multiple species, the FEIS should reference the scientific products from the Washington Wildlife Habitat Connectivity Working Group (www.waconnected.org). Currently a statewide habitat connectivity analysis in current condition and considering climate change are available, and by the release of the final PEIS a finer scale analysis on the Columbia Plateau ecoregion will be released. These products are collaboratively developed by federal and state agencies, NGO's, universities, and indepedent scientists reflecting the best available scientific information and tools to understand habitat connectivity in our state

11-21 implementation (p. 2-31)." Overall, the FPEIS should include more detail on the Adaptive Approach regarding how and who will be involved in the development of the adaptive approach and the anticipated public process.

3) *Include the Gold Creek bridge project as a short-term watershed and lands action opportunity*

11-22 As a prime example of a significant additional need consistent with the purpose of the Targeted Watershed Protections and Enhancements component, we request the FPEIS include replacement of the Gold Creek bridge on Forest Service land near Snoqualmie Pass on the list of short-term actions. The purpose of this bridge replacement is to restore the Gold Creek floodplain and provide for aquatic and terrestrial species population connectivity while maintaining public access. This project is consistent with the purpose of the "mainstem floodplain and tributary fish habitat enhancement program" component of the Integrated Plan (2.4.7.2 of the PDEIS) and has already completed NEPA (see attached Project Description and Finding of No Significant Impact). The project demonstrates a compelling need given its critical role in the ultimate success of the habitat work underway associated with the expansion of I-90 near Lake Keechelus. The existing Gold Creek bridge and Forest Service road impede fish and wildlife movement through the Gold Creek corridor and the I-90 project replaced a bridge downstream of the Forest Service bridge. Without replacement of the upstream bridge, the habitat improvements downstream, including fish passage will not benefit fish and wildlife trying to move upstream or downstream of the bridge.

4) *Clarify that environmental and public review of the federal designations occur in Congress*

11-23 The DPEIS states that "[d]esignations would include additional public involvement and environmental review specific to each area proposed for designation (p. 2-26)." Federal designations are the purview of Congress and the congressional process is the appropriate forum for the necessary public involvement and environmental review. As such, we suggest that the statement above be revised to read "The standard congressional legislative process for federal designations would provide the necessary place-based public involvement and environmental review specific to each area proposed for designation."

Attachments and links:

11-24
- Watershed Land Conservation Subcommittee Proposal. Yakima Basin Study. Proposed Integrated Water Resource Management Plan. December 5, 2011.
- Gold Creek Bridges and F.S. Road #4832 Reconstruction Decision Notice/Finding of No Significant Impact (http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/69353_FSPLT2_055362.pdf)
- American Rivers, et al. letter on the Okanogan-Wenatchee Forest Plan Revision Proposed Action (9/29/11).

E) Evaluate the benefits and costs of the Integrated Plan as required by federal policy

11-25 The Socioeconomic Impacts sections of the DPEIS (§3.22, §4.22 and §5.22) do not give any detail or analysis of the economic impacts of the proposed action. Instead that analysis is deferred to consideration of specific projects to be carried out as part of the Integrated Plan. Current federal policy requires analyzing a water project under the Principles and Guidelines for Water and Land Related Resources Implementation Studies (P&G) prior to being authorized by Congress. The DPEIS in sections evaluating socioeconomics (§§4.22 and 5.22) notes that as "specific projects are carried forward to implementation in the Integrated Plan, they would undergo a detailed determination of potential socioeconomic effects, including the assessment required by the" P&G (pp. 4-62 and 5-102). This deferred analysis of socioeconomic impacts presents some problems for the DPEIS which should be addressed in the final PEIS.

1) *Programmatic effects of the Integrated Plan are not evaluated*

11-26 In the DPEIS, the Integrated Plan is presented as a whole, "optimized during nearly three years of discussion" (p. iii). It is presented as the sole alternative – "the only combination of programs, projects, and resource allocations that could feasibly meet the objectives" (p. iii). However, the socioeconomic impacts of the Integrated Plan as a whole, integrated project will not ever be evaluated under the procedure indicated. Instead, various pieces and project elements of the Integrated Plan will be evaluated separately on a project-by-project basis. Given that this DPEIS is designed to evaluate that overall, programmatic impact, especially those that would not be adequately considered in a project-by-project analysis, this is a serious deficiency. The Programmatic EIS should evaluate the programmatic socioeconomic impacts.

2) *Gaining Congressional authorization of Integrated Plan as a whole is made more difficult without meeting P&G requirements*

11-27 As noted, Congress and the Administration typically require completion of a Feasibility Study that includes compliance with NEPA and the P&G prior to approving water projects. While individual project elements may be subject to this kind of analysis at some later date as indicated in the DPEIS, the project as a whole apparently will not be. That makes obtaining Administration and Congressional support for the project as a whole problematic. It may be that the project will be developed in phases, with specific groups of projects proceeding prior to the rest of the Integrated Plan. However, by both characterizing of the Integrated Plan as a whole package, and failing to provide any analysis that might guide phasing of the projects, providing a rigorous basis for that subsequent phasing is made more difficult.

In addition to these two specific comments, we have three more general comments regarding analysis not performed in this DPEIS.

11-28 First, the approach of evaluating parts of an integrated project separately, but not the whole is typically taken when the environmental impact of a project as a whole is anticipated to be greater than the sum of its parts. In the case of the Integrated Plan, the negative impacts of some of the parts are significant, especially for building or expanding reservoirs. However, when taken as a whole, the net effect of the

project is anticipated to be positive both economically and environmentally. If that analysis is performed with the guidance of the draft revisions to the P&G which are currently circulating, the net effect is anticipated to be strongly positive. While it may be difficult, undertaking rigorous socioeconomic analysis of the project as a whole is almost certainly worthwhile.

Second, Congress typically requires that a project's benefit-cost ratio be greater than 1.0, and more recently in the context of Corps projects, greater than that, as a prerequisite to passing authorizing legislation. The draft PEIS presents results of a prior analysis under the P&G for the most expensive of the proposed action elements, the Wymer Dam and Reservoir, see §1.9.1. Wymer's benefit-cost ratio was only 0.31, far below that typically required for authorization. The only way to get to a positive CBR is likely to look at the project as a whole.

11-28

Third, as noted in section C above, authorizing and funding the Integrated Plan is going to be a significant challenge from a political and congressional point of view, largely due to the plan's price tag and competition from other water and ecosystem projects in other parts of the region and the nation. The DPEIS does not currently create a sufficiently compelling basis for explaining the very real potential of the Integrated Plan to be a compelling model for combining water management improvements with ecosystem protection and restoration. To do this, the final PEIS will need more and better economic and ecosystem services analysis, a clearer explanation and analysis of large scale environmental benefits (and trade-offs), and a clearer and more crisp explanation of why the plan makes sense in a climate change adaptation context.

F) Other comments

	Page/Section Number	Comment
11-29	Ii, 1-4	Add a fisheries and habitat purpose: Protect and restore salmonid fisheries in the basin by meeting and exceeding in-basin recovery goals for bull trout and steelhead, and by developing healthy populations of naturally spawning sockeye, spring chinook, coho and resident trout.
11-30	Iii	2nd ¶ With the need to phase the project becoming apparent, there is a concurrent need to prioritize the project elements. As a Programmatic EIS, this document needs to provide a basis for the phasing by addressing the relative contributions of each element to meeting the goals and purposes, as well as the cost (in both economic and ecological terms) of each element.
11-31	Iv	Unclear which of the project elements are within the No Action alternative. Given the criteria given – "authorized and have identified funding for implementation …and are scheduled for implementation:" none of the fish passage and little of the habitat work would qualify; little of the water conservation work or other YRBWEP work beyond this fiscal year would qualify. Yet the No Action fishery numbers still provide some decent improvement over current returns
11-32	Vii	Evaluation of water quality impacts is inadequate. No Action will have significant impacts due to climate change
11-33	Xi	Recreation – note positive impacts of National Recreation Area designation.

11-34		Last line on this page seems to be confusing habitat protection and acquisition goals with restoration activities, which don't necessarily share the goal of limiting impact on existing land use. And in some cases, some acquisition targets should see changes in land use in specific areas due to restoration needs – the final PEIS should create more flexibility here, or at least a better definition. For instance, is creating a stream buffer where one doesn't currently exist a "change in land use"?
11-35	Xii	Cultural Resources – Salmon and steelhead runs are cultural resources, especially for the Yakama Nation.
11-36	Xiii	The storage projects discussed in the Integrated Plan will improve passage, not impede it – if they end up creating new passage problems they will lose support.
11-37	§1.3	Need to make the purposes and goals more specific – while we have the 70% water supply, need to add fishery goal (An ten year average escapement of 250,000 returning salmon and steelhead?) and lands (miles of restored habitat, tributaries re-watered, land acquired, land protected, river miles protected)
11-38		In addition, Section 1.3 states that pumping ground water for irrigation and municipal uses *may* reduce surface water flows in some locations and *may* affect existing water right holders. Recent studies by USGS show that pumping ground water does affect river flows and, by implication, existing water right holders. Assurance that these impacts – and the impacts and ways to address similar problems created by exempt wells – are taken into account and addressed to the extent possible remains an important part of the scope and goal for the Plan.
11-39	§1.5.1	The dams on the four reservoirs did more than just "contribute" to the extirpation of sockeye in the basin, they assured it.
11-40	§1.8.9	Should be noted that Washington Rivers Conservancy is now the Washington Water Project of Trout Unlimited – see also same issue at §2.3.1.10.
11-41	§1.10	Add Wild and Scenic Rivers Act, wilderness Act, Hoover Power Plant Act of 1984 OTHERS?
11-42	§2.4.3	While the intent may be to operate fish passage within existing operational constraints, the Yakima Project is not operating within a completed ESA Section 7 consultation. Given the presence of listed aquatic species (notably steelhead and bull trout) compliance with Section 7 is necessary. Operational constraints may be different once such consultation is complete. The role of the ESA and consultation should be noted in this section.
11-43		In addition, more fish flows could reduce the project costs allocated to water users.
11-44	§2.4.4.5	Wapatox consolidation: Other projects are subject to more benefit-cost analysis, but are assumed part of the plan. This one should be no different.
11-45	§2.4.5.2	Note that removal of Roza Dam will be evaluated as part of the Wymer Dam project here and/or in later more detailed discussion of Wymer.
11-46	§2.4.7.1 p 2-25, 26	Description of the wild and scenic designations proposed by the watershed subcommittee is incomplete – add all rivers in the subcommittee report. Correct first paragraph on page 2-26 with correct references to either the forest plan or the proposed revisions for the appropriate river designation. Add reference to designation as National Recreation Area as proposed by the subcommittee.
11-47		**Note that §5.15.2.5 discusses the Wilderness (and presumably the NRA) and Wild and Scenic designations as separate from the Integrated Plan – that was not the intent of the Workgroup or the Lands Subcommittee. Reclamation may not like these elements, but**

11-47		**they are part of the Integrated plan**
11-48	§2.4.8.2	The municipal conservation should also seek to reduce non-consumptive uses in order to reduce/minimize withdrawals at the point of diversion, as there is typically some distance between diversion points and the point of return flows.
11-49	§3.3.2.1	We appreciate the importance of snowpack to the basin's water supply, and the tenuous hold that the snowpack has in an era of climate change and warming. But snowpack is snowpack – it needn't be callled a "sixth reservoir," or at least put "sixth reservoir" instead of "snowpack" in parentheses.
11-50	§3.3.4.5	Check with NMFS and the YKFP about lack of salmon access to the Teanaway in "most" years – recent flow improvements may have changed this.
11-51	§3.3.5.1 p3-17 Also §3.5.5.3 p 3-21	Surely Reclamation has data on TWSA and proration from the last six years – data ends in 2005
11-52	§3.5.5.3 p 3-21	The actual historic water use from the Reclamation contractors should be given, not just their entitlement. Please add this information.
11-53	§3.8 and §3.9	Part of the Integrated Plan is restoration of runs of salmonids numbering in the hundreds of thousands. There is a significant body of literature, most out of SE Alaska, that analyzes the effect of marine nutrients on both vegetation and wildlife. Narrowly defining the affected area for vegetation and wildlife to the areas disturbed by construction and inundation misses the effect of additional nutrients provided by fish carcasses. This issue is raised in §5.5.2.1 with respect to water quality, but should be addressed more broadly. In §5.8.2.1 the effect on vegetation of nutrients should be noted as a positive impact.
11-54	§3.15	Recreation analysis should include the terrestrial activities that would be affected by the watersheds lands proposal
11-55	§3.22.2	If you're going to cite Huppert's cost-benefit information, it would be appropriate to cite Griffin's 2005 response pointing out that Huppert's projected gains and losses from changes in crop acreage fail to take into account the effect of increases or decreases in production on crop price, thereby exaggerating the economic benefits of increased acreage.
11-56	§5.3.2.1	Significant increases in TWSA are projected, especially in dry years. Where is the use of that water specified?
11-57	§5.5.2.3	This would be a good place to mention the Roza dam removal study – please refer to it here.
11-58	§5.7	The conditions in the "baseline" scenario need to be better defined. Is it conditions now?
11-59	§5.7.2.5 p. 5-42	These seem like fairly high/optimistic smolt-to-adult ratios – are they supported by performance under current conditions?
11-60	§5.9.2.3	Maybe say "partially" offset by land acquisition and enhancement if the conclusion is that Wymer still contributes to regional declines in some wildlife communities. If it's truly offset, there should be no such contribution.
11-61	§5.10.2.3	Provide total acreage of land inundated by Wymer – it is not in the DPEIS.
11-62		Will additional land be put into agricultural production due to increased and increased reliability of water supplies? State so, and impacts.
11-63	§5.15.3	The lands element is designed to significantly enhance recreation. Correct the statement that the Integrated Plan "would not result in long-term impacts on recreational resources."
11-64	§5.17.2.3	Estimate the quantity, source and cost for electricity needed for pumping for the Wymer project.
11-65	5-102 §5.22	The DPEIS says that detailed socioeconomic effects will be done for specific projects. Yet

11-65		the DPEIS has only one action alternative because the project is Integrated. How can an integrated project be split up for analysis?

Thank you for your consideration of these comments, and we are happy to discuss them further if you have any questions.

Sincerely,

Michael Garrity
Washington State Conservation Director
American Rivers

Mitch Friedman
Executive Director
Conservation Northwest

Steve Malloch
Senior Water Program Manager
National Wildlife Federation

Lisa Pelly
Director, Washington Water Project
Trout Unlimited

Peter Dykstra
Pacific Northwest Regional Director
The Wilderness Society

Alpine Lakes Protection Society - Endangered Species Coalition
Kittitas Audubon Society - Federation of Western Outdoor Clubs
The Mazamas - North Cascades Conservation Council
Sierra Club - Western Lands Project – Western Watersheds Project

January 1, 2012

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

RE: Draft Programmatic Environmental Impact Statement for the Yakima River Basin Integrated Water Resource Management Plan
Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley:

12-1 We have reviewed the Draft Programmatic Environmental Impact Statement (DPEIS) for the "Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project", Benton, Kittitas, Klickitat, and Yakima Counties, Washington, issued by the Bureau of Reclamation (BuRec) and the Washington State Department of Ecology (Ecology). *76 FR 71070 (November 16, 2011)*. In addition to compliance with the National Environmental Policy Act (NEPA), the DPEIS must also comply with the State Environmental Policy Act (SEPA).

GENERAL COMMENTS

12-2 Procedures and Due Process
* The DPEIS (cover letter, page 1) states that BuRec and Ecology "working with the Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup," developed the proposed Integrated Plan. We object to the manner in which the BuRec and Ecology funded this Workgroup.

Q. What was the selection process for the "Workgroup?"
Q. Were any organizations denied membership in the "Workgroup?"
Q. Why did the BuRec choose to form a "Workgroup" rather than use the existing Yakima River Basin Conservation Advisory Group, established under the Federal Advisory Committee Act?

12-3 Q. What is the total amount that has been spent by the BuRec and Ecology on the "Workgroup" from 2009 through current?

12-4 Comment period.
* The BuRec and Ecology have allotted a 49-day comment period, which is an inadequate time for comments. We fail to understand the haste by which the BuRec and Ecology are proceeding. The scoping comment period was held from April 2, 2011, to June 14, 2011.
Q. Why are the BuRec and Ecology allotting far less time for comments on the actual DPEIS than they did for the scoping process?

12-5 Workgroup Subcommittees
Q. Why did the BuRec and Ecology allow Workgroup Subcommittees to meet without public notice?
Q. Please list all Workgroup subcommittees and the dates of all Workgroup subcommittee meetings.

12-6 Workgroup Proposal
The "Workgroup" proposal (April 11, 2011) Sec. 3.1.3 called for an evaluation of a Columbia River to Yakima Basin transfer that would involve an initial screening step and subsequent feasibility study. The DPEIS now states that because the Columbia River Pump Exchange proposal is a study and not a proposed project at this time, it is not analyzed in this DPEIS.
Q. How does the decision to exclude a Workgroup proposal from the DPEIS comply with NEPA/SEPA?
Q. Who made this decision?

12-7 The "Workgroup" proposal (April 11, 2011) Sec. 3.1.5 called for targeted watershed protections and enhancements. On Dec. 5, 2011, after the beginning of the DPEIS comment period, the Watershed Lands Conservation Subcommittee released its proposal, which now includes the establishment of National Recreational Areas on National Forest Service land focusing on motorized recreation.
Q. How does the decision to add a Subcommittee proposal submitted after the beginning of the DPEIS comment period comply with NEPA/SEPA?
Q. Who made this decision?

12-8 Reliance on New Dams and Storage
Since the 1979 passage by Congress of the Yakima River Basin Enhancement Project, the BuRec and Ecology have failed for over 30 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.

We remain 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
12-8 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
> 12-9 1,900 acres of old-growth 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
> 12-9 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).*

12-10 * What are the Yakima irrigation districts growing? How much acreage is devoted to surplus crops? Is the Kittitas Reclamation 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? Please document the actual water conservation measures carried out by each irrigation district.

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

12-11 * 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?

12-12 * What is the current contribution to early spring runoff from clearcuts on the Wenatchee National Forest, DNR land and private forestry land in the

12-12 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 instream flows throughout the summer.

More Specific Comments

12-13 As set out in 40 C.F.R. Section 1503.3 and WAC 197-11-550, we submit the following specific comments concerning the inadequacies of the DPEIS. We cannot address the merits of the alternatives, because the BuRec has failed to rigorously explore and objectively evaluate all reasonable alternatives:

Section 2.3.1 Ongoing Projects

Section 2.3.1.1 describes the Yakima River Basin Water Enhancement Project water conservation project (YRBWEP Phase 2) and the completing of a Basin Conservation Plan in 1999.

12-14 * Please identify all water conservation measures carried out in the Yakima River Basin between 1979 and 1999 and the amount of acre-feet of water conserved.

* Please identify all water conservation measures carried out in the Yakima River Basin between 1999 and 2011 and the amount of acre-feet of water conserved.

Section 2.4.3 Reservoir Fish Passage Element

12-15 * This section states that providing unimpeded fish migration past the existing BuRec dams would provide fish benefits. How is unimpeded fish migration consistent with existing storage dams? Is the BuRec equating proposed fish passage as the equivalent of a free-flowing river? Please delete the term "unimpeded" as dams with fish passage do not meet the definition of "unimpeded."

This section references a 2006 "Settlement Agreement between the Yakama Nation and Reclamation."

* How does this settlement obligate the BuRec to undertake fish passage at the five existing large storage reservoirs independent of any further action under the proposed "Integrated Plan"?

12-16 * If fish passage at BuRec dams is already a BuRec obligation, then this element should be moved to Section 2.3.1 – Ongoing projects.

* Section 2.4.3.1 states that environmental review has been completed for the Cle Elum Dam Fish Passage Facilities. 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). Therefore, we request that this project should be moved to Section 2.3.1 – Ongoing projects.

12-17 * The Yakima Workgroup Integrated Water Resource Management Plan Summary Support Document (YRBSSD) (dated March 23, 2011), 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.

* If only minor instream flow improvements take place in the lower Yakima how will fish passage at Cle Elum be enhanced?

12-18 * Section 2.4.3.2 states that upstream and downstream fish passage would be installed at Bumping Lake. 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.

12-19 * Would similar improvements to the existing Bumping Lake Dam be cheaper than at an expanded dam?

* Would benefits to fish increase if the existing Bumping Lake Dam were to be removed?

12-20 * Section 2.4.3.3 states that upstream and downstream fish passage would be installed at Tieton, Keechelus, and Kachess dams. 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 Indian Nation and BuRec?

12-21 * Regarding Section 2.4.3.4, what is the specific location and design of the proposed upstream and downstream Clear Lake Dam passage?

* This section states that a new pool/weir fish ladder located on the left abutment of the dam would provide both upstream and downstream fish passage. How does a fish ladder provide downstream passage?

* What anadromous or resident fish species would use the improved existing or new Clear Lake Dam upstream and downstream passage?

* What is the 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 Clear Lake Dam fishway?

12-21 ***** If only minor instream flow improvements take place in the lower Yakima and no instream flow improvements on the Naches River occur, how will fish passage at Clear Lake be enhanced?

* If upstream and downstream fish passage facilities have not been designed for Tieton Dam, how can improved anadromous salmonid access to habitat above Clear Lake dam be estimated or assumed?

Section 2.4.4 Structural and Operational Changes Element
Section 2.4.4.1 describes the Cle Elum Pool Rise.
* Why wasn't this project included in Section 2.4.5 under Surface Water Storage Element?
* This proposed project was not evaluated as part of Ecology's 2009 Yakima River Basin Integrated Water Resource Management Alternative Final EIS.
12-22 * What are 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? During 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?

Section 2.4.4.2 describes the Kittitas Reclamation District Canal Modificatons.
12-23 * What is the legal mechanism by which conserved water from the KRD laterals could be transferred to enhance instream flows?.
* Under the 1945 Consent Decree, would the KRD retain the same water rights to any re-regulation reservoir water during a drought year?

Section 2.4.4.3 describes the Keechelus to Kachess (K to K) pipeline
This project would be coordinated with on-going construction of I-90.
12-24 * How realistic is this given the time period need to complete this DPEIS and any additional site-specific EIS review?

Section 2.4.4.4 describes Subordinate Power at Roza Dam and Chandler Powerplants.
12-25 * What type of mitigation agreed upon and approved by BuRec, Bonneville Power Administration and either Roza or Kennewick Irrigation District as applicable would be considered?

Section 2.4.4.5 describes Wapatox Canal Improvements
This section 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
12-26 users may choose not to 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 and clearly disclose those elements dependent on voluntary participation.

Section 2.4.5 Surface Water Storage Element
The following are specific comments on Section 2.4.5 the Surface Water Storage Element of the DPEIS.

1. <u>Alternatives</u>
12-27 * The PEIS should evaluate other alternatives that restore instream flows to the Yakima River Basin and tributaries including a greater range of water conservation savings (see comments on enhanced water conservation below).

2. <u>Earth Resources</u>
12-28 * What studies has the BuRec carried out to evaluate the potential impacts resulting from earthquakes on any of the proposed storage reservoirs?

3. <u>Air Resources</u>
Section 4.13.2 states, "Information is not currently available to estimate whether construction of the Integrated Plan elements would exceed the Ecology guidance level of 25,000 metric tons." This is a
12-29 serious data gap and BuRec should obtain this information as required under 40 C.F.R. Sec. 1502.22(a).

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

4. <u>Water Resources</u>
12-30 * What is the likely amount of spills of contaminants into waters of the United States from new storage construction?
* What measures are proposed, such as an emergency response plan to mitigate impacts?

12-31 Table 3-12 contains Yakima River Basin Tributary 303(d) Listings, while Table 3-13 contains Yakima River 303(d) Listings. Both of these tables do not provide information past 2008.

12-31 * Please provide this information for 2011 or the latest year for which such data is available.

Since 1996 only two tributaries appear to have improved water quality parameters (Teanaway River – temperature in 1998/none in 2008 and Wilson Creek – Fecal Coliform in 2004/none in 2008). All other parameters have not improved or have gotten worse.
* Why has there been so little water quality improvement in the Yakima Basin since 1996?
12-32 * Would reducing irrigated agriculture in the Yakima Basin result in improved water quality?
* Has Ecology developed a water quality restoration plan (Total Maximum Daily Load) for the water bodies in the Yakima River Basin 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 construction of storage reservoirs result in no net degradation of water quality to these listed waters?

12-33 * How will the anti-degradation provisions of the Clean Water Act be met for the construction of new storage reservoirs?

* How will the Clean Water Act (CWA) Section 404 requirements for wetlands be met?
* What quantifiable impacts to adjacent wetlands or indirect impacts to wetlands such as hydrologic changes due to increases in impervious surface would occur due to construction of new storage reservoirs?

* Because the DPEIS fails to evaluate alternatives, the BuRec and Ecology must disclose that the DPEIS cannot be used to comply with the Clean Water Act Section 404(b) guidelines.

12-34

* What specific wetland areas 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?

* How does the BuRec intend to comply with Executive Order (E.O.) 11990, Protection of
Wetlands?

12-35 * Will the proposed construction of new storage reservoirs require any additional dredging?

5. <u>Fishery Impacts</u>

12-36 * What specific impacts will occur 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?

* What specific impacts will occur due to physical and acoustical impacts during construction and operation?

Section 6.2.2 states that the BuRec will not carry out a Section 7 consultation under the Endangered Species Act. Without a consultation under the ESA, no "early action" projects can proceed. The ESA requires cumulative impact analysis, not a piecemeal approach.
12-37 * Which specific project elements will require Section 7 consultation?
* How will the BuRec address cumulative endangered species impacts?
* How will the BuRec asses fisheries and benthic impact requirements for an Essential Fish Habitat Assessment per the Magnuson Stevens Act?

* Will future 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?

12-38 * What impacts will occur between the benthic, fisheries and avian resources?

* What predator-prey interaction studies were conducted to evaluate the potential impacts in siting additional dam projects within the Yakima River Basin?

6. <u>Biological Resources</u>

* What mitigating impacts does the BuRec propose due to the destruction of endangered species habitat?
12-39 * What are the specific critical habitat areas for each listed or proposed endangered species within the Yakima River Basin?

* What endangered species recovery plans are being carried out within the Yakima River Basin?

Section 3.9.2.5 contains a brief summary of movement corridors in the Yakima River Basin.
12-40 * Please identify on a map the known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation within the Yakima River Basin.

12-41 * What specific impacts will the proposal have on aquatic and terrestrial habitat fragmentation caused by roads, land use, and management activities, and human activity?

12-42 Section 3.10.10 states that Bumping Lake and the surrounding forests to the south and northeast are within spotted owl Critical Habitat Unit (CHU) Number 6.
* How does flooding out this habitat aid in the recovery of the spotted owl?

12-43 * What impacts would new dam construction and operation have on the Pacific Lamprey? How would the proposal contribute to the recovery of the Pacific Lamprey?

12-44 **7. Avian Impacts**
* What impact will the proposal have on migratory birds?
* What new field studies were undertaken for the DPEIS?
* What impact will the proposal have on (1) bird migration, (2) food availability, (3) predation, and (4) benthic habitat and benthic food sources?

12-45 **8. Noise**
Section 4.14 describes noise impacts.
* What underwater noise levels would result from the proposed in-water construction?
* Has the BuRec carried out an assessment of the magnitude and frequency of underwater noise and vibrations, and the potential for adversely affecting fish and mammal habitats and migration?
* 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?

12-46 **9. Environmental Health**
* What quantities of hazardous materials are involved with the proposal?
* How will disposal of hazardous materials be carried out?

12-47 **10. Land and Shoreline Use**
Section 5.16 describes land and shoreline uses.
* What changes to state and federal land-use laws, plans and policies would be required due to the proposal?
* What State Shoreline Management Act substantial development permits are anticipated to be needed due to the proposal?

12-48 * Would any cabins along the existing Bumping Lake shoreline be flooded by an Enlarged Bumping Lake? If so, would any new cabins be constructed?

12-49 * What entity would own the land around any new Wymer Dam? Would any Wymer Dam shoreline be made available for second home development?

12-50 Because the DPEIS does not provide a range of alternatives this document cannot be used to satisfy the Section 404(b)(1) guidelines for review of any permits for the disposal of dredged or fill material under Section 404 of the federal Clean Water Act.
* What Section 404 permits are anticipated to be needed due to the proposal?

12-51 **11. Aesthetics**
* What aesthetic mitigation provisions will be provided to address the need for landscaping or buffers?

12-52 **12. Recreation**
* How will the loss of recreational opportunities at Bumping Lake due to a new dam be mitigated?

12-53 **13. Transportation**
* How many daily, weekend, and seasonal vehicle trips would be generated, including trips by employees and service due to the proposal?
* What increase in road maintenance costs are attributable to the proposal?
* What measures will be carried out to mitigate for traffic impacts due to the proposal?
* What is the capacity of local roads to accommodate additional traffic associated with the proposal? Will there be added congestion at any road crossings due to the proposal?
* What transportation impacts to Goose Prairie would occur due construction of a Bumping Lake Enlargement project?

12-54 **14. Public Services and Utilities**
* What will be the need for additional public services, including public safety and emergency services due to the proposal?
* What impacts to local school systems in the Yakima River Basin can be expected due to the proposal?
* How will housing needs for employees be addressed? Where will employee construction housing be developed?

12-55 **15. Cultural Resources**
* What cultural resources analysis have been carried out to identify all historic properties or cultural resources potentially impacted by the proposal or associated offsite development, including traditional cultural properties, other Native cultural resources, and non-Native historic properties?

* What impact would the proposal have on Yakama Indian Nation sacred sites and fishing grounds?

12-55 * Has the proposal fulfilled the requirements of Section 106 of National Historic Preservation Act including coordination with the State Historic Preservation Officer?

16. Socio-Economics

* Can Section 5.22 clarify the time frame for the assessment of economic and social impacts over 10, 20, and 50 years?
* What research was carried out on the socioeconomic effects of other similar projects on other communities?
* What will be the demand for hotel rooms in the Yakima River basin due to the proposal?
* How many jobs will be created; at what wage levels? What percentage of work would be reserved for local contractors?

12-56 * What will be the consequences on property values and property taxes in the Yakima River Basin?
* What will be the impacts from the proposal on existing restaurants, hotels, motels, RV facilities, and other overnight tourism lodging facilities?
* Will there be a loss of workers from existing businesses?
* What nationally accepted socio-economic professional or scholarly data was used to evaluate the potential impacts from the proposal over the next ten years?
* Will there be a shortfall in adequate public and essential commercial services (e.g., housing, medical, emergency) for current and future workers due to the proposal?
* How will safety considerations during construction of any project be addressed?

18. Other Issues

12-57 * What specific Tribal consultations have occur with nearby Indian tribes in a manner consistent with Section 20(b)(1)(A) of IGRA, Ecology's trust responsibilities to tribes, and the 1994 Executive Memorandum entitled Government-to-Government IGRA Section 20?

12-58 * What consultation has occurred with area school districts and other service providers?

12-59 * What geo-tech studies been done for any proposed construction project site?
* Would any proposed project be affected by seismic faults or fractures?

12-60 * Will any element of the proposal increase the potential for litter?
* How will the proposal address the disposal of solid waste?

12-61 * 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?

12-62 * Regarding the sage grouse habitat that would be inundated by a Wymer Reservoir, what is the estimated number of sage grouse currently using the proposed inundated area?

12-63 * What is the potential for shoreline erosion from using a Wymer Reservoir as a pump storage project?

12-64 * For both the Wymer and Bumping Lake projects, describe the legal mechanism by which Wymer or Bumping Lake water could be transferred to enhance instream 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 instream flows?

12-65 * What are the estimated evaporation rates for both a Wymer and Bumping Lake reservoir?

12-66 * What are the estimated refill times for both a Wymer and Bumping Lake reservoir assuming a complete drawdown during a drought year?

12-67 * Regarding the Lake Kachess Inactive Storage project, how does accessing this inactive storage conflict with fish passage/habitat enhancement proposed for Lake Kachess?
Regarding Kachess Reservoir Inactive storage, Section 2.4.5.2 states that fish passage improvements would be carried out at Box Canyon Creek to improve passage for bull trout. The Proposed Yakima River Basin Study Integrated Water Resource Management Plan (PIWRMP) (February 2011) (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?

Section 2.4.5.4 Columbia River Pump Exchange with Yakima Storage

***** Section 2.4.5 states that the study of an out-of-basin operation is included in the Integrated Plan. However, Section 2.4.5.4 states that this proposal will not be analyzed in the DPEIS. If this proposal is part of the Integrated Plan, an EIS that does not include such analysis would be inadequate.

12-68 * Identify all potential dam sites in the Yakima River 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.

Section 2.4.6 Groundwater Storage Element
Sec. 2.4.6.1 describes Shallow Aquifer Recharge.
12-69 * Under the 1945 Consent Decree how would any water stored in shallow aquifers be treated under the Total Water Supply re-allocated to instream flows?

Section 2.4.6.2 describes Aquifer Storage and Recovery
* Under the 1945 Consent Decree how can any water stored in underground aquifers be allocated to instream flows?

Section 2.4.7 Targeted Watershed Protection and Enhancement Element
12-70 The DPEIS, pages 2-24 to 2-25, describes 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:

- *"45,000 acre tract in the middle and lower Teanaway River basin comprised of mid-to-high elevation mixed conifer forest and lower elevation grand fir and Ponderosa pine forest."*

12-71 * Identify the location of this tract. Clarify the current ownership of this acreage. Is the current owner being foreclosed on? If so, who is the next most likely owner? Clarify the targeted acquisition of the 45,000 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 45,000 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 Interstate 82 (I-82)."*

12-72 * 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?

12-73 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."*

12-74 * 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 sites cannot be acquired, a combination of alternative sites of equivalent conservation value would be selected as long as alternatives collectively meet the target goals."*
  45,000 acres as a Conservation Target for High Elevation Watershed Enhancement;
12-75 *15,000 acres as a Conservation Target for Shrub-Steppe Habitat Enhancement;*
10,000 acreas as a Conservation Target for Forest Habitat Enhancement."

* Identify the location of these alternative conservation target lands.

The DPEIS recommends additional federal Wilderness and Wild and Scenic River designation through other processes or through designation of land that have already been recommended by other planning.

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

12-76 * 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 a 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.*"

12-77 * 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 differ from the acquisition of 10,000 acres at the headwaters of the Little Naches River and lands surrounding the headwaters of Taneum and Manastash Creeks?

- "*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 for designation.*"

12-78 * The purpose of the federal Wild and Scenic Rivers Act is to preserve rivers in "free-flowing condition." The W&SRA controls land administered by federal agencies. It prohibits federal agencies from granting permits or making loans regarding the construction of a water resources project. (p. 3-88). What additional specific dams are proposed for the American, Upper Cle Elum and Waptus rivers on federal lands 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?

Section 2.4.7.2 describes Mainstem Floodplain and Tributary Fish Habitat Enhancement Program
The proposed "Integrated Plan" proposes fish habitat enhancement measures including 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.

12-79 * Please list all diversion screening that has taken place since 1979.
* Why is diversion screening still needed over 30 years later?
* Which of these fish habitat enhancement measures are voluntary in nature?
* Without significant improvements to instream flows in the lower Yakima River, how will fish habitat enhancement improvements in the upper Yakima River Basin be ensured?

Section 2.4.8 Enhanced Water Conservation
Sec. 2.4.8.1 describes Agricultural Conservation.

12-80 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 too eager and willing to identify precisely the dam storage projects they intend to build, while refusing to disclose what or where water conservation projects would take place. In addition, it is apparent that, unlike dam storage projects that 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 potential?

12-80 * What water conservation measures have been carried out in the Yakima River Basin since 1979?

* What water conservation measures would be carried out under YRBWEP Phase 2 (as described in Section 2.3.1.1)?

* What water conservation measures would be carried out under the Enhanced Water Conservation Element (as described in Section 2.4.8)?

* 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 acre-feet of water in good water years, how many acre-feet of water would be conserved if irrigation district switched to less water consumptive crops?

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:

12-81
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.

12-81 * Has the BuRec applied the CVP Criteria to any of the past or proposed Yakima River Basin irrigation district water conservation plans?

* Please list all BuRec approved water conservation plans for the Yakima River Basin.

12-82 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 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.

12-83 * Why does the "Integrated Plan" propose less than half of the water conservation potential proposed just two years ago?

The above 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?

12-84 Sec. 2.4.8. 2 describes the Municipal and Domestic Conservation program.
* How much water could be conserved by ending the exempt well provisions under Washington Water Law?

Section 2.4.9 Market Reallocation
* Isn't this an on-going element? Please include this under Section 2.3.1, Ongoing Projects.

* What are the legal and institutional barriers to market reallocation?

12-85 * What are the estimated current water savings that could occur under existing Washington Water Law?

* How has the BuRec evaluated the results of the Market-Based Reallocation of Water Resources (Yakima River Basin Study Task 4.12, November 19, 2010, Power Point page 14)?

12-86 * 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?

12-87 * If all irrigation districts received equal water deliver during drought years what percent of proratable delivery would occur?

12-88 * Why does Table 3-5 only provide April 1 TWSA Estimates through 2005? Where are the figures for the last five years?

12-89 Sec. 2.4.10 Adaptive Approach (p. 2-31)
* Please explain what entity would review progress of the "Integrated Plan."

Potential Barriers to Plan Implementation and Mitigation Strategies

12-90 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).
* Why was this group not involved in the preparation of the "Integrated Plan?"

12-91 * How can water stored or pumped in a new or expanded reservoir and already allocated under the 1945 Consent Decree be reallocated to instream flows?

12-92 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 discussions" that had become prevalent in administrative decisions. These "locker-room discussions" 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.

* Why wasn't a FACA committee established?

12-93 * Please list the members and all meetings of the Yakima Work Group Executive Committee, the minutes from those meetings and how public notice was given.

12-93 * Please list the members and all meetings of the Yakima Work Group Implementation Subcommittee, the minutes of those meetings and how public notice was given.

12-94 * Has the BuRec evaluated 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?

12-95 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.

12-96 Please send us a copy of any final Programmatic EIS that becomes available.

Signed:

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Naturam Expellas Furca *Tamen Usque Recurret*

WISE USE MOVEMENT

P.O. Box 17804, Seattle, WA 98127

December 31, 2011

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

Dear Ms. McKinley:

The Wise Use Movement submits the following comments on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Yakima River Basin Integrated Water Resource Management Plan ("Integrated Plan").

GENERAL COMMENTS

The Wise Use Movement is opposed to new irrigation storage dams in the Yakima River basin. We agree with Rep. George Miller's op-ed in the San Francisco Chronicle ("In the drying West, dams are no longer the answer," January 8, 2009) where he wrote,

> "The Bureau of Reclamation is a billion-dollar-a-year water management agency created for a different era, when our nation had different needs. . .The Bureau of Reclamation has constantly convinced themselves that building one more big dam – or one more canal- would finally solve our water problems. . . such expensive and time-consuming projects only make sense in the context of an agency that follows the science and the law, is a wise steward of the resource, and promotes cost-effective solutions. It's hard to say that the Bureau of Reclamation is that agency. . .Instead of spending time and money we can't afford to study dams that will never be built, the federal government should work with local water managers who have cost-effective plans to stretch their existing water supplies."

13-1

We request that the attached op-ed be made part of these comments and included in the record for the DPEIS (WUM – Attachment A).

The Wise Use Movement agrees with Bob Tuck, a natural resources consultant from Selah, WA who wrote a guest commentary in the Yakima Herald-Republic ("Drought in the Yakima Basin – More Water Storage Isn't the Answer, but There Are Solutions," April 1, 2001) where he wrote:

> "Additional water storage projects are like heroin: They are very expensive, create illusions of power, make us dependent on a continuing supply, and eventually destroy the body. The leaders and interests in the basin that remain fixated on new water-storage projects are doing the people of the basin a disservice. They are leading us down a dead-end street."

We request that this attached guest commentary be made part of these comments and included in the record for the DPEIS (WUM – Attachment B).

The Wise Use Movement agrees with Katherine Ransel, American Rivers, comments of 2001, "Water Storage versus Water Conservation in the Yakima Basin where she wrote:

> "Instead of building new dams and diversions at exorbitant prices, both to our pocketbooks and to our river systems, we must ask how we can provide more benefit from each gallon of water we remove from nature."

We request that these attached comments be made part of these comments and included in the record for the DPEIS (WUM – Attachment C).

13-1 The Wise Use Movement agrees with the position taken by the USFS. Naches Ranger District in its letter of November 20, 2009, which states:

> "On balance we believe the proposed increase in water storage capacity at Bumping Lake has more negative effects on the resource and uses of National Forest System lands than benefits."

We request that this attached letter be made part of these comments and included in the record for the DPEIS (WUM – Attachment D).

13-2 More specific comments are as follows. Please note that because this is a joint NEPA and SEPA document we request separate responses from the Bureau of Reclamation (Bureau) and the Department of Ecology (Ecology) where indicated.

13-3 Executive Summary
Page iii states that under the No Action Alternative, the Bureau and the Department of Ecology would do nothing to expand programs to protect or enhance fish habitat, and would not implement enhanced water conservation, market reallocation, or groundwater storage. Please delete these statements. Both federal and state agencies are obligated to carry out recovery plans for listed ESA species. In addition, as the DPEIS documents, there are hundreds of thousands of acre-feet of water savings that can be carried out in the Yakima River basin.

13-4 Chapter 1.0 Introduction and Background
Sec. 1.2, National and State Environmental Policy Act Review Process, page 1-2
The DPEIS does not provide a range of alternatives as called for by NEPA or SEPA. In addition we object to the short time period provided for comments on the DPEIS.

Sec. 1.3, Purpose and Need for the Action, page 1-3
As stated above, a range of alternatives should be provided, including a non-structural alternative with water conservation and water marketing, coupled with reducing the demand for irrigated water through selection of less water-demanding crops. Without a range of alternatives, the DPEIS remains inadequate.

13-5 Page 1-3 states that a 70 percent of proratable water rights is: "the lowest level of water supply that could be accommodated without catastrophic losses to crops." How does the DPEIS define "catastrophic?" Table 3-5 shows historical April 1 TWSA Estimates from 1977-2005. Table 3-8 shows Yakima Project Proration Years and Percentages with three years in a row: 1992, 1993, and 1994 having proration percentages of 58, 67 and 37 percent respectively. What was "catastrophic about these years? How does a low level of irrigated water supply differ from seasonal rainfall amounts that impact dry land farmers? Is crop insurance available to mitigate against a prorationing year?

13-6 Is the Habitat/Watershed Protection and Enhancement Element necessary in order to reach the stated irrigators' goal of a water supply of 70 percent of proratable water rights during a drought year?

13-7 Sec. 1.4.2. Washington State Authority
Page 1-5 states that additional authority is contained in the 2011 to 2013 state Capital Budget.and funded through the Yakima Basin Integrated Water Management Plan Implementation account (30000278). How much of this account has been spent on dam studies? What is the total amount authorized under this account? How does this account differ from the Columbia River Basin Water Supply Development Program account (20062950)? How much has been authorized for this account? How much money has been spent out of this account?

13-8 Sec. 1.5.1 Basin Fisheries

Page 1-5 states that the Yakima River historically supported anadromous salmonid runs of 300,000 to 960,000 fish per year in the 1880s.

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.

13-8 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. How has the Bureau and Ecology taken into account the historical variability of salmon runs as part of any projections or estimates of future salmon returns?

13-9 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. How has the Bureau and Ecology taken into account these oscillation patterns and the historical variability of salmon runs as part of any projections or estimates of future salmon returns?

Page 1-5 states that three salmon species have been eliminated from the basin: sockeye, summer Chinook and coho. When were these species eliminated from the basin?

Page 1-5 states that steelhead were listed as threatened under the ESA in 1999. What specific steps have been taken to carry out a recovery plan for steelhead in the basin since 1999?

13-10 Page 1-6 lists reasons for the anadromous fish declines and extirpations. Groundwater pumping is not listed. Is groundwater pumping, especially from exempt wells, a contributing factor to anadromous fish declines and extirpations?

Page 1-6 states that bull trout were listed as threatened under the ESA in 1998. What specific steps have been taken to carry out a recovery plan for bull trout in the basin since 1998? Is groundwater pumping, especially from exempt wells, a contributing factor to bull trout declines?

Page 1-6 states that coho salmon reintroduction efforts began in the 1980s using hatchery fish. What is the scope of the fish hatchery program in the Yakima River basin? Please provide the following information.

13-11
- What is the total amount spent on hatcheries in the Yakima River basin for each year from 1985 to current?
- What is the total amount spent on each anadromous fish species in the Yakima River basin for each year from 1985 to current?
- What is the location of each hatchery in the Yakima River basin and what entity is responsible for its operation?

13-12 Sec. 1.5.2. Irrigation Water Supply
Page 1-7 states that the majority of spring and summer runoff is from snowmelt and that snowpack is often considered a "sixth reservoir." The DPEIS fails to provide the review or

decisionmakers with a full disclosure of the role of the United States Forest Service in the Yakima River basin. Tree cutting opens up areas and allows earlier snowpack melt. Past Wenatchee National Forest forest plans counted increase water run-off from clear-cutting as a positive quantifiable benefit. It appears, however, that sales of trees merely accelerated run-off to earlier in the year to the detriment of fish and in-stream flows. In contrast, Wilderness designation ensures the retention of snowpack and snow melt later in the year and continues natural historic conditions.

The PDEIS fails to provide any historical relationship between National Forests and irrigation. In fact, it was Western irrigators who were the most vocal and opposing clear-cutting and grazing on public forest lands at the end of the 1800s. We request that the following information be included in the PEIS:

Forestry and Irrigation history

What group "pioneered in the theory that watershed vegetation directly affected their water supply. Forests, they argued, absorbed rainfall, retarded stream run-off, and increase the level of ground water: forests retarded snow melting in the early months of the year, reduced spring floods, and saved water for summer use when supplies run law; forests retarded soil erosion and silting in irrigation ditches and reservoirs"? It was "Western irrigators" who "played a major role in establishing the national forests and in defending them from attack. . . . Throughout the [eighteen] nineties irrigation groups petitioned, often successfully, that the president reserve particular watersheds as national forests to protect them from commercial use. . .Irrigators constantly sought to improve protection of the forests from fire and timber depredations, to withdraw them from all commercial use, and to prevent timber cutting and grazing within them." *Conservation and the Gospel of Efficiency*, by Samuel P. Hays (Atheneum, 1959) (pages 22-23).

There is a wealth of information in the American Forestry Association's publications of *Forestry and Irrigation* from the early 1900s. Even the French Ambassador weighed in with support of forest preservation! Here are some selections:

Forestry & Irrigation, Vol. XII – No. 11 - November 1906

13-12
- "The Mining Industry and the Forests," by Lewis E. Aubury, State Mineralogist of California (page 494): "That there is urgent need for more national and state legislation in regard to the protection of our forested areas, both from fire and the operations of timber speculators, is a subject which I believe is worthy the attention of the American Mining Congress." (page 495): "One of the greatest causes for concern is the fact that most of the available timber land is in the hands of a few individuals or corporations. For instance, in California approximately one million acres is controlled by one individual."

Forestry & Irrigation, Vol. XIII – No. 3 – March 1907
- A letter from Mr. David W. Cunningham, from Los Angeles (page 152): "As a people, we have a great lesson to learn: If we would have public interest cared for we must not leave them to private individuals. Most individuals have all they can do to care for their private interests. Public interests must be cared for by the public or, as a rule, they will not be cared for at all."

Forestry and Irrigation, No. XIII, No. 10 – October 1907
- Editorial (pages 501-502): "Gradually we are getting our eyes open. The earth is the common foundation upon which all must stand, the common storehouse from which all must draw their supplies. Our natural resources constitute the raw material from which, by the application of labor and capital, all must live, if they are to live at all. The waste of natural resources is a public tragedy if not a public crime. The preservation of these resources is a matter of the greatest public moment." (page 502): "In view of the fact that certain timber cutters, notably the pulp men, cut clean, leaving nothing behind them but stumps, and believe this to be the only profitable course for them to pursue, the question naturally arises as to how pulp wood will be cut when the forester's ideal is realized and timber slaughter is ended by law."

- "The Fifteenth National Irrigation Congress," Sacramento, CA, September 3-7, 1907, by Lydia Adams-Williams, Genoa, Nevada. (page 527): Address by US Senator Perkins of California, "Without our forests there would be no irrigation."

- "The Month in Government Forest Work," (page 548): A report on jury trial in South Dakota fining Robert B. Bale $100.00 and costs for grazing trespass in the Black Hills National Forest.

- "Government Irrigation Work During the Month," (page 552): [Hydrological connection.] "California has learned, says the California Cultivator, not only that the ground may become water-logged by over-irrigation, but that ill-considered drainage and the inconsiderate use of water from wells may so lower the underground water-plane as to threaten the reversion of large areas to unproductiveness."

Forestry and Irrigation, Vol. XIV, No. 2 – February 1908

- Editorial, "Equip the Association," (page 64): "What greater cause could appeal to philanthropy than that of preserving our heritage? What weightier obligation can be laid upon the conscience of one who has accumulated millions from "our boundless resources" than to aid in perpetuating these resources" Men give to the transitory; why not to the permanent? They contribute to small causes, why not to great? They build libraries; why not maintain the supply of material from which books and buildings must be made? They multiply colleges: why not recognize that, whether schooled or unschooled, people must draw their supplies from the earth?"

- Editorial, "The Pressing Need," (page 62): "We have the Director of the Reclamation Service pointing to the vast and beneficent work now in progress under Government auspices in the way of redeeming the desert and providing homes for the people; but avering, at the same time, that the continuance and success of this work are absolutely dependent upon the retention of forests upon the mountain sides, which in turn, is dependent upon National action."

- On December 18th the following letter was addressed to the members of the American Forestry Association by the Secretary, which includes the following (pages 77-79):
"The only trouble with the movement for the preservation of our forests is that it has not gone nearly far enough, and was not begun soon enough," President Theodore Roosevelt.

13-12

"In fine, when the forests fail, every man, woman and child in the United States will feel the pinch. And through misuse the forests are failing rapidly." Gifford Pinchot, Forester

"In six years the Government has reclaimed 250,000 acres. . .The water for this work comes chiefly from streams rising in mountains. To maintain the supply of this water, it is essential that forests be maintained upon the mountains. To this end, National Forests are indispensable." F. H. Newell, Director, US Reclamation Service

"It is an absolute principle: no forests, no waterways. Without forests regulating the distribution of waters, rainfalls are at once carried to the sea, hurried sometimes, alas! across the country. J.J. Jusserand, Ambassador from France

Please provide the following information:

- What is the estimated historical acre-feet of water (as measured from snowpack) stored in the Wenatchee, Mt. Baker-Snoqualmie, and Gifford Pinchot National Forest portions of the Yakima River basin under its natural pre-tree cutting condition?
- How much has the current Wenatchee, Mt. Baker-Snoqualmie, and Gifford Pinchot National Forest conditions changed from the historical acre-feet water (as measured from snowpack) stored in the Wenatchee, Mt. Baker-Snoqualmie, and Gifford Pinchot National Forest portions of the Yakima River basin?
- How many acre-feet of water (as measured from snowpack) could be delayed later in the year, if the Wenatchee, Mt. Baker-Snoqualmie, and Gifford Pinchot National Forests stopped tree-cutting and began an aggressive re-planting program?

13-13

Sec. 1.5.3 Municipal and Domestic Water Supply
Page 1-7 states that groundwater and surface water in the Yakima River basin are interconnected and that surface water rights are fully appropriated. We commend Ecology for issuing a moratorium on new groundwater wells in upper Kittitas County. Because similar problems exist in the rest of the Yakima River basin, will Ecology issue a moratorium on new groundwater wells throughout the Yakima River basin? Doesn't the recent Washington Supreme Court ruling that the 5,000 gallons per day limit does not apply to stockwater, effectively ruling that industrial

13-13 feedlots and dairies may pump unlimited amounts of water without consideration of the impacts on third parties continue to threaten instream flows in the Yakima River basin?

13-14

Sec. 1.5.4 Effects of Climate Change
Page 1-9 states that projected higher air temperatures would cause runoff from snowpack to begin earlier. As stated previously, the DPEIS is inadequate because it does not provide an analysis of how tree cutting practices and policies of the U.S. Forest Service have contributed to reducing snowpack independent of any climate change effects. What actions could the U.S. Forest Service take to retain snowpack within the national forests within the Yakima River basin?

13-15

Sec. 1.5.5 Statutory Constraints on the Water Supply
Page 1-9 states that the Bureau operates the Yakima Project to achieve: irrigation water supply; flood control; power generations; and instream flows. How can the Bureau operate the Yakima Project if it must operate the Yakima Project divisions and storage facilities in a manner that avoids injury to water users especially when legislation passed by Congress in 1994 requires that no purpose for fish, wildlife, and recreation shall impair irrigation purposes or impact existing contracts? (page 1-10) Wouldn't it be more correct to state that the Bureau operates the Yakima Project to serve first and foremost non-proratable water users in the basin?

13-16

Page 1-10 states that since April 1995, the Yakima Project maintains targeted streamflows downstream from Sunnyside Diversion dam from 300 to 600 cubic feet per second (cfs) between April 1 and October 31. How often have these flows not been met? How often has the Yakima River downstream from Sunnyside Diversion dam gone dry since 1995? What are the optimum streamflows for anadromous and resident fish downstream from Sunnyside Diversion dam? How often have optimum streamflows been met since 1995? Under existing conditions, during a drought year with a 70 percent proration, what happens to the target flows?

13-17

Sec. 1.6 Yakima River Basin Background and History
Sec. 1.6.1 Location and Setting
This section, on page 1-10, fails to provide an adequate description of the basin. Please provide a map of the Yakima River basin showing landowners by the U.S. Forest Service, DNR and other public and private land holdings. Please provide a table showing the acreage of various landowners. Page 1-10 states, "About one-fourth of this area is designated as wilderness." Please correct this to: "About one-fourth of this area is designated as Wilderness." Wilderness is a land use designation for areas set aside by Congress. What is the total acreage of land used for tree-cutting and cattle grazing in the Yakima River basin? What is the total acreage referred to by "one-fourth of this area?"

13-18

Sec. 1.6.2 Yakima Project
Page 1-11 states, "Stored water that is not used is carried over to the next year to the benefit of all water users." By "users" do the Bureau and Ecology mean that no carry over water is available for instream flows?

13-19

Table 1-1, page 1-13.
This section discusses water diversions to six irrigation divisions (Kittitas, Roza, Tieton, Wapato, Sunnyside, and Kennewick).
Please add the amount of currently irrigated acreage for each division and each irrigation division within a division, to this table.
Please add the amount of proratable acre-feet for each district (from Table 3-7) to this table.

13-20

Page 1-11 states that 30 percent of the diversions are made of mainly nonproratable water right holders. This represents a significant amount of water usage that does not appear to be accounted for in the DPEIS. What is the total amount of nonprorateable acre-feet diverted to irrigation entities other than the six named above?

13-21

According to Tale 3-7, all Divisions/Districts have proratable water rights. Only the Roza Irrigation District and the Kittitas Reclamation District have no nonproratable water rights. Could the proposed 70 percent water supply be obtained if Roza and Kittitas were to cease operation? If so, this should be an alternative included in the PEIS. If the Tieton, Wapato, Sunnyside, and Kennewick irrigation divisions/districts contain both proratable and nonproratable water rights, what has each division/district done to share water within their

13-21 division/district during drought years? If the Tieton, Wapato, Sunnyside, and Kennewick irrigation divisions/districts shared water equally between proratable and nonproratable water rights during drought years, could the proposed 70 percent water supply be obtained? If so, this should be an alternative included in the PEIS.

13-22 Sec. 1.6.3 History of Water Management in the Yakima River Basin
Page 1-13 states that in the early 1900's existing water users agreed to limit their water use during the low-flow periods of late summer and early fall. What is the status of these "limiting agreements"? Are such "limiting agreements" currently in effect in the basin?

13-23 Sec. 1.6.4.2 1945 Consent Decree
Page 1-14 states that nonproratable entitlements are generally held by preproject water users. What are the location and quantities of water rights held by these preproject water users? In 1979, Secretary of Interior Solicitor John Leshy issued an opinion that because the 1945 Consent Decree defines the total water supply available (TWSA) as the amount of water available from storage in the various Government reservoirs and from other sources, any water in the Yakima River basin, including that from new reservoirs, goes to supply the contract obligations of the United States. How then can any "stored" water be allocated to instream flows during drought years when the TWSA must be allocated first to nonproratable water right holders and then to the proratable water right holders in the basin?

13-24 Page 1-14 states that the Federal projects within the basin were constructed to manage water supplies to serve the proratable water uses in the basin. The contractors for this water supply repay the Yakima Project storage construction costs and the annual operation and maintenance costs allocated to the irrigation purpose. The DPEIS fails to provide any data as to these costs or repayment.

Please provide the following information:

- What are the construction costs of the Bureau's Yakima Project?
- How much of these costs have been repaid?
- What are the annual operation and maintenance costs of the Bureau's Yakima Project?
- How much of these costs have been repaid?
- What is cost of water per acre-foot to each of the Yakima River basin irrigation divisions/districts?
- How much water usage reduction would take place if water costs were doubled?

13-25 Sec. 1.6.4.3 Water Right Adjudication
Page 1-15 states that in spring of 1977, the Bureau predicted the proratable water users would receive only 15 percent of their normal water supply. However, it appears from Table 3-5 that this prediction was completely wrong. What accounted for this forecast failure?

13-26 Page 1-15 states that treaty right for fish is the minimum instream flow necessary to maintain anadromous fish life in the river, according to the annual prevailing condition as they occur and determined by the Yakima Field Office Manager. What are these minimum instream flows for the Yakima River and its tributaries? How does this compare to the optimum instream flows needed to recover extirpated and depressed anadromous and resident fish species? Please include the following explanation of "minimum flows" in the PEIS: "minimum stream flow is the minimum – not the most desirable – flow or lake level necessary to protect the fish and wildlife habitat, aquatic life, water quality, recreation, aesthetic beauty, navigation or transportation."

13-27 Sec. 1.6.4.4 February 17, 1981, Withdrawal
Page 1-16 states that the Bureau filed notice in 1981 with Ecology that it intends to utilize the unappropriated waters of the Yakima River and its tributaries. What was the quantity of water that was unappropriated in 1981? How can unappropriated surface water be for the benefit of the Yakima River Basin Water Enhancement Project if water rights in the basin are fully appropriated as stated on page 1-3? If there was unappropriated surface water in 1981, why didn't Ecology allocate this water toward increasing (or maintaining) instream flows?

13-28 Sec. 1.7.1 Bumping Lake Enlargement

13-28 Page 1-17 states that Congress failed to pass bills in 1979, 1981, and 1985 to authorize construction of the Bumping Lake enlargement. This demonstrates that both Democratic and Republican Administrations found the project fatally flawed. This project remains fatally flawed and we again request that it be dropped from further consideration.

13-29 Sec. 1.7.2 Yakima River Basin Enhancement Project

> As passed by Congress, Public Law 96-162 provides:
>
> Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled:
>
> That the Secretary Yakima River of the Department of the Interior is authorized and directed to conduct a feasibility study of the Yakima River Basin Water Enhancement Project, which shall include an analysis by the United States Geological Survey of the water-supply data for the Yakima River basin. The Secretary is authorized to accept moneys from the State of Washington or other persons or entities, public or private, to assist in the financing of the feasibility study.

Please provide a summary and citation to U.S.G.S analysis of the water-supply data for the Yakima River basin.

13-30 Page 1-17 states that under the YRBEP some 35 potential storage sites outside of the Yakama Reservation have evaluated since the 1980s.

Why have no storage sites on the Yakama Reservation been evaluated? What is the total amount of federal and state funds that have been spent on these potential storage site studies?

13-31 Page 1-17 states that Phase I of the YRBWEP undertook construction of fish ladders and fish screens at water division points throughout the Yakima River basin. What remaining fish ladders or fish screens at water division points have yet to be constructed?

13-32 Sec. 1.7.2.1 Yakima River Basin Water Conservation Program
Page 1-18 states that in 1998 a Basin Conservation Advisory Group, chartered under the Federal Advisory Committee Act, prepared a Basin Conservation Plan. Why didn't the Basin Conservation Advisory Group participate in the development of the "Integrated Plan." Why wasn't the "Workgroup" chartered under the Federal Advisory Committee Act? How many acre-feet of water have been saved due to the Phase II voluntary program of water conservation measures since 1994? Please provide specific figures for each irrigation division/district.

13-33 Sec. 1.7.2.2 Yakima River Basin Water Enhancement Project, Washington, FPEIS
What specific Title XII authorized actions have been carried out since 1994 and what type of NEPA compliance has been carried out on these actions?

13-34 Sec. 1.7.2.3 Report on Biologically Based Flows
What is the definition of "biologically based flows?" How is the definition of "normative flows" useful if it represents historic flow conditions as modified by cultural, legal, and operational constraints? Isn't this just another version of the status quo? The System Operation Advisory Committee (SOAC) prepared a report in 1999 with nine recommendations. What were these recommendations? How many of these have been carried out? Why didn't the SOAC participate in the development of the "Integrated Plan?

13-35 Sec. 1.7.2.4 The Reaches Project
What is the cause of floodplain degradation in the Yakima River basin? How much of this degradation is on private land? On state land? On federal land?

13-36 Sec. 1.7.2.5 Interim Comprehensive Basin Operating Plan for the Yakima Project
Was a final comprehensive Basin Operating Plan for the Yakima Project ever adopted?
The Interim operating plan states (page 2-24) that as of 1992, "Over 45 percent of the irrigated area is used for perennial crops, including orchards, vineyards, hops, mint, and asparagus."

13-36 What is the current percent of the irrigated area used for these perennial crops? Wouldn't switching to annual crops reduce the risk from any single drought year?

13-37 The Interim Operating Plan (page 2-24), contains Table 2-2 that provides a list of Irrigated Acreage of Crops Grown in the Yakima Project from 1982 to 1992. What is the irrigated acreage of crops grown in the Yakima Project from 1992 to 2011? Please provide a table similar to Table 2-2 in the PEIS.

13-38 The Interim Operating Plan states (page 2-24): "Reclamation's 1992 Summary Statistics (table 2-3.) indicates that of the 1,789,068 acre-feet of water diverted throughout the project in 1992, 1,314,713 acre-feet (73%) reached the farms (Reclamation, 1992), as shown in the table below. The other 27 percent were lost to evaporation, leakage losses, or other reasons." How much acre-feet of water was diverted throughout the project in 2010, and what percent reached the farms? How much was lost to evaporation, leakage losses, or other reasons?

13-39 Sec. 1.7.3 Yakima River Watershed Council
Page 1-20 states that the Tri-County Water Resources Agency received a Washington State planning grant for Yakima River basin watershed planning. What recommendations did the Tri-County Water Resources Agency make and how many have been carried out?

Sec. 1.7.4 Watershed Assessment and Watershed Management Plan
Page 1-21 states that the "Watershed Management Plan, Yakima River Basin" covers the entire Yakima River basin with the exception of the Yakama Nation Reservation. Did this plan also cover National Forests within the basin? If not please correct this statement.

13-40 Sec. 1.7.5 Yakima Subbasin Plan
Page 1-21 states that the Yakima Basin Fish and Wildlife Recovery Board completed a draft Yakima Subbasin Plan in 2004 and adopted by the Northwest Power Conservation Council into its Fish and Wildlife Program. The Recovery Board is a member of the "Workgroup." According to the Recovery Board's website, the Recovery Board board of directors is made up of Yakima River basin counties, cities and the Yakama Nation. Because Yakima counties and the Yakama Indian Nation, as well as the City of Yakima are already members of the "Workgroup," doesn't this give these "Workgroup" members two votes at the table? What has the Recovery Board done since 2004?

13-41 Sec. 1.7.6 Yakima Steelhead Recovery Plan
Page 1-22 states that Middle Columbia River steelhead were listed as a threatened ESA species in 1999. What were the steelhead runs in the Yakima River basin in 1999? What are they now? What steps have been taken to aid the recovery of steelhead?

13-42 Sec. 1.8 Fish Recovery Efforts
This section should clarify that these efforts are considered part of ongoing projects that would continue to take place in the future. Therefore, contrary to the assertions in the Executive Study that little would be accomplished in the absence of the "Integrated Plan," there are substantial programs listed in Secs. 1.8.2 through 1.8.10 that would continue to be carried out.

13-43 Sec. 1.8.1 Reclamation Improvements to Existing facilities
What are the quantifiable fish recovery benefits from the actions described in this section?

Sec. 1.8.2 Yakima River Side Channels Project
What are the quantifiable fish recovery benefits from the actions described in this section?

Sec. 1.8.3 Yakima Tributary Access and Habitat Program
Page 1-23 states that projects funded through this program are primarily fish screening. What remaining fish screening needs to be carried out in the Yakima River basin? What are the quantifiable fish recovery benefits from the actions described in this section?

13-44 Sec. 1.8.4 Yakima/Klickitat Fisheries Project
Page 1-23 states that the YKFP enhances existing stocks of anadromous fish while maintaining genetic resources through "supplementation". What is the location of each "supplement ation" hatchery? How many supplementation sources of anadromous salmon come from outside the Yakima River basin? What has been the total cost of "supplementation" to date? When

13-44 while anadromous fish recovery be sufficient to allow "supplementation" to be discontinued? How much do proposed fishery benefits from the "Integrated Plan" depend on continued "supplementation" programs? What are the quantifiable fish recovery benefits from the actions described in this section?

13-45 Sec. 1.8.5 Kittitas Conservation Trust
What are the quantifiable fish recovery benefits from the actions described in this section?

Sec. 1.8.6 Salmon Recovery Funding Board Supported Projects
What are the quantifiable fish recovery benefits from the actions described in this section?

Sec. 1.8.7 Yakima County Comprehensive Flood Hazard Management Plans
What are the quantifiable fish recovery benefits from the actions described in this section?

Sec. 1.8.8 Washington State Department of Transportation Programs
What are the quantifiable fish recovery benefits from the actions described in this section?
Sec. 1.8.9 Conservation Projects by Private Organizations
What are the quantifiable fish recovery benefits from the actions described in this section?

13-46 Sec. 1.8.10 Yakima Storage Dam Fish Passage Study
Why is storage dam fish passage included in the "Integrated Plan" when a separate cooperative investigation is already underway and a Final Planning Report Cle Elum Dam Fish Passage Facilities was completed in April 2011? This element should be included as part of on-going projects in Sec. 2.3.1.

13-47 Sec. 1.9.1 Yakima River Basin Water Storage Feasibility Study Planning Report
It is ironic that the Bureua and Ecology received comments on its January 2008 Draft Planning Report/EIS that the agencies had "failed to evaluate an adequate range of reasonable alternatives." Because that was true then, it is even more true today given that the Bureau and Ecology have again failed to evaluate an adequate range of reasonable alternatives. The lack of such alternatives makes the PDEIS inadequate as a document for public review or for decisionmakers.

It is particularly significant that the Bureau and Ecology rejected including a new Bumping Lake dam as part of this study. It is equally as significant that NONE of the three storage projects evaluated by the Bureau in its Final Planning Report/EIS, Black Rock, and two Wymer Dam variations have a positive benefit/cost ratio. Black Rock would only return 13 cents for every dollar spent. The two Wymer dams would only return 31 cents and 7 cents for every dollar spent.

Because the Bureau has already carried out a benefit/cost analysis for two Wymer Dam variations, what are the differences between the current proposed Wymer Dam project and the two Wymer Dam variations already studied? Isn't it correct that there is no Wymer Dam project variation that could generate a positive benefit/cost ratio? If this is the case, then shouldn't the Wymer Dam project be dropped from further study?

13-48 Sec. 1.9.3 YRBWEP Workgroup Process
How has the Workgroup been funded? Why was this Workgroup not formed as a Federal Advisory Committee? Have public notices been issued for all Workgroup and Workgroup subcommittee meetings? Have any Workgroup subcommittee meetings been closed to the public? As noted above, why were some entities allowed to have more than one vote on the Workgroup?

13-49 Sec. 1.9.3.1 Development of Preliminary Integrated Plan
On page 1-30 it states that the Workgroup members supported funding from the Department of Interior's WaterSMART Basin Study program. With a majority of "Integrated Plan" funding going toward the construction of massive new irrigation dams in the Yakima River basin, how does this meet the goals of a "WaterSMART" program. Isn't the purpose and mission of the Bureau's WaterSmart program establishing a framework to provide federal leadership and assistance on the efficient use of water, integrating water and energy policies to support the sustainable use of all natural resources, and coordinating the water conservation activities of the various Interior offices? If so, doesn't allowing Yakima River basin irrigators to advocate for

13-49 more storage irrigation dams directly contradict the goals and mission of the "WaterSMART" program and return the Bureau to the days of "DamDUMB" projects?

13-50 Page 1-31 states that the Workgroup prepared costs estimates for the Integrated Plan. These cost estimates must be included in the PEIS so that the public and decisionmakers can determine whether a total cost of nearly $6 billion dollars with likely a near billion dollars for an new Bumping Lake Dam and over two billion dollars for a new Wymer dam is a "Water and DollarSMART" program. Why were these costs not included?

13-51 Sec. 1.9.3.2. Integrated Plan Summary Support Document
Page 1-31 states that in March 2011 the Workgroup unanimously agreed to endorse the Integrated Plan Summary Support Document. Isn't it correct that the Workgroup take action at its December 14, 2011 meeting to amend and adopt a Habitat/Watershed Protection and Enhancement Element after the issuance of the DPEIS? How can the public have confidence in what is presented in the DPEIS if this information was modified by the Workgroup after the DPEIS was issued?

13-52 Sec. 1.11 Public Involvement
Page 1-32 states that formulating alternatives to water resource issues that are response to the needs and desires of the American public requires planning expertise and direct public participation. Apparently not. Despite clear and specific requests during the PDEIS scoping process for a range of alternatives, the task of formulating alternatives to water resource issues appears has eluded the grasp and expertise of both the Bureau and Ecology. We again request that the PEIS process present a range of alternatives for public review and for decisionmakers.

13-53 Chapter 2.0 Alternatives
Sec. 2.1 Introduction
Page 2-1 states that the environmental impacts of the "Integrated Plan" are evaluated at a programmatic level. This is deceptive and misleading. The proposed elements are not all on the same "programmatic" level. Several of the "elements" proposed in the "Integrated Plan" have had project level EIS's already prepared, such as the Bumping Lake dam, the Wymer Dam, and the Cle Elum Dam Fish Passage. Why have the Bureau and Ecology set out these projects as program elements? Isn't it more likely than not that by doing so, the Bureau and Ecology can point to the PEIS as having given "approval" to these projects and then "adopt" the previous project level EISs and avoid having to reanalyze the probably significant adverse impacts?

13-54 Page 2-1 states that only the Integrated Plan meets the objectives outlined in the Purpose and Need statement. The NEPA regulations (40 C.F.R. 1502.14) provide that the Alternative section "is the heart of the environmental impact statement." 40 C.F.R.1502.14(c) requires federal agencies to "Include reasonable alternatives not within the jurisdiction of the lead agency." Changes to Washington water law to make all water users proratable is a reasonable alternative not within the jurisdiction that should be included. Cropping pattern changes is another reasonable alternative that should be included.

13-55 Page 2-1 states that Integrated Plan modifications could result in additional environmental review. What additional public involvement and public review would be carried out on any modifications?

13-56 Sec. 2.3 No Action Alternative
As noted in comments to page iii, this section also states that under the No Action Alternative the Bureau and the Department of Ecology would do nothing to expand programs to protect or enhance fish habitat, would not implement enhanced water conservation, market reallocation, or groundwater storage. Please delete these statements. Both federal and state agencies are obligated to carry out recovery plans for listed ESA species. In addition, as the DPEIS documents, there are hundreds of thousands of acre-feet of water savings that can be carried out in the Yakima River basin. Limiting the no-action alternative to only projects authorized with funding for implementation is an artificial constraint. There is no more certainty that all the elements of the "Integrated Plan" will be authorized with funding. This limitation should be deleted from this section.

13-57 Sec. 2.3.1 Ongoing Projects

13-57 Why isn't fish passage on Cle Elum Dam (Sec. 2.4.3.1) listed here as on ongoing project? As noted above, it is unlikely that all the elements of the "Integrated Plan" will be authorized with funding. Therefore, Ongoing Projects should include projects such as Cle Elum Dam fish passage for which an EIS has already been prepared and for which there is a separate settlement process requiring that such passage be carried out.

13-58 Sec. 2.3.1.1 Yakima River Basin Water Enhancement Project
Please clarify the amount of acre-feet of water conservation carried out under YRBWEP Phase 2 since 1994. What is the expected amount of acre-feet of water conservation that is yet to be accomplished under YRBWEP Phase 2?

13-59 Sec. 2.4.1 Introduction
Page 2-9 states that all projects would undergo project-level environmental review. Please clarify this statement? Does this mean that an EIS would be issued for all projects? Or does it mean that the Bureau and Ecology would prepare an Environmental Assessment, adopt the PEIS and any previous EISs and then issue a Finding of No Significant Impact?

13-60 Page 2-10 states that the Habitat/Watershed Protection and Enhancement Element would help protect substantial areas of existing habitat from future losses due to development-related habitat impacts. What are these substantial areas? What are the potential future losses?

13-61 Sec. 2.4.2. Benefits of an Integrated Approach
What benefits would accrue to the Yakima River basin if instream flows and temperatures constraints remain in the lower Yakima River? What measures would the "Integrated Plan" take to address water quantity and water quality problems in the lower Yakima River?

13-62 Page 2-10 states that additional storage would provide additional flows for fish. This statement should be deleted. How can this be a correct statement when the 1945 Consent Decree already allocates all the amount of water available from storage in the various Government reservoirs and from other sources to irrigation needs during a drought year? Does the Bureau and Ecology agree that a new Bumping Lake Dam or a Wymer Dam only holds up water that would be allocated for Yakima Project purposes?

13-63 Sec. 2.4.3 Reservoir Fish Passage Element
Page 2-11 states that fish passage studies were undertaken as part of a 2002 Settlement Agreement with the Yakama Nation. Fish passage at existing reservoirs appears to be an independent element that is not dependent on any other "Integrated Plan" element. Because fish passage does not contribute to the goal of a water supply of 70 percent of proratable water rights during a drought year, we request that this element should be considered as part of ongoing projects.

13-64 Please clarify upstream and downstream fish passage proposals for each dam. Sec. 3.18.4 states that fish passage will involve "trap and haul" activities where fish are transported on local roads around reservoir fish passage barriers. If so, what is the purpose of the proposed fish ladder at the Cle Elum Dam (page 2-12). Is it correct that no fish ladders would be installed at any other existing reservoir? Where has similar trap and haul upstream passage been successful outside the Yakima River basin? Where has similar intake and juvenile bypass conduit downstream passage been successful outside the Yakima River basin?

13-65 Sec. 2.4.3.1 Cle Elum Dam
As noted above, fish passage at the Cle Elum Dam, already evaluated in an EIS, should be considered as part of ongoing projects.

13-66 Sec. 2.4.3.2 Bumping Lake Dam
Wouldn't fish passage at the existing Bumping Lake Dam be cheaper than providing such fish passage at a much higher new dam? We request that the Bureau and Ecology evaluate the benefits to anadromous and resident fish by the removal of the Bumping Lake Dam. As the dam with the smallest reservoir capacity, this dam represents the best opportunity for watershed and fishery restoration.

13-67 Sec. 2.4.4.1 Cle Elum Pool Raise

13-67 Have the Bureau and Ecology analyzed the feasibility of dredging out Cle Elum Reservoir to form a deeper pool rather than raising the dam? How would the proposed additional three-foot raise help if there were two drought years in a row?

13-68 2.4.4.2 Kittitas Reclamation District Canal Modifications
Page 2-15 states that this project would include piping of irrigation laterals and that in combination with other actions, flows in Manastash Creek could be increased by approximately 4,300 acre-feet. Why is this the only irrigation division/district that includes piping? What is the estimated miles of irrigation laterals that could be piped on the Roza Irrigation District, the Yakima-Tieton Irrigation District, the BIA and Wapato Irrigation Project, the Sunnyside Division, and the Kennewick Irrigation District? How many acre-feet of water could be conserved on each of these irrigation division/districts by piping irrigation laterals?

13-69 Sec. 2.4.4.3 Keechelus-to-Kachess Pipeline
What are the impacts to this proposal if the ongoing WSDOT I-90 construction project is completed first? Would this raise the cost of this proposal if coordinated construction with WSDOT cannot be achieved?

13-70 Sec. 2.4.5 Surface Water Storage Element
Page 2-17 states that study of an out-of-basin option is included in the Integrated Plan. This is not clear in Sec. 2.4.5.4, which states that a Columbia River Pump exchange proposal is not analyzed in the DPEIS. If an out-of-basin option is included in the Integrated Plan it must be analyzed in the DPEIS. How can the Bureau and Ecology decide to delete an Integrated Plan element from the DPEIS?

13-71 Page 2-17 states that a portion of additional storage supply should be allocated to needs in each of the three Yakima River basin counties and that one-half of the municipal and domestic supply would remain unallocated. How can additional storage supply be considered "unallocated" when the 1945 Consent Decree already allocates all the amount of water available from storage in the various Government reservoirs and from other sources to irrigation needs during a drought year?

13-72 Sec. 2.4.5.1 Wymer Dam and Reservoir
The Wise Use Movement is opposed to the construction of and any future study of a Wymer Dam and Reservoir. How does the proposed Wymer Dam and Reservoir differ from the two Wymer proposals studied in the 2008 Final Planning Report/EIS discussed on pages 1-28 and 1-29 of this DPEIS? Would the proposed Wymer Dam and Reservoir have a higher or lower benefit/cost ratio than the Wymer Dam and Reservoir alternative ratio of 0.31 analyzed in 2008? Would the proposed Wymer Dam and Reservoir have a higher or lower benefit/cost ratio than the Wymer Dam Plus Yakima River Pump Exchange alternative ratio of 0.07 analyzed in 2008? What impact would the proposed reservoir have to I-82? Would there be any additional costs from flooding underneath I-82? What impact would the proposed reservoir have to the Yakima Training Center? How would this storage improve instream flows upstream of the reservoir? What fish impacts would occur from the screened intake channel on the Yakima River?

Figure 2-4 depicts Wymer Dam and Reservoir and shows the "Burbank Tunnel" leading south from the middle of the proposed reservoir. No mention is made in Sec. 2.4.5.1 of this tunnel. What is the purpose of this tunnel? Where would it terminate? Why is it called the "Burbank Tunnel?"

13-73 Why does this section and other sections fail to include the acreage of shrub-steppe habitat that would be flooded? We request that this information be included.

13-74 How long would the Wymer Dam reservoir take to fill? It states on page 4-7 that during the first fill of Wymer Dam flows in the Yakima River downstream of Lmuma Creek would be reduced. How much would streamflow be reduced? Would this take place every year that Wymer Dam was refilled? How long would it take to refill a Wymer Dam in the second year of a drought? What would be the evaporation loss each year from the Wymer Dam reservoir?

13-75 Sec. 2.4.5.2 Kachess Reservoir Inactive Storage
Has the Bureau and Ecology analyzed the feasibility of dredging out Kachess Reservoir to form a deeper pool? How would the proposed use of inactive storage help if there were two drought years in a row?

13-76 Sec. 2.4.5.3 Bumping Lake Reservoir Enlargement
The Wise Use Movement is opposed to the construction of any future study of a new Bumping Lake Reservoir. As noted in our general comments, we agree with the USFS Naches Ranger District's letter of November 20, 2009, stating that this project has more negative effects on the resource and uses of National Forest System lands than benefits.

13-77 This section fails to mention that the enlarged reservoir would inundate roadless area within the Wenatchee National Forest. Please add this to this section.

13-78 How long would a new Bumping Lake Dam reservoir take to fill? It states on page 4-7 that during the first fill of the new Bumping Lake Dam reservoir flows in the Bumping River and Naches River would be reduced. How much would streamflows be reduced? Would this take place every year that a new Bumping Lake Dam reservoir was refilled? How long would it take to refill a Bumping Lake Dam reservoir in the second year of a drought? What would be the evaporation loss each year from a new Bumping Lake Dam reservoir?

13-79 Sec. 2.4.7 Habitat/Watershed Protection and Enhancement Element (Habitat Component)
This section fails to provide any detail on this element. Without additional information, the reviewer and decisionmakers cannot evaluate the actions or the impacts. If many of the proposed habitat enhancements have already been identified in studies, the PEIS must include a list of these habitat enhancements. Especially since this element is estimated to cost over $100 million dollars.

13-80 Sec. 2.5.4. Study of Columbia River Pump Exchange with Yakima Storage.
The DPEIS previously stated that this out-of-basin option is included in the Integrated Plan. Therefore it must be analyzed in the DPEIS. How can the Bureau and Ecology decide to delete an Integrated Plan element from the DPEIS?

13-81 Figure 2-5. Why is no late successional "old growth" forest shown along the northern area along the Bumping Reservoir?

13-82 Sec. 2.4.7 Habitat/Watershed Protection and Enhancement Element (Habitat Component)
Land Acquisition Program, page 2-24
The PEIS should include a map showing the proposed land acquisition program. Without such a map, the reviewer cannot determine where these areas are at. How does this land acquisition program help meet the stated irrigators' goal of a water supply of 70 percent of proratable water rights during a drought year?

Regarding the 45,000 acres in the middle and lower Teanaway River basin, what is the ownership of this acreage?

Regarding the 10,000 acres at the headwaters of the Little Naches River, how many acres of ancient forest (late successional old growth forest) remain?

13-83 Recommendations for Wilderness Area and Wild and Scenic River Designations, page 2-25
The land acquisition program states (page 2-24) that if these sites cannot be acquired a combination of alternative sites would be selected. What happens with the recommendations for Wilderness Area and Wild and Scenic River Designations? Both of these require Congressional approval. Neither of these designations can be accomplished by the Workgroup, Ecology or the Bureau. If these designations are not accomplished, doesn't this reduce the Habitat/Watershed Protection and Enhancement Element?

13-84 The Wise Use Movement supports adding the entire remaining roadless area surrounding the existing Bumping Lake reservoir to the William O. Douglas Wilderness Area.
What is the purpose of Wild and Scenic River designation for the American, Upper Cle Elum, and Waptus Rivers? Are there any new dams proposed on these rivers? If these Wild and Scenic River designations were included as recommendations in the Wenatchee National Forest 1990 Forest Plan and Wilderness designation for Teanaway roadless areas were included as recommendations in 2011 preliminary planning documents, shouldn't these be classified similar to ongoing projects that could be accomplished independent of the "Integrated Plan?"

13-85 Sec. 2.4.8 Enhanced Water Conservation Element (Water Supply Component)
Sec. 2.4.8.1 This section provides no specific information on this element. How is it possible that 170,000 acre-feet of water conservation remains to be carried out when water conservation was supposed to have been carried out under YRBWEP Phase 2?
What are the specific water conservation measures that would be carried out on each Yakima irrigation division/district under YRBWEP Phase 2? What are the specific water conservation measures that would be carried out on each Yakima irrigation division/district under the "Integrated Plan."

13-86 Sec. 2.4.8.2 Municipal and Domestic Conservation Program
How can domestic conservation be carried out if unlimited stockwatering groundwater withdrawals are allowed to continue in the basin? Isn't municipal and domestic conservation an ongoing obligation in the 21st Century? Shouldn't this program be part of ongoing projects?

13-87 Sec. 2.4.9 Market Reallocation Element (Water Supply Component)
This is one of the most disappointing sections in the entire DPEIS. We request the Bureau and Ecology summarize the "Market Based Reallocation of Water Resources", Yakima River Basin Study Task 4.12, November 19, 2010. This report, page 14, estimated inter-district water trading of 50,000 to 110,000 acre-feet and intra-district water trading of 90,000 to 230,000 acre-feet. How far would an aggressive market reallocation go toward meeting the stated irrigators' goal of a water supply of 70 percent of proratable water rights during a drought year?

13-88 Sec. 2.5 Alternatives Eliminated from Detailed Study
Sec. 2.5.1 Black Rock Reservoir
Page 2-32 states that Black Rock does not solve major aquatic resource problems including fish passage and degraded habitat. Isn't it also true that a new Bumping Lake dam and new Wymer dam also do not solve major aquatic resource problems including fish passage and degraded habitat? Don't both these dams destroy habitat for ESA listed or candidate species such as northern spotted owl, bull trout and sage grouse?

13-89 Sec. 2.5.2 Other Storage Projects
Table 2-1 lists 30 potential storage sites considered. What is the cost of each storage site study?
Sec. 1.7.2 states that "some 35 potential storage sites" have been evaluated. Including Black Rock and Pine Hollow Reservoir, this only accounts for 32 sites. Weren't storage sites considered at Cabin Creek and Silver Creek? Why were these sites not included on Table 2-1? Weren't storage sites considered at Selah Creek and Burbank Creek? Why were these sites not included on Table 2-1? What other storage sites in the Yakima River basin have been considered that are not listed in Table 2-1?

13-90 Sec. 2.5.3 Operational Changes at Existing Reservoirs
This section states that the "flip-flop" could be modified to reduce adverse impacts. What adverse impacts are referred to?

13-91 Sec. 2.5.4 Reliance on Conservation and Water Marketing
Ecology's 2009 FEIS on the Yakima River Basin Integrated Water Resource Management Alternative indicated that nearly 225,000 acre-feet of water conservation is possible. What is the total proposed water conservation savings under the YRBWEP Phase 2 and under the proposed "Integrated Plan."

This section does not present a range of alternatives. If the amount of water exchanged by the Market Reallocation Element were 230,000 acre-feet and the amount of water conservation were 225,000 acre-feet, how close would this come to meeting instream and out-of-stream needs?

13-92 Table 2-2 Comparison of Impacts for Alternatives
Can the Bureau and Ecology provide a definition of "old-growth vegetation?" Is this a recognized biological term?

13-93 Chapter 3.0 Affected Environment
Sec. 3.2 Earth
Page 3-4 states that Yakima River floodplains are now degraded. Please provide some context to explain the causes of this degradation and what areas are most capable of restoration?

13-94 Sec. 3.2.1.1 Cle Elum Dam
This section describes this as an earthfill dam (as is Keechelus and Tieton Dams). Lake Kachess, Rimrock Reservoir, Bumping Lake Dam, and Clear Lake Reservoir are mentioned in Sec. 3.2.1.2, Sec. 3.2.3, Sec. 3.2.3.1 and Sec. 3.3.2.1 but do not state if these are also earthfilled. If so, please clarify these sections. What dam safety studies have been done on all earthfilled dams in the Yakima River basin? Are any of the dams susceptible to the same catastrophic dam failure that caused the collapse of the Bureau's Teton Dam in Idaho in 1976?

13-95 Sec. 3.3.1 Yakima River Hydrology
This section references annual precipitation and snow pack. What percentage of snowfall occurs on US National Forests in the basin?

13-96 Sec. 3.3.2 Yakima River Basin Reservoirs
This section states that the Yakima River basin reservoirs are operated to supply the needs of the system as a whole. What is the system? Isn't it correct that the basin reservoirs are operated to supply the needs of the Yakima Project and its irrigators?

13-97 Sec. 3.3.2.1 Sixth Reservoir (Snowpack)
We would again request a much more comprehensive review of the role that US National Forests play in providing a "sixth reservoir." How much of this "sixth reservoir" is within US National Forests? How much of this "sixth reservoir" is designated Wilderness? What analysis did the Workgroup carry out to explore ways of improving snowpack retention in the basin? How would snowpack retention be improved if the US National Forests stopped tree cutting and carried out an aggressive tree-planting program?

13-98 Sec. 3.3.4.5. Teanaway River Basin
Page 3-13 states that there has been extensive logging in the upper watershed. What is the acreage and land ownership of these lands? How can land in the middle and lower Teanaway River basin (the 45,000 acres proposed for targeted acquisition) be protected if the upper watershed is so heavily disturbed?

13-99 Page 3-13 states that exempt wells from residential development may be in continuity with the Teanaway River. On page 3-79 it states that surface and groundwater systems of the basin are interconnected. If this is the case, then this statement should be revised to state that surface and groundwater systems are interconnected in the Teanaway River basin, as well.

13-100 Sec. 3.3.4.8 Lmuma Creek
What is the average and annual stream flow of Lmuma Creek?

13-101 Sec. 3.3.5.1 Total Water Supply Available
If the TWSA must be allocated first to non-proratable irrigation divisions/districts how can any of this water be allocated to instream flows?

13-102 Table 3-5 Historical April 1 TWSA Estimates
This table while perhaps accurate for April 1, is misleading as it only provides estimates and does not display the ACTUAL TWSA on July 31. Please provide an additional showing the TWSA forecast for each year on July 31. In addition, the TWSA "Estimates" only go through 2005. Please provide April 1 TWSA estimates and July 1 ACTUAL TWSA on July 31 for 2006 through 2011. Why did the Bureau and Ecology fail to provide these most recent years?

13-103 Sec. 3.3.5.3 Current Operations
Page 3-19 states that the impacts of the drought year of 1977 were reduced because of favorable carryover storage from 1976. If this was the case, why did the Bureau and Ecology estimate that proratable water uses would receive only 15 percent of their normal water use as stated on page 1-15?

13-104 Page 3-19 states that entitlement diversions do not include irrigation diversions on tributaries or adjudicated streams such as Big Creek, Little Creek, Teanaway River, Taneum Creek, Manastash Creek, Wenas Creek, Cowiche Creek, Ahtanum Creek, and others. What is the total diversion of these non-entitlement diversions? What water conservation plans are approved for these non-entitlement diversions? How will the "Integrated Plan" affect these non-entitlement diversions?

13-105 Page 3-20 states that the RID and KRD contract for their entire water supply. What are the water contracts for each division/district? How much are water users in the basin paying for each acre-feet?

13-106 Table 3-8. How do these proration percentages compare to the figures given in Table 5-1?. Table 5-1 shows that 1994 resulted in a 21% irrigation proration level, while Table 3-8 shows that 1994 results in a proration percentage of 37%. Other proration percentages on these tables for the same year also do not match. Please explain these discrepancies.

13-107 Page 3-21 states that during water-short years of 1994, 2001, and 2005, emergency water right transfers were authorized. Is this program still in effect? Is it limited to emergency situations? Who declares these emergencies?

13-108 Sec. 3.3.5.4 Target Flows
Page 3-22 states that target flows have been developed for the Yakima River basin. What is the difference between the historical Yakima Project Target Flows in Table 3-9 and minimum and optimum instream flows?

Page 3-23 states that Title XII authorized target flows as low as 65 percent of the Title XII minimum flow for a 24 hour period at the Sunnyside Diversion Dam (Park gage) and up to 50 cfs below target flow at Prosser Diversion Dam. What would the historical instream flows prior to the Bureau's Yakima Project been for each of these reaches? Table 3-11 provides no quantitative information, nor does it appear to actually provide a comparison. In Table 3-10, why are the flows past the Parker Gage July-September demand labeled Title XII "Minimum Flow?"

13-109 Page 3-24 states that water entitlements stipulated in the 1945 Consent Decree are not changed by Title XII. If this is the case, wouldn't water entitlements stipulated in the 1945 Consent Decree also remain the same under the "Integrated Plan?"

13-110 Sec. 3.3.6 Yakima River and Tributary Flow Issues
Please describe the land use practices above the Yakima River basin reservoirs. If forest practices accelerate snow melt in spring, flow conditions can hardly be called more natural. What are land ownership patterns and acreage above each reservoir?

13-111 Sec. 3.5.3 Tributary Water Quality
Table 3-12 provides a 303(d) listing for Yakima River basin tributaries. Why has such little progress been made on improving water quality parameters since 1996? Please provide an updated 303(d) listing for 2011.

13-112 Sec. 3.5.3.2 Naches River Basin Tributaries
This section states that forest practices contribute to high temperatures. What is the land ownership that contributes to this problem?

13-113 Page 3-34 states that in 2003 temperatures greater than 16 degrees C were measured in the Bumping River, Teneum Creek, North Fork Taneum Creek, and South Fork Tieton River. What accounts for these high temperatures in these reaches?

13-114 Sec. 3.5.4 Yakima River
Page 3-34 states that water quality degrades in the Yakima River downstream to the mouth. Page 3-35 states that point source discharges on dissolved oxygen are noticeable in the lower Yakima Valley. What are the specific sources of water quality degradation in the lower Yakima River? What are the specific sources of point source pollution in the lower Yakima River? How many National Pollution Discharge Elimination System (NPDES) permits discharge into the Yakima River? How many NPDES permits that discharge into the Yakima River have expired?

13-115 Sec. 3.7 Fish
What are the total annual number of wild anadromous fish for each species in the Yakima River basin? What are the total annual number of hatchery (supplemented) fish for each species in the Yakima River basin?

13-116 Sec. 3.7.1.1 Distribution of Steelhead and Salmon

13-116 What restoration is planned for summer Chinook in the Yakima River basin?

13-117 Sec. 3.7.1.2 Anadromous Fish Status
Page 3-41 states that Pacific lamprey is a Federal species of concern. What recovery plan is in effect for Pacific lamprey? What instream flows are required for Pacific lamprey recovery? What is the potential for fish passage facilities to aid Pacific lamprey? What is the potential for Pacific lamprey habitat above the existing reservoirs?

13-118 Sec. 3.7.1.3 Habitat Conditions for Anadromous Fish
Page 3-44 states that bottom-draw release structures provide homogeneous, cold discharge to the Yakima, Kachees, Cle Elum, Tieton, and Bumping Rivers that may interfere with certain aspects of salmonid ecology. Will these adverse impacts continue under the "Integrated Plan?"

13-119 Sec. 3.8.1, Sec. 3.8.2 and Sec. 3.8.3
For each of these basins (Upper Yakima, Lower Yakima, and Naches), please identify the major landowners, both public and private, including acreage.

13-120 Sec. 3.9 Wildlife
Sec. 3.9.2.2 Naches River Basin
Page 3-54 describes wildlife surrounding the Bumping Lake and Rimrock Reservoirs. The ancient forests along the northern side of Bumping Lake contain spectacular examples of red ant mounds as high as four to five feet. These mounds would be destroyed by a new Bumping Lake dam. What red ant mound inventory has the Bureau and Ecology carried out in the Bumping Lake area?

13-121 Sec. 3.10 Threatened and Endangered Species
Please identify all ESA listed species and their habitat that would be destroyed on public lands within the Yakima River basin under the "Integrated Plan." Will the Workgroup apply for an ESA "Take" permit?

13-122 Sec. 3.13.3.1 Risks to Water Supply
Page 3-75 states that the water supply of the Yakima River basin is susceptible to changes in snowpack due to climate change. We again request that the PEIS provide an analysis of historic changes to snowpack runoff changes due to tree cutting in the Yakima River basin on federal, state and private lands. How has snowpack runoff changed from historic levels? Please provide modeling results showing such runoff changes similar to Figures 3-5 to 3-8.

13-123 Table 3-17 and Table 3-18. Both of these tables are labeled NRNI (No Regulation No Irrigation) representing current or historical hydrologic conditions. Which is it? Is it the current or the historical conditions? We request that these tables and Figures 3-5 to 3-8 display both historical conditions (pre-reservoir) and current conditions.

13-124 Sec. 3.16.1.1
Page 3-88 states that under the Wild and Scenic Rivers Act no U.S. department of agency may assist in the construction of a water resources project on a designated river. If the purpose of the Wild and Scenic Rivers Act is to protect free-flowing rivers from dams, what dam proposals have been made for the American, upper Cle Elum, and Waptus Rivers?

13-125 Sec. 3.16.1.3 Regulation of State Lands
Page 3-88 states that local Shoreline Master Programs are intended to protect shoreline ecology, public access, and water-dependent uses and to require mitigation of impacts where appropriate. What is the status of Shoreline Master Programs within the Yakima River basin? Please list all such programs and the dates they were last updated. How many miles of Yakima River basin shorelines are designated as a "Natural" environment? Why haven't the Shoreline Master Programs been more successful in protecting Yakima River basin shorelines?

This section should be changed to Regulation of State and Private Lands. The Shoreline Management Act applies to private lands, as well.

13-126 A separate section is also needed for the State Growth Management Act. We request that this be included along with an analysis of how the Growth Management Act's critical area requirements have been incorporated into land use planning in the Yakima River basin.

13-127 Sec. 3.16.2 Current Land Use
What percentage and acreage of the Yakima River basin is in private forest lands? What percentage and acreage is in state land? What is the percentage and acreage of the Yakima Training Center, the Hanford Nuclear Reservation, and Bureau of Land Management lands within the Yakima River basin?

13-128 Chapter 4.0 Short-Term Impacts and Mitigation Measures
Sec. 4.1 Introduction
This section lists the elements of the "Integrated Plan." However, this section does not list individual actions that would be undertaken by various entities and agencies under the No Action Alternative. What are the specific individual actions that would be undertaken under the No Action Alternative?

13-129 Sec. 4.3.2.3 Surface Storage Element
Page 4-7 states that Bumping Lake Reservoir may need to be temporarily drawn down to all removal of a portion or all of the existing dam. How long would this take? What impact would this have on bull trout above and below the existing dam?

13-130 Sec. 4.7 Fish
4.7.1 No Action Alternative
Why are artificial supplementation programs listed under No Action Alternative short-term impacts to vegetation (page 4-20), but not under No Action Alternative short-term impacts to fish (page 4-16). What are the short-term impacts to fish from artificial supplementation programs? As noted previously, the PEIS should describe each of these programs, their location, their cost, and what outcomes have been achieved to date?

13-131 Sec. 4.10.2.3 Surface Storage Element
Page 4-30 states that habitat for Middle Columbia River steelhead would be temporarily affected by construction of a new dam. What are these impacts? How would steelhead be affected?

13-132 Sec. 4.22.2.1 Reservoir Fish Passage Element
Page 4-63 states that fish passage expenditures would create local jobs at the rate of about one job per every $102,900 of total construction expenditures. The PEIS should clarify that local jobs do not necessarily mean local hiring. For each "Integrated Plan" element, what is the estimated number of local hiring (within the Yakima River basin)?

13-133 Section 4.25 Cumulative Impacts
Page 4-31 states that mitigation for listed fish and wildlife species would be associated with conservation measures identified during future Endangered Species Act consultations. Without ESA consultations, state and Federal decisionmakers lack the necessary information to approve any of the elements proposed by the "Integrated Plan." What the Bureau and Ecology are doing is segmenting each "Integrated Plan" proposed action and avoid a cumulative analysis of ESA impacts. This results in an inadequate EIS. Will the Bureau and Ecology address cumulative impacts on Endangered Species as part of the EIS process?

13-134 Chapter 5.0 Long-Term Impacts and Mitigation Measures
Sec. 5.1 Introduction
Page 5-1 states that the details of project implementation are not well known. 40 CFR 150.22 requires the following when there is incomplete or unavailable information:

> When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking.
>
> (a) If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement.
>
> (b) If the information relevant to reasonably foreseeable significant adverse impacts cannot be obtained because the overall costs of obtaining it are exorbitant or the means to

13-134 obtain it are not known, the agency shall include within the environmental impact statement:

> (1) A statement that such information is incomplete or unavailable; (2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; (3) a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment, and (4) the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.

40 CFR 1502.22 [51 FR 15625, Apr. 25, 1986].

We request that the Bureau comply with 40 CFR 1502.22, as set out above.

13-135 Page 5-1 states that projects or actions included as features of the Integrated Water Resource Management Plan would be subject to subsequent project-level environmental review under NEPA and SEPA before being approved for implementation should the Integrated Water Resource Management Plan alternative move forward. Why has the Workgroup established an Implementation Subcommittee that has already prepared an "Early Implementation Request" (October 2011)?

This request includes a base cost and a request for 2012:

- Tributary Habitat Enhancement Program ($180 million) ($2.6 million)
- Fish Passage At Clear Lake Dam ($3 million) ($0.4 million)
- Subordinate Power Divisions, Roza & Chandler ($0.5 million) ($0.5 million)
- Pool Level Increase at Cle Elum Dam ($16.8 million) ($2.0 million)
- Land Acquisition (TBD) ($2.0 million)
- Wymer Reservoir ($1.077 billion) ($2.0 million)
- Fish Passage at Cle Elum Lake Dam ($87.6 million) ($2.6 million)
- Bumping Lake Enlargement ($402.5 million) ($1.2 million)
- Pipeline from Lake Keechelus to Lake Kahess ($190.7 million) ($3.5 million)
- Lake Kachess Inactive Storage ($253.8 million) ($1.5 million)
- Groundwater Infiltration Pilot study ($4.7 million) (1.6 million)

This results in a base cost of $2.216 billion (without the land acquisition element) and a 2012 request of nearly $21 million. .This figure is far lower than other cost figures that have appeared in other studies. Why didn't the Workgroup present a range of alternatives for the base costs? How can this be considered a balanced plan if two new storage reservoirs make up two-thirds of the total costs? Where does the Bureau and Ecology plan on obtaining $21 million dollars in 2012? Please identify all sources of funding. What contribution will Yakima River basin irrigation divisions/districts contribute? What is the estimated increase in water contracts that would occur as a result of the "Integrated Plan?"

13-136 Sec. 5.2.2.3 Surface Storage Element
What core samples have been taken to verify that a new Bumping Lake Dam and a new Wymer Dam can be safely constructed?

13-137 Sec. 5.3.1 No Action Alternative
We again object to the characterization of the No Action Alternative would not meet the purpose and need for the action. As stated above, the DPEIS fails to display a range of alternatives. In addition, the DPEIS fails to display a non-structural alternative such as more aggressive water marketing, water conservation, water reallocation or crop switching. While Table 5-1 attempts to paint a dire picture of disaster during drought years, weather variability has always been a feature of the Yakima River basin. Additional measures such as crop insurance, or an aggressive conservation reserve program could provide both habitat restoration and reduce water demand. We request that the PEIS provide a range of alternatives.

13-138 Why do irrigation proration level percentage differ from those presented in Table 3-8?

13-139 Page 5-8 states that the Integrated Plan operating modeling did not include all of the instream flow objectives prepared by a Workgroup fisheries subcommittee. Why weren't these flow objectives included? What changes to the RiverWare Model would result if they were included?

13-140 In Table 5-2, how is it possible for the irrigation proration level to reach exactly 70 percent under the model runs in 1993, 1994, 2001 and 2005?

13-141 Page 5-9 states that the Yakima River tributaries are not represented in the RiverWare model, and flow improvements for the tributaries could not be modeled. Why not? If this is the case, what is the source of the tributary data provided in Table 5-3? What are the desired flow objectives and modeled outcomes of the "Integrated Plan" for the Yakima River reach from Prosser downstream to the Columbia River?

13-142 Why is Table 5-3 focused on "minimum flows." How do minimum instream flows aid in the recovery of ESA listed species or resident fish? Would the "Integrated Plan" meet optimum instream flows for any Yakima River reach or tributary?

13-143 Sec. 5.3.2.2 Reservoir Fish Passage Element
Page 5-15 states that the fish passage element is not expected to affect water delivery contracts. As noted above, please include information on water delivery contracts, how much is delivered, the costs, and when the contracts are up for renewal for each Yakima River basin irrigation division/district.

13-144 Sec. 5.3.2.7 Enhanced Water Conservation Element and Sec. 5.3.2.8 Market Reallocation Element
These sections fail to describe the impacts of agricultural conservation on surface water under a range of water conservation alternatives. We request the modeling efforts include the impacts from 250,000-300,000 acre-feet of water conservation and from 250,000-350,000 acre-feet of water reallocation.

13-145 Sec. 5.5 Water Quality
Page 5-24 states that improved streamflows are expected to improve water quality conditions. Please identify those stream reaches where water quality would improve and which water quality parameters would be reduced. Is the Bureau and Ecology assuming that dilution (with increased stream flows) is the solution to pollution?

13-146 Sec. 5.5.2 Integrated Water Resources Management Plan Alternative
Pages 5-24 to 5-25 states that new reservoirs may increase temperatures of water released from the dams. Isn't this contradicted by the statement on page 3-44 that bottom-draw release structures provide cold discharge water? If new reservoirs would increase temperatures, please quantify this increase. How does the Bureau intend to operate reservoirs to "minimize temperature impacts?"

Sec. 5.5.2.3 Surface Storage Element
Page 5-26 states that flows from Wymer Dam have the potential to be warmer than downstream Yakima River water. Flows from a Bumping Lake Enlargement could also cause warmer temperatures. Isn't this contradicted by the statement on page 3-44 that bottom-draw release structures provide cold discharge water? If new reservoirs would increase temperatures, please quantify this increase. How does the Bureau intend to operate a Wymer Dam or Bumping Lake Enlargement to "minimize temperature impacts?" Temperature is already a water quality parameter on the 303(d) list for the Yakima River and Bumping River (Table 3-13). Wouldn't the Bureau and Ecology be prohibited from building either Wymer Dam or a Bumping Lake Enlargement if temperatures increase downstream and make it less likely to meet water quality parameters?

Sec. 5.5.4 Mitigation Measures
What mitigation measures are proposed for possible increases in temperatures from water releases from Wymer Dam and a Bumping Lake Enlargement?

13-147 Sec. 5.7 Fish
Sec. 5.7.1 No Action Alternative

13-147 Page 5-34 states that under the no action alternative, the Bureau or Ecology would not expand programs to protect or enhance fish habitat. Please delete this statement. Under the ESA, recovery plans require additional programs to protect and enhance fish habitat.

13-148 Sec. 5.7.2.1 Reservoir Fish Passage Element
What additional predation or interactions between resident and anadromous fish would result from the fish passage element of the "Integrated Plan?"

13-149 Sec. 5.7.2.3 Surface Storage Element
Page 5-36 states that new storage would support increased flows for anadromous and resident fish passage. As noted above, this appears to be contrary to the TWSA concept as set out in the 1945 Consent Decree. Please delete all statements in the PEIS that claim that new storage is available for increased fish flows.

13-150 Page 5-36 states that the Bumping Lake enlargement project would inundate approximately 18 to 20 percent of redds found annually in Deep Creek. How many feet of Deep Creek and bull trout habitat would be inundated by the Bumping Lake enlargement project?

13-151 Sec. 5.7.2.5 Habitat/Watershed Protection and Enhancement Element
As previously mentioned, the DPEIS fails to provide any details on these habitat enhancements. What are these enhancements and where are they located?

13-152 Table 5-6, page 5-41
How much of the listed fish population improvements are due to hatchery/supplementation programs in the Yakima River basin? What is the location and cost of the current hatchery/supplementation programs? At what point will hatchery/supplementation programs in the Yakima River basin cease?

For Table 5-6, please add a column showing the improvements attributable to hatchery/supplementation programs.

13-153 For Table 5-7, please added a column showing the improvements to sockeye populations attributable to hatchery/supplementation programs.

For Table 5-8, please added a column showing the improvements to sockeye populations attributable to hatchery/supplementation programs.

13-154 Page 5-44 states that additional bull trout management actions are identified in Section 3.1.5. There is no Section 3.1.5. Please correct this.

13-155 Page 5-45 states that for Deep and Box Canyon creeks, and for the Bumping and Kachess rivers, the "Integrated Plan" would result in adverse impacts without commensurate mitigation and that any potential adverse effects on bull trout would require appropriate mitigation. The proposed Bumping Lake Enlargement would flood significant amounts of bull trout habitat. How can flooded bull trout habitat be "mitigated' within the Bumping River drainage? Where has the Bureau or Ecology been successful in mitigating for the loss of bull trout habitat?

13-156 For Table 5-9 please clarify when" ++" means re-connectivity and when it means another project.
Shouldn't this table indicate negative impacts to bull trout as "- - -" given that bull trout habitat would be destroyed?

13-157 Sec. 5.8.2.3 Surface Storage Element
Do the Bureau and Ecology agree that flooding up to 4,000 acres of shrub-steppe habitat for sage grouse at the Wymer Dam site cannot be mitigated and represents a permanent loss of this habitat?
Do the Bureau and Ecology agree that that flooding nearly 1,000 acres of ancient forests (late successional forest habitat) around Bumping Lake cannot be mitigated and represents a permanent loss of this habitat? As previous mentioned, we agree with the U.S.F.S. Naches Ranger District that the Bumping Lake Enlargement has more negative effects on the resource and uses of National Forest System lands than benefits. Do the Bureau and Ecology agree with this?

13-158
Sec. 5.9 Wildlife
Sec. 5.9.2.3 Surface Storage Element
As noted above, the ancient forests surrounding the existing Bumping Lake contain a significant number of very large and tall red ant mounds. Have the Bureau and Ecology carried out an inventory of such ant mounds in this area? We request that additional information about these ant mounds be included in the PEIS.

Sec. 5.9.4 Mitigation Measures
What mitigation has the Bureau and Ecology proposed for the loss of red ant mounds due to flooding from a Bumping Lake Enlargement?

13-159
Sec. 5.10 Threatened and Endangered Species
Sec. 5.10.2.1 Reservoir Fish Passage Element
Page 5-59 states that bull trout would benefit from an increased prey base. What is this prey base? What other predation interactions would occur involving ESA listed fish species due to the fish passage element?

13-160
Sec. 5.10.4 Mitigation Measures
The "Integrated Plan" would result in the direct habitat loss to ESA listed (or candidate) species habitat of the northern spotted owl, bull trout and sage grouse. There is no mitigation that can replace this lost habitat. One purpose of the ESA is to promote the recovery of ESA listed species and to avoid the loss of ESA listed species habitat. Do the Bureau and Ecology agree that there will be no mitigation for the loss of ESA listed species habitat under the "Integrated Plan?"

13-161
Sec. 5.16.2.3 Surface Storage Element
Page 5-87 states that no long term impacts to land and shoreline use would be expected from the Bumping Lake enlargement project. Please delete this statement. The Bumping Lake enlargement project would destroy roadless area within the Wenatchee National Forest that should be included within the William O. Douglas Wilderness Area. This is a long-term impact that should be added to this section.

13-162
Sec. 5.22 Socioeconomics
Sec. 5.22.2.3 Distribution of Costs and Benefits
The long-term impacts on the distribution of costs and benefits associated with surface water storage would NOT be similar to those described in Sec. 5.22.1.4 (the no action alternative). Wouldn't the billions of dollars of costs of the "Integrated Plan" be borne by the state's and nation's taxpayers? Wouldn't the costs of the "Integrated Plan" be borne by dryland farmers who do not receive a state and federal subsidy for irrigated farming? Wouldn't the benefits of the "Integrated Plan" accrue to a relatively small number of irrigators? This section should clarify that the "Integrated Plan" represents a transfer billions of dollars from taxpayers who will receive no direct benefit.

13-163
Sec. 5.24 Overall Long-term Impacts and Benefits of Integrated Plan
Page 5-114 states that under the Habitat/Watershed Protection and Enhancement Element, additional high-quality habitat would be acquired and protected. Where is this high-quality habitat? Please identify all such high-quality habitat areas on a map. Acquisition of existing habitat does not mitigate for the loss of habitat elsewhere. Have any Bureau or Ecology projects involving the loss of ESA listed species habitat been mitigated for by acquisition of other habitat? If so, where?

13-164
Sec. 5.26 Unavoidable Adverse Impacts
Please revise this section to note that long-term Endangered Species Act impacts related to the loss of nearly 1,000 acres of ancient forest habitat for northern spotted owls, 4,000 acres of shrub-steppe habitat for sage grouse and tributary habitat loss for bull trout would occur. Pages 5-119 to 5-120 state that these impacts would be offset by the Habitat/Watershed Protection and Enhancement Element. Please delete this sentence. There has been no ESA consultation and no finding that that there is any acceptable offsets for these losses.

13-165
Sec. 5.28 Irreversible and Irretrievable Commitments of Resources
Please revise this section to note that irreversible and irretrievable commitment of resources include Endangered Species Act habitat losses of nearly 1,000 acres of ancient forest habitat for

13-165
northern spotted owls, 4,000 acres of shrub-steppe habitat for sage grouse and tributar loss for bull trout.

13-166
Chapter 6.0 Consultation and Coordination
This chapter does not describe the public involvement undertaken by the Bureau and Ecology to date. It ignores the numerous public involvement process problems involved in establishing a "Workgroup" with limited representation; "Workgroup" meetings where action items were agreed to prior to any public comment period; "Workgroup" subcommittee meetings that did not have public notice; and "Workgroup" Implementation subcommittee meetings that are closed to the public. The public cannot have confidence in a NEPA or SEPA document that has such a failed public process in the development of the "Integrated Plan." We request that this section be revised to indicate that it only represents the steps taken in preparing the DPEIS.

13-167
Sec. 6.6.2 Endangered Species Act, Section 7
This section states that no Section 7 ESA consultation has been carried out because the selection of a preferred alternative would have no effect on listed species. This is incorrect. The Workgroup has already prepared an Early Implementation Request of actions and a Workgroup Implementation subcommittee is already actively seeking funding for these actions. Therefore, the selection of a preferred alternative will have an effect on listed species by providing a "green light" to carryout and fund various elements of the "Integrated Plan."

Therefore, we request that Bureau and Ecology carry out Section 7 ESA consultation on the "Integrated Plan."

13-168
List of Preparers
Of the eight pages of preparers of the NEPA and SEPA EIS, only one is an Ecology employee. How can Ecology ensure that SEPA has been followed if only one Ecology employee has contributed to the preparation of the DPEIS?

13-169
In summary, we remain disappointed that since 1979 so little progress has been made on non-structural alternatives to new storage dams in the Yakima River basin. There is a reason no new irrigation dams have not been built in the Yakima River basin, even though over 30 sites have been studied. That is because none have been found to be cost-effect with costs far exceeding benefits. We request that the Bureau and Ecology respond to each comment and question as set out by 40 CFR 1503.4, especially by developing and evaluating alternatives not previously given serious consideration.

Please send us a copy of any revised DPEIS or FPEIS.

Signed,

John de Yonge
/ Signature

President
Wise Use Movement

San Francisco Chronicle

In the drying West, dams are no longer the answer

George Miller

Thursday, January 8, 2009

In the 1960s, the U.S. Bureau of Reclamation began planning a reservoir on the American River, hoping it would become a major element of California's extensive system of dams and canals that ships water across the state. The bureau studied the proposal, to be called Auburn Dam, for decades only to find the dam would cost $10 billion to construct - if it ever survived environmental review and if earthquakes didn't render the site useless in the interim. This fall, the State of California finally revoked the federal government's unused water right for the project. Ultimately, the Bureau of Reclamation spent more than 40 years and $300 million studying a dam that would never be built and would never deliver a drop of water.

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The Auburn Dam boondoggle is not an outlier. The Bureau of Reclamation is a billion-dollar-a-year water management agency created for a different era, when our nation had different needs. Enormous water infrastructure projects like dams and reservoirs once drove agricultural and urban development, but no longer. Today, the serious water challenges facing the American West have been exacerbated by climate change, and the largest water manager in the country hasn't adapted. The Bureau of Reclamation has constantly convinced themselves that building one more big dam - or one more canal - would finally solve our water problems.

In some cases, reservoirs help to meet our new water needs, but such expensive and time-consuming projects only make sense in the context of an agency that follows the science and the law, is a wise steward of the resource, and promotes cost-effective solutions. It's hard to say that the Bureau of Reclamation is that agency, and to remain relevant in the coming years the agency will have to reinvent itself.

President-elect Barack Obama has articulated a clear and compelling vision of a government that, in sharp contrast to the last eight years, addresses real-world problems. As he said last month, "This isn't about big government or small government. It's about building a smarter government that focuses on what works."

Smart government, when it comes to supplying water to cities, farms and the environment in the 21st century, will mean leaving behind the dam-building and pipeline-laying federal bureaucracy of the last hundred years. If we put our money into proven and cost-effective strategies like groundwater cleanup and better coordination between reservoirs, then we can dramatically improve the reliability of our existing clean water supplies without wasting time and energy chasing the cumbersome and expensive infrastructure dreams of the past century.

Instead of spending time and money we can't afford to study dams that will never be built, the federal government should work with local water managers who have cost-effective plans to stretch their existing water supplies. In the city of Pittsburg, in my congressional district, and in other parts of the Bay Area, for example, water managers are actively pursuing alternative water supplies through water recycling, where wastewater is treated and the clean result is reused for commercial irrigation and industrial processes. This allows us to add water to the system - quickly, reliably and without causing environmental damage or depending on increasingly unreliable snowpack. Congress authorized the San Francisco Bay Area Regional Water Recycling Program last year, which will pump nearly $30 million in federal seed money into the system that will be matched many times over by local entities. Congress will be pursuing similar efforts in the years to come.

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Under the Bush administration, the Bureau of Reclamation fought these proposals every step of the way.

Federal agencies also need to do much more to help businesses, farms and cities adjust to a new, more water-constrained future by becoming more efficient. California has already proved it can rise to such a challenge with energy use: We use 40 percent less electricity per capita than the national average, and a recent UC Berkeley study found that our investments in energy efficiency have created more than a million jobs while saving Californians $56 billion in energy costs. We can take that model and apply it to our world of water.

Significantly improving the water-use efficiency of major appliances and fixtures could save billions of gallons of water per day, yet today there are no tax incentives targeted specifically at water conservation. Expanded federal incentives, improved research and development, and stronger federal efficiency requirements can help us reduce our reliance on dwindling or unstable water supplies, while driving innovation, saving money and adding to the economy.

Now is the time to have a serious conversation about whether we will still need a $1 billion-a-year federal dam construction and water management agency in the 21st century. The president-elect and his team clearly understand the challenges posed by a warming and more variable climate, and they recognize that a smarter government can help America meet its challenges. It's time to insist that an old bureaucracy learn new tricks so that we can meet our clean water needs without breaking the bank or wreaking havoc on our natural waterways.

Rep. George Miller, D-Martinez, is a member of the House Democratic Leadership and the former chairman of the House Natural Resources Committee.

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Drought in the Yakima Basin -- More Water Storage Isn't the Answer, but There Are Solutions

Article from Yakima Herald-Republic Article date: April 1, 2001 Author: BOB TUCK

GUEST COMMENTARY

The first drought in the Yakima Basin after irrigation development reached its present scope occurred in 1973. In the nearly three decades since, the basin has experienced several drought years: 1977, 1979, 1988, 1992, 1993 and 1994.

The current water year is shaping up as one of the lowest water supply years on record. Competing demands for water in the basin have sparked a heightened interest in formulating plans to more efficiently use a severely limited resource, as well as renewed calls for the construction of additional storage projects.

There are those in the basin who view more water storage as the easy answer to periodic water-supply shortages. The question is, if construction of more water storage is the obvious and easy solution, why hasn't it happened over the past three decades? Answer: Because it is neither the appropriate nor defensible course of action as we move into the 21st century.

Even though the construction of new water storage continues to pose an irresistible allure to some, there are several reasons why additional water storage will not be constructed in the Yakima Basin:

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-- Cost. Water storage projects are enormously expensive. Even the proposed small Pine Hollow project is in the $40 million range. Building the Bumping Lake Enlargement project would cost a staggering quarter billion dollars. The only option to finance a project of this magnitude would require a direct taxpayer subsidy of enormous proportions.

--Environmental damage. Water-storage projects cause extensive environmental damage that cannot be avoided or mitigated, including the loss of fish and wildlife habitat, additional adverse modifications to the hydrograph, blockage of fish migration routes, decreases in water quality, and blockage of wildlife movement corridors.

-- Impacts on infrastructure and people. There are people and infrastructure located in every potential storage site in the basin. Even the proposed small Pine Hollow project would require several families to vacate their homes and move, some may not want to.

-- Political and legal hurdles. It is highly unlikely that a new storage project would survive economic, environmental, political, and legal scrutiny.

So, if more water storage is not the answer, what are some of the potential solutions to the periodic water supply shortages in the basin? Fortunately, there are programs and actions that can be implemented that would provide an adequate supply of water for irrigation and instream flows, and in a much more timely manner than attempting to build new storage.

-- Conservation. Many of the irrigation districts have been implementing water-conservation programs for a number of years, but more can and should be done. Additional state and federal funds should be provided so a more aggressive conservation program can be implemented.

-- Water must be severed from the land, so water sales and leases can move water freely between users, and between uses. This would require significant modifications to Washington water law. Both the Roza Irrigation District and the Kittitas Reclamation District are attempting to buy water for this irrigation season. They are on the right track. Dry-year leases should also be implemented, so water can be available in a dry year for permanent crops. There are about 150,000 acres of irrigated pasture and hay in the basin. In dry years, the water associated with this acreage may be far more valuable than the forage produced.

-- Some land in the basin needs to be taken out of production. Property owners should be compensated through conservation easements, purchase of land and water rights, or other mechanisms. Congressional authorization for land and water purchases exists, and some purchases have been completed. However, this program needs additional funding to meet available opportunities.

Additional water storage projects are like heroin: They are very expensive, create illusions

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of power, make us dependent on a continuing supply, and eventually destroy the body. Those leaders and interests in the basin that remain fixated on new water-storage projects are doing the people of the basin a disservice. They are leading us down a dead-end street. They have cost us many years and many lost opportunities to implement programs that would have materially assisted farm families by providing the means to meet the challenges of a low-water year. How many decades will it take, how many drought years, how many family farms put at risk, until they understand that additional water storage is a mirage, a siren's song?

Those who advocate more water-storage projects have had more than a half-century to implement their preferred course of action. What have they accomplished? Not one new drop of additional water storage capacity has been constructed in that 50-year time span.

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It is time for all of us to realize that new water storage is not viable and get solidly and vigorously behind alternative courses of action that will meet the needs of the basin for an adequate water supply. Meeting the water-management challenges of the 21st century requires innovation, imagination, the ability to think "outside the box," changes to Washington water law, application of the latest technologies, and vision.

The Yakima Basin needs a 21st century system of water management for the 21st century, not one rooted in the mid-19th century. Do the people of the Yakima Basin, particularly the political, agricultural, and civic leadership, have the vision to successfully meet the challenges of properly managing water in the 21st century? Stay tuned.

-- Bob Tuck is a natural resources consultant from Selah.

Comments of
Katherine Ransel, American Rivers
regarding
Water Storage versus Water Conservation in the Yakima Basin
(2001)

Between 40-60% of the crops in the Yakima valley are still grown with rill, furrow and other inefficient on-farm water application technologies, according to the statistics I have seen. There has never been a sophisticated analysis of what water could be made available from upgrading irrigation delivery and on farm-systems in the Yakima valley to best available technologies, to my knowledge, although this kind of analysis is performed quite regularly in other water scarce areas, such as in the Central Valley of California (irrigation districts there have upgraded their systems and sold the water yielded to cities). Moreover, no analysis has been done of the potential for water transfers and other market based incentives to address the legitimate water needs of the Yakima basin, yet as much as 40% of the basin is in forage and other relatively low value crops. Water was leased last summer in the Yakima basin for from $50 to almost $500/acre foot for only one irrigation season or part of the irrigation season, which shows that there is a strong market incentive for the transfer of water from lower value crops to high value crops and other uses. Until such legitimate analyses are done, it is simply not fiscally responsible, let alone environmentally responsible, to advocate new supplies.

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Moreover, conservation and water transfers have other benefits, which are never taken into account. Besides avoiding the astronomical costs of new supplies, they also avoid the external costs of new supplies, that is, damage to the environment. This proposal would take water from Hanford Reach water supplies, where other programs are working to restore habitat conditions. It is trying to rob Peter to pay Paul instead of just paying the piper, which is to deal with the problem in the basin itself.

Conservation not only means stretching current supplies farther. The same technologies that increase efficiency also decrease the water *quality* impacts of irrigation water use. Drip irrigation, for instance, results in very little sediment runoff to the river compared to rill, furrow, and flood irrigation methods. Reports from the Department of Ecology a few years ago showed that at least 24 dump truck loads of soil - 355 tons - were washing off farms and into the Yakima river on a daily basis. The sediment chokes aquatic life and is laden with farm chemicals, some of which are toxic to fish and dangerous to people. It fills up pores in river gravel and destroys the homes and habitat of aquatic insects and salmon nests. It also increases water temperature, sometimes drastically, because it soaks up light and heat. And a 1993 study showed Yakima river fish had one of the highest concentrations of the carcinogenic pesticide DDT in the country, prompting the state Health Department to warn people not to eat many bottom fish from the lower river. The culprit is 19th century irrigation practices,

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such as rill, furrow and flood irrigation, that cause the soil, laden with fertilizers and pesticides, including the persistent pesticide DDT, to run off into the river. Twenty-first Century practices can be an important part of the solution. Moreover, modern application systems such as drip produce better crops. In other words, conservation and demand-side management can result in a win-win-win situation.

Instead of building new dams and diversions at exorbitant prices, both to our pocketbooks and to our river systems, we must ask how we can provide more benefit from each gallon of water we remove from nature. Experts suggest we need to double water productivity over the next 30 years if we are to successfully meet the needs of 8 billion people while protecting the health of the aquatic environmental. Highly efficient drip irrigation only accounts for approximately 1% of global irrigated area today. Farmers need to become comfortable with information technologies that tell them precisely how much water to apply to their crops and when to apply it. Industries must move to nearly complete internal water recycling, which will cut pollution and water use dramatically. And homes and communities must move from thirsty green laws to native landscaping, conserving water and enhancing biological diversity.

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Conservation, often viewed as just an emergency response to drought, must be transformed into a suite of measures resulting in cost-effective and environmentally sound ways of balancing water budgets. Just as energy planners have discovered that it is often cheaper to save energy (e.g., home insulation, compact fluorescent lights) than to build more power plants, water planners must realize that an assortment of water efficiency measures can result in *permanent* water savings which can delay or obviate altogether the need for expensive new dams and reservoirs, groundwater wells, and treatment plants. Managing water demand rather than continuously seeking to meet it can also result in tremendous costs savings and protect the environment at the same time.

Pricing incentives may be one of the most important steps we can take in a comprehensive conservation strategy. Proper pricing gives consumers an accurate signal about just how costly water is, and allows them to respond accordingly. More than 100 demand studies have determined that water pricing, in the form of increasing block rates, is a powerful conservation tool at the disposal of water utilities.

Conservation-based pricing structures have been successful not only in urban settings, but in agricultural settings as well, and have been endorsed (but not often implemented) by the Bureau of Reclamation. Moreover, as I noted above, changes in irrigation practices in response to conservation measures, motivated by inclining water rate structures and decreased deliveries, have been rewarded with yield improvements. Surface irrigation methods that result in non-uniform infiltration of water can reduce yields for crops that are susceptible to

overwatering.

Not only do many current pricing structures not reflect the true cost of the resource, some utilities actually reward waste by charging less the more that is consumed (declining block rates). Moreover, many water users are not even metered, which precludes even the possibility of charging people appropriately for their water use. Metering is not only a prerequisite to the success of most conservation measures, it encourages savings in and of itself simply by making people aware of the link between their water bill and their water use.

The 1994 Yakima River Basin Water Enhancement Project legislation has only begun to be implemented. The purpose of that legislation was to finance conservation and other system improvements in the Yakima basin to increase the stability of irrigation water and to transfer water to instream flows for salmon and steelhead recovery. An illustration of what technology improvements can do is the Yakima-Tieton irrigation district, which was able to decrease its diversions dramatically after installing a pressurized conveyance system in the mid-1980s. It is difficult at best to know the extent to which we may need additional storage in the basin and where it would make most sense without implementing the YRWEP legislation, and without fully implementing water trading programs, conservation-based pricing, and other conservation technologies suggested by Congress in that legislation.

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USDA United States Department of Agriculture | Forest Service | Okanogan and Wenatchee National Forests, Naches Ranger District | 10237 Highway 12, Naches, WA 98937, (509) 653-1400

File Code: 1920
Date: November 20, 2009

Mr. Derek Sandison
Central Regional Director
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, WA 98902-3452

Dear Mr. Sandison:

The Okanogan-Wenatchee National Forest encompasses much of the upper Naches River Drainage and the entire area of the existing pool and proposed enlargement of Bumping Lake as now being considered by the YRBWEP. The National Forest System encompasses numerous and varied resources managed under a multiple use conservation mandate. The Forest Service has stewardship responsibility for maintaining the integrity and productivity of these lands for both tangible and esthetic values. Clean, abundant water; wildlife and fish habitat; livestock forage; forest products and recreation opportunities are all part of our mission. With this in mind, we wish to formally express our perspective on the proposed modifications to the Bumping Dam.

We enthusiastically support the re-establishment of fish passage over Bumping Dam. As fish habitat managers and partners with the Washington State Department of Fish and Wildlife, providing improved access to suitable habitat above Bumping Dam would potentially benefit the restoration of historic anadromous fish populations that have long been absent in and above the lake.

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Enlarging the dam and reservoir has several potentially adverse effects on National Forest resources and facilities. Raising the pool's elevation would flood considerable existing forest area, some of which is identified as suitable habitat and may impinge upon a portion of a Critical Habitat Unit (CHU-WA 15) for the federally protected Northern Spotted Owl. Removal or inundation of this habitat could also have an adverse effect on those species that depend upon similar conditions. Deer, elk and numerous other wildlife species, including uncommon invertebrates, inhabit this area during various stages of their life histories. Flooding of normal use areas and travel routes could have an adverse effect on them, especially those with limited mobility.

High quality spawning and rearing habitat of threatened bull trout would be irreparably lost by the inundation of lower Deep Creek. Under the 458 KAF alternative, up to 40 percent of the accessible habitat in Deep Creek would be severely degraded and become non-productive. The bull trout population using Deep Creek is the third largest bull trout population in the Yakima River Basin. Permanent loss of pristine spawning and rearing habitat in Deep Creek would cause significant setbacks in recovery goals for Columbia River bull trout.

The expansion area has a high potential for the presence of rare plants and plant communities. For example, the upper Bumping River drainage is one of the few places on the District that supports large western red cedar trees and related mesic forest communities uncommon to the east slopes of the Washington Cascades.

Historic and pre-historic cultural properties would be adversely affected. A number of features related

to the construction of the original dam, historic structures and pre-settlement sites and artifacts would be inundated by the expansion. The historic structures are privately owned cabins on National Forest System lands authorized by recreation residence permits. With a very few exceptions, most of them were constructed well over 50 years ago and are potentially eligible for listing on the National Register of Historic Places. In addition to their historical value, these cabins have considerable intrinsic value to their owners and families.

We are also concerned about other facilities and improvements that are either within the footprint of the proposed expansion or would have their access cut off by the expanded pool. The 15 cabins referenced above and the Bumping Lake Marina operating under Special Use Permits on the north shore, two Forest Service campgrounds and a picnic area and boat launch ramp and numerous undeveloped camping sites on the south shore would be inundated. Given the proximity of the William O. Douglas Wilderness boundary to the new reservoir level, it is highly unlikely that a comparable replacement location on Bumping Lake could be provided for these facilities. Important recreation opportunities would be lost.

The current location of Forest Service Road 1800 would be inundated from the new dam location upstream for several miles. This in turn interrupts current motor vehicle access to Forest Roads 1808 and 1809 and the popular trailheads that serve hikers and equestrians using the William O. Douglas Wilderness. Admittedly, these trailheads are maintained to a rustic standard, but a recent analysis addressing restoration of motorized access to these areas revealed very strong public support for the proposal to repair flood damaged roads. We are currently seeking funds to build two bridges to accomplish that. A significantly enlarged pool makes it highly unlikely that acceptable alternate routes to these destinations would be feasible

13-170

Reduced access also complicates our ability to provide fire protection in the affected area. Without the ability to readily employ mechanized equipment, fires would have the potential for larger growth and more severity when compared to the current access.

In fairness, the lands and resources above the proposed reservoir level could experience some benefits. Reduced access would likely also reduce the effects of human activity on the affected landscape. Biotic communities that prosper under low disturbance regimes would be expected to prosper. Likewise people who enjoy solitude would have an enhanced opportunity to experience fewer encounters and evidence of human activity upstream of the reservoir pool.

On balance, we believe the proposed increase in water storage capacity at Bumping Lake has more negative effects on the resource and uses of National Forest System lands than benefits.

Thank you for the opportunity to comment on these proposals. As the agency with stewardship responsibility for these public lands, we hold a keen interest in this process and request that we be appropriately involved as your deliberations proceed.

Sincerely,

/s/ Randall D. Shepard
RANDALL D. SHEPARD
District Ranger

From: Alex Conley
To: BOR YRBWEP, sha-UCA
Subject: YBFWRB staff Integrated Plan Draft EIS comments
Date: Tuesday, January 03, 2012 5:19:42 PM

Dear Ms. Candace McKinley, Environmental Program Manager

14-1 Below you will find technical comments from Yakima Basin Fish and Wildlife Recovery Board staff on the Yakima River Basin Integrated Water Resource Management Plan Draft EIS. Board staff and many of its member governments have actively participated in development of the fish habitat and instream flow elements for the Plan, and are glad to see this next step in the planning process proceed. The following comments are those of staff, and do not reflect a formal position of the Board or any of its member governments. Please to contact us if we can be of assistance as you finalize this document and respond to our comments below.

14-2 2.3.1.7 (p 2-8): Please correct this reference to reflect that the YBFWRB acts as the lead entity for the SRFB funding program in the basin, but does not itself implement SRFB funded habitat projects. The funding allocation process run by the YBFWRB provides funding for other entities to implement projects.

14-3 2.4.7 (p2-23): Thank you for explicitly recognizing the role of the Subbasin and Steelhead Recovery Plans in guiding habitat investments proposed in the Integrated Plan.

2.4.8 (p 2-26): We encourage Reclamation and Ecology to consider using existing processes, such as the YBFWRB's Lead Entity process, to develop the more detailed approach to habitat project funding and scheduling. This may offer efficiencies when compared to creating a new advisory group.

14-4 3.3.4.5 (p 3-13): The discussion of flow issues in the lower Teanaway River and the degree to which they have been addressed contradicts itself. This section should clearly state the degree to which current conditions do or do not limit passage.

14-5 3.3.4.9 (p 3-14): Additional upstream reaches may also go dry, further limiting accessible spawning areas for bull trout.

14-6 3.3.4.11 (p 3-15): The last paragraph in this section clearly refers to Ahtanum Creek, which is not a Naches tributary. Add a corresponding header and introductory statement describing Ahtanum Creek.

14-7 3.5.4 (p3-35): The last paragraph should be adjusted; based on recent monitoring work, the lower river is typically significantly warmer than return flow sources during the summer. We can provide data if it is useful.

14-8 3.7.1.1 (p3-39): Spring Chinook also spawn in the Cle Elum and Teanaway Rivers.

14-9 TABLE 3-14 (p3-40): This table is inaccurate and out-of-date and should be edited. We are glad to work with you to provide up to date maps and data. I'd quickly note that:
-A significant partial barrier exists at the Hwy 97 crossing of Swauk Creek near the Swauk Campground
-The barriers blocking access into Jack and Indian Creek have been removed, and no structural barriers remain in these creeks
-Manastash Creek may have higher access, and will soon have full access
-Reecer Creek is now accessible several miles up from the mouth
-Passage now extends further upstream in Coleman and Cherry Creeks
-Ahtanum Creek has no major barriers
-Toppenish Creek has no major barriers, though some partial barriers remain

Other areas with significant barriers (eg Wenas, Little) are not listed.

Comment Letter 14

14-10 3.7.1.3 (p 3-43): It is a stretch to say summer habitat conditions in the Wapato Reach improve as flow improves moving downstream, as temperatures increase significantly in the same reach, to levels that are sometimes inhospitable for salmonids.

14-11 3.7.1.3 (p 3-44): Under Channel Conditions it states that there are no constructed barriers above the reservoir, but it is unclear what reservoir is meant. Constructed barriers do exist on some tributaries above reservoirs (eg Cold Creek).

14-12 3.10.1.2 (p 3-60): Steelhead numbers do not include 2007 through 2011. We are glad to provide you with updated numbers.

14-13 5.7.2.3 (p5-36): The percent of redds in the inundated area is highly variable depending on annual flow conditions. In drought years, this lower reach may represent more of the spawning distribution.

14-14 While 5.7.2.3 briefly mentions the impact of the proposed action on Bull Trout spawning habitat in Deep Creek, and access into Box Canyon Creek and the Kachess River, it is not mentioned in:
- Executive Summary (p vii under fish; p x under listed sps)
- 5.10.2.3 (p 5-61- mentions Box and Kachess, but not Deep Creek impacts)
- 5.10.3 (p5-63)
- 5.10.4 (p5-63)
- 5.24 (p5-114)
- 5.26 (p5-119)

14-15 While the DEIS does a strong job of emphasizing the potential benefits for instream flows and fisheries from the integrated plan, it should also note that care will need to be taken to ensure that actual operations of project elements will need to be carefully managed to avoid creating negative impacts on instream flows, particularly mainstem spring flows in the Naches and Mid and Lower Yakima. As specific proposals are developed, effective operational rules will need to be developed to assure negative impacts are avoided, and the positive impacts described here are indeed achieved. This should be acknowledged in:
-Executive summary, p xv, p5-14

14-15 -5.7.3 (p 5-48)

14-16 Formatting issues exist in the table on E-28

Thank you for the opportunity to provide these comments.

Alex Conley,

Executive Director
Yakima Basin Fish & Wildlife Recovery Board
1110 W. Lincoln Ave
Yakima, WA 98902
509 453-4104
aconley@ybfwrb.org

Washington State Chapter

180 Nickerson Street, Suite 202
Seattle, WA 98109
January 3, 2012

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

RE: Draft Programmatic Environmental Impact Statement for the Yakima River Basin Integrated Water Resource Management Plan

Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley:

On behalf of the Sierra Club's 25,000 members in Washington State, I would like to provide Sierra Club's comments on the above-referenced proposal. These comments are additive to the comments of the joint comment letter of January 1, 2012 by conservation groups (Alpine Lakes Protection Society et al.) that Sierra Club was a part of.

Sierra Club members use many of the lands, waters, and resources that would be impacted by the proposed action described in the above-referenced Draft Programmatic Environmental Impact Statement (DPEIS). Our members engage in hiking, backpacking, snowshoeing, cross-country skiing, bird and wildlife watching, fishing, photography, nature study, and land conservation planning throughout the federal and state lands within the upper Yakima Basin that would be impacted by the proposal, including specifically lands in the Bumping River basin that would be inundated by the proposed action, and lands in the Yakima Canyon in and near the Wymer project. For example, we have studied, and provided extensive comments on, the U.S. Forest Service's recent Proposed Action for the Okanogan-Wenatchee National Forest Plan Revision, which would make management decisions for federal lands adjacent to Bumping Lake.

15-1

Comment Letter 15

In reviewing the DPEIS, the Sierra Club has multiple concerns with the Bureau of Reclamation's planning for the Yakima River Basin Integrated Water Resource Management Plan alternative. Central to our concerns is the lack of attention that the DPEIS gives to water flows downstream of Parker on the Yakima River, destruction of critical wildlife habitat at Bumping Lake and Wymer, and the plan's adverse effects on recreation opportunities in the vicinity of the Bumping Lake and Wymer projects. We feel that the Bureau of Reclamation's plan does not provide sufficient and certain gains in protected habitat, water conservation, and fish connectivity to warrant the substantial cost of over two billion dollars for the Bumping Lake and Wymer Dam projects. In addition to a poor return on dollars spent, these two projects would entail irreversible and detrimental effects on the surrounding landscapes. We agree that coming climate change is likely to exacerbate water resource challenges in the Yakima Basin, but feel that a more holistic approach is necessary for management. Conservation within existing systems should be emphasized, not low-productivity enlargement and development of surface water storage. Climate change will dramatically affect the wildlife, salmonid populations, and vegetation of the Basin, and current water resource planning should address issues of future water temperature, quality and connectivity, and the Basin's current threatened animal populations, in addition to the agricultural demand for water.

15-2

Low flows downstream of Parker

Although the integrated plan calls for additional passage and stream flow upgrades, the improvements focus on only the river and stream segments upstream of Parker. Salmon must first clear the lower reach of the Yakima, downstream of Parker, during their return journey, and if water flows are low in this section, the combination of existing dams, warm water, and low river flow will prevent adults from reaching the upper river segments that would receive the most attention under the integrated plan. Section 2.4.3 of the DPEIS explains that plans for fish passage development at the five major dams in the Basin would "help fish to cope with potential future climate change impacts by providing access to high-quality habitat at higher elevations if lower elevation habitat is no longer suitable for supporting fish life stages at certain times of the year."

This analysis neglects the water flows downstream of Parker, one of the largest problems for salmonids in the Basin. Even the supporting study, *Yakima River Basin Study, Instream Flow Needs Technical Memorandum* (U.S. Bureau of Reclamation Contract No. 08CA10677A ID/IQ, Task 3, prepared by Anchor QEA and HDR Engineering, April 2011, at http://www.usbr.gov/pn/programs/yrbwep/reports/tm/3instrm-flow-needs.pdf) failed to model this reach's pulse flows in dry years (study p. 19) or changes to ramping rates, even though the study's "flow objective" for this reach had a spring pulse of 15,000 to 20,000 acre-feet in early May in dry years (study p. 4) and a "change in ramping rate at [the] end of high flows that occur in June-July in average to wet years." Moreover, this study (p. 19) admits that the "modeled outcome" of the Integrated Water Resource Management Plan would increase spring flows in the reach from Parker to Toppenish Creek by only 201 cfs, an increase of only 6%. The Bureau has presented no analysis of whether this minor level of increase is adequate to the long-term ability of salmonids to navigate and survive this low-flow reach through drought years and through changes wrought by climate change.

15-3

If the flows in the reach downstream of Parker are not improved, even higher-elevation habitat of the highest quality will be of little use to spawning or juvenile salmon. Additionally, fish will continue to face the challenge of unnatural diversion and passage at the five dams, taxing adults that have already labored through the low, warm flows of the lower reaches of the Yakima River. Table 5-4 in the DPEIS identifies that "no priority" or "lower" priority has been assigned to
15-3 Yakima River flows between Parker and the mouth. In many of these situations, the DPEIS projects that no significant change, or only minor improvement, is expected. *Any viable integrated plan must address water flow issues in this section of the Yakima River.* As such, the DPEIS is incomplete in assessing and addressing the stated Purpose and Need for the Action, and it fails to ensure the long-term survival and recovery of salmonid species, which is a major requirement under federal law.

Climate change impacts

Climate change will create even more perilous conditions for migrating salmon. The DPEIS analysis estimates both a strong effect from climate change and a highly unpredictable resulting effect on water runoff into the water system supply (p. 1-9). These observations should lead to a focus on water flow in all parts of the Basin, including lower reaches of the Yakima River as discussed above. Additionally, decreased water availability due to reservoir level unpredictability
15-4 and increased agricultural demand creates a bleak scenario for future salmonid protection. At current levels "spring flows in the middle and lower Yakima River reaches are not sufficient to optimize survival of out-migrating smolts" (p. 3-43). Flows from the Wymer project would also damage salmonid populations in the vicinity as a warming effect would be created in the rivers' most vulnerable and dry years (p. 1-28). Above all, considerable uncertainty exists regarding the effectiveness of large reservoirs given diminishing snowpack and unpredictable weather.

Guaranteed results are to be found in water conservation projects within the existing system. Such conservation projects should be attempted before more expensive and destructive solutions
15-5 such as the Bumping Lake enlargement and Wymer Dam are ever undertaken. The Sierra Club feels that the fish passage mitigation outlined in the integrated plan does not adequately address fish conservation issues, particularly in the lower reaches of the Yakima River, and will ultimately be insufficient given the likely effects of climate change.

Wildlife habitat impacts

Surface water storage resulting from the Wymer and Bumping Lake projects would negatively affect the region's wildlife and inundate habitat that is increasingly rare in Washington State. A habitat loss mitigation strategy has been issued by the Bureau of Reclamation, but the DPEIS also states that "the exact timeline for implementation would be largely dependent on the availability of funding" (p. 2-9). This uncertainty, combined with the vagueness of habitat purchase scenarios, gives us serious doubt regarding the conservation side of the plan.
15-6

Mitigation for displaced wildlife populations would be considerably less effective should these habitat protection actions take place long after the dam construction at Bumping Lake and Wymer. A detailed purchase strategy for habitat conservation has not been identified, nor is funding assured. This risk is expressed by the statement, "substantial habitat impact could occur if replacement habitat is unavailable" (p. 2-37). Permanent impacts on shrub-steppe habitat and old-growth vegetation are guaranteed under the integrated plan. But replacement habitat is

afforded no such confidence. Moreover, there is no comparable mitigation habitat on private lands available in the Yakima basin for the old-growth forests that would be destroyed at
15-6 Bumping Lake. Remaining old growth forests of similar quality to those around Bumping Lake are minimal to non-existent on private lands within the basin.

The destruction of the shrub-steppe habitat at Wymer and old-growth forest at Bumping Lake would also adversely affect vulnerable species in those areas. The greater sage-grouse is a candidate for Federal Endangered Species Act listing, and currently uses the Wymer Reservoir site as habitat. This same habitat has been "identified by the State as a potential expansion and reintroduction area" (p. 3-62). The proposed Wymer Dam and storage area would permanently destroy this section of habitat, fragment and impact remaining habitat, and jeopardize the State's recovery plan.

The northern spotted owl is currently listed as endangered by the State and threatened by the federal government, and would be further threatened by the proposed reservoir expansion at Bumping Lake. Bumping Lake and surrounding forests are contained within a spotted owl Critical Habitat Unit, and although spotted owl recovery will be updated in the future, changes to high-quality habitat such as the old growth forest in the Bumping Lake area are unacceptable. Furthermore, mitigation through protection of additional old-growth is uncertain given the rarity of this habitat type. Additionally, there is no guarantee that populations of both the greater sage-
15-7 grouse and northern spotted owl would truly benefit from the proposed conservation land if it they are not fundamentally connected to the populations that would be imperiled by the Wymer and Bumping Lake projects. The Wymer location's relatively pristine shrub-steppe habitat would be permanently eliminated, as well as areas of freshwater wetlands. This action could result in "regional declines" in important shrub-steppe wildlife communities (p. 5-56). The Bumping Lake project would also affect additional wildlife species beyond spotted owl, including wolverines, a state priority species in the mountains of central Washington. The wolverine is identified by the U.S. Forest Service Regional Forester as a sensitive species, and it is a candidate for listing under the federal Endangered Species Act. The wolverine is mentioned only in passing in the DPEIS, but impacts to the quantity and quality of wolverine habitat, to prey, to migration routes, and other such qualitative and quantitative assessments are not disclosed in the DPEIS. The overall effect of the plan for listed, priority, sensitive, and candidate species depends entirely on the quality and category designation of currently unidentified future land acquisitions. Until such detail becomes available, the negative impacts on habitat of the integrated plan remain completely unacceptable. We remain quite skeptical that the Bureau can actually identify sufficient mitigation lands to offset the major wildlife impacts to be created by the project.

Recreational impacts

The integrated plan would also degrade the quality of outdoor recreation in impacted areas. Bumping Lake exists in very close proximity to the William O. Douglas Wilderness Area, a landscape that is managed in its natural state. In addition to its high value as wildlife habitat, the
15-8 area surrounding Bumping Lake holds an impressive recreational value, with high recreational usage and developed facilities for boating, fishing, and camping. There are also privately-owned cabins in the area. The DPEIS explains that "the Surface Storage Element may affect recreational opportunities at Bumping Lake but the actual effects and their magnitude are uncertain" (p. 5-106).

The Bureau of Reclamation must give more attention to the integrated plan's impact on recreation tied to this exceptional landscape. Although wilderness designations would be proposed for the land around Bumping Lake under the integrated plan, the quality of the wilderness and its recreational draw would be significantly diminished due to the noticeable water changes of the reservoir due to drawdown, etc., and likely changes to trails and routes that access the wilderness. The enlarged reservoir would also be closer to and clearly visible from the William O. Douglass Wilderness, negatively impacting the character of this area and would adversely affect the wilderness experience of visitors to the William O. Douglass Wilderness. The DPEIS states that "the new dam and expansion of Bumping Lake would substantially affect the visual character of the Bumping Lake valley by removing trees and flooding the area behind the new dam. It is possible that U.S. Forest Service Visual Quality Objectives and Scenic Integrity Levels would not be met at certain locations" (p. 5-68). Outside of the existing wilderness area, adverse impacts on recreation would be felt by other recreational users of the lake's resources. All existing shoreline recreational facilities would be eliminated by the Bumping Lake expansion as well as access to trailheads in the area. Replacements for the residences and marina displaced by the reservoir enlargement would be impossible, and construction of new access roads and trails and a new campground and boat launch would cause additional adverse impacts on the listed, priority, sensitive, and candidate wildlife species in the affected area.

15-8

The planned Wymer reservoir location is situated in close proximity to the State-designated Yakima River Canyon Scenic Byway (YRCSB). Part of the Wymer structure would be visible from the roadway, dramatically altering the character and recreational value of the Canyon. The concrete wall used by the project would sharply contrast with the surrounding natural landscape of shrub-steppe vegetation and basaltic cliffs. The crippling effect on recreation in the Bumping Lake area and damage to the character of one of our State's most important scenic stretches of highway create an unreasonable burden on recreational users. These issues must be addressed before irreversible construction takes place at Wymer and Bumping Lake.

In conclusion, the Sierra Club is concerned that the current proposed mitigation would not be sufficient given the habitat loss and financial cost of the integrated plan identified by the DPEIS. Water flow levels downstream of Parker on the Yakima River must be addressed before upstream habitat and fish passage improvements can prove effective to the recovery of salmonids. The loss of important habitat due to the enlargement of Bumping Lake and construction of Wymer Dam are also unacceptable. Finally, both the Bumping Lake and Wymer projects would adversely affect recreation in the region. The DPEIS does not place enough emphasis on water conservation measure within the existing irrigation system, does not adequately detail future land acquisitions for habitat mitigation, and does not place enough value on existing recreational resources.

15-9

We feel that current water management issues will only grow as the impact of climate change is realized. Simultaneously, most forms of wildlife in the region will be stressed as changing habitat conditions force adaption or extinction. Given this uncertainty, any water management plan must emphasize factors which lie within our control: existing conservation measures and the protection of current high-value wildlife habitat. The integrated plan outlined in the DPEIS focuses on the increase of water storage within a system that suffers from waste and vulnerability

to changes in temperatures and snowpack. Protecting the Basin's ecosystem services along with its associated fish and wildlife populations depends on the preservation of connectivity within existing habitat and reducing our impact on the region's ecological systems. For this reason, we ask that the Bureau of Reclamation refocus its proposal to address the water flow issues in the region that most jeopardize salmon populations and reject destructive proposals such as the Bumping Lake enlargement and Wymer Dam.

15-9

Thank you for considering these comments.

15-10

Please keep the undersigned on the mailing list for this proposal.

Mark Lawler

On behalf of
Tristin Brown, Chair, Conservation Committee
Sierra Club Washington State Chapter

Please send electronic correspondence on this matter to:
Mark Lawler (mark.lawler@sierraclub.org) and Elaine Packard (espackard@msn.com)

Seattle Audubon Society
for birds and nature

January 3, 2012

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

RE: Draft Programmatic Environmental Impact Statement for the Yakima River Basin Integrated Water Resource Management Plan

Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley:

Seattle Audubon is submitting this letter in response to the Draft Programmatic Environmental Impact Statement (DPEIS) for the "Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project", Benton, Kittitas, Klickitat, and Yakima Counties, Washington, issued by the Bureau of Reclamation (BuRec) and the Washington State Department of Ecology (Ecology).

16-1 The mission of Seattle Audubon is to cultivate and lead a community that values and protects birds and the natural environment. Since 1916, Seattle Audubon has worked to protect birds of our region whose habitats are at risk. Our members have a long history of engagement on forest-related issues in Washington state and an on-going interest in the inter-relationship between bird habitat and human development activities in the forested landscape.

Seattle Audubon is deeply concerned with the potential impact of the Integrated Plan on habitat for at-risk bird species, including the Northern Spotted Owl (listed as a threatened species under the federal Endangered Species Act) and the Greater Sage Grouse (listed as a candidate species under the federal Endangered Species Act). While the DPEIS includes numerous statements that adverse impacts to existing habitat for such species would be offset by habitat/watershed protection and enhancement efforts (page 5-51) and that the long-term impacts of the habitat restoration projects in the Integrated Plan are expected to be beneficial (page 5-52 and page 5-53), the DPEIS fails to include adequate information to substantiate such claims.

16-2 In addition to the lack of information to support the conclusions in the DPEIS regarding habitat impacts to at-risk avian species, the DPEIS also includes internal contradictions regarding those impacts. For instance the document accurately notes that the proposed new surface storage at Wymer Dam / Reservoir would exacerbate ongoing losses of Greater Sage Grouse habitat, *"resulting in potentially substantial impacts to this species"* (page 5-60), and that expansion of the Bumping Lake Reservoir *"would further reduce available habitat for the Northern Spotted [sic] and could represent a substantial impact."* (page 5-51) Yet elsewhere the document claims that overall impact of the Integrated Plan is expected to be positive for listed species.

16-2 It is essential that a revised environmental analysis of the Integrated Plan include substantially more detailed information for decision-makers and the public to be able to evaluate the actual impacts (beneficial and adverse) of the proposed action.

16-3 The Land Acquisition Program described in the DPEIS (pages 2-24 and 2-25) includes introductory paragraphs that highlight numerous potential benefits of protection and restoration of key landscapes, yet tellingly there is no mention of benefits to avian species such as northern spotted owls or greater sage grouse. While the DPEIS puts forward "targeted goals" for watershed protections and enhancements, it does not provide even minimal details on how much of the proposed targeted acreage is currently suitable habitat for these key species. It is essential that any Plan to enhance the amount and quality of habitat for listed and / or candidate species actually do so; sacrificing approximately 2,000 acres of high quality habitat – 980 acres of old growth habitat for northern spotted owls (page 5-51) and 1,000 of shrub-steppe habitat for greater sage grouse (page 5-56) – makes no sense without explicit articulation of the amount of replacement high quality habitats to be acquired that otherwise could be lost due to development under existing ownership. The closest the DPEIS comes to specifying such information is that in the land proposed for acquisition in the Little Naches headwaters, "most" of the land has been logged and "some" areas of old growth forests remain.

The document needs to be revised to explicitly identify the composition of the lands proposed for acquisition – how much of it is currently high quality habitat for these avian species, and how much is degraded habitat in need of restoration? In addition, what would be the approximate expected timeframe for the degraded habitat to be restored high quality habitat comparable to the lands permanently inundated?

16-4 The Bumping Lake Enlargement project has been studied repeatedly over the last three decades, and those analyses have failed to generate a positive benefit/cost ratio or Congressional authorization. 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. Re-initiating efforts to inundate nearly 1,000 acres of high quality old growth habitat for northern spotted owls is likely to re-ignite highly contentious administrative, legislative, and judicial battles. This component of the Integrated Plan is particularly troubling in light of the recommendations of the U.S. Fish and Wildlife Service in the June 2011 Revised Recovery Plan for the Northern Spotted Owl. In that plan, the agency calls for increasing the amount of owl habitat, including the protection of both occupied sites and unoccupied, high quality habitat. (Recovery Plan at page III-51)

16-5 We appreciate the opportunity to comment on the DPEIS and look forward providing additional comment as the environmental review process moves forward. If you have any questions regarding Seattle Audubon's comments or would like additional information, feel free to contact me by telephone at 206/523-8243 ext. 15 or by email at shawnc@seattleaudubon.org.

Thank you for your consideration.

Sincerely,

Shawn Cantrell

Shawn Cantrell
Executive Director

Ms. Candace McKinley
Environment Program Manager
Bureau of Reclamation
Columbia-Cascade Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

January 3, 2012

RE: Draft Programmatic Environment Impact Statement (DPEIS) for the Yakima River Basin Integrated Water Resources Management Plan

Dear Ms. McKinley;

17-1 The Mountaineers with nearly 10,000 members in Washington is one of the oldest and largest outdoor muscle-powered recreation and conservation organizations in the state. Our members hike, backpack, climb and ski the National Forests on the Cascade Mountain crest from the Columbia River to the Canadian border and beyond. Participation in our outings increases our members' awareness of the wilderness and indeed the environment in general.

We strongly support an effort to manage the limited water resources in the Yakima River Basin. However the DPEIS, while touching on many important aspects of the situation, deals with these issues in a very narrow and cursory manner by not considering a wide range of alternatives. The Mountaineers believe that the circumstances are too numerous and complicated to be dealt with this single DPEIS.

17-2 The Mountaineers supports the increase of in-stream flows and improvements to the existing Bureau of Reclamation dams to support fish passage and we support water conservation measures to more efficiently utilize the available resources. However, we are concerned that the DPEIS favors massive water storage projects. The proposed Bumping Lake enlargement will drown nearly 2,000 acres of old growth forest and flood a popular and accessible hiking destination as well as the inundation of shrub steppe habitat due to the Wymer dam.

17-3 In the 2008 *Yakima River Basin Water Storage Feasibility Study Final Report/EIS*, the Bureau of Reclamation concluded that the Wymer Dam and Reservoir did not meet Federal standards for an economically and environmentally sound water project. The study demonstrated a negative benefit-cost ratio for the Wymer project and the Bumping Lake Expansion was dropped from the study for several stated reasons including the fact that, "the larger-capacity reservoir would not fill on a regular basis and would not be a reliable source of water." We do not feel that the DPEIS satisfactorily demonstrates consideration of other alternatives to dam enlargement and construction and does not address the problems highlighted by the most recent studies of these projects.

17-4 Further, while The Mountaineers is opposed to rampart real estate development in the Teanaway River sub-basin, we do not feel that the protection of the Teanaway should be treated as mitigation for environmental destruction elsewhere.

7700 Sand Point Way NE
Seattle, WA 98115
(206) 521-6000
(206) 523-6763 fax

The Mountaineers
www.mountaineers.org

17-4 We are very disappointed that the DPEIS fails to offer a range of alternatives between no action and the complete package. Also the DPEIS does not provide cost-benefit analysis for any of the various proposed actions, which is especially problematic considering the results of the 2008 *Yakima River Basin Water Storage Feasibility Study*. We do not believe the DPEIS presents sufficient detail and analysis of any of the numerous and varied proposed projects to justify approval. We reserve the right to comment on any and all such future proposals.

17-5 The Mountaineers strongly object to the short, forty-five day, comment period for this very complex proposal. We request that the comment period be extended for at least thirty days to allow for more meaningful study and comment.

Thank you for the opportunity to make these comments. Please notify us of further action and comment periods.

Sincerely,

Martinique Grigg
Executive Director

AMERICAN WHITEWATER

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
3537 NE 87th St.
Seattle, WA 98115
okeefe@americanwhitewater.org

January 3, 2012 *electronically transmitted to yrbwep@usbr.gov*

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

RE:Yakima Basin Integrated Water Resources Management Draft Programmatic Environmental Impact Statement

Dear Ms. McKinley,

Thank you for providing the Draft Programmatic Environmental Impact Statement (Draft PEIS) for the Yakima Basin Integrated Water Resources Management Plan.

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.

18-1

We provide some comments on the Draft PEIS below. We are extremely disappointed with how the public outreach has been conducted on this project. The Integrated Plan Alternative would have major impacts at a regional scale. Public meetings were conducted in a very limited geography that failed to recognize the scope of interest in this project. The public comment period was too short in light of the complexity of the proposal, the time required for analysis, and our reduced staffing over the holiday period.

18-2

Specific Comments

As stated in our previous scoping comments, 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

18-3

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. New Wild and Scenic Rivers would be embraced by our members.

18-3

The PEIS states that "long-term impacts to recreational resources could occur associated with land acquisition for habitat protection, which could limit some recreational uses" and designation of areas as Wilderness or Wild and Scenic Rivers could limit some recreational uses such as motorized vehicles or mountain biking."[1] This statement should be clarified in light of the fact that the Wild and Scenic Rivers Act does not prohibit motorized or mechanized use. In fact, the International Mountain Bicycling Association has specifically recognized the value of Wild and Scenic designation as a land protection tool that allows bicycling use to continue while protecting protecting the recreational, wildlife, and fishery values that rivers provides.[2] In our view, Wild and Scenic designation will not limit recreational uses. Under the language of the Wild and Scenic Rivers Act and the obligation of agency managers to "protect and enhance" the values for which a river is designated, recreational amenities including public access and associated facilities are typically improved. Examples of this in Washington State include new public access facilities on the Sauk and White Salmon Wild and Scenic Rivers.

18-4

The PEIS states that "Wild and Scenic River designation should be sought for the American, Upper Cle Elum, and Waptus Rivers and that "other rivers determined eligible and recommended for designation in future Forest Plans should also be considered for designation."[3] Given analysis in preliminary documents related to the ongoing Forest Plan revision, we note that the Cooper River, Deep Creek, Devils Creek, Little Naches River, Silver Creek, and Rattlesnake Creek have all been identified as eligible Wild and Scenic Rivers. In addition, the Forest Service is further considering the Teanaway River. We believe all of these rivers should be included for Wild and Scenic designation to protect their free-flowing character.

18-5

The statement is made that there " is very little rafting on the Naches River, because of limited access due to private ownership of adjacent lands".[4] In our view, the issue is not the private ownership but the lack of facilities on the public land. We have raised this issue in the Forest Planning process and hope to see it addressed there however the statement should be corrected in the document because it is not accurate.

18-6

[1] PEIS at page ix
[2] Testimony of International Mountain Bicycling Association before Testimony of IMBA before Senate Energy and Natural Resources Committee, Subcommittee on Public Lands and Forests, May 18, 2011.
[3] At Page 2-25
[4] At Page 3-86

18-7 Thank you for the opportunity to comment. We hope to see a stronger commitment to public engagement as this process moves forward.

Sincerely,

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

To: Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901
Regarding: Comments on DPEIS for the Integrated Water Resource Management Plan,
Yakima River Basin Water Enhancement Project
Date: January 3, 2012
From: Joan Zuber, President
Federation of Western Outdoor Clubs

Dear Madame,

Our organization consists of 52 outdoor recreation and conservation groups in eight western states, twelve being in Washington State.

We support the effort to increase water conservation and efficiency measures by the Yakima Irrigation District, and for increased flows for salmon and native fish.

However, the planning group and the plan focus on water, agricultural and fish interests at the exclusion of other natural resource and wildlife values that are of equal importance. The plan does not consider the overall ecology of the Yakima River Basin.

We oppose creating new surface water storage areas by building a new dams at Bumping Reservoir and Wymer. New dams will not restore ecological functions in the Yakima River Basin, they will cause further environmental damage and disruption to natural functioning systems. We are strongly opposed to the sacrifice of 2000-3000 acres
19-1 of old growth forests and roadless areas providing habitat for the endangered northern spotted owl and bull trout in the Wenatchee National Forest to expand the Bumping Lake Dam and Reservoir. We also oppose a new Wymer Dam, which would flood habitat for the endangered sage Grouse.

People in the Northwest have fought for over 25 years to preserve what is left of our original old growth forests. Over time new research has demonstrated how very valuable these forests are in combating the effects of climate change by providing carbon sinks, retaining and slowly releasing water, moderating flooding and providing cool streams for salmon reproduction. What is the point of providing fish passage at Bumping Lake if you cut down the forest to enlarge the reservoir?

We urge you to eliminate creating new water storage facilities by building dams at Bumping Lake and Wymer from your Final Environmental Impact Statement.

Regards,
Joan Zuber, President FWOC
44731 S. Elk Prairie Rd
Molalla, OR 97038

North Yakima Conservation District
1806 Perry St., Suite C - Yakima, WA 98902 - (509) 454-5736, Ext. 5 - Fax (509) 454-5682

December 30, 2011

Ms. Candace McKinley
Environmental Program Manager
Columbia-Cascades Area Office
1917 Marsh Road
Yakima WA 98901-2058

Re: Yakima River Basin Integrated Water Resource Management Plan – DPEIS

Ms. McKinley,

20-1 The North Yakima Conservation District (NYCD) Board of Supervisors wishes to comment on the Yakima River Basin Integrated Water Resource Management Plan – DPEIS (draft plan). Our specific comments will be in reference to the drafts plans "Targeted Watershed Protections and Enhancements" - land acquisition actions. NYCD's position is to not approve the "draft plan" as written.

20-2 To begin, the NYCD believes that the "acquisition" (purchase of private land) is an un-necessary element of the plan and nothing more than an eleventh hour politically leveraged move by the environmental contingency of the work group and as such should not be included in the Final Plan. The Habitat Protection and Enhancement Element of the draft plan, prior to the "acquisition" element, provides more than enough short-term and long-term environmental benefit, mitigation, and sustainable habitat for all interested and vested parties to the draft plan.

20-3 Further, NYCD is disappointed to see that the use of Conservation Easements was not mentioned in conjunction with "acquisition", and if the Bureau of Reclamation (BOR) and Washington State Department of Ecology (DOE) believe that the plan should include the environmental contingencies "political will" then, the use of Conservation Easements should be promoted as the preferred alternative. In addition, if "acquisition" is to be included it must be on a priority level below all other elements of the draft plan.

20-4 In considering the use of "acquisition", the BOR should look to their own "Yakima River Basin Water Enhancement Project, P.L. 103-434 Title XII" program's land acquisition component. Under this component, lands with water rights are acquired. These lands are then highly managed (at great cost i.e. BOR staff, contractual needs for personnel and equipment, etc...) by the BOR to produce a desired result. At the end of the Project the BOR cannot own these lands for legal and policy reasons. These reasons were created because it's simply difficult to own and be responsible for land. In the BOR's relinquishment of the acquired land you will be using a land trust, however even land trusts need operating capital for managing lands in perpetuity

and this fact will be the biggest issue faced by the BOR when relinquishes those lands – who's got the cash for the trust fund! In acquisition of the nearly 71,000 acres proposed in the draft plan, it is our understanding that the Washington Department of Fish and Wildlife may be a leading candidate for holding title. NYCD must point out that even the WDFW has and has had issues with its ability to manage its current lands to produce the desired results in a responsible manner (consult with Jennifer Quan, WDFW Lands Manger). NYCD's point is that if the BOR and DOE move forward the Final Plan with acquisition element, they must have assurances 20-4 that any title holder is capable of preparing a "plan" to manage the land for a desired result and managing the land in an agreed to manner in perpetuity (for ever). The BOR and DOE should also consider an enforceable contract with the title holder to guarantee that the publics' financial expenditures are delivered and maintained (a financial penalty scale for non-compliance). As a note the 46,000 acres identified in the middle and lower Teanaway River Basin will need to be highly managed due to past and current landowner activities and that management expenses alone should cause concern.

20-5 The lands identified for "acquisition" are currently privately held. This means that they are part of the local tax base and produce agricultural products (timber and livestock) that fuel the local and state economy and the economic role they play are not included in the draft plans considerations. These lands at a minimum can produce $3.5 million annually under a managed rangeland grazing scenario (WSU extension). This annual economic loss and annual cost to taxpayers of the region is not acceptable.

To require the removal of 71,000 acres in order to move the draft plan forward should be asked in a different manner. The question to provide perspective is this, **"Should the draft plan eliminate the Roza Irrigation Districts' 72,000 acres from agricultural production for politically necessary environmental needs?"** I'm sure that the answer from the working group would be a resounding no! Therefore, the NYCD Board of Supervisors reiterates its position to not approve the "draft plan" as written.

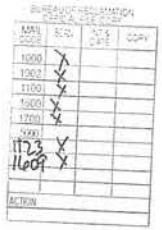
20-6 As a final comment the NYCD would like to advocate that the "Pine Hollow / Ahtanum Watershed Plan" components be included in the final plan due to their storage and strong environment benefits, to truly make this a comprehensive watershed plan.

Respectfully,

Gail Thornton

Gail Thornton,
NYCD Chairman
Sent on behalf of the NYCD Board of Supervisors.

YAKIMA COUNTY FARM BUREAU



December 21, 2011

Candace McKinley
Environmental Program Manager
US BOR
1917 Marsh Road
Yakima, WA 98901

RE: Comments on Yakima River Basin Integrated Water Resources Management Plan

Dear Ms. McKinley:

21-1 The Yakima County Farm Bureau (YCFB) has over 3,000 members representing farmers, ranchers and others affiliated with the production of agricultural products in Yakima County. YCFB represents a variety of member interests including land and water use and the availability of irrigation water for crops.

Yakima County leads the state in agricultural production with a farm gate value of over one billion dollars annually. Reliable irrigation water is paramount to our agricultural based economy that not only provides thousands of jobs locally, but throughout the state as well. Our crops are second to none in quality and are used to feed an ever increasing world population. Our climate allows for diverse and unique crops to be grown here such as fruit, hops and blueberries. It is also desirable for other commodities such as dairy production that encompasses all of the animal feed stuffs associated with the production of wholesome milk and milk products.

21-2 We applaud the efforts put forth by those involved with the Yakima River Basin Integrated Water Resources Management Plan. This broad based approach encompasses most of the current basin water shed needs, which are over due to be addressed. The basin needs additional water storage and water management capabilities for industrial/municipal uses that will allow for future growth of agricultural commodity processing, a stable supply of irrigation water to provide

21-2 water when the current precipitation is not adequate to meet irrigation needs and water for fish and wildlife enhancements to help reestablish attainable habitat areas.

These issues are not new to the Yakima Basin. A lot of work and money have been spent over the past several years and continues to be spent. Unfortunately, only a portion of the items identified in this plan, specifically the environmental enhancements and water conservation efforts, have been addressed. No new water storage has been acted upon, even though water storage is the backbone of our water supply system.

21-3 If this plan were to be adopted and implemented, the YCFB supports moving water storage along with other plan elements. Specifically, new water storage construction has to be addressed "up front." In our opinion, it does not make sense to focus on habitat or introduce fish species that are not currently present without new water storage facilities and the water they would provide.

21-4 Those that planned our original water storage facilities may have been shortsighted, but the current water storage facilities were put in place for irrigation purposes. Through the years, additional uses have been thrust upon our "agricultural water" without just compensation to the water supply system for construction or maintenance. For a multitude of public benefit reasons, future water storage costs should be mostly borne by the public.

21-5 This plan has a land acquisition component to obtain private lands in both Kittitas and Yakima Counties. Our research has revealed that approximately 80% of the land in Yakima County is currently government or tribal owned. Approximately 65% of the land in Kittitas County is currently government owned. Since such a high percentage of land in the two counties is already under governmental or tribal ownership, it seems unnecessary to take more land out of the private sector. Our position is that there is already enough land preserved to address mitigation issues associated with new or additional water storage facilities and that no more land should be taken out of the private sector.

In our current economic climate, spending additional money for land when so much land is already owned by the government seems very counter productive to the proposal, and gives the impression of some sort of an agenda (how much land is enough??). Currently, government is having a hard time keeping up with the land they already have under their control, both in management capacity and dollars to get things done. Current and on-going efforts to protect and restore the land already under government management should be the priority, not additional land acquisitions. There are alternatives already available to conserve lands without purchasing them.

21-6 Thank you for the opportunity to provide this input. I would be glad to answer any questions you may have. I look forward to your timely reply.

Sincerely,

Steven E. George
President, Yakima County Farm Bureau
350 Hoff Road
Moxee, WA 98936
(509)930-2335

c. Rep. Doc Hastings
Governor Christine Gregoire
13th, 14th, 15th District Legislators
Yakima County Commissioners
Derek Sandison, Dept. of Ecology

January 3, 2012

Ms. Candace McKinley
Environmental Program Manager
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901

Re: Yakima River Basin Integrated Water Resource Management Plan – DPEIS

Ms. McKinley,

22-1 Yakima County Cattlemen's Association would like to comment on the Yakima River Basin Integrated Water Resources Plan. As written **we oppose this plan**. We do not believe it addresses the needs of the district and is inaccurate and flawed.

22-2 One of our main concerns is the proposed acquisition of 71,000 acres of land located in the Yakima and Kittitas Counties. We do not believe this is in the county's or the state's best interest. In the current economic climate we believe this is a waste of tax dollars. This would remove land off the tax rolls of the County and put added pressure on existing private property to make up the shortfalls. There is no clear advantage to the State owning this land. The State cannot afford to manage the land it already owns.

22-3 Secondly, it is very inaccurate to call this the Yakima River Basin study when the Ahtanum Watershed has been excluded. The benefits of the Pine Hollow Reservoir have been completely ignored. The Pine Hollow Reservoir has been researched and permitted and is nearly ready to build. Why was this not considered and included?

22-4 Thirdly, this is a $5.2 billion project. In our opinion, we are not getting enough new storage for that price tag. We agree that we need more storage. We just do not see enough benefit in this plan for the large amount of money.

Sincerely,

Justin Waddington, President
Yakima County Cattlemen's Association
3111 Brownstown Road
Harrah, WA 98933

YBSA COMMENTS ON
DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
FOR YAKIMA RIVER BASIN
INTEGRATED WATER RESOURCE MANAGEMENT PLAN
January 3 2012

SUMMARY OF POSITION

YBSA supports elements of the Integrated Plan ("IP") because it provides a *short-term* solution to the water supply problems of the Yakima Basin, while providing needed habitat improvements to help restore the Basin's fisheries. YBSA is, however, deeply concerned that the IP water storage element does not provide a sufficient *long-term* solution to the water supply needs of the Basin, especially in light of current State and Federal funding shortages, and the National need to integrate Northwest wind power.

23-1 To more effectively meet the stated long-term needs for water storage and stabilization, YBSA urges an acceleration of the Columbia River Pumped Storage option identified in the IP. In particular, YBSA believes that funding for a study of the Columbia Pumped Storage option should be made a prority of the IP, and that the study should include a pumped storage electricity production element. The PEIS's decision to make that option a mere aspiration does not adequately protect the Yakima Basin's future, especially if the more severe climate change scenario considered in the IP come to pass.

PURPOSE AND NEED

The Purpose and Need statement in the PEIS demonstrates the urgent need for action to address water supply issues in the Yakima Basin, problems that will only grow worse as the Basin's population grows and the effects of climate change alter the amount and timing of precipitation in the Basin. For many years, YBSA has been concerned about exactly these problems, and we believe the Purpose and

23-2 Need statement underscores the need for action without further delay.

In particular, we note:

- Water supply is already a serious issue in the Yakima Basin. In dry years, proratable water rights holders already face substantial reductions in their water supply, placing the Basin's agricultural economy at risk. As the PEIS correctly observes: "Demand for irrigation water significantly exceeds

supply in dry and drought years, leading to severe prorationing for proratable, or junior, water rights holders." (PEIS at 1-3).

- Water rights in the Basin are fully subscribed, making it difficult for both municipalities and individual businesses and homeowners to obtain new water supplies for municipal uses. This places the Basin's non-agricultural economy at risk. Ground water adjudication puts all Basin interests at risk by jeopardizing State, Federal and private investment in our needed infrastructure.

- As the PEIS notes, the Yakima Basin historically supported anadromous fish runs of somewhere between 300,000 and 950,000 fish annually. Habitat degradation over the last century has substantially reduced these numbers. (PEIS at 1-5 to 1-6). Low streamflows and high temperatures in certain reaches of the Yakima, as well as excessive streamflows during certain times of year in other reaches, have contributed substantially to the decline of the Basin's fisheries. By our calculations the IP further reduces flows in the lower 100 miles of the Yakima.

23-2 As the effects of climate change take hold, these problems are likely to grow worse, possibly much worse. The August 2011 Addendum to the Integrated Plan concludes that, even under the less adverse climate change scenario, average water supply in the Yakima Basin would be about 150,000 acre-feet below current levels and under the more adverse scenario, the supply would decline by *950,000 acre-feet, with proratable water supplies at zero during dry years*. (August 2011 Addendum at 12).

But these declines in overall water supply tell only half the story: as temperatures rise, more precipitation will come as rainfall rather than snowfall, reducing the snowpack the Basin relies upon as its "sixth reservoir." The Basin's reservoirs currently are capable of storing only about thirty percent of the average annual runoff, making the Basin extremely dependent upon melting snow for water supply during the summer months. (PEIS at 1-6 to 1-7). In addition, summer flows on the Yakima are likely to decline. Under all three climate change scenarios considered in the IP, summertime streamflows will decline markedly. (August 2011 Addendum at 25). Under the more adverse climate change scenario, runoff in the July-September period *could decline by more than 70%.* (August 2011 Addendum at 7).

In short, YBSA strongly agrees with the assessment of need for the Yakima Basin. It is undeniable that current water supplies are inadequate to support the Basin's agricultural economy, municipal demands, and healthy fisheries. Without action, reasonably anticipated changes in precipitation and rainfall patterns are likely to turn a serious situation for the Basin into an outright disaster.

We therefore support the PEIS's statement describing how the problem should be addressed: 23-2

> These problems have created a need to restore ecological functions in the Yakima River system and to provide more reliable and sustainable water resources for the health of the riverine environment, and for agricultural, municipal, and domestic needs. These problems should be addressed in a way that anticipates increased water demands and changes in water supply related to climate change.

(PEIS at 1-3). We are concerned, however, that the measures proposed in the IP are, in the absence of additional measures, do not adequate address the need in the manner prescribed by the PEIS.

THE IP HELPS, BUT DOES NOT FULLY MEET THE IDENTIFIED NEED

- Surface water supply: Collectively, the water supply projects proposed in the IP will provide only about 450,000 acre-feet of additional storage (PEIS at 2-17), compared to existing storage capacity of slightly more than 1 million acre-feet. Even if each of the water supply proposals put forth in the IP is developed as planned, Yakima Basin water supplies are likely to remain inadequate. In fact, while the additional storage will improve the situation, the IP predicts that water delivery to proratable users in the Basin would improve only under current and less adverse climate change scenarios, while under the moderately and more adverse scenarios, conditions for proratable users would decline. Under the more adverse scenario, the proration level would be 50%, far below the 70% minimally acceptable level identified in the IP. (August 2011 Addendum at 12-13). 23-3

  The IP also assumes that each of the identified water supply options will be permitted and built. YBSA believes this is not a safe assumption. Enlargement of storage at Bumping Lake, for example, has been controversial in the past because of environmental concerns. If Bumping is not constructed, 190,000 of the 450,000 acre-feet of storage planned in the

IP would be lost. It is certainly possible that similar problems could arise at one or more of the water supply projects identified in the IP. If this occurs, the benefits of added water supply offered by the IP could be significantly reduced. 23-3

- Fisheries benefits: The PEIS observes that "[i]f fish habitat enhancements are implemented without providing fish passage at existing reservoirs and improving flows, the habitat enhancements will have more limited benefits to fish." (PEIS at 2-10). Similarly, YBSA believes that implementing fish passage improvements at existing reservoirs without improving the downstream flows necessary to allow migrating fish to reach the passage facilities will severely limit the benefit of passage improvements.

  YBSA is particularly concerned that the IP does not improve flow conditions in the lower reaches of the Yakima River and, in fact, makes those conditions slightly worse. (Yakima River Basin Study, Vol. 1 at 76-77). This could, we fear, undermine the value of fish passage improvements at the reservoirs in the upper Basin because low flows and high temperatures are most likely to be a barrier to fish migration in the late summer. Sockeye, which are the species most likely to benefit from passage improvements because their life-cycle depends upon access to lakes, migrate at precisely this time. 23-4

- Additional measures needed: YBSA therefore believes that, in order to meet the need identified in the PEIS, the IP by itself is likely to prove inadequate, especially in the long term. YBSA therefore supports moving forward with additional measures to assure the Basin's future, in particular acceleration of the Columbia Basin Pumped Storage study option identified in the IP. Taking such action will provide solid information about the feasibility of the Columbia Basin Pumped Storage alternative, both as a means of addressing the shortfalls of the IP as planned, and as a fallback if the storage projects identified in the IP do not come to fruition. 23-5

- Conservation, by itself, is inadequate: YBSA supports the PEIS's conclusion that additional water conservation measures, by themselves, cannot meet the Yakima Basin's future needs. Specifically, the PEIS notes that additional agricultural conservation would, in good years, save about 170,000 acre-feet of water, with substantially less savings occurring in dry years. (PEIS at 2-27). YBSA agrees with this conclusion and believes the IP has substantially advanced the debate by debunking the idea that water 23-6

conservation, by itself, is a panacea. While YBSA supports using all cost-effective water conservation measures, there is no longer any doubt that water conservation, by itself, is simply inadequate to the Basin's needs, and that additional storage capacity, along with additional conservation, is essential.

23-6

THE COLUMBIA BASIN PUMPED STORAGE OPTION SHOULD BE PRIORITIZED

The IP includes a two-step study of a pumped exchange using Columbia River water with storage in the Yakima Basin. Step 1 would include an "initial screening" that would look at: (1) the availability of water from the Columbia; (2) alternative configurations for pumping, routing and storage; (3) estimates of the costs of such a project; and, (4) an evaluation of cost allocation for funding the project. Step 2 would include a detailed, site-level analysis of this alternative, including a project-specific EIS.

The YBSA supports: (a) proceeding at once with Step 1; and, (2) adding electricity production in the form of pumped storage capability to the project as a means of potentially improving its economic viability.

23-7

YBSA supports immediate implementation of Step 1 for several reasons:

- Identifying "Plan B". A careful analysis of the PEIS reveals that water storage will be inadequate under the IP if any of the planned water storage options are, for any reason, derailed. It also reveals that if the more severe climate change scenarios emerge, the IP will be inadequate even if all storage options are built as planned. It is therefore prudent for the Yakima Basin to begin at once to identify a "Plan B" so that if "Plan A" – the IP – either falls short or proves inadequate in the face of climate change, additional storage options are immediately available. It is sensible to perform the "Step 1" analysis as soon as possible because this will provide a baseline to determine whether the Columbia River pump exchange can be carried out as currently envisioned. If it cannot, then another "Plan B" alternative should be developed. If the results of the "Step 1" analysis demonstrate that in-depth study of the project is likely to prove worthwhile, then the "Step 2" analysis can begin.

Such a project is likely to take years to complete. Accordingly, it is imprudent to wait for a crisis to emerge before thoroughly studying this option.

23-7

- Addressing the need for renewable energy integration. In the past decade, renewable energy (especially wind) has become a major economic force in Central Washington, but the existing power system is rapidly running out of capacity to reliably integrate wind. For example, in both spring 2010 and spring 2011, wind producers were forced to shut down because of lack of storage capacity in the federal hydro system, producing large economic losses, a waste of valuable wind resources, and protracted litigation. This is a major barrier to continued regional investment in wind and other variable renewable technologies such as solar.

  Adding the capability for electricity production (likely in the form of reversible turbines) to the Columbia River alternative allows these energy integration problems to be addressed. Pumping water uphill to the storage reservoir when energy is in excess supply allows the energy to be stored, and electricity can then generated when it is needed to support the wind fleet or when electricity prices are high. In this way, pumped storage can greatly expand the capacity of the regional power system to integrate renewable resources, and substantially enhance the economic value of the Columbia Basin pump exchange option. In addition, it will allow the increasing value of dispatchable power to be harnessed to help improve project economics.

23-8

- Addressing adverse conditions in the lower Yakima. By shifting lower Yakima irrigation districts to Columbia water so that they do not need to withdraw from the Yakima, the pumped storage option would substantially improve flows in the lower Yakima. As we note above, even under the IP, low flows and high temperatures in the lower river remain one of the major impediments to improved anadromous fish runs in the Yakima Basin. For this reason, we suggest that the "Step 1" study also address the effects of Columbia River pump exchange on the flow and habitat conditions in the lower Yakima. In particular, the study should assess the extent to witch the Columbia Basin option will improve lower Yakima flows and should also

23-9

address options for ameliorating temperature problems in the lower Yakima that might involve, in addition to improved flows, measures such as groundwater storage or aquifer recharge. We believe water quality issues (temperature, phosphorous, pH and nitrates) will be the subject of suits that will significantly impact the operation of the Yakima River. This is the best opportunity to address those potentially crippling issues now.

23-9

- Improved water storage. As noted above, by moving the lower Yakima irrigation districts away from dependence on Yakima water, the pumped storage option can substantially improve the overall water supply picture in the Basin. This would be particularly true if the pumped storage is combined with a storage facility inside the Yakima Basin.

OTHER COMMENTS ON THE PEIS

- Economic benefits of improved agricultural productivity are underestimated. The PEIS suggests that the economic value of reducing the prorations faced by junior water rights holders in the Yakima Basin is only about $0.4 billion. We believe this significantly underestimates the value of improving water availability in the Basin for several reasons: (1) if junior water rights holders have improved assurances of water deliveries, they are likely to plant higher-value perennial crops such as wine grapes and fruit trees, rather than relying on lower-value annual crops like wheat (in the absence of assured water supplies, perennial crops are infeasible because the farmer risks losing his entire investment in any dry year when water may be unavailable or inadequate); (2) these higher-value crops also tend to be more labor-intensive, increasing the secondary economic impact of the switch to such crops; and, (3) the wine industry, in particular, supports a robust tourist industry in Eastern Washington, further increasing the economic multipliers associated with the switch from annual crops to wine grapes.

23-10

NOTES:

The Integrated Plan includes a section discussing study of "Columbia River Pump Exchange with Yakima Storage" (Vol. 1, page 44). The study would include, as Step 1, a detailed analysis of the physical and legal availability of Columbia River water, a description of alternatives for inter-basin transfer (including configurations of pumping, routing, and storage), estimates of the costs for each alternative.

As Step 2, it would include a detailed, site-specific feasibility-level analysis of the pumped storage option. "Depending on the outcome of the Wymer dam and interbasin transfer project described above, an evaluation of Roza Dam removal and whether to serve all or a portion of the Roza diversion through Columbia River water supply would also be evaluated."

23-11

On page 61, the IP timetable includes study of the Columbia River pumped storage option, which is projected to occur in 2013-15, with triggers for possible implementation in 2016, 2021, and 2026.

The PEIS (Section 2.4.5.4, p. 2-20) briefly addresses the Columbia River pump exchange, indicating that the studies would occur if the IP Workgroup "decides to move forward with a Columbia River pump exchange project in the future."

Questions from YBSA:

1. Integrating wind power into the NW system is a State and regional problem and a national priority. Should not all Washington water projects be evaluated as to their pumped storage benefits and costs?

23-12

2. Increased regulations are reducing our ability to access new withdrawals out of the Columbia. How do we know that water we will need will be available in 10, 20, or more years?

3. How will the upcoming Canadian treaty negotiations effect new water withdrawal supplies?

23-13

4. Water storage studies have been done on the Columbia river, what are the results of those efforts?

23-14 5. How can we increase tributary flows without diminishing agricultural supplies in drought years?

23-15 6. How do we know how much water fish will need?

7. Can water conservation projects provide enough instream flows?

8. How will fish be valued?

9. How will these projects be paid for, and what can the payers expect in return?

23-16 10. How do the various packages compare for environmental benefits and costs on an apples to apples basis?

11. How can we access more private capital?

From: Jeff Chapman
To: BOR_YRBWEP, sha-UCA
Subject: Back Country Horsemen comments on Yakima Basin Plan DPEIS
Date: Monday, January 02, 2012 11:24:23 PM
Attachments: BCHW CommentsonYakimaRiverBasinPlan.pdf

24-1 Attached are the official comments on the Draft Programmatic EIS for the Yakima Basin Plan by the Back Country Horsemen of Washington. We have many concerns with the potential impacts this will have on trails based recreation in the region. Active recreation is a vital industry in Washington State and particularly along the Cascades. We should be considered stakeholders in this process at all levels. Our members have deep ties to the communities in the Yakima and Kittitas valleys.

Thank you,
Jeff Chapman
Public Lands Committee Chair
Back Country Horsemen of Washington
bbbranch@olympus.net 360-385-6364

BACK COUNTRY HORSEMEN OF WASHINGTON
110 w. 6th Ave. PMB 393
Ellensburg, WA 98926

DATE: January 2, 2012

RE: Yakima River Basin Study DPEIS

24-2 The Back Country Horsemen of Washington represent the interests of saddle and pack stock users throughout Washington State. Our members, families, and friends live and recreate throughout the region covered by the Yakima River Basin Study in the Integrated Water Resource Management Plan (the Plan). While we certainly realize the importance of an effective water supply to serve the region, we hope that this effort can be accomplished without reducing the recreational opportunities available to the citizens of Washington State and to trails enthusiasts focused on preserving outdoor recreation access. There is no reason to believe these efforts can't be complementary. Many of our members themselves rely on the Basin water system for irrigation, for drinking water, and for other business and residential needs. In addition as recreationists, we camp out and travel the drainages from Conrad Meadows south of Rimrock Lake to Haney Meadows north of Ellensburg throughout the year.

24-3 While we support adequate protections for the surface water system in the Yakima Basin, we are also aware of the potential for over-regulation or needless access restrictions. The focus should be narrow, addressing water capacity, availability, and quality. The Plan should not be used as an opportunity to reach well beyond the scope for achieving other land use goals. For example, the Okanogan-Wenatchee National Forest is updating their forest management plan. We are involved in the various issues being addressed by that planning process. We have concerns that the two different planning efforts will result in vastly different outcomes. Knowing that the YRBS workgroup has been attempting to prevent that from happening is appreciated.

24-4 Our members ride on the American Forest Land Company (AFLC) property in the Teanaway by the gracious permission of the owners. We are concerned that the purchasing of this land will affect our access. Conservation and recreation are compatible, but different folks seem to have different ideas of what is included when they refer to recreation. As active recreation users, we feel saddle and pack stock use on trails and back roads must be preserved. This should not be dealt with as a concession but as a standard expectation within the scope of rural recreation within Washington State. What happens with the AFLC property after purchase is something we have a vested interest in.

24-5 An area we also have used extensively in the past is the Deep Creek drainage behind Bumping Lake that is an access into the popular stock destination, the William O. Douglas Wilderness. Working with the Forest Service, we have pushed for the repair of the roads into the drainages. Part of the reconstruction effort is going on this year. We do have serious concerns with a proposal raising the level of Bumping Lake without providing a plan by which access will be retained. Indeed, some aspects of the Plan seem to indicate that the entire area behind the lake will be added to the wilderness, which essentially means a loss of the road systems. This is not an acceptable solution. We would like clarification on what accesses would be retained in the Deep Creek watershed and to the Bumping River drainage south of Bumping Lake.

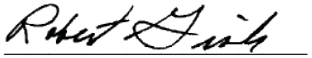
24-6 Several possible federal designations are considered in the Plan for public lands. Generally speaking, we do not see Wild and Scenic River designations as a key component of addressing water capacity and even water quality. Again we feel the Plan may be getting used as a vehicle to another regulatory purpose not directly associated with the central objectives. BCHW does support some Wild and Scenic designations in federal land management, particularly "wild" designations in wilderness areas and "recreation" designations otherwise. Indeed, there are several eligibility proposals in the Okanogan-Wenatchee preliminary forest plan update. What we would like to know is how W&S designations will address any issues that the Plan is meant to resolve.

24-7 The two National Recreation Area considerations are worth exploring. We do not have a lot of experience with this designation since the Mt Baker NRA is mainly focused on non stock activities. Since both the Teanaway and Manastash/Taneum areas are substantially used by horseback riders, we do want to be included in any such designation proposals.

24-8 Horseback riding is also a common means of accessing shrub steppe habitat. Putting a number of added regulations of these lands into the Plan again seems to be a way to address non-water capacity issues. We want to be engaged in any discussions about purchasing or restricting recreation use with areas such as Conrad Meadows.

24-9 We do wish to take part in further deliberations on the use, ownership, and designation of recreation areas as this effort progresses.

Sincerely,



Robert Gish, President
Back Country Horsemen of Washington

January 3, 2012

Candace McKinley

Bureau of Reclamation

1917 Marsh Road

Yakima, WA 98901

RE: Public comment on the Yakima River Basin Integrated Water Resource Management Plan Draft PEIS.

Dear Ms. McKinley,

Please accept the following letter into the public record for consideration by the work group and future discussion pertaining to site-specific action within the Draft Proposed Integrated Water Resource Management Plan.

I encourage the work group delegate as appropriate a sub-taskforce charged with expanding on the economic effects technical memorandum, 2.2, to include clean energy generation. The cost barrier of low-carbon energy production facilities is significantly reduced when options are explored in the pre-design phase of specific capital projects. Including opportunities to utilize power production through renewable technology will provide additional benefits to the Yakima River basin project feasibility through near-term returns and intangible regional improvements to regional environmental health.

25-1 The Preliminary Assessment of the Wymer Reservoir Downstream Conveyance, 4.7, projected a maximum capacity of 89,000 megawatts and estimated annual gross revenue of $5.3 million. Further review of project opportunities should be undertaken to include the Keechelus to Lake Cachess pipeline, increased Cle Elum storage pool capacity, efficiency savings upgrades with the KRD canals and Wapatox canal, the new Bumping Reservoir construction, and the increased Lake Cachess storage capacity. A technical advisory group, if designated, could assist in evaluating the potential of these additional projects paired with current and appropriate energy production technology.

Capitalizing on energy generation investments to achieve a neutral or positive utility consumption is consistent with economic interests of the ongoing operations and maintenance for new facilities. If the workgroup explores solutions for including renewable energy production it will increase the direct benefit for residents in the Yakima River basin.

These recommendations are intended to contribute to the overall success of the Proposed Integrated Plan by increasing potential benefits over project costs through: reduced operational

Comment Letter 25

consumption of electricity; increased contribution to the vitality of the regional economy and sustain the riverine environment; improved resiliency and adaptability of the Yakima River basin in responding to regional climate, subject to localized weather events; pollution reduction and
25-1 resulting higher quality of life and more attractive outdoor recreational venues; and, including the unquantified climate-change benefits.

Thank you for considering these suggestions.

Sincerely,

Tony Aronica

Program Coordinator

Central Washington Resource Energy Collaborative

(509) 925-2002

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YAKIMA COUNTY DEMOCRATIC CENTRAL COMMITTEE

P.O. Box 121 • Yakima, WA 98907-0121
Visit our Website: yakimademocrats.com

yccc@yakimademocrats.com

January 2, 2012

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
1912 Marsh Road
Yakima WA 98901-2058

26-1

The Yakima County Democratic Central Committee, an official entity of the Washington State Democratic Party, supports the implementation of the Yakima River Basin Integrated Plan. We conducted a review of the Project Environmental Impact Study and recommend to the Department of the Interior that it be accepted.

The Yakima River is the lowest tributary of the Columbia River in Eastern Washington that is unimpeded by hydroelectric dams and is capable of providing safe fish passage at minimal cost. Yakima County produces the highest value in crops and food products in Washington State, yet faces the greatest threat of severe drought during seasons when water is most needed for agricultural irrigation.

All concerned agencies and stakeholders were represented and met frequently over a span of two years to craft a single integrated plan that has resulted in a comprehensive project proposal which is impressive and deserving of our support.

Sincerely,

Mary M. Stephenson

Mary M. Stephenson, Chairman

From: Darlene Schanfald
To: BOR YRBWEP, sha-UCA
Cc: woolley@tfon.com
Subject: DEIS comment on new Yakima Dams
Date: Friday, December 30, 2011 5:30:35 PM

Bureau of Reclamation

27-1

Friends of the Miller Peninsula State Park, organized to protect parks and natural resources, oppose new dams in WA State.

Millions of dollars and years of planning are bringing down two dams on the Olympic Peninsula -- the Elwha and the Glines Canyon dams. It is sad to see governments looking to recreate the *faux pas* of years past by drowning forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest, as well as shrub steppe habitat by the proposed Wymer Dam.

Water is needed as is our forests to retain and cleans water and keep our air clean and wildlife habitat.
Conservation of water must be the plan and the rule if we are to survive.

The cost of losing these natural resources and what they provide for life in the area will never be off set by what dams do; in fact the score sheet will be a negative.

The Bureau of Reclamation and Ecology must withdraw the Draft Environmental Impact Statement for the Yakima Integrated Water Resource Management Plan.

Respectfully submitted,

Darlene Schanfald, President
Friends of Miller Peninsula State Park
PO Box 2664
Sequim WA 98382

From: Kenneth Hammond
To: BOR YRBWEP, sha-UCA
Subject: DPEIS Yakima River Basin Integrated Water Resource Management Plan
Date: Thursday, December 29, 2011 4:30:50 PM
Attachments: Integrated Plan DPEIS comments.docx
ATT00001.txt

Dear Ms. McKinley,

I attach my comments on the Draft PEIS for the Yakima River Basin Integrated Water Resource Management Plan. I will appreciate a response indicating you did receive this message. My address, phone number and email address are on p. 1 of the document.

Thank you,

Ken Hammond

TO:
U.S. Department of the Interior
Ms. Candace McKinley
Bureau of Reclamation Environmental Program Manager
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901-2058
509-575-5848, ext. 613
yrbwep@usbr.gov

FROM: Kenneth A. Hammond
7321 Cove Road
Ellensburg, WA 98926
Ph. 509-925-2452
kenhammond@fairpoint.net

COMMENTS on the DRAFT PEIS
YAKIMA RIVER BASIN INTEGRATED WATER
RESOURCE MANAGEMENT PLAN

28-1 The Integrated Plan does not possess most of the components and qualities that reasonably should be expected of a river basin water plan. It does not even fully live up to the claims of being integrated and comprehensive. Important assumptions are not stated. Criteria used to screen proposed programs and projects are not clear. The entire exercise appears to be more one of cobbling together an array of projects that will gain votes of approval from the Workgroup than with resolving problems in a timely manner and at least cost.

There are two sides to every resource equation—supply and demand. As written, what appears to be the problem definition (pp. 1,2, DPEIS) is biased toward supply. The problem magnitude and timing are not clear and only partially quantified.

It is no surprise that the Draft PEIS follows the same unsatisfactory pattern. What is not included is as noteworthy as what is included.

28-2 **1)** MARKETING is a demand management strategy that reallocates water as needed. I put marketing first simply because it could be the most positive and promising program put forward if one is interested in actually solving the problems on a timely basis.

I applaud the fact that a Marketing program actually appears in the Plan and the DPEIS. My enthusiasm is dampened by the fact it is generally treated as a minor item. One comment (p. 5-110, DPEIS) suggests Marketing deserves a much more prominent role in planning for the future. Perhaps the potential significance of their observation was lost on those who wrote it.

[B]y itself, the market-based element of the Integrated Plan has the potential to offset much, but not all, of the irrigation related economic losses from a future severe drought.

With the usual lack of specificity and detail in the DPEIS (or the plan for that matter), it is not possible to evaluate how large the losses might be or their frequency of occurrence at various loss levels. In some years of modestly low water flow a well-designed marketing program could eliminate all losses. It well may be that offsetting “much” or even all of the loss in some years with marketing, and bearing the rest of the loss in

some years, is one of the very least-cost options over the long term.

At some level, marketing can be put into place as soon as institutional barriers are removed. Nothing needs to be constructed. It does need some start-up money, but the program could be totally self-supporting over time. Initial costs could be as little as 10% of the costs of Wymer and provide more water than Wymer. And, also in contrast to any dam and reservoir, operation costs are low in years when supplemental water is not needed. At least one similar program based on rotation fallow already exists elsewhere.

In addition, and worthy of greater emphasis in the DPEIS, "Marketing" is conspicuously evaluated to have few or no short term or long term impacts on any of the listed categories of environmental resources. Any EIS for Marketing should be very brief.

28-2 The above quote does not speak to losses other than "irrigation related economic losses," but needed water for any purpose could be obtained from the same sort of program.

So, there you have it. At relatively lower economic and environmental cost, much of the problem can be resolved. When the potential for conservation and transfer of at least a portion of the saved water is added to marketing, any case for costly dams and reservoirs with higher environmental costs becomes feeble.

Were any specific water marketing programs considered and rejected?

Specifically, was a rotation fallow program considered at any point in the preparation of the plan or the DSPEIS?

2) The DPEIS lacks an explicit, identifiable PROBLEM DEFINITION. The following supply-side statement (found on pp. 1, 2) comes close, and it is misguided.

The current water resources infrastructure of the Yakima River basin has not been capable of consistently meeting aquatic resource demands for fish and wildlife habitat, dry-year irrigation demands, and municipal water supply demands.

What is the justification for putting the blame for problems on "infrastructure?"

When the problem is defined as "infrastructure," the solutions are guided toward new or changed infrastructure -- dams, reservoirs, diversions and delivery systems. In comparison to remodeling of the biophysical world to provide greater supply, demand
28-3 side solutions have a much smaller environmental impact and cost less per acre-foot of water obtained.

A more useful problem definition would read something like the following.

With current practices, institutions, economics, and physical conditions in the Yakima River Basin, there are periods of time when water demand and water supply are not in balance.

The virtues of this definition are:

A) It identifies both sides of the water balance equation – Supply and Demand. Either side is equally available for change to cope with problems of imbalance, whether flood or drought.

B) It identifies four aspects of our condition (current practices, institutions, economics, and physical conditions) that might be amenable to change and does not specify which should be targeted.

C) No strategy, program, action or project is favored or excluded.

28-3 Each of the categories has multiple components. For example, "current practices" would include possibilities for changing cropping patterns, points of extraction, water delivery systems, methods of water application, and other aspects of land and water use. Changes to any of them could help close the gap between water demand and water supply. Costs of those changes are likely to be lower than building and supporting a new dam and reservoir at Wymer.

3) The DPEIS makes frequent reference to WATER DEMAND without providing either a working definition of "demand" or their basis for calculating demand. There is an implicit assumption of continued growth in population and water demand. As cited above the presumed problem definition from pp. 1 & 2 seems to assume that demands for water should be met with increased supply coming from an "improved" infrastructure. All "demand" is not equal. If urban demand increases by 25%, the total number of acre feet needed to satisfy it will be less than if agriculture demand increases by only 10%. This does not mean urban use should be encouraged. It does mean the key player in water demand and consumption is agriculture. Significant increases must not be encouraged.

An objective definition for water DEMAND is**: The volume of water requested at a given price**. Where (as is common for underpriced goods) water demand exceeds water need, a significant price increase will tend to reduce demand. The price for
28-4 agricultural water in the Yakima River Basin is far below the costs of service, plus environmental costs resulting from water extraction.

A singular emphasis on satisfying "demand" is a faulty base on which to build a water plan. In the Plan and DPEIS, growth is assumed with no indication of limits. At some point, any form of growth that demands additional water cannot be accommodated. Water supplies are physically, economically, and environmentally limited. The farther we stay below the absolute limits, the easier it is to address problems. The other side of that coin is, the closer we get to limits, the more constrained the options will be. The sooner we face the inevitability of reallocation of existing water, the less painful will be the consequences.

What data and/or methodologies were employed to quantify demand?

What consideration was given to basing a desired supply on need rather than demand?

4) Other words are also put to questionable use. The writers were quoting state law and so could not have changed the wording found on p ii of the Executive Summary used to define a drought as:

"**[W]hen water supply for a significant portion of a geographic area falls**
28-5 **below 75% of normal"** and causes hardship**.**

Factually, variability is the only condition that is "normal" in our natural system. Some years get more snow than others, and so on. It follows that every year is normal. They could mean average, but that is not the best standard either The statistical average changes with every year of experience. If several years have heavy snowfall, the

average moves upward. Expectations should not move upward or downward with the average. Almost no year is average. Every year is normal, and rational water planning should proceed with a mindset where variability is a given. Rational plans will include projects, programs, and institutions that can respond intelligently to variability.

28-5 Clear thinking on water "shortages" is also rare. Natural systems experience no shortages of water. Of necessity, every living being there is adapted to the water regime in that system. Failure to adapt leads to exclusion or extinction.

It follows that water "shortages" are a human mental construct. They arise only when someone attempts to do something the natural water regime will not support. Therefore, a supply-demand imbalance is created only when excess demand exists some or all of the time.

5) The DPEIS does not contain data indicating the magnitude of the problem in the Yakima River Basin. Other studies have widely divergent numbers purporting to indicate the size of the problem. The number used by the Workgroup, and the basis used for arriving at that number are needed. Then, the water made available by every proposed program or project can be compared with that number to see how much it contributes to a solution. Once costs are determined for each project or program, several combinations of least-cost alternatives can be explored to arrive at the most desirable combination.

28-6 Any magnitude number must be modified every time something happens to change it. For example, every conservation project changes the magnitude of the problem. It works on both sides as it reduces demand for irrigation water and makes some water supply available for other uses. As I understand it, the Roza District is paying for the piping of their main canal so they can retain all the conserved water for use in their District. Roza ia a proratable district and serious water conservation in the Roza District will change the size of the problem.

What number was used by the Workgroup to identify the magnitude of the water problem? How was that number obtained?

6) Both the "comprehensive" and "integrated nature of the plan and the DPEIS is called into question by what is generally missing.

28-7 For the most part, there is no obvious attempt to coordinate with the multiple private irrigation districts, most of which have senior water rights. To carry this a bit further, in the section on **Climate Change**, (pl 10, EX), they are knocking the "uncoordinated approach" of the No Action Alternative and infer the Plan is "Approaching management on a basinwide level" but I don't see it. "Basinwide" surely would include all irrigation districts. Some of them are doing important things.

28-8 Both conservation and acquisition are included in the Plan but there is no listing (much less an evaluation) of projects or programs already completed, underway or planned for both of them. It simply is not adequate to lump them in the No Action alternative and ignore them. It is reasonable to assume those projects already have had, or in the future should have, some impact on the environment and/or on solving water problems. The size of their impact is important in any planning activity. Some projects are sketchily described (pp 2-6 to 2-8, DPEIS). Additional information on Fish Recovery Efforts (pp. 1-22 through 1-25) provides other sources of information for what is happening, but again with no indication as to how they fit into the current plan.

28-8 **Is it accurate to say that water conservation projects already completed or underway have saved water and will continue to save water? If yes, how much water was saved by each project and at what cost? If no, please identify the projects and explain why were they funded.**

28-9 There is also some question as to how comprehensive a water plan can be when it deals not at all with periods of high water. Restoration work on riparian and flood plain habitat, along with other programs dealing with groundwater infiltration will probably have a short term and/or long-term impact on stream flows.

Was any consideration given to how the plan relates to floods and flooding?

28-10 **7)** A truly integrated water plan surely would work in coordination with work being done by the Yakama Nation, the State Salmon Recovery Funding Board, Bonneville Power Administration, and other state, local and federal agencies, along with all of the environmental organizations currently investing time, talent, and money in the basin.

Did the Workgroup have available a complete listing of representatives of active groups in the Basin? Who was included on the list? How frequently were they consulted?

28-11 The claim that this is the only plan and array of projects that will resolve water problems in the basin is preposterous. That repeated position suggests, once again, the Workgroup approved this plan only because each of them had at least one log on the load.

28-12 **8)** The DPEIS is inadequately revealing. It sets a precedent (pp. 2-33 – 34, DPEIS) with a listing of numerous storage sites considered and rejected. Some data and reasons for rejection are noted. I found no similar listing and detail on other categories of programs and projects considered but rejected. For example, it may be that multiple water transfer programs were considered and data was accumulated. It would be interesting to know why they did not move forward.

In addition to specific water storage projects, what specific non-storage projects and programs were rejected after due consideration? What were the grounds for rejection?

28-13 **9)** Vegetation changes are mentioned frequently. In the **Vegetation** section (p. viii, Executive Summary) it is stated there would be "some negative impacts" to "shrub-steppe and old-growth in the areas of new [Wymer] or expanded [Bumping Lake] reservoirs." But, "the overall log-term impact of the integrated plan is expected to be positive." Those statements may or may not be true. Bluntly put, in both cases, unique areas would be drowned on a rather permanent basis. Whatever their annual natural values now are, they would be lost for every future year, forever.

28-14 There is no hint that the annual values of the ecosystems on those parcels of land have been calculated, estimated, or even that such values came to mind for consideration. The values should be identified and deducted every year from anticipated benefits of their destruction. If experts in valuing ecosystem services agree that mitigation has fully replaced those values, the deductions could be ended.

However the calculations come out, one thing is reasonably certain. The permanent loss of green plants reduces by that much the ability of the planet to extract CO^2 from the atmosphere. One can argue that it is not very much, but that is the very foundation of

the nibbling effect. A little here and a little there and, over time, it is all gone.

28-14 **How is it even possible to "mitigate" in kind for the loss of shrub-steppe and old-growth forests when the total amount available is finite?**

10) In the Threatened and Endangered Species section (pp. ix-x, Executive Summary), threats are essentially dismissed. However if we return to the plan (Vol. 1, p.43) states "Wymer Reservoir releases would pass through tunnels, a siphon, and a hydroelectric powerhouse to the Roza Canal" and "downstream conveyance alignment provides for connection with future potential storage sites within the Burbank Creek and Selah Creek drainages." If water moves from the proposed Wymer Dam and into or through lower
28-15 Selah Creek vicinity, there is a concern. The Basalt Daisy is an endemic and rare species in the region. There is even a preserve to protect it. It is not clear the species got any consideration in this Plan.

Was consideration given to the Basalt Daisy in writing the DPEIS? If the answer is "yes," what was the basis for the conclusion to ignore it. If the answer s "no," why not?

11) Major storage construction projects (pp 17-21, DPEIS) include Wymer Dam (162,500 acre feet), Bumping Lake Enlargement (190,000 acre feet), and Keechelus-to Kachess
28-16 Pipeline.). All of them have been studied before and were not found economically feasible. It is not obvious that anything has changed in the past three years since Wymer was last studied that would change it from a hopeless non-starter to an economically feasible project.

What has changed to justify including Wymer in the Integrated Plan?

Given the lack of information provided, there is nothing persuasive about the claimed need for much, or any additional storage. Out of curiosity, I went back to the Volume I of the Plan released on April 11, 2011. On p. 25, a table shows entitlements and proration levels for the driest year for which records exist (2001). Data shows a shortfall of 355,412 acre feet between what was actually diverted after May 1 (597,054 acre feet) and what would have been diverted to provide a 70% supply for each of the proratable districts (952,466 acre feet).

Taking those numbers at face value, it appears conservation still to be done (170,000 acre feet, p 2-27, DPEIS) could solve much of this portion of the water problem even though the irrigation districts and individual growers involved legally get to keep a share of the saved water. Even so, conservation works on both sides of the problem. If water
28-17 is saved, it lowers the need for extractions from the streams and some water is available for reallocation.

Rational people would not seek storage for enough water to care for the driest year yet experienced. To build to that level means the facilities would not be needed but about once in 50 or 100 years. Climate change is a slender reed on which to hang that much expense. The best response to variable conditions is flexible institutions that can respond to change. Rotation fallow is a good bet.

Exactly how much of the stored water may be dedicated to habitat enhancement?

Are the projects now under consideration the most efficient and least cost means of getting the needed water?

Do the people producing the Plan and the DPEIS have numbers indicating how

28-17 **much water is needed, how much can be obtained from each alternative program or project and now much an acre-foot of water costs from each possible source? If yes, where are those numbers? If no, how can rational decisions be made on which programs or projects to pursue?**

12. In addition to the new dams and reservoirs, another project in the plan is designed to
28-18 tap the 200,000 acre feet of what is termed "inactive storage" in Lake Kachess. At the same time the plan includes restoring salmon runs above existing dams. The life cycle of young Sockeye require water in the lake for most or all of the year.

How, exactly, does additional drawdown of the lake impact the restoration of Sockeye Salmon above the dam for Lake Kachess?.

13) This is not a serious issue, but I must have misplaced the Teanaway River. In the
28-19 section on the Kittitas Basin, it says (p. 3-5,DPEIS) the Teanaway "flows through the southern edge of the valley." In my mind, and in reality, it is located mostly to the north of Cle Elum in the NW quadrant of the Basin and flows mostly south and east. As a geographer, I would argue it is nowhere near what can legitimately be labeled the "southern edge" of the drainage basin.

14) Table 3-8 (p. 3-21, DPEIS) is titled **Yakima Project Proration Years and Percentages**. The figures shown almost certainly are accurate, but there is a problem. The table shows the years of prorationing in the 14 years running from 1992 to 2005. That suggests prorationing occurs in slightly more than one year in three. The text says, "Prorationing has been imposed an average of once every four years in the last 20 years."

Presumably the 20-year time span fairly includes 2006 through 2009, but maybe not. To be fair, data for every year under consideration should have been displayed. Both earlier and later numbers are available.

Exactly which 20 years were under consideration for Table 3-8?

28-20 **What is the frequency of rationing when the table is extended into years prior to 1992, and through 2010 and even 2011?**

That bias toward making the problem look worse than it really has been is not the most important point to be noted here. Based on history, benefits from any additional supply available to proratable districts would be zero in most years while the costs of storage continue in all years. There could be other benefits of additional supply in those years.

What are the economic benefits of a new storage reservoir in years when no supplemental water is needed?

What is the least cost strategy to obtain needed water?

What water uses in the Yakima River Basin could pay all the costs associated with water from the proposed Wymer Dam and Reservoir?

15) The DPEIS includes acquisition but gives no hint as to the effect land acquisition outside of the Plan has on Plan formulation or implementation. It is simply glossed over under the No Action alternative.

28-21 Actually, past purchases in flood plain and riparian areas are significant and ongoing. Forterra, (formerly Cascade Land Conservency) purchased 480 acres of forestland on Dec. 7, 2011. Usually, the purchases are small but they do add up and might influence

the magnitude of purchases needed under the Plan. Perhaps more importantly, they are now happening without a request to a dysfunctional Congress for a major raid on the federal Treasury.

28-21 It is not clear that the Workgroup writing "acquisition" into the Plan was regularly updated on how much land was being acquired through means included in the No-Action Alternative. It might not have changed their recommendations but should have been considered worth knowing.

Did the Workgroup have information on acquisitions being made that might relate to the plan?

28-22 16) The text makes reference to fact the Keechelus-to-Kachess pipeline crosses "at least six streams" and there also would be "work along portions of the Yakima River, Swamp Lake area and Lodge Creek."

What types, and how much environmental damage would be done during and after construction of the Keechelus to Kachess pipeline?

17) We probably need a new and more detailed map on the location and productivity of irrigated and irrigable lands in the Yakima River Basin. Water rights were granted when conditions, technology, and knowledge were very different from today. Rights were granted to water that is not there some, much or all of the time. Some land considered not irrigable then, might well be irrigable and highly productive under new application techniques.

28-23 On the other hand, irrigation water rights may exist for land no longer suitable for irrigation. Transportation facilities, structures, and reservoirs come to mind. We don't water very many freeways or hay barns, but the land they occupy may still be assigned water rights.

An up-to-date map might indicate that a significant part of our water problem is irrational water allocation.

What information did the Workgroup have on irrigated land soil types and productivity in the Basin? How was that information utilized?

What information did the Workgroup have on formerly irrigated land that no longer is available for irrigation? How was that information utilized?

28-24 **What information did the Workgroup have on economic values that accrue from the various uses of one acre-foot of water in the basin? How was that information utilized?**

18) The Groundwater Storage Element (p. 5-21, DPIS) is described as involving an area of 160 to 500 acres to gain an infiltration capacity of 100,000 acre-feet of water. Simple arithmetic suggests the total infiltration of water on each acre of land would be between 200 and 625 vertical feet. That is impressive.

28-25

What type of surface material will be on the land?

How long would it take to achieve the goal of 100,000 acre-feet of storage using a surface area of 160 acres?

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January 2, 2012

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Office
1917 March Road
Yakima, Washington 98901-2058
yrbwep@usbr.gov

Re: Yakima River Basin Integrated Water Resource Management Plan, Draft Programmatic Environmental Impact Statement (November 2011)

Dear Ms. McKinley:

Please find attached my comments on the above referenced document. Notwithstanding Reclamation's and Ecology's laudable reliance upon the outcome of the YRBWEP Workgroup's work, the legal requirements of both the National Environmental Policy Act and State Environmental Policy Act require that development of the Columbia River Pump Exchange option be considered as an alternative to the other action projects within the Surface Water Storage Elements of the Integrated Plan. The final PEIS would be inadequate, in my view, were it not so considered.

29-1

Although cognizance of the further development of the Columbia River for water supply purposes may be politically difficult at this time, that course remains a reasonable alternative to those actions elected in the Integrated Water Resource Management Plan described in the Draft PEIS, particularly in light of the salubrious assets of the Columbia under the effects of climate change, the Washington State Legislature's mandate for further development of the Columbia (Ch. 90.90 RCW), the Department of Ecology's recent "Columbia River Basin Long-Term Water Supply and Demand Forecast," and the prospects of creative approaches to enhanced water supply through upcoming discussions with Canada regarding the Columbia River Treaty.

Sincerely,

James H. Davenport

Enclosure: Comments Regarding the Yakima River Basin Integrated Water Resource Management Plan Draft Programmatic Environmental Impact Statement

Comment Letter 29

Comments Regarding the
Yakima River Basin Integrated Water Resource Management Plan
Draft Programmatic Environmental Impact Statement

29-2

The Draft Programmatic Environmental Impact Statement is inadequate because:

- It fails to consider all reasonable alternatives.
- It fails to adequately consider the implications and effects of climate change.
- It unlawfully delegates the decision making authority of Reclamation and Ecology to a political process, thereby avoiding NEPA compliance.
- The action under consideration is not just "programmatic," as the "program" is merely a composite of major actions significantly affecting the quality of the environment.
- It fails to consider the irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

29-3

1. <u>The DPEIS fails to consider all reasonable alternatives</u>

The Draft Programmatic EIS is inadequate in that it analyzes only one action alternative: The Integrated Resource Water Management Plan Alternative. It's analysis of the "no action alternative," or not implementing the Management Plan, is merely an analysis of the single alternative in the negative. This Management Plan Alternative is composed of seven components. All the components contain specific projects which will be pursued. Four action alternatives are listed within the Surface Water Storage Element (Water Supply Component) of the Integrated Plan, These include 1) Wymer Dam and Pump Station, 2) Kachess Reservoir Inactive Storage, 3) Bumping Lake Reservoir Enlargement, and 4) Study of Columbia River Pump Exchange with Yakima Storage. Implementation of the fourth action alternative is conditioned upon later failure of the 1st, 2nd or 3rd alternatives <u>and</u> the political acceptance of the Integrated Plan planning group.

a. Legal Requirements

NEPA requires that Reclamation include analysis of the Columbia River Pump Exchange Alternative. This could be configured as the Integrated Resource Water Management Plan with Columbia River Pump Exchange Component; the Columbia River Pump Exchange in Lieu of Bumping Lake Expansion Alternative; or the Columbia River Pump Exchange in Addition to Bumping Lake Expansion Alternative.

Consideration of all reasonable alternatives is required by both federal and Washington State law. Section 102 (C) (iii) of the National Environmental Policy Act (NEPA)[1] requires that environmental impact statements on major federal actions significantly affecting the quality of the environment include a detailed statement including an analysis of <u>all reasonable alternatives</u> to the proposed action. The Columbia River Pump Exchange Alternative is a reasonable alternative to any of the other three projects within the Surface Water Storage Element.

[1] 42 U.S.C. § 4332 (C)(iii).

The Council on Environmental Quality's regulations implementing NEPA also require that environmental impact statements consider all reasonable alternatives.

> **40 C.F.R. § 1502.14 Alternatives including the proposed action.**
> This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (§1502.15) and the Environmental Consequences (§1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall:
>
> (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.
>
> (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
>
> (c) Include reasonable alternatives not within the jurisdiction of the lead agency.

29-3

> (d) Include the alternative of no action.
>
> (e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.
>
> (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

Washington State's Environmental Policy Act, RCW 43.21C.030(2)(c)(iii), likewise requires that "(2) all branches of government of this state, including state agencies, municipal and public corporations, and counties shall: (c) Include in every recommendation or report on proposals for legislation and other major actions significantly affecting the quality of the environment, a detailed statement by the responsible official on: (i) the environmental impact of the proposed action; (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented; (iii) alternatives to the proposed action."

Washington Department of Ecology's regulations for environmental impact statements, WAC 197-11-440 (5), addresses the requirement for consideration of reasonable alternatives in the environmental impact statement.

(5) **Alternatives including the proposed action.**

(a) This section of the EIS describes and presents the proposal (or preferred alternative, if one or more exists) and alternative courses of action.

(b) Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation.

(i) The word "reasonable" is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative.

(ii) The "no-action" alternative shall be evaluated and compared to other alternatives.

(iii) Reasonable alternatives may be those over which an agency with jurisdiction has authority to control impacts either directly, or indirectly through requirement of mitigation measures.

(c) This section of the EIS shall:

29-3

(i) Describe the objective(s), proponent(s), and principal features of reasonable alternatives. Include the proposed action, including mitigation measures that are part of the proposal.

(ii) Describe the location of the alternatives including the proposed action, so that a lay person can understand it. Include a map, street address, if any, and legal description (unless long or in metes and bounds).

(iii) Identify any phases of the proposal, their timing, and previous or future environmental analysis on this or related proposals, if known.

. . . .

(v) Devote sufficiently detailed analysis to each reasonable alternative to permit a comparative evaluation of the alternatives including the proposed action. The amount of space devoted to each alternative may vary. One alternative (including the proposed action) may be used as a benchmark for comparing alternatives. The EIS may indicate the main reasons for eliminating alternatives from detailed study.

(vi) Present a comparison of the environmental impacts of the reasonable alternatives, and include the no action alternative. Although graphics may be helpful, a matrix or chart is not required. A range of alternatives or a few representative alternatives, rather than every possible reasonable variation, may

be discussed.

29-3

. . . .

b. Columbia River Pump Exchange is a reasonable alternative

The Columbia River Pump Exchange Project is a reasonable alternative to the water storage projects identified for development in the Integrated Plan. The Columbia River Pump Exchange Project is described in a "Plan of Study." [2]

> Water from the Columbia River near Priest Rapids Dam or above Wanapum Dam would be pumped over the drainage divide into the Yakima River Basin. Water could be delivered to irrigation districts and/or to the Yakima River to support flow objectives for fish habitat. Water not used consumptively would flow down the Yakima River and rejoin the Columbia River at Pasco, Washington.
>
> Storage within the Yakima River Basin could potentially be included in the project. Possible storage sites could include the proposed Wymer Reservoir in the Lmuma Creek canyon, or another off-channel reservoir constructed in either Burbank Creek or Selah Creek canyon. [3]

29-4

The demand in the Yakima River Tributary Basin for water from the Columbia River, via a Columbia River Pump Exchange Alternative, has been recognized by the Washington State Department of Ecology. The need for action on the Columbia River Pump Exchange Project is great. The 2008 Final Planning Report/Environmental Impact Statement for the Yakima River Basin Water Storage Feasibility Study[4] found that the total of Yakima River Basin annual water entitlements upstream of Parker Gage totaled 2.501 MAFY.[5] 1.284 MAFY of that entitlement is categorized as "Proratable" and 1.217 MAFY is categorized as "Nonproratable." Additional municipal and domestic water needs for year 2050 equal 215,000 AFY.[6] The Surface Water Storage Element (Water Supply Component) of the Integrated Plan plans to address only 70% of the proratable demand. The Supply and Demand Forecast lists "Yakima Basin Water Supply (proratables, municipal/domestic, and fish)" with an estimated demand of 450,000 acre-feet per

[2] Yakima River Basin Study, Columbia River Pump Exchange, Plan of Study, U.S. Bureau of Reclamation, Contract No. 08CA10677A ID/IQ, Task 4.15 http://www.usbr.gov/pn/programs/yrbwep/reports/tm/4-15-colpumpexchng.pdf, ("Columbia River Pump Exchange, Plan of Study").

[3] Columbia River Pump Exchange, Plan of Study, p. 2.

[4] Yakima River Basin Water Storage Feasibility Study Final Planning Report/Environmental Impact Statement Released by the Bureau of Reclamation, December 19, 2008. ("Storage Feasibility Study")

[5] Table 2.3, Storage Feasibility Study.

[6] Table 2.4, Storage Feasibility Study.

year, as identified in the Yakima Integrated Water Resource Plan (April 2011) [7] as an actionable need.

And the Department of Ecology has found that the need for irrigation supply will grow when climate change is taken into account:

> The agricultural portion of the forecast focuses on irrigation water demands. The 2030 forecast of demand for irrigation water across the entire Columbia River Basin was an average of 11.8 million acre feet (MAF), which is roughly 10% above historic levels. The range of low and high estimates was from 11.4-12.4 MAF (20^{th} and 80^{th} percentile). The results represent demands for water as applied to crops, plus the additional water needed to account for irrigation application inefficiencies. It does not include conveyance losses that occur as water is transported through irrigation ditches and canals. In Washington, increases by 2030 were roughly 12%. Basin wide imbalances between irrigation water demand and surface water supply are forecast to worsen by 2030, primarily due to climate change.[8]

29-4

> The greatest concentration of current and future irrigation and municipal water demands are in the southern central Columbia Basin, including Rock-Glade (WRIA 31), Walla Walla (WRIA 32), Esquatzel Coulee (WRIA 36), Lower Yakima (WRIA 37), Upper Yakima (WRIA 39) and Lower Crab (WRIA 41), as well as Lower Snake (WRIA 33), Upper Crab-Wilson (WRIA 43), and Okanogan (WRIA 49). Irrigation dominates the demand for water in these WRIAS.
>
> Interruptible water rights holders in the Wenatchee, Okanogan, and Methow, and pro-ratable water rights holders (subject to impose diversion restrictions) in the Yakima, are particularly vulnerable to water shortages at the watershed (WRIA) level. [9]

The Washington legislature found, in 2006 that" a key priority of water resource management in the Columbia River Basin is the development of new water supplies that includes storage and conservation in order to meet the economic and community development needs of people and the instream flow needs of fish" and declared that "a Columbia river basin water supply development program is needed." The legislature therefore "direct[ed] the Department of Ecology to aggressively pursue the development of water supplies to benefit both instream and out-of-stream uses." [10]

[7] Water Supply and Demand Forecast, "Columbia River Basin Long-Term Water Supply and Demand Forecast," 2011 Washington State Legislative Report, Washington State Department of Ecology, in collaboration with Washington State University and Washington Department of Fish and Wildlife, (submitted pursuant to RCW 90.90.040, Publication No.11-12-011, p. 38, Table 4. ("Water Supply and Demand Forecast").

[8] Water Supply and Demand Forecast, p. vi.

[9] Water Supply and Demand Forecast, p. viii.

[10] RCW 90.90.050.

The Plan of Study makes it clear, however, that the Columbia River Pump Exchange project would remain subject to the political decision-making process of the YRBWEP Workgroup, as opposed to an objective evaluation, on the environmental merits, through a decision-making process required by NEPA.

> The Integrated Plan identifies a wide variety of water supply and habitat restoration actions in the Yakima River basin. It also acknowledges uncertainties regarding implementation of the actions, future growth and development and potential climate change effects. Because of these uncertainties it is possible that additional actions may be needed to achieve the goals of the Integrated Plan. If this occurs, the pump exchange using water from the Columbia River could be added to or substituted for other projects in the Integrated Plan.
>
> The need for additional water-supply enhancements would depend on the effectiveness of projects that are implemented as part of the Integrated Plan, how the Yakima Basin economy develops over time, and the timing of and manner in which climate change affects water supply availability.

29-4

> The evaluation of a Columbia River to Yakima Basin transfer would involve an initial screening step and subsequent feasibility study, as outlined below. The feasibility study would be conducted only if the initial screening step demonstrates that an interbasin transfer is a viable option and the YRBWEP work group authorizes its inclusion as part of the Integrated Plan.[11]
>
> At the end of Step 1, the YRBWEP Workgroup would consider the results and a determination would be made whether to carry out Step 2 of the study. The set of infrastructure alternatives may be narrowed for Step 2. [12]

Step 1 does not include compliance with NEPA. The requirement under the Study Plan that Step 2 would not commence unless the YRBWEP Workgroup determines the project "necessary" also does not include compliance with NEPA. Thus a determination whether to take action on the three other project alternatives within the Surface Water Storage Element will occur without evaluation of the Columbia River Pump Exchange Alternative as required by NEPA.

The sole test for proceeding with the Columbia River Pump Exchange Project is, ostensibly, whether, in the YRBWEP Workgroup's prerogative, it is "necessary to achieve the goals of the integrated plan" because of the failure of other components of the plan to do so. [13] The

[11] Columbia River Pump Exchange, Plan of Study, p. 1, (Emphasis supplied.).

[12] Columbia River Pump Exchange, Plan of Study, p. 1.

[13] Columbia River Pump Exchange, Plan of Study, p. 5. "If results from Step 1 indicate the Columbia River Pump Exchange Project is viable, and the YRBWEP Workgroup determines the project is necessary to achieve the goals of the Integrated Plan, then a request will be made for authorization and funding of Step 2 of the study to refine the alternatives, review environmental effects and select a preferred alternative."

subjective test is delegated to a group which is not subject to NEPA. Objectively, the failure is probable when the "barriers" to moving forward with the other components of the plan.

Sufficient information is currently available to perform a comparative analysis. In any case, the amount of information available regarding each alternative need not be equivalent, so as to qualify them for comparative evaluation. Meaningful comparison is even possible in circumstances where legal authorization has not yet been obtained. City of Sausalito v. O'Neill, No. 02-16585 (9th Cir. 10/20/2004).

29-4

Assuming arguendo that the Columbia River Pump Exchange project is not an "alternative" on the basis that it "depends upon" other actions within the Integrated Plan, then the Pump Exchange project is a "cumulative impact" of the Integrated Plan and must be analyzed in any case. 40 C.F.R. § 1508.7. It's probability is more than speculative, given the inadequacy of the other elements to meet the need.

c. One alternative to Columbia River Pump Exchange, Bumping Lake Reservoir Enlargement, is likely to fail.

The three elements of the Surface Water Storage Component of the Integrated Plan (Wymer Dam and Pump Station, Kachess Reservoir Inactive Storage, Bumping Lake Reservoir Enlargement) are not likely to meet even the compromised 70% Proratables objective of the Integrated Plan. The shortcomings of the other three components of the Surface Water Storage Element are described in an, Environmental, Policy and Legal Barriers Technical Memorandum.[14] "The term 'barriers' is used instead of impacts because this analysis focuses on major issues that could prevent a project from moving forward." [15] The discussion of major issues that could prevent development of the Bumping Lake Enlargement element (see DFEIS, §2.4.5.3), in particular, reveals that that component of the Integrated Plan will not occur:

29-5

> Bumping Lake is located on the Bumping River, 16.6 miles upstream of the confluence with the Little Naches River. The current reservoir has a 61-foot-high earth dam with a storage capacity of 33,700 acre-feet (Reclamation 2006). Expansion of Bumping Lake would involve construction of a new, higher dam about 0.5 miles downstream from the existing dam. The expanded reservoir would have a total storage capacity of 190,000 acre-feet.
>
> Enlargement of the reservoir would flood forested area above the current level of Bumping Lake (see Figure 3). This could adversely affect listed and priority species and habitats known to occur in the vicinity, including the northern spotted owl. Both mapped northern spotted owl habitat and late successional (old-growth)

[14] Yakima River Basin Study, Environmental, Policy and Legal Barriers Technical Memorandum, U.S. Bureau of Reclamation, Contract No. 08CA10677A ID/IQ, Task 5.2. ("Environmental, Policy and Legal Barriers Technical Memorandum").

[15] Environmental, Policy and Legal Barriers Technical Memorandum, p. 1.

forest habitat would be inundated (WDFW 2010). Potential habitat impacts have been estimated to include the following:

- 982 acres of late old-growth forest habitat
- 719 acres of northern spotted owl habitat

The northern spotted owl was Federally listed as a threatened species in 1990 because of widespread habitat loss and degradation and a lack of effective regulations to conserve the species. The major causes of the species' decline are considered to be timber harvesting; catastrophic natural events such as fire, volcanic eruption and wind storms; and competition from barred owls (USFWS 2009). Northern spotted owls generally rely on mature and old-growth forests that provide the habitat structures and characteristics required for nesting, roosting, and foraging (USFWS 2008).

Enlargement of the reservoir would flood areas of mapped spotted owl habitat located around most of the perimeter of Bumping Lake, incrementally reducing the amount of habitat available for the northern spotted owl in eastern Washington. The largest contiguous spotted owl habitat in the project area overlaps with mapped old-growth forest habitat on the south side of the lake and in the Deep Creek and Granite Creek drainage basins. The expanded reservoir would replace existing forest habitat with open water.

29-5

The expanded reservoir would inundate perennial and intermittent stream habitat downstream from the existing dam and upstream of the existing reservoir, including approximately 3,500 linear feet of Deep Creek and the Bumping River. Bull trout were Federally listed as threatened in the Columbia and Klamath River basins in 1998. The inundated area includes portions of Deep Creek and the Bumping River that are designated as critical bull trout habitat (Reclamation and Ecology 2008). Bull trout currently use Bumping Lake and its tributaries above Bumping Lake Dam. Deep Creek is thought to be the primary tributary of Bumping Lake where bull trout spawn (Ecology 2009a). The USFWS is currently performing redd surveys to evaluate more specifically where bull trout spawn in this area.

. . . .

The expanded reservoir would inundate forest communities and displace wildlife. Mobile wildlife species would be permanently displaced to adjacent suitable habitats. Travel corridors for wildlife would also be impacted by the change in lake level, likely resulting in adverse impacts on elk, deer, and small mammals.

The expansion area is known to have cultural resource features such as those related to construction of the original dam, historic recreational residences, and recorded archaeological sites from the pre European contact period. These

cultural resources, some of which may be eligible for the NRHP, could be impacted by reservoir expansion.

All existing lakeshore access and recreational facilities would be inundated by expansion of the reservoir, including:

- Boat launch, picnic area, and parking
- Marina and parking
- Two campgrounds
- Several informal campsites
- Approximately 15 vacation cabins
- Access to trails and trailheads
- The lower portion of Forest Roads 1800, 1808 and 1809, preventing access to some recreation areas

New recreational facilities would be constructed where possible, but it is unlikely that comparable replacement locations for the residences and the marina could be provided on Bumping Lake, given the steepness of the topography on the north and the proximity of the William O. Douglas Wilderness Area. Replacing recreation facilities such as the campground and boat launch would cause additional impacts on forested communities that could further adversely affect the listed and priority species and habitats known to occur in the vicinity.

29-5

The project would also eliminate11.14 miles of roads that provide access to recreational sites and facilities above Bumping Lake. Opportunities to construct new access roads to trailheads would be limited. Reduced access would complicate the U.S. Forest Service's ability to provide fire protection in the affected area.

All the land surrounding Bumping Lake is owned and managed by the Forest Service. The area needed for reservoir expansion has been reserved for Reclamation for the purpose of expanding the reservoir. No property would have to be acquired, but a Special Use Permit would be required from the Forest Service. Several private cabins on the north shore of Bumping Lake are located on land leased from the Forest Service. These cabins may need to be relocated or the lessees may need to be compensated.

Three potential environmental barriers are associated with expansion of Bumping Lake: flooding of spotted owl habitat and late successional old-growth forest, inundation of bull trout spawning areas, and impacts on recreational facilities. [16]

There is a long history of public opposition to expansion of Bumping Lake. When expansion was proposed in the 1970s, it was met with organized opposition from residents and environmental groups and the proposal did not move forward.

[16] Environmental, Policy and Legal Barriers Technical Memorandum, pp. 19-24.

> Ecology received over 50 comments on its Draft EIS for the Integrated Water Resources Management Alternative in opposition to the proposal (Ecology 2009a). The YRBWEP Workgroup has heard from environmental groups that oppose the project, and public opposition is likely to remain a barrier to expanding Bumping Lake. [17]
>
> A similar strategy of property acquisition and restoration could be used for mitigating impacts on old-growth forest and spotted owl habitat from Bumping Lake expansion. Most spotted owl habitat in the Yakima Basin is on Forest Service land, but a significant amount is on private property. Obtaining and protecting such properties would expand spotted owl habitat, which is especially threatened by fire and climate change in the eastern Cascades (USFWS 2008). Obtaining and protecting large areas of spotted owl habitat would be compatible with recovery actions proposed in the Recovery Plan for the Northern Spotted Owl (USFWS 2008). [18]

29-5

The environmental impacts of the Bumping Lake Enlargement are so great that a Land Acquisition Program (DFEIS, p. 2-24) would be necessary to mitigate them. The costs of this mitigation through land acquisition should be compared against the absence of similar costs in other alternatives, particularly including the Columbia River Pump Exchange Alternative.

2. The DPEIS fails to adequately consider the implications and effects of climate change.

The Washington State Department of Ecology recognized, in 2008, that changes in natural resource supply due to climate change would compel changes in water management.

> The effects of climate change could alter runoff and precipitation in the Yakima River basin and affect water management throughout the region. Changes in runoff and precipitation would require Ecology, Reclamation, and other agencies to adapt water management to respond to changing conditions as they occur. [19]

29-6

By 2011, considering the effects of climate change, Ecology acknowledged that:

> meeting water demands will be more challenging by 2030 as increased demands are placed on limited existing supplies. Solutions will require combinations of conservation, water banking/marketing, and new supplies based on storage of water in peak runoff seasons. [20]

[17] Environmental, Policy and Legal Barriers Technical Memorandum, p. 25.

[18] Environmental, Policy and Legal Barriers Technical Memorandum, p. 27.

[19] Storage Feasibility Study, p. S-11.

[20] Water Supply and Demand Forecast, p. viii.

Consideration of the Columbia Basin Pump Exchange Alternative in the EIS is driven by the requirement to consider the impacts of climate change. Environmental impact statements must evaluate the effect of climate change upon the availability of natural resources when considering the environmental merits of proposed actions. *Center for Biological Diversity v. Nat'l Highway Traffic Safety Admin*., 538 F.3d 1172, 1217 (9th Cir. 2008) ("[C]limate change is precisely the kind of cumulative impact analysis that NEPA requires."); *Center for Biological Diversity v. National Highway Traffic Safety Administration,* 508 F. 3d 508, 550 (9th Cir. 2007) (environmental impact statements must evaluate the effect of the action under consideration upon climate change). The PEIS should thus compare the advantages and disadvantages consequent of the regional effects of climate change on the volume and availability of alternative water supplies.

The DPEIS identifies the impact of climate change on the Yakima River Basin, but fails to compare those effects against similar effects in alternative water resource areas, like the Columbia River headwaters, where the effects of climate change are far more favorable and provide a solution to the negative effects of climate change in the Yakima River system. Both the harms presented by climate change and the benefits derived from it, should be considered. Where climate change will likely cause one water resource to become smaller and more prone to drought conditions and another to become larger and less prone to drought conditions, the environmental and socioeconomic consequences of relying upon the respective systems should be compared. The choice between these actions is significant. The alternatives are each significant actions affecting the quality of the environment, both as to costs and benefits.

29-6

The Yakima River water supply depends significantly on snowpack as a natural storage component.

> Annual precipitation ranges from 100 inches in the Cascades to less than 10 inches in the eastern portion of the basin. Most of the precipitation occurs as snowfall in the Cascades from October through January; less than five percent of the precipitation falls during July and August. Approximately 25 percent of the average annual precipitation is discharged by the Yakima River at the basin outlet. The Yakima River average annual discharge is approximately 3,700 cubic feet per second (2,700,000 acre-ft per year) near the basin outlet at Kiona, and 2,500 cubic feet per second (1,800,000 acre-ft per year) near the City of Yakima (USGS 1993).[21]
>
> Changes in runoff in the Yakima River basin caused by climate change are projected to be significant. Generally, the projected increased air temperatures would cause some precipitation to fall as rain instead of snow, which would increase winter and early spring runoff and reduce the volume of runoff from snowpack that occurs in the late spring and early summer. Additionally, projected higher air temperatures would cause runoff from snowpack to begin earlier, shifting the peak runoff period earlier in the season. Spring and summer runoff is projected to decrease (ranging from 12 to 71 percent of existing runoff) and fall

[21] Upper Yakima River Comprehensive Flood Hazard Management Plan, January 2007 Update p. 2-1.

and winter runoff is projected to increase (ranging from an increase of 4 to 74 percent of existing runoff). Fall and winter inflow to reservoirs would increase, and the reservoir system may not be able to capture and hold the increased flow for release during the high-demand period (spring and summer). Additionally, a decrease in spring and summer supply would cause water stored in reservoirs to be depleted at a faster rate to meet demand. The combined effects would likely cause a decrease in overall supply during the high-demand period.[22]

Inflow from precipitation above Columbia River mile 335 (where the Snake and Yakima Rivers meet the Columbia) is derived from west flowing rivers fed from west slope Rocky Mountain precipitation in Montana, Idaho and British Columbia (above Grand Coulee Dam) and east flowing rivers fed by east slope Cascade Mountain precipitation in Washington, via the Similkameen, Kettle,Okanogan, Methow, Chelan, Entiat, and Wenatchee Rivers (below Grand Coulee Dam). The total current average flow volume of the Yakima (3,859,644 AFY) is 2% of the current average flow volume of the Columbia River tributaries above River Mile 355 (195,158,544 AFY). The total active capacity of Roosevelt Lake is 9,386,000 acre-feet.[23] It's storage capacity and the storage capacity of Columbia River hydro-electric dams above River Mile 355 should also be taken into account. Figures 6 and 11 of the Supply and Demand Forecast provide the basic data in cubic feet per second. Table 1 below is stated in acre-feet per year:

29-6

Table 1

Columbia River Basin Water Flows above RM 355									
Columbia River Basin Water Supply--West Flowing									
	Upstream Supply (From Fig. 6)			Tributary Supply (From Fig. 11)			Total Supply		
	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change
Columbia	50,302,072	52,085,284	3.55%	85,874,364	90,295,832	5.15%	136,176,436	142,381,116	4.56%
Pend Orielle	15,360,384	16,858,340	9.75%	20,956,180	22,875,504	9.16%	36,316,564	39,733,844	9.41%
Spokane	4,243,364	4,624,912	8.99%	5,425,656	5,960,692	9.86%	9,669,020	10,585,604	9.48%
Total	69,905,820	73,568,536	5.24%	112,256,200	119,132,028	6.13%	182,162,020	192,700,564	5.79%
Columbia River Basin Water Supply--East Flowing									
Similkameen	1,423,384	1,360,396	-4.43%				1,423,384	1,360,396	-4.43%
Kettle	1,102,652	1,008,532	-8.54%	2,036,612	1,904,120	-6.51%	3,139,264	2,912,652	-7.22%
Okanogan				4,152,140	3,903,084	-6.00%	4,152,140	3,903,084	-6.00%
Methow				946,268	933,960	-1.30%	946,268	933,960	-1.30%
Chelan				1,269,172	1,248,176	-1.65%	1,269,172	1,248,176	-1.65%
Wenatchee				2,066,296	2,011,996	-2.63%	2,066,296	2,011,996	-2.63%
Total	2,526,036	2,368,928	-6.22%	10,470,488	10,001,336	-4.48%	12,996,524	12,370,264	-4.82%
Combined Total	72,431,856	75,937,464	4.84%	122,726,688	129,133,364	5.22%	195,158,544	205,070,828	5.08%

The Washington State Department of Ecology has already determined, in its Columbia Basin Water Supply and Demand Forecast, that climate change will affect annual water supplies throughout the Columbia River Basin.

[22] DPEIS, p. 1-9, §1.5.4.

[23] http://www.usbr.gov/pn/grandcoulee/pubs/factsheet.pdf

The forecast for water supply [raw supply—"supply prior to accounting for demands"] and timing in 2030 for all areas of the Columbia River upstream of the Bonneville Dam noted the following changes compared to the historical flows (1997-2006). Increase of around 3 % in annual water supplies for average flow conditions (50th percentile). Increase of around 2% in annual water supplies for wet flow conditions (80th percentile). Increase of around 4% in annual water supplies for dry flow conditions (20th percentile). Changes in timing of water supply at Bonneville, with increases of up to 36% between November and May and decreases of up to 21% between June and October.[24]

Tributaries to the Columbia River basin are primarily snow-fed (i.e., precipitation falls mainly as snow). These tributaries typically have low winter flows and strong spring and summer peaks with snowmelt, which concentrates about 60 percent of the natural runoff to the Columbia River during May, June, and July. Tributaries that are fed by glacial melt in addition to snow pack along the Cascade Range or in Canada exhibit a different flow pattern. Glaciers contribute a considerable amount of flow to rivers during late summer and early fall after the snow has melted and when precipitation is normally low. [25]

29-6

The water supply resources available in the eastern reaches of the Columbia River Basin (from west-flowing tributaries) are substantially more robust than the water supply in its Yakima Basin tributary, particularly when climate change is taken into account.

Table 2

Columbia River Basin Water Supply									
	Upstream Supply (From Fig. 6)			Tributary Supply (From Fig. 11)			Total Supply		
	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change
Columbia	50,302,072	52,085,284	3.55%	85,874,364	90,295,832	5.15%	136,176,436	142,381,116	4.56%
Pend Orielle	15,360,384	16,858,340	9.75%	20,956,180	22,875,504	9.16%	36,316,564	39,733,844	9.41%
Kettle	1,102,652	1,008,532	-8.54%	2,036,612	1,904,120	-6.51%	3,139,264	2,912,652	-7.22%
Spokane	4,243,364	4,624,912	8.99%	5,425,656	5,960,692	9.86%	9,669,020	10,585,604	9.48%
Similkameen	1,423,384	1,360,396	-4.43%				1,423,384	1,360,396	-4.43%
Okanogan				4,152,140	3,903,084	-6.00%	4,152,140	3,903,084	-6.00%
Methow				946,268	933,960	-1.30%	946,268	933,960	-1.30%
Chelan				1,269,172	1,248,176	-1.65%	1,269,172	1,248,176	-1.65%
Wenatchee				2,066,296	2,011,996	-2.63%	2,066,296	2,011,996	-2.63%
Yakima				3,859,644	3,755,388	-2.70%	3,859,644	3,755,388	-2.70%
Clearwater	11,812,784	12,064,736	2.13%				11,812,784	12,064,736	2.13%
Snake	23,637,876	28,151,292	19.09%	42,359,792	47,970,792	13.25%	65,997,668	76,122,084	15.34%
John Day	1,360,396	1,552,256	14.10%	1,360,396	1,552,256	14.10%	2,720,792	3,104,512	14.10%
Deschutes	4,907,272	5,036,868	2.64%	4,907,272	5,036,868	2.64%	9,814,544	10,073,736	2.64%
Klickitat				1,029,528	1,009,980	-1.90%	1,029,528	1,009,980	-1.90%
Total	114,150,184	122,742,616	7.53%	176,243,320	188,458,648	6.93%	290,393,504	311,201,264	7.17%

[24] Water Supply and Demand Forecast, p. 39.

[25] Storage Feasibility Study, p. 3-25.

However, while the water resource from the Columbia Basin's northeastern headwaters and west-flowing tributaries will increase, the water resource from the Columbia's east-flowing tributaries (draining the Cascade Mountains) will decrease.

> "Modeling results indicated a number of important changes in surface water supply entering Washington between the historical period (1977-2006) and 2030. These changes reflect the impacts of climate change (Figures 6 and 7).
>
> An increase of to 7% in annual water supplies for most of the eastern incoming rivers, including the Columbia, Pend Oreille, Spokane, Clearwater, Snake and John Day. Increased flows occur during the late fall, winter, and spring, while flows decrease in the summer and early fall.
>
> A decrease as much as 6% in annual water supplies for most of the western incoming rivers, including the Similkameen and Kettle. For these rivers, flows are still higher in the later fall, winter, and spring, and lower in the summer and early fall.
>
> The higher flows in late fall, winter and spring, and lower flows in the summer and early fall, are fairly consistent across the Columbia River Basin, though the exact timing may vary somewhat. They are evident at most points where significant amounts of water enter Washington, including the Columbia River and the Snake River." [26]

29-6

Table 3

Columbia River Basin Water Supply--West Flowing									
	Upstream Supply (From Fig. 6)			Tributary Supply (From Fig. 11)			Total Supply		
	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change
Columbia	50,302,072	52,085,284	3.55%	85,874,364	90,295,832	5.15%	136,176,436	142,381,116	4.56%
Pend Orielle	15,360,384	16,858,340	9.75%	20,956,180	22,875,504	9.16%	36,316,564	39,733,844	9.41%
Spokane	4,243,364	4,624,912	8.99%	5,425,656	5,960,692	9.86%	9,669,020	10,585,604	9.48%
Clearwater	11,812,784	12,064,736	2.13%				11,812,784	12,064,736	2.13%
Snake	23,637,876	28,151,292	19.09%	42,359,792	47,970,792	13.25%	65,997,668	76,122,084	15.34%
John Day	1,360,396	1,552,256	14.10%	1,360,396	1,552,256	14.10%	2,720,792	3,104,512	14.10%
Deschutes	4,907,272	5,036,868	2.64%	4,907,272	5,036,868	2.64%	9,814,544	10,073,736	2.64%
Total	111,624,148	120,373,688	7.84%	160,883,660	173,691,944	7.96%	272,507,808	294,065,632	7.91%

[26] Water Supply and Demand Forecast, p. 17.

Table 4

Columbia River Basin Water Supply--East Flowing									
	Upstream Supply (From Fig. 6)			Tributary Supply (From Fig. 11)			Total Supply		
	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change	1977-2006 average (AFY)	2030 50% forecast (AFY)	% change
Similkameen	1,423,384	1,360,396	-4.43%				1,423,384	1,360,396	-4.43%
Kettle	1,102,652	1,008,532	-8.54%	2,036,612	1,904,120	-6.51%	3,139,264	2,912,652	-7.22%
Okanogan				4,152,140	3,903,084	-6.00%	4,152,140	3,903,084	-6.00%
Methow				946,268	933,960	-1.30%	946,268	933,960	-1.30%
Chelan				1,269,172	1,248,176	-1.65%	1,269,172	1,248,176	-1.65%
Wenatchee				2,066,296	2,011,996	-2.63%	2,066,296	2,011,996	-2.63%
Yakima				3,859,644	3,755,388	-2.70%	3,859,644	3,755,388	-2.70%
Klickitat				1,029,528	1,009,980	-1.90%	1,029,528	1,009,980	-1.90%
Total	2,526,036	2,368,928	-6.22%	15,359,660	14,766,704	-3.86%	17,885,696	17,135,632	-4.19%

29-6

The effect of climate change on water supply throughout the Columbia River Basin is dramatic. The Columbia River Pump Exchange alternative provides significant resource stabilization assets to the Yakima River system because of this climate change effect. Failure to consider this alternative is a failure to consider the implications and effects of climate change, as required by NEPA.

Just as the upper Yakima River and Naches River are "flip-flopped" for fishery enhancement purposes in the Yakima River system, so might the Yakima (relying exclusively on the east slope Cascade Mountain snow pack) be "flip-flopped" with the Columbia River (relying on the west-slope Rocky Mountain snow pack and greater storage capacity) for climate impact mitigation purposes. Although Reclamation recognized the difference between the two riparian systems with respect to available water supply in 2004, [27] no discussion of this subject is contained in the Final DPEIS.

Comparison of the hydrologic records of the two river systems would indicate whether dry years coincide or vary between the Yakima River and the Columbia's other tributaries. The analytic tools for comparison are available. The Supply and Demand Forecast contains hydrologic analysis of all of the Columbia Basin tributaries.

[27] "[T]he proratable water delivery criteria are set based on water conditions in the Yakima River. Weather patterns vary geographically, and water supply conditions in the Yakima basin may be different from those in the Columbia Basin. While the Yakima River water supply may be plentiful, water supply conditions in the Columbia Basin, as a whole, may be below average and not always available for diversion to a Black Rock project." Water Availability Appraisal, p. 10.

3. The Integrated Management Plan DPEIS unlawfully delegates the decision making authority of Reclamation and Ecology to a political process (YRBWEP Workgroup), thereby avoiding NEPA compliance.

The Integrated Management Plan delegates the decision whether to implement the Columbia River Pump Exchange option to YRBWEP Workgroup. The Workgroup would not perform any environmental compliance in support of that decision. That approach, which defers Reclamation and Ecology's consideration of Columbia River Pump Exchange until later, and only pursue it if the Workgroup approves it, as contemplated by Step 2 of the Columbia River Pump Exchange Plan of Study, unlawfully delegates Reclamation's and Ecology's decisional authority and avoids the requirements of NEPA.

> Following completion of its separate environmental analyses, Reclamation and Ecology decided to continue the process of evaluating options to improve water resources in the Yakima Basin through the YRBWEP process. In April 2009, the two agencies initiated the YRBWEP Workgroup to develop a proposal for an Integrated Water Resource Management Plan that incorporated studies and information developed during more than 30 years of work on water issues in the Yakima River basin. The Workgroup is composed of representatives of the Yakama Nation; Reclamation; the Service; NMFS; Ecology; WDFW; Washington Department of Agriculture; Benton, Kittitas, and Yakima Counties; City of Yakima; American Rivers; Yakima-Tieton Irrigation District; Kittitas Reclamation District; Kennewick Irrigation District; Sunnyside Valley Irrigation District; Roza Irrigation District; Yakima Basin Fish and Wildlife Recovery Board; and Yakima Basin Storage Alliance. DPEIS, pp. 1-30., 2-3, see also Figure 2-2.

29-7

Reclamation and Ecology's inclusion of other public officials interested in and affected by Reclamation and Ecology's decision how to proceed with addressing the Yakima Basin water shortage problems is laudable. However, it does not relieve either agency from complying with the statutory requirements of state and federal law (SEPA and NEPA). The advice provided to Reclamation and Ecology by the YRBWEP Workgroup does not supplant the requirement that Reclamation and Ecology themselves consider environmental alternatives when making decisions about major actions significantly affecting the quality of the environment. Reclamation and Ecology may not delegate that decision making authority to others, or accept a Workgroup recommendation without comparing that recommendation against other alternative courses of action.

The YRBWEP work group has no legal authorization to take action pursuant to state or federal law, nor to relieve the Department of Ecology or the U.S. Bureau of Reclamation from the responsibility of performing their own statutory responsibilities, including compliance with NEPA and SEPA.

It is important to distinguish between the Integrated Plan as a political[28] compromise document, and the Environmental Impact Statement as an environmental compliance document. The Integrated Plan was determined as a politically appropriate synthesis of programs, taking into account the political positions of the state and federal agencies, counties and tribal representatives entabled in the planning process organized by Ecology and Reclamation. There is no legal requirement that all viable alternatives be considered in a political planning process. There is a legal requirement that all viable alternatives be considered in an environmental compliance document required by the National Environmental Policy Act.

29-7

4. The action under consideration is not just "programmatic," as the "program" is merely a composite of major actions significantly affecting the quality of the environment.

The DPEIS is characterized as a "programmatic" EIS. But it states clearly that the "program" is merely a "combination of programs, projects and resource allocations." [29] The course of action proposed by this "programmatic" EIS is to leave precise actions within the selected "combination" to be considered in later environmental compliance. However, if the environmental qualities of alternative projects are not considered at this time, and are excluded now from the "program," then they will not be available as "alternatives" when the specific projects' environmental effects are later examined.

The Council on Environmental Quality's regulations implementing NEPA refer to two types of "tiering":

> (a) From a program, plan, or policy environmental impact statement to a program, plan, or policy statement or analysis of lesser scope or to a site-specific statement or analysis.
>
> (b) From an environmental impact statement on a specific action at an early stage (such as need and site selection) to a supplement (which is preferred) or a subsequent statement or analysis at a later stage (such as environmental mitigation).
>
> 40 C.F.R. § 1508.28

29-8

The three categories of environmental impact statements include 1) program, plan, or policy environmental impact statements, 2) program, plan, or policy statement or analysis of lesser scope, and 3) site-specific statement or analysis. None of the categories mentioned there include program including mixed programs and specific project actions. 40 C.F.R. § 1506.1 (a) (2) precludes any agency from limiting the choice of reasonable alternatives prior to making a record of decision. It necessarily follows that the record of decision is intended to be conclusive as to the choice of alternatives. Where reasonable alternative projects are eliminated at a

[28] The term "political" is not intended here to be pejorative, but rather descriptive of the collection of varied competing interests with the purpose of reaching a common acceptable objective.

[29] Draft PEIS, p.iii.

"programmatic level," without their consideration, or comparison against the chosen alternative, then the "reasonable alternative" requirement has been avoided, in violation of NEPA. Washington State's regulations, implementing the State Environmental Policy Act, use somewhat different terminology, but have the same import. WAC 197-11-704 (2)(a) and (b) define "project actions" and "nonproject actions." "Nonproject actions" are clearly of a more "programmatic" character. Washington courts have been sensitive about the dismissal of consideration of alternative projects by means of use of a "nonproject" environmental impact statement. That approach has been rejected as impermissible "snowballing," giving preference to uncompared projects in the "nonproject" or "programmatic" environmental documents and then never reaching evaluation of the alternatives that should have been considered. Magnolia Neighborhood Planning Council v. City of Seattle, 230 P.3d 190, 155 Wash.App. 305 (Wash.App.Div.1 03/29/2010); King County v. Washington State Boundary Review Board for King County and City of Black Diamond, 122 Wn.2d 648, 663, 860 P.2d 1024 (1973).

Environmental analysis of a "program" that is merely a combination of "projects" requires that the projects chosen to be within the program be measured and compared against those projects which have been excluded from the "program." In the case of the Columbia River Pump Exchange, study of the project is, in one sense, "in" the "program," but engaging in the "project" is not. Failing to consider alternative combinations of projects in the environmental impact statement, under the guise of the EIS being merely "programmatic" avoids the clear mandate of NEPA—that all reasonable alternatives be considered.

29-8

As the contemplated program involves precise actions, it is incumbent on the Reclamation and Ecology to evaluate the environmental effects of those actions against the environmental effects of alternative actions which are otherwise available, but not chosen to be included. Postponement of an alternative course of action, or making it contingent upon a later political decision, does not preclude the comparison of its effects in the environmental impact statement. Were it so, the statutory requirement that all available alternatives be considered would be hollow. The fact that a different level of cost information is available now for various alternatives is not a sufficient basis to wholly disregard another reasonable alternative within the scope of those the Washington State legislature has mandated Ecology to pursue when environmental compliance is performed.

The device used in the DPEIS of including a "study" of a reasonable alternative project in the "program," but precluding implementation of the project until a delegated political conclusion is reached, cannot be relied upon as meaningful comparative evaluation of that reasonable alternative. It will not suffice that the project is "in, but not in" the "combination" of projects which make up the "program." Such devices may suffice in political documents, but not in environmental compliance documents. NEPA requires consideration of the environmental impact of approaches that may be politically difficult.

5. The DPEIS fails to consider the irreversible and irretrievable commitment of resources which would be involved in the proposed action should it be implemented.

Section 102 (C) (v) of NEPA[30] requires that the environmental impact statement include a detailed statement on "any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented."

Likewise, RCW 43.21C.030(2)(C) requires that environmental impact statements "include in every recommendation or report on proposals for legislation and other major actions significantly affecting the quality of the environment, a detailed statement by the responsible official on: (v) "any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented."

29-9

The choice to leave the Columbia River Pump Exchange project out of consideration for development until after the other surface storage projects fail permits the DPEIS to omit discussion of the wasted fiscal resources that will be committed to projects that are likely to fail. Both NEPA and SEPA require consideration of all available alternatives in the first instance so that the competing "irreversible and irretrievable commitment of resources" of the various alternatives can be weighed against each other. The approach taken by the DPEIS permits the irreversible costs of both projects to be suffered.

[30] 42 U.S.C. § 4332 (C)(v).

January 2, 2012

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Dear Ms. McKinley:

Please include the following comment and attached photos on the Yakima River Basin Integrated Water Resource Management Plan, Draft Programmatic Environmental Impact Statement.

30-1 Section 3.11 Visual Quality fails to include a single photo of any of the visual qualities that the DPEIS pretends to describe. I request that the Department of Ecology and the Bureau of Reclamation include photos of the areas listed in this section that would be visually impacted by the proposal.

In addition, I request and give consent to have the attached photos, taken by me at Bumping Lake on September 10, 2010, reprinted in the PEIS.

David E. Ortman
7043 22nd Ave N.W.
Seattle, WA 98117

Bumping Lake Ancient Forests – September 2011 / By David E. Ortman

Bumping Lake Ancient Forests – September 2011 / By David E. Ortman

Bumping Lake red ant mound – September 2011 / David E. Ortman

Bumping Lake – September 2011 / By David E. Ortman

January 1, 2012

Candace McKinley
Environmental Program Manager
Bureau of Reclamation
1917 March Road
Yakima, WA.

Dear Ms. McKinley,

This is provided in response to the November 16, 2011, notice in the Federal Register of the availability of the Draft Programmatic Environmental Statement for the Yakima River Basin Integrated Water Resources Water Management Plan (DPEIS) and the submittal of comments. The DPEIS is a voluminous document; in addition there is a document describing the proposed Integrated Plan (Volume 1) and some twenty-seven supporting technical memorandums (Volume 2). Consequently, I found it necessary to first summarize what was done, and the results followed by my views/comments. I apologize for the lengthiness of the attachment!

My review and comments are oriented around five basic questions I believe are appropriate to ask on any proposed water resource project. Following are the questions and summary of my responses.

Question 1: Have the current and future water problems and needs been identified?

Irrigation - - Yes, for five (Kittitas, Roza, Wapato, Sunnyside, and Tieton) irrigation divisions of the Yakima Project. For the sixth irrigation division (Kennewick) whose water supply is mostly return flows from upstream irrigation districts the Integrated Plan notes this improves the reliability of their supply. If Kennewick continues to divert from the lower Yakima River, the reliability of this supply may be uncertain because the system operation modeling indicates a decrease in flows at the Parker gage and because the potential for water conservation measures in the Wapato Division and the impact on streamflows in the lower river are unknown. For others receiving water from the Yakima Project and have Reclamation contracts for their proratable supply, the assumption appears to be that their nonproratable supply is adequate to handle any reduction in proratable supply that may necessary. The extent of discussions with these entities is not indicated.

31-1

Other irrigated lands within the Yakima basin were identified as to the number of acres irrigated and the volumes of groundwater and surface water use, but potential water needs were not assessed as these lands are outside of the Federally water supplied areas.

Future Municipal and Domestic - - Yes, for those future water needs met by public water systems and individual domestic wells.

Instream Flows - - Yes, fifteen mainstem reaches and eight tributaries or groups of tributaries were reviewed; nine mainstem reaches and there tributaries were characterized as high-priority. However, an area of concern expressed by some are the volume and temperature of summer flows in the lower 100 miles of the Yakima River. This is particularly acute when sockeye salmon (a reintroduced species) will be migrating to spawning areas above Yakima Project storage dams made possible by the Integrated Plan. There also appears to be questions of existing fishery habitat conditions of some of the lower Yakima River reaches for which additional study is proposed.

Other Problems and Needs - - Problems and needs that appear to have received little consideration are the impacts of groundwater pumping on streamflows and the opportunity to develop joint-use facilities to resolve water supply and power operation problems.

Groundwater rights are junior to surface rights and in an average water year pumping is estimated to result in a decrease in flow volume of about 80,000 acre-feet at the Parker gage and 155,000 acre-feet at Richland. The depletion at the Parker gage is about the same as the 82,500 acre-feet of reserved storage for instream flows in the proposed Wymer Reservoir, and at the mouth of the Yakima River about the same as the total storage capacity of Wymer Reservoir. How can this be an Integrated Plan for the future if potential groundwater–surface water problems are not considered?

31-1

At times, BPA has a problem of integrating wind generation into the Federal Columbia River Power System operation; the Yakima River basin has a water supply problem. Yet these problems have not been mutually addressed. Why not collaborate with BPA and public power entities and address these problems now as a part of this ongoing effort to the mutual benefit of all parties?

Question 2: Do the projects and measures of the Integrated Plan (a) fully address the identified water needs and (b) are they the best means of providing a reliable water supply to sustain the basins agricultural economy, provide for future municipal and domestic water supplies, and improve streamflows to sustain and provide the opportunity to further enhance salmoniod populations?

The following responds to Question 2(a) assuming no change in climatic conditions.

Irrigation - - Yes, the Kittitas, Roza, and Wapato Divisions of the Yakima Project will receive additional water in dry years to provide a 70 percent proratable supply. However, when the additional water supply is incorporated into the Yakima Project the result is a third category of irrigation water to be distributed from the total water supply available for irrigation: nonprortable; proratable based on existing Yakima Project facilities; and the dry-year supplemental supply for Kittitas, Roza, and Wapato. The Sunnyside and Tieton Divisions have stated “they do not need additional water at this time”. The proratable water supply in dry years

for these two Divisions, and others receiving water from the Yakima Project, will continued to be prorated in the same manner as is currently done. A reliable water supply for the Kennewick Division may be a concern.

Future Municipal and Domestic - - A water supply for future municipal and domestic needs projected to year 2060 is included in the Integrated Plan. A concern is to underestimate the volume of water needs 50 years in the future, particularly with the reductions associated with urban encroachment on currently irrigated lands and future water conservation.

Instream Flows- - The Integrated Plan addresses the instream flow needs to the extent they were identified with the exception of high September flows in the lower Naches River resulting from the "flip-flop operations". This however, is with the caveat that the September 30 reservoir carryover can be used to meet some of these needs and that such use does not involve some risk and impact on the dry-year irrigation water supply objective. A major shortcoming is that the DPEIS (and the Integrated Plan) is deficient in addressing instream flows in the lower 100 miles of the Yakima River remain an issue. The concern is that insufficient water could "trigger" the time immemorial treaty rights for fish impacting the future reliability of the water supply. Why shouldn't this issue be addressed now?

31-1 The following responds to Question 2(b) assuming no change in climatic conditions.

The question of whether the Integrated Plan the best water supply plan for the Yakima River basin's future cannot reasonably be addressed as the Workgroup has been constrained in looking at storage potentials other than those involving impoundment of Yakima basin waters.

Climate Change Impacts - - Results of the simulated operations of the Integrated Plan indicate the dry-year irrigation water supply target for the three Yakima Project irrigation divisions securing a supplemental dry-year supply is met with the less adverse climate change scenario; but when the moderately adverse and the more adverse scenarios are considered, the dry-year irrigation water supply is significantly deficient.

While climate change is a controversial subject with diverse opinions on the scientific information, what the modeling for the Yakima basin indicates is the potential of increased temperatures, and changes in the volume and timing of runoff, all of which will impact water supply and its use. The implementation schedule for the three storage projects of the Integrated Plan shows them "being online by the beginning of 2020 to 2026; climate change scenarios are based on conditions that may occur during the 2040s. Economic monetary benefits for major water resource projects usually reflect a 100-year period from project implementation. What more can be said!

Question 3: Does the Integrated Plan meet the economic, financial, and cost-sharing criteria of Federal and State water resource projects?

While State criteria may be different, Reclamation water resource projects being considered for Congressional authorization and appropriations for implementation and operation generally require an evaluation of economic justification (project monetary costs equal to or greater than project costs), a determination of financial feasibility (a allocation of project costs to reimbursable and non-reimbursable purposes and how the reimbursable costs will be repaid), and non-Federal cost sharing (local and regional up-front investment to lessen the amount of Federal appropriations for construction and annual operation costs). Has this been done to date? The response is an emphatic No! What will the water supply cost? Who knows!

Question 4: Does the Integrated Plan address the matter of tribal treaty rights for fish and reasonably assure the availability of an adequate water supply in all years?

The Aquavella Adjudication indicates the flow right for fish is the minimum necessary to maintain anadromous fish life in the river according to prevailing conditions as they occur. The priority date for the Treaty fishing right is time immemorial. This places the treaty fishing right at the top of all surface rights; proratable rights are at the bottom and groundwater rights even lower. If an investment of $3.1 to $5.6 billion is to be incurred isn't it reasonable to expect an adequate and reliable water supply available in all years to meet this time-immemorial instream right and out-of-stream irrigation and municipal and domestic needs? Yet nothing appears in the DPEIS or the Integrated Plan documents indicating tribal treaty rights for fish was discussed.

31-1

Question 5: What is the extent of local and regional support for the Integrated Plan and are there major issues which could adversely impact its authorization funding for implementation?

The Integrated Plan appears to be supported by the Workgroup which is comprised mostly of Yakima basin stakeholders including the Yakama Nation. The extent of public and regional support is unknown and while there are some regional and national environmental groups that are supportive, others are not. Some also contend that irrigation water needs in dry years can be solely met by non-storage measures such as water conservation and market reallocation.

Bumping Lake Enlargement has long been an issue and a major reason for the decades of ineffectiveness in securing additional water storage. The latest effort includes a smaller Bumping Lake Enlargement (190,000 acre-feet) and an extensive package of land acquisition (70,000 acres) and protection of lands under Federal Wilderness Area and Wild and Scenic River designations. The bottom line is that controversy continues and could adversely impact authorization and funding!

31-1 Comments on several other matters are included in the attachment following Question 5.

Sincerely,

Larry Vinsonhaler 2567 Lynx Way
Boise, Idaho 83705

Attachment to January 1, 2012, Transmittal of DPEIS Comments

The Draft Programmatic Environmental Impact Statement (DPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) indicates "the current water resources infrastructure of the Yakima River basin has not been capable of consistently meeting aquatic resource demands for fish and wildlife habitat, dry-year irrigation demands, and municipal water supply demands. Climate change projections indicate there will be changes in runoff and streamflow patterns, increasing the need for prorationing of the irrigation supply and reducing flows for fish. Further, hydraulic continuity between groundwater and surface water in the basin creates uncertainty over the status of groundwater rights and permitted exempt wells within the basin's appropriative water rights system, potentially making groundwater use junior to nearly all surface water."[1] The foregoing is the context of the "purpose and need for action" of the DPEIS and the Integrated Plan, a conglomerate of seven elements containing proposed projects and measures, the Action Alternative purported to provide for the long-term management of basin water supplies that contribute to the vitality of the regional economy and sustain the health of the riverine environment.[2] The Integrated Plan is proposed to be implemented over the next 20 years (2011-2030) at a current estimated construction cost of $3.1 to $5.6 billion.[3]

31-2 A November 16, 2011, article in the Yakima Herald Republic indicates that Derek Sandison of the Washington State Department of Ecology described the DPEIS as a procedural step toward a final decision and quoted him as saying "This reports tells the decision makers and the public we have all these elements of the plan and this is how we connect the dots." In my view, what the decision makers and the public want to know for a "final decision" are responses to the following five basic questions. These are the basis for my comments on the DPEIS.

1. Have the current and future water problems and needs been identified?
2. Do the water supply projects and measures of the Integrated Plan (a) fully address the identified water problems and needs and (b) are they the best means of providing a reliable water supply to sustain the basins agricultural economy, provide for future municipal and domestic water supplies, and improve streamflows to sustain and provide the opportunity to further enhance salmoniod populations?
3. Does the Integrated Plan meet the economic, financial, and cost sharing criteria of Federal and State water resource projects?

[1] Executive Summary, Draft Programmatic Environmental Impact Statement, November 2011, pages i and ii.
[2] Ibid, page iv.
[3] This cost range is exclusive of yet to be determined costs required to acquire about 70,000 acres for watershed protection and enhancement purposes.

4. Does the Integrated Plan address the matter of tribal treaty rights for fish and reasonably assure the availability of an adequate water supply in all years?

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5. What is the extent of local and regional support for the Integrated Plan, and are there major issues which could adversely impact its authorization and Federal and non-Federal funding for implementation?

Question 1: Have the current and future water problems and needs been identified?

Irrigation - - The assessment of irrigation water needs is focused on the five Divisions comprising the Yakima Project which divert from the main-stem Yakima and Naches Rivers above the Parker gage (RM 103.7); Kittitas, Roza, Wapato, Sunnyside, and Tieton, and the Kennewick Division which diverts below the Parker gage.

During drought years when an insufficient volume of water is available to serve all Yakima Project entitlements above the Parker gage the supply for proratable entitlements is reduced.[4] Those with a higher percentage of proratable entitlements in relation to their total entitlement (Kittitas, Roza, and Wapato) are in more need of a dry-year water supply compared to entities with lower percentages of proratable entitlements (Sunnyside and Tieton) and have expressed their desire to obtain a water supply of 70 percent of their proratable entitlements in a dry year.[5] Sunnyside and Tieton have indicated they do not need additional water at this time.

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The 2001 drought was the worst single-year drought in recent Yakima basin history and was used in estimating the "shortfall" between a proration level of 70 percent, and the water diversions that occurred in 2001 when the proration level was 38 percent. This "shortfall" amounts to 355,400 acre-feet for Kittitas, Roza, and Wapato.

The five Yakima Project Divisions account for about 78 percent of the total entitlements above the Parker gage; 1,939,000 acre-feet of the total 2,502,000 acre-feet. The residual 563,000 acre-feet of entitlements involves entities also diverting from the mainstem rivers and is predominately nonproratable (93 percent) with any entity having a nonproratable entitlement of at least 70 percent of its total entitlement. Reclamation also has contracts with the holders of the proratable entitlements totaling about 41,000 acre-feet. These entities are not included in the dry-year irrigation needs.

Kennewick, diverting from the Yakima River (RM 47.1) below the Parker gage, has only proratable entitlements. In drought year 2001, Kennewick's diversions represented 77 percent of their proratable entitlement and 85 percent of their average diversion in non-drought years. In

[4] Proratable entitlements are provided pursuant to Reclamation contracts with require repayment of the construction costs of the Yakima project storage facilities and the annual operation and maintenance costs. Nonproratable entitlements do not pay these costs even though they do receive stored water

[5] Roza and Kittitas have only proratable entitlements and Wapato has about an equal amount of proratable and nonproratable entitlements.

drought year 2005 it was 68 percent and 75 percent, respectively. It is not clear if the reduced diversions in these drought years are the result of a lesser water supply or something else. The Integrated Plan indicates that most of the water for Kennewick is derived from return flow from upstream irrigation districts which improves the reliability of their supply. Generally Yakima Project stored water is not specifically released for Kennewick.

Potential changes in climate conditions are anticipated to affect the Yakima River water supply, both in volume available and the timing of runoff, as well as the consumptive water use of crops. The increase in consumptive crop use was estimated at eight to ten percent of the current estimated crop irrigation requirement. This amounts to an additional 95,000 acre-feet for the six Yakima Project Divisions.

In addition to the irrigated lands adjacent to the mainstem rivers that are provided water from the Yakima Project, there are other lands within the Yakima basin which are irrigated by diverting from the tributaries and by groundwater pumping. `The irrigated areas indentified in the "non-Federal irrigation demand assessment" include about 50,000 acres irrigated from surface water and 41,000 acres by groundwater pumping.[6] The estimated surface water diversions are 350,000 acre-feet and groundwater pumping of 161,000 acre-feet.[7] The foregoing is not included in the assessment of current and future water needs.

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Future Municipal and Domestic - - Future municipal and domestic water needs include those met by public water systems serving the six largest cities in the Yakima River basin, smaller public water systems, and domestic wells. Estimated municipal and domestic use in 2010, the forecasted use in 2030 and 2060, and the 2010 to 2060 increase are shown below.

Medium Forecast of Municipal and Domestic Water Needs				
	2010	2030	2060	2010 - 2060 Increase
	acre-feet			
Large Systems	42,000	56,000	76,000	43,000
Smaller Systems	15,000	20,000	27,000	12,000
Domestic Wells	34,000	45,000	60,000	26,000
Total	91,000	121,000	163,000	72,000

The increased total need of 72,000, after accounting for water conservation measures and conversion of irrigated agricultural land to urban use, is about 49,000 acre-feet.

Instream Flows - - Instream water needs for salmoniods were determined by reviewing reach-specific flow problems in fifteen mainstem reaches and eight tributaries or groups of tributaries

[6] This information is from Appendix B of the "Out-of-Stream Water Needs Technical Memorandum, July 15, 2010" and my interpretation of this information may be incorrect.

[7] Ibid. Lands irrigated by surface diversions above the Parker gage are estimated at 42,000 acres and those by groundwater pumping at 24,000 acres.

within the Yakima River basin.[8] From this effort, recommended flow objectives, characterization of stream reaches as high or lower priority, species benefited, and actions to improve the flow objectives were identified. Nine mainstem reaches and three tributaries were characterized as high priority.[9]

An area of concern expressed by some during the process of identifying instream water needs is the 100 miles of the Yakima River below the Parker gage. Instream flows in this 100-mile corridor through which all Yakima basin salmon and steelhead must migrate to and from spawning grounds are dependent on unregulated and return flows, and when necessary stored water releases to meet the Title XII instream target flows.[10] The high priority instream water need that is included in the Integrated Plan for the lower Yakima River is a pulse (flushing) flow release from upstream reservoirs of 15,000 to 20,000 acre-feet in early May of dry years.

One concern is the lower river instream flow regime in the latter summer months when sockeye salmon will be migrating to the spawning areas that will become available above the existing Yakima Project storage dams upon implementation of the Reservoir Fish Passage Element of the Integrated Plan. This concern appears to be primarily related to water temperature and the characteristic of sockeye salmon to "hold" and delay migration to the spawning grounds at undesirable water temperatures. The other concern is the adequacy of instream flows to handle the salmon and steelhead populations of about 490,000 which are anticipated to be entering the Yakima River in the future; close to 70 percent of these are estimated to be sockeye salmon.

31-3

A flow objective indentified for the lower river based on available water supply is to increase flows from June to October 15, to 550 cfs in drought years, 750 cfs in average water years, and 850 cfs in wet water years; no priority was assigned to this flow objective. Current Title XII target flows are 300 to 600 cfs depending on the estimated TWSA. The following is stated in a summary of the lower priority instream flow objectives: "The reach from Parker to Toppenish Creek (a 23-mile reach) needs a better understanding of existing conditions. Design and implement research, monitoring, and evaluation (RM&E) program to better understand improvements to develop flow objectives from RM&E results." This also appears to be the situation in the subsequent 33-mile reach from Toppenish Creek to Prosser Diversion Dam.

Other Problems and Needs - - In year 2000, the U.S. Geological Survey, in cooperation with Reclamation, Ecology, and the Yakama Nation, initiated a study of the Yakima River basin

[8] Mainstem river reaches comprised nine reaches on the Yakima River from RM 214.5 to RM 0.0, plus the Kachess and Cle Elum Rivers and two reaches on the Naches River from RM 44.6 to RM 0.0, and the Bumping River and Tieton River.

[9] Eight of the mainstem reaches are above the Parker gage (RM 103.7) and one is a -mile reach immediately below the Parker gage. The three tributaries are in the upper Yakima basin in the Kittitas Reclamation District service area.

[10] The Title XII target flows were established by the Act of October 31, 1994, and range from 300 to 600 cfs at Sunnyside Diversion Dam (RM 103.8) and Prosser Diversion Dam (RM 47.1).

aquifer system for the purpose of obtaining a better understanding of the groundwater-flow system and its relation to the surface water resources. A major objective of this study was to develop a numerical model of the groundwater system that could be used to assess short-term and long-term management activities (such as the Integrated Plan) that could be affected by groundwater withdrawals. This study, completed in 2011, indicates there are about 2,800 active groundwater rights that can legally withdraw an annual quantity of 530,000 acre-feet during dry years, the irrigation rights are for about 130,000 acres. In addition, there are about 16,000 groundwater claims for some 270,000 acre-feet of groundwater. [11]

The groundwater-flow model simulates streamflow for most of the Yakima River and the lower 17 miles of the Naches River. The model was used to quantify the relationship between simulated groundwater pumping and streamflow; it has been concluded there is continuity between these water resources. Information indicates that groundwater pumping in an average water year results in a decrease in streamflows of about 80,000 acre-feet at the Parker gage and 155,000 acre-feet at Richland.[12] The volume of depletion at Parker is about the same as the 82,500 acre-feet of reserved storage for instream flows in the proposed Wymer Reservoir and the volume at the mouth of the Yakima River is about the same as the total capacity of Wymer Reservoir.

31-3

Groundwater rights are junior to surface water rights and used, not only for irrigation, but are the predominate source of supply for the public municipal water systems and individual domestic exempt wells. While a surface water supply for future municipal and domestic needs is included in the Integrated Plan, and the supplemental dry-year irrigation supply should result in the curtailment of emergency irrigation wells in dry years, the groundwater-surface water relationship and its management appears to have received little discussion by the Workgroup. How can this be an integrated plan for the future of the Yakima River basin if potential problems of groundwater-surface water are not appropriately considered?

Recently the Federal Energy Regulatory Commission (FERC) ruled that the Bonneville Power Administration (BPA), which administers the marketing of power from the Federal Columbia River Power System, discriminated against wind developers when it ordered shutdowns of wind generation facilities during high Columbia River flows in spring 2011. FERC said that BPA's decision "significantly diminished open access to power transmission". This conflict is the result of significant increases in wind generation development and the need to lessen the amount of spills over Columbia River dams" by running the hydropower turbines at maximum generation. Such operation minimizes the impact on anadromous fishery occurring from high levels of dissolved nitrogen resulting from substantial "reservoir spills". Reducing wind generation

[11] Abstract "Numerical Simulation of Groundwater Flow for the Yakima River Basin Aquifer System, Washington", D.N. Ely, M.P. Bachman, and J.J. Vaccarro, 2011.

[12] Information obtained from U.S.G.S. October 2011.

impacts the amount of Federal and State tax credits developers receive for each kilowatt produced.[13]

BPA has a problem of integrating wind generation into the Federal Columbia River Power System operation; the Yakima River basin has a water supply problem. Why not collaborate with BPA and public power entities and address these problems now as a part of this ongoing effort to the mutual benefit of all parties?

31-3

Out-of-stream water problems and needs have been identified in dry-years for irrigation and three (Kittitas, Roza, and Wapato) of the six Divisions of the Yakima Project are to obtain a supplemental irrigation supply; the other three (Sunnyside, Tieton, and Kennewick) will not. Future municipal and domestic water needs to the year 2060 have been identified. Instream needs have been reviewed for fifteen mainstem river reaches and eight tributaries or groups of tributaries. Nine mainstem reaches and three tributaries were characterized as high-priority and flow objectives recommended. However, an area of concern expressed by some is the inadequacy of the flow regime in the lower 100 miles of the Yakima River. Problems and needs that appear to have received little consideration are the impacts of groundwater pumping on streamflows and the opportunity to develop joint-use facilities to resolve water supply and power operation problems.

[13] Information obtained from December 12, 2011, article by Rocky Barker of the "Idaho Statesman".

Question 2: Do the projects and measures of the Integrated Plan (a) fully address the identified water needs and (b) are they the best means of providing a reliable water supply to sustain the basins agricultural economy, provide for future municipal and domestic water supplies, and improve streamflows to sustain and provide the opportunity to further enhance salmoniod populations?

The water supply projects and measures of the Integrated Plan proposed for implementation are summarized below.

31-4

Water Supply Projects and Measures of the Integrated Plan Proposed for Implementation	
Category and Project or Measures	**What It Does**
Surface Water Storage	
Wymer Dam and Reservoir	Provides 162,500 acre-feet of new storage with 82,500 dedicated to instream flows and 80,000 dedicated to dry-year irrigation.
Kachess Reservoir Inactive Storage	Enables discharge of up to 200,000 acre-feet from the inactive storage space of Kachess reservoir below the current outlet works.
Bumping Lake Enlargement	Provides a new Bumping Lake Reservoir of 190,000 acre-feet storage one-mile downstream of the existing 33,700 feet capacity reservoir for dry-year irrigation, instream flows, and flood control. The existing Bumping Lake Dam will be removed and the old reservoir expanded by the new reservoir.
Groundwater Storage	
Shallow Aquifer Recharge	Provides two pilot recharge projects. If successful, full implementation with the capability of injecting into and discharging from up to 100,000 acre-feet annually could result.
Non-Storage	
Enhanced Water Conservation	Provides for the continued improvement of existing water conveyance, delivery, and on-farm irrigation systems to saving about 170,000 acre-feet of system losses (excludes Wapato Irrigation Project).
Market Reallocation	Estimate of up to 120,000 acre-feet.

For the Integrated Plan, the effectiveness of the foregoing water supply projects and measures is assessed by using the hydrologic reservoir and river computer simulation operation model of the Yakima Project (Yakima RiverWare Model). The hydrologic data represents that occurring historically for the 25 water years of 1981-2005. System operation results were provided for two scenarios: a Future Without Integrated Plan (No Action Alternative) and the Integrated Plan (Action Alternative).[14]

[14] In addition, a Non-Storage scenario was developed which expands the No Action Alternative to include (1) enhanced water conservation measures of the Integrated Plan, and (2) the shallow aquifer recharge projects.

Modeling results are expressed in terms of "hydrologic indicators" germane to Yakima Project operations such as the April-September TWSA estimate, reservoir storage at the end of September, the April-September flow volume past Parker and at the mouth of the Yakima River, and the irrigation proration level. Comparing the hydrologic indicators of the Action Alternative to those of the No Action Alternative provides the incremental change in accomplishments which occurs when the Integrated Plan is fully implemented.

31-4

The following responds to Question 2(a) of whether the projects and measures of the Integrated Plan in total fully address the identified water needs assuming no change in climatic conditions.

Irrigation - - The Kittitas, Roza, and Wapato Divisions were identified as needing additional water in dry-years. In a reoccurrence of 2001 water supply conditions, the irrigation proration level of the No Action Alternative is 32 percent; the water supply element of the Action Alternative increases the prorated water supply of these Divisions to the 70 percent dry-year irrigation proration level target. In 1993 and 1994, the irrigation proration level is increased for both years to 70 percent from 44 percent in 1993 and 21 percent in 1994.

Thus for the Kittitas, Roza, and Wapato Divisions of the Yakima Project which will receive an additional water supply in dry years, and will be required to pay for this additional water, the identified needs are fully met by the water supply projects and measures of the Integrated Plan. It should be noted however, that the irrigation proration level of all other entities with proratable entitlements will remain at about the same proration level as the No Action Alternative; 32 percent in a 2001 type water year and 44 percent and 21 percent in 1993 and 1994. As previously indicated the Sunnyside and Tieton Divisions stated they did not need additional water at this time. It is not clear if others with proratable entitlements indicated they too were "opting out" of an additional dry-year water supply.

31-5

When the additional water supply of the Integrated Plan is incorporated into the operation of the Yakima Project the result is a third category of irrigation water to be distributed from the total water supply available for irrigation; nonprortable, proratable based on existing Yakima Project facilities, and the dry-year supplemental supply for Kittitas, Roza, and Wapato.

Some of the water supply indicators in Table 5-2 of the DPEIS (such as the April 1 TWSA, the reservoir contents remaining after the irrigation season, and the irrigation proration level) may be somewhat misleading as to what they include, how they are used in the system operation, and to which entities they are applicable.

Future Municipal and Domestic - - I could not find any information in the DPEIS regarding modeling results of future municipal and domestic water needs. While there is some discussion of municipal and domestic water input to the Yakima RiverWare model in the "Modeling of Reliability and Flows' June 2011 Technical Memorandum, and reference is made to the "Water

31-6

Needs for Out-of-Stream Uses" Technical Memorandum of June 2011, I found it difficult to follow.

It is also not clear if the volume of future municipal and domestic water which is to be provided from the Integrated Plan is stored water, and whether it will be used directly as a surface supply or as a groundwater mitigation supply for the compensation of future impacts of groundwater pumping. *The concern here is perhaps to underestimate the volume of water needs 50 years in the future, particularly with the reductions associated with urban encroachment on currently irrigated lands and future water conservation.*

31-6

Instream Flows - - The DPEIS indicates the following: "The Integrated Plan operational modeling did not include all of the flow objectives prepared by the subcommittee. The Integrated Plan also does not include use of all of the water stored in new and expanded reservoirs. Increased carryover storage is provided, which would allow flexibility in operations to meet instream flow objectives. It is understood that significant additional instream benefits could be achieved by resource managers, working with Yakima Project operators, to optimize reservoir operations for both instream and out-of-stream purposes".[15]

The instream flow accomplishments are expressed as "significant improvement, minor improvement, no significant change, or could worsen." According to the DPEIS, the modeling results indicate a significant improvement in desired flow objectives at six of the nine mainstem river reaches. In the other three mainstem river reaches, the DPEIS indicates the following results:

31-7

- Yakima River, Roza Diversion Dam (RM 127.9) to Naches River confluence (RM 116.3): Minor improvement in flow objectives. However, reduction in diversions for potential generation at the Roza Powerplant (subordination of hydropower) was not modeled in the operation study. If subordination of hydropower were to occur when necessary, flows in this reach could be increased and the flow objective met.
- Yakima River, Parker gage (RM 103.7) to Toppenish Creek confluence (RM 80.4): Minor improvement in flow objectives. The proposed pulse flows in dry years were not modeled. The DPEIS noted however, that average reservoir carryover for the 25-year period with the Integrated Plan is increased by 330,000 acre-feet and this additional storage could be used to provide pulse flows in dry year as well as flow to change ramping rates in average and wet years.[16]
- Lower Naches River, Confluence of Tieton River (RM 17.5) to the mouth of the Naches River: Flow conditions could worsen. The modeling shows a decrease in July and

[15] DPEIS, pages 5-8 and 5-9.
[16] This is exclusive of Kachess inactive storage.

August flows however, this appears to be the result of the model not being able to properly balance storage and flows in this reach. Average carryover storage in Rimrock and Bumping Lake Enlargement is increased by about 207,000 acre-feet which could be used to change the ramping rate and increase early summer instream flows. The objective of reducing September flows by changing flip-flop operations was not achieved.

31-7 The carryover storage referred to is that available at the end of September in existing Yakima Project reservoirs plus the new reservoir additions. The hydrologic indicator shows an average annual increase for the 1981-2005 period of 550,000 acre-feet; this includes the contents in the 200,000 acre-feet of Kachess Reservoir inactive storage. Assuming on the average this is close to the entire 200,000 acre-feet volume, the residual September 30 reservoir contents would be about the 330,000 acre-feet indicated in the second "bullet" above. The reserved dry-year irrigation storage in Wymer Reservoir further reduces this carryover. In dry-year 1994, the September 30 reservoir contents are shown as 130,000 acre-feet including the inactive storage; an increase of 80,000 acre-feet from the No Action Alternative.

The following questions are asked:

- Won't a portion of the September carryover be required to meet the October dry-year supplemental irrigation needs of the Kittitas, Roza, and Wapato divisions?
- 31-8 In various discussions of the modeling results in meeting instream flow objectives, there are references to the September 30 reservoir contents being for instream flows; i.e. provide pulse flows in dry years (which are not included in the model), change ramping rates and increase summer instream flows, etc. Is it appropriate to assume the 25-year average September 30 reservoir contents are available for instream and out-of-stream purposes without some risk and potential impact on the dry-year irrigation water supply objective which is dependent on reservoir carryover? It seems if these are potential uses of stored water some effort should be made to show the accomplishments and impacts, if any, on other purposes.
- 31-9 Information on the use of the Kachess inactive pool and its refill situation should be provided to show that such action is not affecting the water supply of those users dependent on Kachess Reservoir stored water. This is also germane to the proposed aquifer recharge project in the Kittitas Valley whose injection water appears to come from Kachess Reservoir inflow which is currently stored but would be bypassed downstream with the Action Alternative for use in this groundwater storage project. What are the Kachess inactive pool conditions in the pre-and-post 1994 years?

A major instream flow objective of reducing September flows in the lower Naches River was not achievable. These high flows are the result of the "flip-flop operation" in which releases from Cle Elum Reservoir are decreased for salmon spawning and reservoir releases in the Naches River area are increased to meet stored water needs of diverters downstream of the Naches River confluence. The diversions are predominately those required by the Wapato and Sunnyside Divisions. Reducing these diversions through water conservation, which Sunnyside has done, but others have not, will help to some extent, but changes in points of diversion may be the only answer.

31-10 The extent of tributary flow objective accomplishments are a qualitative assessment as the tributary streams, except for their inflow contributions to the mainstem rivers, are not included in the Riverward model.

The discussion starting at the bottom of page 5-46 of the DPEIS citing (1) more normative flow conditions and the creation of habitat more capable of supporting salmonid populations in the Yakima River basin, and (2) the positive effects on specific river reaches is an endorsement that the water supply projects and measures of the Integrated Plan addresses the identified needs. However, the objective of reducing September flows in the lower Naches River was not achieved, and the only positive stored water effect that is proposed for the lower Yakima River is the release of 15,000 to 20,000 acre-feet for pulse flows in drought years.

Maintenance of lower Yakima River instream flows are driven by the target flows at Sunnyside and Prosser Dams established in Title XII of the Act of October 31, 1994 and by surface and subsurface flows entering the lower river. Title XII target flows are based on the TWSA estimate and range from 300 to 600 cfs. With the existing Yakima Project these target flows are increased by 50 cfs for each 27,000 acre-feet of water saved from water conservation activities undertaken through the Basin Conservation Program by entities whose point(s) of operational spill are below the Parker gage. In addition, water acquired for instream flow purposes that
31-11 would be available at this point also increase the target flows.

With the Integrated Plan the target flow will continue to be based on the TWSA estimate using the five Yakima Project reservoirs, plus stored water in the groundwater recharge projects, the 82,000 acre-feet of instream flow storage in Wymer Reservoir, and instream conservation benefits.[17] It is not clear what the effect, if any, this will have on the resulting instream target flows with the Integrated Plan in operation. To what extent are the target flows increased by the Title XII conservation criteria referred to in the previous paragraph?

31-12 The hydrologic indicators of April-September flow volume at Parker and at the mouth of the Yakima River show conditions at the "top and bottom" of this 100 miles of river, but not what is

[17] "Modeling of Reliability and Flows Technical Memorandum of June 2011", page 26, item 7.

occurring at points in-between. The following is the hydrologic information for these two indicators for selective water years without climate change.

April-September Flow Volumes at Two Points in the Lower 100 Miles of the Yakima River						
	Parker			Mouth		
	(million acre-feet)					
Water Year						
25-Year Average	0.64	0.60	-0.04	0.89	0.87	-0.02
Dry-Year						
1994	0.31	0.25	-0.06	0.39	0.35	-0.34
2001	0.25	0.20	-0.05	0.30	0.27	-0.03
Wet-Year						
1997	1.94	1.94	- -	2.25	2.26	0.01

50 cfs for 180 days is18,000 acre-feet; 100 cfs for 180 days is 36,000 acre-feet

31-12 Input to the Yakima RiverWare model included the three additional water storage projects, the aquifer recharge projects, and enhanced water conservation measures with the exception of those that may be undertaken in the Wapato Division.[18] Stored water releases for dry-year pulse flows were excluded. Based solely on the two hydrologic indicators of flow volume at the top and bottom of these 100 miles of Yakima River, the effect of the Integrated Plan is a flow decrease.

The concern of some about the lower river is "driven home" by the following statement on page 5-74 of the DPEIS concerning climate change: "Increased temperatures are predicated to affect fish by interfering with salmon migration, elevating the risk of disease and increasing mortality. Fish passage at Cle Elum Dam would expand the habit available to anadromous fish, increasing the abundance and productivity of fish". This is exactly the concern expressed; "more fish and little attention to the lower 100 miles of the only migration corridor in and out of the Yakima River basin."[19] The Integrated Plan (and the DPEIS) is deficient in addressing instream flow needs in the lower Yakima River.

31-13 Section 1205(a)(6)(B) of Title XII of the Act of October 31, 1994, required the System Operation Advisory Committee (SOAC) to evaluate the target flows for the purpose of reporting to the Secretary of the Interior and Congress what is necessary to have biologically-based flows target flows (specifically those over Sunnyside and Prosser Diversion Dams). SOAC's report was completed May 1999 and sent to the Secretary of the Interior and it is assumed was then forwarded to the Congress.

[18] Inflows to the Yakima River from an aquifer recharge project in the Wapato area would be in below the Parker gage. Potential water conservation projects in the Wapato Division were excluded on the assumption "conserved water from these projects would contribute to full build-out of Tribal irrigation. If this means further irrigated land development the effects of such action has not be addressed.

[19] See reference to this on page need on page 4 of these comments.

31-13 SOAC made 10 recommendations for assessing biologically-based flows (see Section 4 of the report). The question now is "does the flow regime represented by the Integrated Plan fully close the door on the biologically-based flow matter in the Yakima River basin?" It seems prudent that a requirement for moving the Integrated Plan forward is written confirmation from SOAC to the Secretary of the Interior and the Congress that this is the case or otherwise this matter remains open and is subject to interpretation in the future.

31-14 *The Integrated Plan addresses the instream flow needs to the extent they were identified with the exception of reducing September flows in the lower Naches River. This however, is with the caveat that the September 30 reservoir carryover can be used to meet some of these needs and that such use would not result in some risk and potential impact on the dry-year irrigation water supply objective. A shortcoming is that instream flows in the lower 100 miles of the Yakima River remains an issue with some. The concern is that insufficient water could "trigger" the time immemorial treaty rights for fish impacting the future reliability of the water supply. Why shouldn't this issue be addressed now?*

The following responds to Question 2(b) of whether the projects and measures of the Integrated Plan are the best means of providing a reliable water supply assuming no change in climatic conditions.

31-15 *This question cannot reasonably be addressed as the Workgroup has been constrained in looking at storage potentials other than those involving impoundment of Yakima basin waters.* This was based on the premise of (1) full use of the waters of the Yakima basin must occur before any consideration of inter-basin opportunities, and (2) the statement of some Workgroup members that they "would leave the table" if importation of water from the Columbia River was considered. The foregoing excluded any opportunity for comparison of other storage projects, their costs, joint operations in conjunction with the five reservoirs of the Yakima Project, accomplishments, environmental effects, and economic and financial aspects. Is the Integrated Plan the best water supply plan for the Yakima River basins future? Who knows?

31-16 One of the measures of the Integrated Plan is a "Study of a Columbia River Pump Exchange with Yakima Storage". This study is to commence "as the three in-basin surface-storage projects of the Integrated Plan are implemented". The potential for proceeding with such a project is contingent on its viability and the effectiveness of the Integrated Plan's water supply projects and measures, how the Yakima basin economy develops over time, and the manner in which climate change affects water supply availability. This ignores the upcoming US-Canada Columbia River Treaty discussions and the reality of further restrictions on out-of-stream withdrawals, why such a project objected to during the Workgroup process, would subsequently be acceptable, and why, after incurring significant costs to implement the three in-basin water storage projects, further Federal and State funding would be forthcoming. It also foregoes a comparison of the cost of

31-16 implementing such a water supply project now (in lieu of the three in-basin storage projects) contrasted with implementation at a future date.

The Impacts of Climate Change - - The DPEIS indicates the following with respect to climate change: "The Yakima River basin is dominated by a mix of direct runoff from fall rain and winter snowmelt. Simulations predict that this type of watershed will be most affected by climate change. Increased air temperatures from climate change would cause more precipitation to fall as rain rather than snow in the Cascades. This would reduce snowpack in the headwaters of the Yakima River system. Also, higher air temperatures would cause snowpack to melt earlier than under current conditions." [20]

Three climate impact scenarios from work conducted by the University of Washington Climate Impact Group using a range of assumptions about future greenhouse gas emissions and a range of different global climate models were modeled by the Yakima RiverWare model to assess their affect on the Yakima River basin's water supply. These were used to compare the impact on (1) the historical conditions of average monthly inflow to the five Yakima Project reservoirs and (2) the water supply operations of the Integrated Plan. The impact of the climate change scenarios on historical reservoir inflows are:

31-17

- Fall and winter runoff is expected to increase ranging from 4 to 74 percent of existing runoff taxing the capability of the reservoir system to regulate for late spring and summer water needs.
- Spring and summer runoff is expected to decrease from 12 to 71 percent of existing runoff resulting in an earlier demand for release of stored water and depletion of reservoir contents at a faster rate.

The impacts of the climate change scenarios on the Integrated Plan are:

- Less September 30 reservoir contents
- Dry-year irrigation proration levels for 1994 and 2001 of 70 percent (less adverse), 25 percent and 61 percent (moderately adverse) and 14 percent and 10 percent (more adverse). The proration level of entities with proratable entitlements not participating in the additional irrigation water supply of the Integrated Plan would be lower.

Results of the simulated operations of the Integrated Plan indicate the dry-year irrigation water supply target for the three Yakima Project Divisions obtaining additional dry-year supply is met with the less adverse climate change scenario but when the moderately adverse and the more adverse scenarios are considered, the dry-year irrigation water supply is significantly deficient.

[20] DPEIS pages 3-74 and 3-75.

The moderately adverse climate change scenario requires a much more extensive use of the three additional storage projects of the Integrated Plan as noted on page 5-76 of the DPEIS. Bumping Lake Enlargement would be needed in an additional 10 out of 25 years; Kachess Reservoir inactive storage would also be required an additional 10 years; and the 80,000 acre-feet of dry-year storage space in Wymer Reservoir would be extensively used.[21]

The graph showing "end of month contents" of Kachess Reservoir with access to the inactive storage indicates that for many years the reservoir contents are never within the current active storage capacity. To what extent is this impacting the stored water supply of those currently

31-17 relying on Kachess Reservoir storage?

While climate change is a controversial subject with diverse opinions on the scientific information, what the modeling for the Yakima basin indicates is the potential for increasing the temperature, and altering the amount and timing of runoff, all of which will impact the water supply and its use. The implementation schedule for the three storage projects of the Integrated Plan shows them "being online by the beginning of 2020 to 2026; climate change scenarios are based on conditions that may occur during the 2040s. Economic monetary benefits for major water resource projects usually reflect a 100-year period from project implementation. What more can be said!

Question 3: Does the Integrated Plan meet the economic, financial, and cost sharing criteria of Federal and State water resources project?

Reclamation water resource projects being considered for Congressional authorization and appropriations for implementation and operation generally require an evaluation of economic justification (project monetary costs equal to or greater than project costs), a determination of financial feasibility (a cost allocation to reimbursable and non-reimbursable purposes and how the reimbursable costs will be repaid), and non-Federal cost sharing (to lessen the amount of Federal appropriations for construction and annual operation costs). Has this been done to date

31-18 for the Integrated Plan? *The response to Question 3 is an emphatic No!*

While criteria for State water resource projects may be different, it is incomprehensible that the Integrated Plan, which includes Reclamation involvement and subsequent Congressional authorization and significant Federal appropriations has proceeded to this point without the foregoing information being available to the stakeholders and the public. In addition, it is difficult to understand how the irrigation entities that will receive the dry-year supplemental water supply, and the entities and counties receiving the future municipal and domestic water supply, appear to have not questioned what this is going to cost and how it is to be repaid. Such information is vital for decision-making at various stages of the planning process and yet is still

[21] I could not find similar information on the use of these reservoirs (number of years) under current climatic conditions.

31-18 not available. At times the response has been "this will come later", other times there has been no response and definitely no forthcoming action.[22]

Question 4: Does the Integrated Plan address the matter of tribal treaty rights for fish and reasonably assure the availability of an adequate water supply in all years?

The Partial Summary Judgment entered July 17, 1990, in the Superior Court of Yakima County in the Aquavella Adjudication indicates the flow right for fish in the mainstem Yakima River was "the specific minimum instream flow necessary to maintain anadromous fish life in the river according to the annual prevailing conditions as they occur and determined by the Yakima Field Office Manager (Reclamation) in consultation with the Yakima River System Operations
31-19 Advisory Committee, Irrigation Districts and Company m anagers, and others This decision was later extended to include all tributaries at the Yakima Nation' usual and accustomed fishing locations. The priority date for the treaty fishery right is time immemorial." [23]

The foregoing places the treaty fishing at the top of all surface water rights, proratable entitlements are at the bottom, and groundwater rights even lower. *If an investment of $3.1 to $5.6 billion is to be incurred, isn't it reasonable to expect an adequate and reliable water supply in all years to meet to meet this time immemorial instream right and out-of-stream irrigation and municipal and domestic needs? Yet nothing appears in the DPEIS or the Integrated Plan documents indicating tribal treaty rights for fish was discussed.*

Question 5: What is the extent of local and regional support for the Integrated Plan, and are there major issues which could adversely impact its authorization and Federal and non-Federal funding for implementation?

The Action Alternative at this time appears to be supported by the Workgroup which is comprised mostly of Yakima basin stakeholders including the Yakama Nation. The extent of public and regional support is unknown and while there are some regional and national
31-20 environmental groups that are supportive, others are not. A major issue is the position of some that Bumping Lake Enlargement and to some extent Wymer Reservoir should not proceed, and that the water needs can be solely met by non-storage measures, such as water conservation and market reallocation.

Enlargement of Bumping lake has been proposed several times in the past; Congressional authorization was not obtained. The current effort involves a smaller reservoir with a total capacity of 190,000 acre-feet (157,300 acre-feet new storage and 33,700 acre-feet which is replacement storage of the existing reservoir) and Wymer Reservoir to be located adjacent to the

[22] See letter of June 3, 2011, regarding scoping of the Integrated Plan and concerns regarding plan formulation and use of sockeye salmon populations resulting from the Reservoir Fish Passage Element in the economic justification of the entire Integrated Plan.
[23] DPEIS, page 1-15.

Yakima River about 8 miles upstream of Roza Diversion Dam. Also included is a proposed "Target Watershed Protections and Enhancement" element involving the acquisition of about 70,000 acres as well as new designations of existing Forrest Service lands and of select river corridors. The latter has been developed in conjunction with some environmental groups such as
31-20 American Rivers, National Wildlife Federation, and Trout Unlimited as "potential trade-offs" for enlarged and new storage. To date, the cost of acquiring the 70,000 acres, and the identification of specific lands as mitigation in contrast to those for enhancement have not been indicated in the information that is available. *The bottom line is that controversy continues and could adversely impact authorization and funding.*

Other Comments on the DPEIS

No Action Alternative - - The No Action Alternative used in the planning of Reclamation water resources projects is to represent a projection of current conditions and future actions in the area that may be taken during the life of the project whether or not any of the project action alternatives. Authorized actions in the area being carried out by Reclamation, other Federal agencies, or other entities, with a reasonable certainty of occurring should be considered in the No Action Alternative as being implemented.

This is not the case, as Reclamation and Ecology have limited the No Action Alternative to those "projects, actions, and policies that have been planned and designed through process outside of the Integrated Plan, are authorized and have identified funding for implementation, and are scheduled for implementation.[24] This has resulted in moving projects, actions, and policies which could be accomplished as a part of the "Ongoing Projects" identified in Section 2.3.1 of the DPEIS to elements of the Integrated Plan. For instance, Title XII of the Act of October 31,
31-21 1994, established a Basin Conservation Plan providing for the development of entity water conservation plans and subsequent implementation of those determined to meet the "Feasibility Guidelines". The listing of potential projects in the Enhanced Water Conservation element includes many of these. It appears however, that only three projects are included in the No Action Alternative (Roza, Sunnyside, and Benton) with estimated conserved water of about 97,000 acre feet.[25]

Title XII also provides for the purchase or lease of land, water, or water rights from any individual or entity willing to limit or forego water use on a temporary or permanent basis. It also calls for "the cooperation of the Secretary of the Interior with the State of Washington to facilitate water and water right transfer, water banking, dry-year options, the sale and leasing of water, and other innovative allocation tools to maximize the utility of existing Yakima River basin water supplies." Consequently, the Market Reallocation Element of the Integrated Plan is a relabeling of potential actions that have long been available for use in the Yakima River basin.

[24] DPEIS, page 2-6, Section 2.3, 2nd paragraph.
[25] "Modeling of Reliability and Flows Technical Memorandum of June 2011", Table 7.

31-21 The "Mainstream Floodplain Tributary and Tributary Habitat Program" of the Integrated Plan consists of actions proposed by the Yakima Basin Fish and Wildlife Recovery Board, many of which are currently underway.

31-22 Agricultural Water Conservation - - Some interests advocate that water conservation and market reallocation could provide an adequate and reliable supply to meet the identified water needs alleviating the need for further development of surface storage. Section 2.5.4 (page 2-35) of the DPEIS addresses this matter and indicates the Enhanced Water Conservation element of the Integrated Plan "would save approximately 170,000 acre-feet largely for instream uses during average water years. During drought years, water savings are substantially less, about 30,000 acre-feet of savings are realized during the third year of a 3-year drought." Also, the information in Table 8 of the "Modeling of Reliability and Flows Technical Memorandum", categorizes the saved water associated with the Enhanced Water Conservation element solely as an "irrigation benefits" which is compatible with the modeling and the proposed financing of these measures. However, what is missing from the DPEIS and other documents is an explanation of why; what this saved water means in terms of Yakima Project operations pre-and-post storage control periods, system carryover, at the end of the irrigation season, and subsequent refill and spill. Further, to what extent (policy and flows) are the Title XII criteria regarding increases in target flows applicable to water pursuant to the Enhanced Water Conservation element of the Integrated Plan?

31-23 In modeling the system operations, potential water conservations projects within the Wapato Irrigation Project (Wapato Division) were excluded "on the assumption that conserved water from these projects would contribute to full buildup of tribal irrigation". This implies further development of irrigated lands within the Wapato Project (or the Yakima Reservation), the effect of which is unknown on surface and subsurface waters returning to the Yakima River below the Parker gage. This raises the larger question of the extent of the extent of water conservation plans and irrigation system improvements within the Wapato Project to date and future expectations, the relationship between water conservation and the aquifer recharge project proposed to be construction in this area, previously irrigated lands not now being irrigated (idle lands), and the dry-year supplemental water supply to be available with the Integrated Plan.

The Wapato Irrigation Project has the largest water entitlement of those receiving water from the Yakima Project. Previous information indicates the potential of about 85,000 acre-feet of "saved water" from water conservation.[26] Title XII authorized a specific appropriation for conservation measures within the Wapato Project and further funding under the Basin Conservation Program. The Wapato Irrigation Project is operated by the Bureau of Indian Affairs, an agency within the

[26] "Final Environmental Impact Statement, Yakima River Basin Integrated Water Resource Management Alternative", June 2009, Washington State Department of Ecology.

31-23 Department of the Interior, and could be "leading the way" in water conservation activities in the Yakima River basin.

31-24 Targeted Watershed Protections and Enhancements - - This program is part of the Habitat Watershed and Enhancement Element of the Integrated Plan and includes the acquisition of 70,000 acres and recommendations for protection of some lands under the Federal Wilderness Area and Wild and Scenic River designations. Three major land acquisitions are proposed: 45,000 acres in the middle and lower Teanaway River basin as a conservation target for high elevation watershed enhancement; 15,000 acres in Yakima River Canyon including the valley bottom and eastern slopes from the Yakima River to Interstate Highway 82 as a conservation target for shrub-steppe habitat enhancement; and 10,000 acres as a conservation target for forest habitat enhancement at the headwater of the Little Naches River and lands surrounding the headwaters of Taneum and Manastash Creeks.

There is no indication that the proposed land acquisitions are for the purpose of mitigation impacts that may associated with construction of new water supply facilities. In fact, the entire 70,000 acres of proposed land acquisition is characterized as enhancement. Authority of Reclamation and Ecology to acquire this land for enhancement purposes should be clearly stated as well as the reimbursable and non-reimbursable nature of the "yet to be determined expenditure" including that for long-term management.

From: WGP
To: BOR YRBWEP, sha-UCA; Glen Parker
Subject: DPEIS Yakima River Basin Integrated Water Resource Management Plan
Date: Monday, January 02, 2012 6:32:38 PM

After reviewing then DPEIS I believe the following items are not adequately addressed or are misleading.

A. The cabins and resort at bumping lake will most likely be displaced. The FS Has no in-lieu lots to offer these cabin owners. The bumping lake resort will have its authorization terminated, and most likely based on new competitive prospectus, not win the new permit. In each of these cases, the PEIS has not offered adequate notice of these events, the damage awards or compensation and probably litigation that will be created.

32-1 B. The resulting harm to both the Goose Prairie area and the cabin owners impacted by the expansion are not addressed. Financial compensation to the G.P. property owners is not mentioned. The projected large increase in fees to the cabin owners - supported by similar property at Lake Wenatchee - and elsewhere is not mentioned. This financial impact will also be subject to compensation by the project. Fees for these areas land rents will be significantly higher, making the continued ownership by current residents improbable.

32-2 C. Damage to the roadway, haul fees, and general construction damage to the highway and bumping lake road is downplayed. The roads will need reconstruction.

32-3 D. Access to the upper Bumping Lake falls, Copper City, and points south will be significantly impaired, if not destroyed, or flooded. The geology of the terrain make any replacement roads, on the step hillsides marginally sustainable. The cost to the BOR such replacement facilities is not mentioned.

32-4 E. Mitigation is significantly not identified, or discussed.

32-5 F. Downstream flooding, or sustained higher than traditional flow rates is not adequately discussed with the impacts to the bumping river road, cabin owners, additional settlement and stream bank loss.

32-6 G. The recent DOI and ACOE agreement to retrofit,expand, and study existing facilities forHydro powers notice notified. This administration initiative suggests that reduced Hydro at Roza is not on the table, instead expansionisbeingconsidered. Bumping lake expansion also fits into the initiative to build Hydro as part of the dam. Routing of the transmission is not discussed.

32-7 H. Wilderness designation is a Congressional prerogative, the DPEIS misleads that the subsequent NEPA and EIS can infer that designation. Roadless areas have previously been identified as potential Wilderness expansion and the PEIS suggests that modification of the Bumping can effect such a future designation.

32-8 J, The limited ability to impact old growth under the NW Forest Plan is not adequately discussed, and is misleading. There is no mention of the Regional Interagency Executive Committees review of the DPEIS and concurrence with published comments on the NW Plan.

32-9 K. Is there designated roadless in the development area? Expansion in roadless areas and that consideration, for the entire project area needs to be discussed.

32-10 L. Social Economic analysis is limited, and due to the significant project costs and water rate expansion to project participants, that needs to be fully discussed.

32-11 M. Timber haul and milling. The extent of the local area to process timber from the project area is not discessed. If hauled outside the area by road or rail, it's potential disposition and conversion is not discussed.

32-12 N. The 1905 withdrawal to the BOR is not discussed and how it's relationship with the FS Limits the

Comment Letter 32

32-12 FS's ability to manage this are of the NFS.

32-13 Thank you for the opportunity to comment.
I own property in the area that will be significantly impaired by this project.

William Parker
7860 painted daisy drive
Springfield, va. 22152

Sent from my iPad

November 26, 2011

This is a multimillion dollar project to eliminate hatcheries with concrete holding pens that are producing sick fish.

Inbreeding hatchery stock totally depleting the WILD fish runs for at least 50 years.

On the Endangered Species Act!

This is our plan we want to enhance wild fish, no inbreeding.

Just like God designed the wild salmon and steel head. There nature is to swim upstream as far as possible. Spawn! Die in the cold water. And then after 30 days or so the spawn hatches out and start to eat. Then they find the dead parents laying in the cold water all tenderized and start to eat the parent fish- THE BEST, HIGH PROTEIN.

My system mimics the wild fish habitat in order to create this project we must use screen type fish pens with hatcheries on the fish pens plus ICE plants to freeze parent fish in 100 lb ice blocks to feed the new hatch, THE BEST! Plus the ice blocks keeps the water cool for the new hatch. The new hatch would be going in and out of water just like in the wild. The sun shines on these small pools of water warm up and cool down every day. We will add sand to the bottom of these small pens to create a more natural environment for the fish.

33-1

To put this project in operation it would put a lot of people to work plus increase fish production creating healthy wild fish. Also this will open up over 50% new habitat.

It requires that our group to obtain the exclusive authority (to protect our inventions and intellectual property rights) to all the lakes and slack water behind all the dams that does not have navigation locks; from Priest Rapids Dam to Grand Coulee Dam. We must design new fish ladders on all seven dams from Priest Rapids Dam to Grand Coulee Dam. This would open up the fish habitat in Canada for the first time in over 75 years and open up over 50% of new habitat including Spokane River. These fish ladders need to be able to transfer the new hatch fish from fish pen to fish pen down stream over Grand Coulee Dam past Priest Rapids Dam to the Pacific Ocean in large ocean going fish pens through all the dam navigation locks.

Basic ideal fish pen would be constructed in size, 468 ft length x 78 ft width, to go gently down through all the navigation locks (size of navigation locks are 600 ft x 87 ft). This would allow tugs to accompany one fish pen at a time to go gently through the navigation locks from Lewiston, ID and Priest Rapids Dam to Pacific Ocean.

Sizes to work with is 468 ft x 78 ft this would include:
27 floats total size 50 ft length x 12 ft width x 6 ft (can be much larger if needed).

Living quarters and dormitory.
Hatchery storage.
On deck hatcheries (small screened pen in the large pen).
Laboratory (watch for diseases).
Ice plant (to freeze the 100 lb blocks of ice with parent fish for new hatch).
Electric plant.

More about the structure of the fish pens. There would be one main fish pen plus two satellite fish pens of the same size 468 ft length x 78 ft width. The floats would be hooked together with pintle hooks (like big trucks, trailers), they are designed to come back straight on their own. Each fish pen would need to be separated to gently go through the navigation locks one fish pen at a time. The floats require two medium size tugs. Floats maximum width 234 ft with satellites attached, 468 ft length.

Lake Roosevelt behind Grand Coulee Dam is 100 miles long to Canada. We could use at least three of these large fish pens with satellite pens. This would produce mass fish. Each lake behind six of the dams could use one large fish pens with satellites. This would really produce a lot of health fish.

The same operation could be used on California rivers (Sacramento River, McCloud River) to restore there fish loss.

The same operation would help Oregon's rivers, Deschutes River, Rouge River, Williamette River, plus many other rivers with dams to get the smolts down the rivers to restore there fish loss.

33-1

Canada has not had any salmon or steel head for 75 years plus all the upper Columbia River habitat is lost for salmon and steel head. But we can fix it with our plan. We want to enhance WILD fish no inbreeds of hatchery sick fish.

Fish pens could be moved often to keep fish waste from accumulating under the fish pens. If necessary I have designed a diaper to put under the fish pen to catch the waste plus designed a table to go across the pen to feed the new hatch/smolts. The table can be cleaned with a swimming pool vacuum pump, the table can be turned over to dump any waste that can fall through the screened floor on a diaper if necessary. This plan would STOP smolts from standing on their heads eating in there own poop on concrete floor.

Concrete holding pens are plagued with diseases in the course concrete, like aluminum cookware. Plus this is what causes the smolts to lose their appetite and become sick, unhealthy.

Screens for new hatch/smolts would be a finer steel wire mesh and the screens for larger fish would be a larger steel wire mesh. Steel wire screen will not rust. By using steel wire screen for the fish pens this allows the natural water to flow through the fish pens increasing taste, smell, and nutrients for the fish allowing the fish to mark their way back to where they started from. A cycle.

The pens must keep **TOTAL** control of all the hatch from Lewiston, ID and Grand Coulee Dam down

all fifteen dams or more to the Pacific Ocean and released past the Astoria Bridge IN PERFECT CONDITION.

The North West Power Planning Council, NWPPC, has put up 900 million dollars moratorium to save four Snake River Dams for 10 years. These Dams and navigation locks are very necessary for our fish pens to go through to deliver our perfect condition hatch to the Pacific Ocean.

We need this funding to enhance our depleted fish runs -the world really needs the food! We can get this started and build as many fish pens with hatcheries as possible and phase out these sick hatcheries with sick concrete holding pens!

How to pay for this? Federal Fish Stamps for steel head and salmon. About 20 dollars each per person or 40 dollars for both for a year, commercial and all personnel.

We can build these fiberglass type fish ladders on the order of water slide parks, any size, no concrete necessary. Get the smolts back down past all the dams without navigation locks, UNDERSTAND?

33-1

We would hire as many Veteran's as possible, any color, any gender. They must speak English. We could provide a lot of year round light duty jobs.

Canada can join our efforts to enhance the WILD fish runs with these same type fish stamps because the fish are international.

We must have this authority to have complete control for finances and control of my inventions and intellectual property rights. No competition. We will deal direct with US government and Canada. No Tribes, Indian Nations. We will hire tribal veterans, yes. For over 50 years the Tribes has had a large percent of the hatcheries and has produced very inferior sick fish. And destroying our infrastructure, like taking out the dams.

The Tribes took 900 million dollars for a 10 year moratorium, FOR WHAT? Not to sue for 10 years to take out four dams on the Snake River? These dams and locks are very necessary to get our fish pens to the Pacific Ocean with wild salmon and steel head smolts-IN PERFECT CONDITION.

John W. Couch
923 Vista Ave
Lewiston, Idaho
83501

208-746-4020
jwcouch@cableone.net

From: klaichuck@charter.net
To: BOR_YRBWEP_sha-UCA
Subject: Comments on Draft PEIS
Date: Monday, January 02, 2012 9:43:39 PM
Attachments: Comments on IP Draft PEIS Klaich.doc

Attn: Ms. Candace McKinley

Comments on IP Draft PEIS January 2, 2012

34-1 The stated need for and purpose of the IP is to provide a more reliable and sustainable water resources for the health and riverine environment, and for agriculture, municipal and domestic needs. Additional water storage would supply instream and out-of-stream flows to meet agricultural, municipal, and domestic needs and address aquatic resource problems.

Surface Water Storage Elements

34-2
- The components of the surface water storage element include projects which have been found to not meet the cost benefit ratio required for project approval.
- The distribution of cost of construction and operational costs for each proposed project has not been identified (who will pay and how much).

34-3
- The cost of purchasing additional properties to mitigate the loss of Bull Trout, Forest, and Shrub-Steppe Lands which would be lost are included to seek consensus.

34-4
- The inclusion of the Columbia River Pump Exchange with Yakima Storage would be delayed indefinitely while millions of dollars will continue to be spent reviewing the storage projects which were reviewed in the past.
- The threat of some members of the Work Group saying they would not continue to participate in the comprehensive program of water resources and habitat improvements in response to existing and forecast needs of the Yakima River Basin if Columbia River water is part of the storage solution.
- A water exchange program from the Columbia River to the Yakima Basin with Yakima River water returning to the Columbia River including the re-watering of the Lower Yakima River, with thousands of fish was not discussed during the Work Group process.

34-5 It appears the methodologies, sources of information and conclusions drawn which is used to develop the Integrated Plan and the Draft PEIS do not meet the requirements to include all possible solutions to the shortage of water necessary to benefit fish, agriculture, municipal, and domestic needs.

Question! How does the IP with the above questions unanswered provide a more reliable and sustainable water resources for the Yakima River Basin?

Retention Code : ENV-6.00
Folder #: 1148003
Control #: 12000935

December 30, 2011

Ms. Candace McKinley
Environmental Program Manager
Columbia-Cascades Area Office
1917 Marsh Road
Yakima WA 98901-2058

Re: Yakima River Basin Integrated Water Resource Management Plan – DPEIS

Ms. McKinley,

35-1 We want to comment on the Yakima River Basin Integrated Water Resource Management Plan (YRBWRP). **We are opposed to this plan.** We are in favor of finding added storage for irrigation water in the region, but not at the cost of this plan.

To begin, we believe the "acquisition" (purchase of private land) is an un-necessary element of the plan. The Habitat Protection and Enhancement Element of the draft plan, prior to the "acquisition" element, provides more than enough short-term and long-term environmental benefit, mitigation, and sustainable habitat for all vested parties. Outside entities should not command a project as they have in YRBWRP.

35-2 The 71,000 acres of private property to be purchased in this plan has a positive net economic impact of $3.5 million annually under current management. The private owners of the property currently pay taxes as well. Under this plan there will be zero wealth produced and a negative economic value annually on this property. In fact, this plan will cost the taxpayers of the State management costs forever. This is the type of project that has helped cause the State and Nation's economic problems. There is greater acreage in the acquisition part of YRBWRP than the Rosa Irrigation District we are trying to stabilize. This is wrong and if the citizens of the region knew about this aspect of the plan, a large amount of opposition would be heard. It appears the comment period has been limited and falls directly over the holidays to avoid public awareness.

35-3 Additionally, we believe the "Pine Hollow / Ahtanum Watershed Plan" should be included in the final YRBWRP plan due to their storage, renewable energy and strong environment benefits. The omission of Pine Hollow makes the YRBWRP plan political and almost worthless. Pine

35-3 Hollow stabilizes the irrigation on 121,000 acres (a larger area than Roza), has a positive impact on 8% of the *Salmonids* in the whole Yakima River watershed and would eliminate the use of 232 groundwater irrigation wells. Pine Hollow is almost ready to build. It has been researched and permitted. Why is it not included?

35-4 Our nation is over $15 trillion in debt. Our State has another $2 billion shortfall to add to the $3 billion of last year. Stop wasting our money. Parts of this plan are a huge waste of money. The plan needs to be reworked to include public input.

Sincerely,

W. F. Hendrix Kathleen Hendrix

W. F. Hendrix & Kathleen Hendrix
433 Ames Road
Selah, WA 98942

From: Margie Van Cleve
To: BOR_YRBWEP, sha-UCA
Subject: Comments on the Yakima River Basin Integrated Water Resource Management Plan - Draft Programmatic EIS
Date: Monday, January 02, 2012 4:57:55 PM

Dear Washington State Department of Ecology and US Bureau of Reclamation,

Thank you for the opportunity to comment on the Draft Programmatic EIS for the Yakima River Basin Integrated Water Resource Management Plan. I have the following comments:

36-1 1. During the June 30, 2009 meeting of the Yakima Basin Enhancement Project roundtable, I voiced concern during the public comment period concerning the inclusion of only one representative from an environmental organization as part of the roundtable. While Michael Garrity of American Rivers has done an admirable job representing aquatic based environmental issues, the lack of a representative from an environmental organization when the issue turned to terrestrial based environmental issues is troubling. While this may have made it easier for the group to come to consensus, I find the consensus weakened by this omission.

36-2 2. I am extremely disappointed in the lack of alternatives in the Draft Programmatic EIS. The EIS as stated includes the Yakima River Basin Integrated Water Resource Management Plan Alternative and the No Action Alternative. This appears to be a "take it or leave it" approach. The Department of Ecology website (http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch03.html#3.3.2) states the following:

> The EIS evaluates the proposal, the no-action alternative, and other "reasonable alternatives" [WAC 197-11-786, 197-11-440(5)] . A reasonable alternative is a feasible alternate course of action that meets the proposal's objective at a lower environmental cost. Reasonable alternatives may be limited to those that an agency with jurisdiction has authority to control either directly or indirectly through the requirement of mitigation.
>
> Alternatives are one of the basic building blocks of an EIS. They present options in a meaningful way for decision-makers. The EIS examines all areas of probable significant adverse environmental impact associated with the various alternatives including the no-action alternative and the proposal.

With all of the work done by the roundtable, how can it be that there are no other alternatives?

36-3 3. The Yakima River Basin Integrated Water Resource Management Plan Alternative proposes to mitigate the enlargement of Bumping Lake with preservation of land in the Teanaway River Basin. I have no issue with a proposal to preserve land in the Teanaway River Basin, but not as mitigation to the enlargement of Bumping Lake. Bumping Lake is located within the Naches drainage of the Yakima basin. If mitigation must occur, it must occur within the Naches River Basin, not the Teanaway River Basin.

Comment Letter 36

36-4 4. I could not find any cost benefit information for either of the alternatives shown in the Draft Programmatic EIS. Please remedy this issue by providing this information.

36-5 In summary I request that the Yakima River Basin Integrated Water Resource Management Plan Draft Programmatic EIS be withdrawn until these issues are resolved.

Kind regards,

Margie Van Cleve
Selah, Washington

37-1 I am a resident of Naches, Washington, and am primarily concerned with the proposed expansion of the Bumping Reservoir. In general, I am opposed to the expansion of the Bumping Reservoir. Although the current Bumping Reservoir is not entirely natural, it has been a permanent feature on the landscape for a long enough period such that it is viewed as a natural feature of a largely wild landscape. Also, its current extent was in existence prior to the establishment of the William O. Douglas Wilderness. If water shortages are an issue for the Yakima Valley, I feel that the most beneficial plan would (1) implement more stringent guidelines on water usage in the valley, or (2) expand/build reservoirs that will not impact one of our few remaining wilderness or roadless areas.

I have the following specific comments:

37-2 (1) In the Executive Summary, the Draft EIS states that the Integrated Plan is expected to be positive for wildlife. This is an overstatement, and is not well supported by the main body of the Draft EIS. Wildlife (generally defined as terrestrial vertebrates) have diverse and often opposing habitat requirements. Therefore, a mechanism that improves habitat for one group of species almost necessarily will degrade habitat for another suite of species. Please specify in the Executive Summary which species are likely to benefit from the project, and which are likely to suffer (or omit the statement altogether).

37-3 (2) The Draft EIS states that the Integrated Plan will improve fisheries habitat through the installment of fish passage mechanisms at five reservoirs. If fish passage is especially critical at these reservoirs, it should be provided regardless of whether the Integrated Plan is approved.

37-4 (3) Will the proposed expansion of the Bumping Reservoir encroach on the William O. Douglas Wilderness? If it is possible, are there any proposed mitigation actions?

37-5 (4) Please provide more detail on the means by which the YRBWEP will pursue wilderness designation for the area around Bumping Lake not inundated by the proposed expansion.

37-6 (5) Climate change should be of paramount concern for all individuals in the region, as noted in this Draft EIS. Since climate change is driven by the production of green house gases, please consider adding a statement to the Draft EIS that estimates a carbon budget associated with all of the proposed activities (both the No Action Alternative and the Integrated Plan). If it is not possible to reliably estimate a carbon budget, add a statement that acknowledges that the Integrated Plan will likely result in a higher production of greenhouse gases, compared to the No Action Alternative. Also, please list any proposed actions/mitigation that will offset the carbon produced by implementing either plan.

Teresa Lorenz
22620 US Hwy 12
Naches, WA 98937
email: lore5748@vandals.uidaho.edu

Yakima River Basin Integrated Water Resource Management Plan is Unacceptable:

38-1 Requiring current and future users to modernize their irrigation methods while providing some funding to accomplish it may be a more long-term solution. I would rather tax dollars fund modern, water-saving, irrigation strategies and systems than a short-sighted, land use altering, construction projects.

Other Reasons for the Unacceptability of this Proposal:

38-2 The days of having abundant fish and wildlife populations to mitigate our ecosystem altering actions are over. The destruction to fish and wildlife populations and habitats has born the brunt of our reclamation projects. The small numbers of fish escapement as well as low population numbers of other fish and wildlife species are a testament to the long lasting if not permanent nature of our resource allocations.

The EIS optimistically states that impacts from sediment load will be temporary, however, the already reduced fish and wildlife populations may not be able to recover from a localized, near extinction event back to their current endangered, threatened, candidate, and sensitive status. The amount of sediment load in the local tributaries and down stream waters is unacceptable for both the Bumping River area and Lmuma Creek.

38-3 Temperature is a huge factor in the health of many species. Intact forests provide a stabilizing affect on temperature for the organisms. The logging that must take place will expose the proposed flooded areas to substantial heat (and cold, seasonally). Any fish, amphibians, and other wildlife that didn't die directly from the logging will likely perish from the overheating of the soil and water. The severe temperature swings and long term recovery may be permanently detrimental to the fish, wildlife and plant species.

38-4 The Bumping River drainage area was already severely impacted in the past when the current dam was installed. Let's allow this area to continue as it is with the current level of impact from the dam. The recreation here is currently a well used for hiking, camping, etc. The proposed cross-country skiing area will be a valuable addition to non-motorized recreation. Most of the ones currently designated are too low in elevation for reliable snow cover.

The Bumping and Lmuma areas provide uses for many. Let's not change them into areas with one main use, agricultural water. Agriculture is important to our area but there is a lot of water already available. What is missing is a proposal to require conservative watering methods and reduce other water wasting means (i.e., busted valves, broken sprinklers and pipes, watering roads, over watering, land flooding, etc.).

Camille Bennett
Tieton Area Resident

From: Raelene Gold
To: BOR YRBWEP, sha-UCA
Subject: Comments on DPEIS for Yakima R. Basin Water Plan
Date: Tuesday, January 03, 2012 2:09:33 PM
Attachments: Comments DPEIS Yakima River Plan

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

Regarding: Comments on DPEIS for the Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project

Date: January 3, 2012

From: Raelene Gold
4028 NE l96th St.
Lake Forest Park, WA 98155
206-363-4107

Dear Madame,

39-1 I support many of the objectives and initiatives in the DPEIS for the Yakima River Basin Water Enhancement Project. Specifically, I support a comprehensive approach to water resources and ecosystem restoration in the Yakima River basin. I also support the reservoir fish passage and the enhanced water conservation and efficiency aspects of the plan.

39-2 I strongly oppose gaining surface water storage by building new dams. I think this aspect of the plan reflects the unbalanced representation on the Yakima River Basin Study Group that represented municipal and agricultural water interests, as well as fish interests, excluding other government agencies and environmental groups that would have better represented forests, endangered species and overall ecological functioning of the area. It is also a regressive and costly solution that we should be well beyond.

I specifically oppose creating new surface water storage areas by building new dams at Bumping Reservoir and Wymer. New dams will not restore ecological functions in the Yakima River Basin; they will cause further environmental damage and disruption to natural functioning systems you say you aim to restore. I strongly opposed to the sacrifice of 2000-3000 acres of old growth forests and roadless areas providing habitat for the endangered northern spotted owl and bull trout in the Wenatchee National Forest to expand the Bumping Lake Dam and Reservoir. I also oppose a new Wymer Dam, which would flood habitat for the endangered sage Grouse.

People in the Northwest have fought for over 25 years to preserve what is left of our original old growth forests. Over time new research has demonstrated how very valuable these forests are in combating the effects of climate change by providing carbon sinks, retaining and slowly releasing water, moderating flooding and providing cool streams for salmon reproduction. What is the point of providing fish passage at Bumping Lake if you cut down the forest to enlarge the reservoir?

I urge you to eliminate creating new water storage facilities by building dams at Bumping Lake and Wymer from your Final Environmental Impact Statement.

Retention Code : ENV-6.00
Folder #: 1194952
Control #: 120003057

Edward M. Henderson, Jr.
407 Smith Street
Seattle, Washington 98109
(206) 283-6497

Received by Mail Room
JAN 03 2012
Yakima, Washington

Ms Candace McKinley
Environment Program Manager
Bureau of Reclamation
Columbia-Cascade Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

January 3, 2012

RE: Draft Programmatic Environment Impact Statement (DPEIS)
For the Yakima River Basin Integrated Water Resources Management Plan

Dear Ms. McKinley;

40-1 I have lived in the Pacific Northwest for over thirty years. I have hiked, backpacked, skied and climbed in all the national forests in the Cascades Mountains. In my travels about Washington State I have frequently observed wasteful and inefficient irrigation practices. Ponderous quantities of precious water sprayed high into the air on hot, sunny days only to be blown away from the crops in the fields. Mandatory water conservation measures to more efficiently utilize the available resources are required.

I strongly support an effort to manage the limited water resources in the Yakima River Basin. However the DPEIS, while touching on many important aspects of the situation, deals with these issues in a very narrow and cursory manner by not considering a wide range of alternatives. The circumstances are too numerous and complicated to be dealt with this single DPEIS.

40-2 The basic problem, which the DPEIS recognizes, is that the limited water resources are already allocated and indeed are over allocated. The solution is not environmentally destructive construction of more water storage, but rather a reallocation of the existing resources. The money should be spent purchasing the existing water rights rather than building dams, tunnels and diversion canals. Irrigation farmers should transition from the current antiquated, wasteful and inefficient methods to modern systems. The capital to finance this move will come from the purchase of the existing water rights.

40-3 The increase of in-stream flows and improvements to the existing Bureau of Reclamation dams to support fish passage is a laudable goal. However, I am concerned that the DPEIS favors massive water storage projects. The proposed Bumping Lake enlargement will drown nearly 2,000 acres of old growth forest and flood a popular and accessible hiking destination. The proposed Wymer dam will inundation of shrub steppe habitat.

40-4 In the 2008 *Yakima River Basin Water Storage Feasibility Study Final Report/EIS*, the Bureau of Reclamation concluded that the Wymer Dam and Reservoir did not meet Federal standards for an economically and environmentally sound water project. The study demonstrated a negative benefit-cost ratio for the Wymer project and the Bumping Lake Expansion was dropped from the study for several stated reasons including the fact that, "the larger-capacity reservoir would not fill on a regular basis and would not be a

40-4 reliable source of water." The DPEIS does not satisfactorily demonstrate consideration of other alternatives to dam enlargement and construction and does not address the problems highlighted by the most recent studies of these projects.

40-5 Further, I am opposed to rampart real estate development in the Teanaway River sub-basin. Protection of the Teanaway must not serve as mitigation for environmental destruction elsewhere.

40-6 Inexplicably the DPEIS fails to offer a range of alternatives between no action and the complete package. Furthermore the DPEIS does not provide cost-benefit analysis for any of the various proposed actions. The DPEIS fails presents sufficient detail and analysis of any of the numerous and varied proposed projects to justify approval. I am reserving the right to comment on any and all such future proposals. Please notify me of further action and comment periods.

40-7 The short, forty-five day, comment period provided for this very complex proposal is unconscionable. The comment period should be extended for at least thirty days to allow for more meaningful study and comment.

40-8 In view of the multitudinous shortcomings and failures to address and adequately document the impact of almost all of the proposed actions, the DPEIS it should be withdrawn.

Thank you for the opportunity to make these comments.

Sincerely,

Edward M. Henderson, Jr.

cc: Mr. Derek I. Sandison
Washington Dept. of Ecology

From: pat kelleher
To: BOR_YRBWEP, sha-UCA
Subject: DEIS
Date: Tuesday, January 03, 2012 3:50:00 PM

To: yrbwep@usbr.gov

From: Pat Kelleher

6530 WilsonCreek Road

Ellensburg, Wa 98926 psk98926@yahoo.com

41-1 The Bureau of Reclamation (Reclamation) and the Washington State Department of Ecology (Ecology) have jointly prepared this Draft Programmatic Environmental Impact Statement (DPEIS) on the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). This document was prepared in compliance with the National Environmental Policy Act (NEPA) andWashington State Environmental Policy Act (SEPA). Ecology is the SEPA leadagency for the proposal. The joint DPEIS will not work. One authority must have the final say, I would favor Ecology because of the broader and more concern for state interests.

41-2 • Demand for irrigation water significantly exceeds supply in dry and drought years, leading to severe prorationing[1]
○ A water supply of 70 percent of proratable water rights during a drought year would provide a minimally acceptable supply to prevent severe economic losses to farmers. This number was reached following extensive discussions with stakeholders regarding the lowest level of water supply that could be accommodated without catastrophic losses to crops, assuming aggressive water management techniques were employed. This 70 percent threshold is similar to the State of Washington's definition of a drought condition contained in RCW 43.83B.400, which recognizes a drought when water supply for a significant portion of a geographic area falls below 75 percent of normal and is likely to cause undue hardship for various water uses and users.

Are you defining critical water year? What is normal? When did it last occur?

41-3 The Yakima River historically supported large runs of anadromous salmonids, with estimated runs of 300,000 to 960,000 fish per year in the 1880s (Natural Resource Law Center, 1996). These numbers have declined drastically, and three salmon species have been extirpated (eliminated) from the basin – sockeye, summer Chinook, and coho. Pre-European settlement estimates of returning steelhead salmon alone (a subset of the total basin fish population) range from 20,800 to 100,000 (YBFWRB, 2009). Between 1981 and 1990, the average annual return of all anadromous salmonids to the Yakima River was only 8,000. For the period from 2001 to 2010, the following counts were recorded:

41-3 • Combined Chinook past Prosser Dam: 5,425 to 25,783[2]
• Coho: 818 to 9,091; and
;
• Steelhead: 1,537 to 6,793 (YKFP, 2011; Columbia River DART, 2011).

This is a very poor description of the historic and/or current condition concerning fish. The draft should be explicit in current fish restrictions in the project area. Fish currently traverse Rosa to Lake Cle Elum via trucks on I-90.

41-4 **Figure 1-1. Yakima Basin Map is good but it should also show land ownership. Also the area of potential effects should be defined: fema 100 year floodplain of the river or ½ width of stream buffer on smaller creeks.**

2.4.5.2 Kachess Reservoir Inactive Storage
The Kachess Reservoir is located just east of Interstate 90 near Easton, Washington. The project would modify the outlet to Kachess Reservoir to allow it to be drawn down approximately 80 feet lower than the current outlet. This would provide the ability to withdraw another 200,000 acre-feet of water from the lake, when needed, for downstream uses during drought conditions.
41-5 Two options have been identified to withdraw the additional water from Kachess Reservoir, both starting from a new lake tap outlet in the Kachess Dam about 80 feet deeper than the existing outlet at the southeast end of the lake. Additional design is needed to select the preferred option.
Option 1 would use a gravity-flow tunnel that would discharge into the Yakima River approximately 4.6 miles southeast of the Kachess Dam. Option 2 would withdraw water from the outlet and use a pump station near the lake shoreline to pump through a pipeline to a discharge to the Kachess River just downstream of the dam. Either option would include fish passage improvements at Box Canyon Creek to improve fish passage for bull trout.

The reason this has not been implemented already?

41-6 **2.4.5.3 Bumping Lake Reservoir Enlargement: not going to happen, not funded three times already. Bumps up to wilderness area, will never get approved.**

2.4.9 Market Reallocation Element (Water Supply Component)
Under this part of the Integrated Plan, water resources would be reallocated through a "water market" and/or "water bank," where water rights would be bought, sold, or leased on a temporary or permanent basis, to improve water supply and instream flow conditions in the Yakima basin. This effort would include recommendations to:
41-7 • Increase the overall value of the goods and services derived from the basin's water resources, by reallocating water from low-value to high-value uses;
• Reduce the delay and cost of transactions that reallocate water resources; and
• Ensure that, before transactions are completed, appropriate consideration is given to the potential impacts on third parties.

How can this process be used to firm jr. water rights, take marginal land out of production,

41-7 why are you using 3 to 1 to move water through system?

41-8 **2.5.1 Black Rock Reservoir: why is this even included?**

3.15.2 Recreation Visitation

Table 3-21 presents the estimated annual visitation to the key reservoirs and rivers in the Yakima River basin (Reclamation, 2008g).

Table 3-21 Estimated Annual Visitation to Key Reservoirs and Rivers in the Yakima River Basin (2006)

Reservoir Number of annual visitors

Keechelus Lake 660
Kachess Lake 17,292
Cle Elum Lake 6,996
Rimrock Lake 10,824
Clear Lake 4,620
Bumping Lake 7,524
Lake Easton 19,260

River Number of annual visitors

Yakima River 18,000
Tieton River 8,844
Naches River 3,696
Bumping River 5,016
Cle Elum River 5,280

41-9 These numbers are not even close. Recreation in the APE area needs to be completely inventoried. For example BLM sites in the Yakima Canyon . No recreation plan is included. No WDOT plan is included. Wymer reservoir is proposed without any public access or recreation. Recreation in this DEIS is treated as a waste by-product. Tragic.

41-10 The layout of this DEIS is totally disjointed and confusing. What do you propose on doing. What are the costs of each action. What are the benefits each action. Basic question $20,000,000 falls from the sky, what would you spend it on?

41-11 FERC has preliminary permits all over this area, FERC is not mentioned once. What about a FERC license to mitigate?

41-12 The purpose or usefulness of this DEIS is unclear. You should start over.

Comment Letter 42

From: bennett pearson
To: BOR YRBWEP, sha-UCA
Subject: yakima river
Date: Saturday, December 24, 2011 11:22:36 PM

Hello Ms. Candace McKinley,

42-1 My name is Bennett Pearson. I am from Washington state and am just writing to you to express my agreement with going forward with a new plan on the Yakima river, in any way you can to help the fishery in that watershed.

Thank you. and happy holidays.

Comment Letter 43

From: richardr1066@comcast.net
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Draft Programmatic EIS
Date: Tuesday, January 03, 2012 8:17:40 PM

U.S. Bureau of Reclamation

Re: Comments on Yakima R. Basin Draft Programmatic EIS (DrProgEIS)

Please include my comments on the Yakima River Basin Integrated Water Resources Management Plan DrProgEIS.

43-1 The DrProgEIS only includes an "Integrated Plan" and a "No Action Alternative" as full alternatives. One action and one no-action alternative do not meet the requirement of the National Environmental Policy Act (NEPA), which requires a range of alternatives.

43-2 An alternative that must be considered, and should become the Preferred Alternative, is for the State and the Yakima River Basin irrigation districts to implement and carry out water conservation, water marketing and water reallocation measures. The EIS should be withdrawn to be revised and resubmitted with at least this alternative fully evaluated.

43-3 This silly and damaging proposal would destroy ancient forest and endangered species habitat at Bumping Lake within the Wenatchee National Forest, as well as shrub steppe habitat at the Wymer Dam.

43-4 At a time when the State and Nation are facing massive shortfalls, this wasteful $5 billion proposal does not even include a benefit-cost analysis. Just from a superficial glance, the new dams do not appear to be cost-effective, especially if the environmental harm and the opportunity cost of expending money here rather than elsewhere are considered and factored in. I submit that conservation and better use of existing water resources, and environmental restoration, will be more cost-effective.

43-5 Speaking of "No Action", the Bureau of Reclamation has not taken necessary actions at its existing dams in the basin. These existing Bureau of Reclamation dams block salmon and bull trout from upper watershed habitat. Before considering damaging new dams, the Bureau must provide fish passage at these existing dams and meet its fish and wildlife responsibilities.

Thank you.

Sincerely,

(s)

Richard Rutz
13735 Linden Ave N, Apt. # B-405
Seattle, WA 98133

Comment Letter 44

From: Sierra Club on behalf of Ronald Eber
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, January 03, 2012 12:29:29 PM

Jan 3, 2012

U.S. Bureau of Reclamation

This past summer, I was able to personally visit the Bumping Lake area and the magnificent old growth groves south of the lake that would be flooded by the new dam you are proposing. These roadless lands adjacent to the William O. Douglas Wilderness need to be protected and added to the existing wilderness area. The current situation is characterized by careless development and intensive recreational activities that need to be limited. Increasing the size of the lake will only encourage more inappropriate attractions and development. We need to preserve the very limited remaining magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), not drown it!!! Trails and campsites for people to visit and enjoy these magnificent groves are called for. I oppose this new dam and any others flooding similar cirtical habitats.

Long before such wasteful projects are considered more practical alternatives need to be reviewed such as more efficient water conservation practices by the agriculture industry in the Yakima Valley. These must be developed so that additional storage is not needed especially if it is only for a possible drought situation in the furture. Flooding ancient forest groves to primarily provide irrigation water is unacceptable. 44-1

Further, existing Bureau of Reclamation dams need to add approrpiate passages for fish. Further blocking fish migration rather than addressing past mistakes and blockages is not acceptable.

Water demanding rural resdidential development in the Yakima basin is is not
consistent with Washington's Growth Management Act.

A full benefit-cost analysis that reviews and analizes all the costs, both private and public needs to be prepared and all alternatives to buidling another dam or expanding an existing one needs to be considered. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project and prepare and appropriate analsis.

Until such time that a complete and comprehensive review is available for public review, this project should be withdrawn and tabled.

Sincerely,

Mr. Ronald Eber
PO Box 249
Port Gamble, WA 98364-0249
(360) 930-8500

Comment Letter 45

From: Daniel Martinez
To: BOR_YRBWEP, sha-UCA
Subject: OP PEIS
Date: Monday, January 02, 2012 12:30:49 PM

Dear Ms. Candance McKinley,

Twenty years of study and billions of dollars have been spent trying to solve the water problems of the Yakima Basin. To date not one additional ounce of water has been found to aid agriculture, fish habitat, or municipalities for use in the future. The Work Study Group has not come up with an effective solution to provide additional water needed for these uses.

The idea of enlarging Bumping Lake is only going to result in long term court fights with ultra conservationists who have already threatened to deadlock any progress thereby using up money for lawyers rather than actual improvement in water supply. This will not help anyone who is seriously concerned with a long term solution to a sufficient water supply. 45-1

There will be a huge amount of money necessary to build the Wymer Dam, which will provide only a minimal additional amount of water for the Yakima Basin. It certainly cannot be considered cost effective.

Sincerely,

Daniel Martinez
509-949-7709

Comment Letter 46

From: Doyle McClure
To: BOR_YRBWEP, sha-UCA
Subject: DEIS for the Integrated Water Resource Management Plan, Yakima,River Basin Water Enhancement Project
Date: Wednesday, December 28, 2011 12:38:35 PM

Dear Sirs:

In the face of climate change, aggressive water conservation, adoption of water efficiency standards and metering, water markets, low- impact storage projects (e.g., aquifer storage and recovery), forest and flood-plain restoration, and other strategies to promote natural storage are much more cost-effective than new dams, and could vastly improve the efficiency of water use in Washington State.

The historic, massive hydrologic re-engineering of Washington's rivers using dams and irrigation projects has caused widespread environmental damage. I strongly urge decision-makers to focus on future water projects that fix existing problems, not cause new ones.

46-1 I oppose any new storage projects on the Yakima River and its tributaries, including the Bumping Dam Enlargement (Large or Small Option), Wymer Dam (on Lmuma Creek), and Black Rock Dam. DOE and Bureau of Reclamation (BuRec) identified numerous possible measures for improved water conservation, including measures in the No Action Alternative and the Enhanced Water Conservation Alternative of the January 2008.

At a time of extreme stress, both climatically and financially, it is a travesty to propose new costly projects that burden the taxpayer to benefit a few wealthy agricultural interests. It is high time that the Bureau of Reclamation terminate its wasteful focus on development projects that inevitably have negative environmental impacts as well as promoting government pork-barrel waste.

Respectfully yours,

--
Doyle McClure
717 S Adams St, Apt 4
Moscow, ID 83843
208-874-5449

Comment Letter 47

From: Jiri Pertold
To: BOR_YRBWEP, sha-UCA
Subject: Fwd: [waclist] Conservation News
Date: Tuesday, January 03, 2012 8:42:51 AM

Candace McKinley,
Environmental Program Manager, Bureau of Reclamation, Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901
or email
yrbwep@usbr.gov

Dear Candace,

It came to my attention that proposed new dams at Wenatchee National Forest will flood ancient Wenatchee forest. See below for detailed location desctiption.

I am writing you this email as a resident of Washington and avid outdoors person to express my wish stop the project and safe the giant trees.

Thank you for your consideration,

Jiri Pertold, Ph.D.
503.724 6650

47-1 In the Central Cascades east of Mt. Rainier, in the Wenatchee National Forest, there is a gem of a place called Bumping Lake. On two sides of the lake are large stands of truly magnificent ancient forest that are adjacent to the William O. Douglas Wilderness.
Their size and extent are truly awe inspiring: an untouched 2,000–3,000 acre gathering of giants, 8–10 feet in diameter, harboring on the east side ponderosa and sugar pine, and on the west side Douglas fir and western hemlock. The best and deepest part of these famous forests is reached about three miles in via a lakeside trail. There are literally hundreds of places to camp and stroll beside these great massed columns of giants, alongside beautiful Bumping River where it flows into the lake. This area needs your help as
it is slated to be flooded from additional dams
for water storage.

Comment Letter 48

From: R B Smythe
To: BOR_YRBWEP, sha-UCA
Subject: Comments on Yakima River Basin Draft Programmatic Environmental Impact Statement
Date: Sunday, January 01, 2012 1:21:03 PM

2 January 2012

TO: U.S. Bureau of Reclamation
FROM: Robert B. Smythe

Please include the following comments on the Yakima River Basin Integrated Water Resources Management Plan DPEIS.

48-1 The National Environmental Policy Act and the CEQ NEPA Regulations require analysis of a range of reasonable alternatives. This DPEIS only includes an "Integrated Plan" and a "No Action Alternative." The DPEIS is therefore deficient on its face.

48-2 I oppose construction of new dams that would destroy existing ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest, as well as shrub steppe habitat (the Wymer Dam).

This $5 billion proposal does not include a benefit-cost analysis; however, the proposed new dams do not appear to be cost-effective. Rather than build new irrigation dams, Yakima River Basin irrigation districts should carry out an integrated management program of water conservation, water marketing and water reallocation measures. Furthermore, existing Bureau of Reclamation dams in the basin now block salmon and bull trout from upper watershed habitat. Fish passage structures should be constructed at these dams.

Thank you for considering these comments.

Robert B. Smythe, Ph.D.
4907 Wellington Drive
Chevy Chase, MD 20815
phone: 301-656-0654
fax: 301-652-8710
e-mail: rbsmythe@comcast.net

Comment Letter 49

From: Eliabeth Tutsch
To: BOR_YRBWEP, sha-UCA
Subject: Comments to Bumping Lake storage expansion
Date: Monday, January 02, 2012 9:30:26 PM

To whom it may concern:

49-1 I am opposed to the water storage expansion plan for Bumping Lake. Old growth will be flooded, and that cannot be replaced. But, there is no replacement plan for the lost access to recreational areas that will be flooded as well, including the new and lovely cross country ski area. The cross country ski area is a tribute to William O. Douglas and his love of the outdoors and non-mechanized pursuits. Expanding the water storage at Bumping Lake benefits few, but harms many. It is dismissive of our cultural and historical heritage and the giants who were and still are among us.

Sincerely,

Elisabeth Tutsch
302 Stanley Blvd
Yakima, WA. 98902

Comment Letter 50

From: jimdougherty@aol.com
To: BOR_YRBWEP, sha-UCA
Subject: Comments on Yakima River Basin Draft Programmatic Environmental Impact Statement
Date: Sunday, January 01, 2012 7:46:52 PM

Dear U.S. Bureau of Reclamation,

Please include these comments on the Yakima River Basin Integrated Water Resources Management Plan DPEIS.

50-1 This DPEIS only includes an "Integrated Plan" and a "No Action Alternative." It does not present a range of alternatives.

I oppose new dams that would destroy magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest, as well as shrub steppe habitat (the Wymer Dam).

This $5 billion proposal does not include a benefit-cost analysis and new dams do not appear to be cost-effective.

50-2 Wasteful water practices by the agriculture industry in the Yakima River Basin must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

Sincerely,

James B. Dougherty
709 3rd St. SW
Washington, D.C.
202-488-1140 (office)
202-607-7093 (mob)

Comment Letter 51

From: seastar47@comcast.net
To: BOR_YRBWEP, sha-UCA
Cc: Suzy Cyr
Subject: Public comment on proposed Bumping Lake dam
Date: Monday, January 02, 2012 5:25:57 PM

Hello,

51-1 Please allow us to state our complete opposition to the proposed replacement dam at Bumping Lake, Washington. This proposal makes no sense fiscally, logistically or environmentally and is a complete waste of precious revenue. Until water conservation measures are in place for the Yakima Project, there should be no proposals to build new dams as there is sufficient water supplies in place for all water users. This proposed dam would wipe out irreplacable habitat for multiple endagered species, block access to spectacular wilderness areas, and inundate significant tracts of our dwindling old growth forests. It would also eliminate public recreation and trail access in the area and force the relocation or the more likely destruction of historically significant summer homes.
This project has been considered and rejected regularly since the 1950's for all of the same reasons and should be rejected again before any more taxpayer's monies are wasted on further studies of this outrageous proposal.

Thank you for your consideration.

Sincerely,

Thomas and Susan Cyr
Christina Cyr
Catherine Cyr
Clark Cyr
Virginia Cyr
William Cyr

Susan Summit Cyr
SeaHorse Studio
14525 168th Ave NE Woodinville, WA 98072
425-487-2908 studio/206-979-6564 cell
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www.SeaHorseStudio.net

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Yakima, Washington

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Control # : 12000315

Friday, 30 December, 2011
David Huycke
112 North 22nd Avenue
Yakima, WA 98902
dhuycke1@gmail.com

Ms. Candace McKinley
Environmental Program Manager
Yakima River Basin Water Enhancement Project
Columbia-Cascades Area

Dear Ms. McKinley,

Please count my wife, Mary, and me as two who stand in firm opposition to construction of a new Bumping Lake dam for increasing water storage for the Yakima River Valley. We believe that building a dam is a desperate and needlessly destructive means to increasing water supply.

Creating a new reservoir while destroying vast acreage in a mountain ecosystem is what people do when they're devoid of imagination, desperate for a quick fix to water 'shortages.' Building a dam permits us to only temporarily sidestep adoption of inconvenient conservation measures – which, amazingly, still have yet to be employed on a serious scale in our region. Aren't thoughtful people around the world now removing dams, not building more of them? Need we be so short-sighted in our planning? We will pay dearly for ignoring how wasteful many of our practices truly are and for continuing to live as though altering the environment comes without cost. Anyone paying attention knows that even if the Bumping Lake reservoir is expanded, it's just a matter of time (indeed, perhaps not for another generation or so) before we are still forced to adopt sustainable practices; the world is simply not large enough for us to not confront the reality of population growth and limited resources. Do the math!

52-1

While water is certainly in limited supply in our region (hello – we live in the shrub-steppe!), there really is plenty of this resource in the Yakima River watershed for multiple uses -- if we recognize its value and use it wisely. Instead of building a dam, a wasteful, false solution to our water supply issue, why not learn how other arid regions of the world creatively conserve water (Israel, for example), and then imaginatively develop sustainable water consumption practices appropriate for our region? If we broaden our thinking and innovate for the long term, the Yakima Valley could become a model for intelligent, sustainable water usage. Building a shiny new dam on the Bumping River only declares to the world how backward we are.

Respectfully,

David T. Huycke

From: gycwash@juno.com
To: BOR YRBWEP, sha-UCA
Subject: new dams
Date: Friday, December 30, 2011 2:08:46 PM

Hello, I am concerned about a proposal to build new dams near Yakima which would flood ancient forests and wipe out homes in the wilderness. There appears to not be a really good reason to build more dams. I think the utilities should first emphasize conservation and help their customers to improve their ways of saving water. We don't know what climate change will bring but it may get wetter and then we need to learn how to conserve the extra moisture. Please do NOT try to build more dams. Thanks, Glenda Carper, Normandy Park

53-1

member of Sierra Club and a user of the wilderness for camping

Comment Letter 54

From: Peg Altman
To: BOR_YRBWEP, sha-UCA
Subject: Dams
Date: Saturday, December 31, 2011 5:27:13 PM

54-1 This is simple,

NO NEW DAMS!

Thank you,
American Taxpayer
Peg Altman
4618 SW 32th Way
Federal Way, WA
98023
Sent from my iPad

Comment Letter 55

From: Sierra Club on behalf of Mike Nykreim
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 4:26:24 PM

Dec 20, 2011

U.S. Bureau of Reclamation

55-1 We are in a despirate national calamity. we must have family paying jobs. cutting off our nation's natural resources to appease the fanatics in the Sierra Club harms millions of American families. Please ignore the message below since it is a robo mailer by hysteriacle members of an elitest organization, the Sierra Clum.....

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new >>>>>> Blah Blah Blah Blah.....

Sincerely,

Mrs. Mike Nykreim
101 10th Ave
Kirkland, WA 98033-5522
(425) 822-8031

Comment Letter 56

From: National Wildlife Federation Action Fund on behalf of Raymond Bily
To: BOR_YRBWEP, sha-UCA
Subject: Draft Programmatic EIS on the Yakima River Basin Integrated Plan
Date: Tuesday, January 03, 2012 12:29:28 PM

Jan 3, 2012

Ms. Candace McKinley, U.S. Bureau of Reclamation, Columbia-Cascades Area Office
WA

Dear Ms. U.S. Bureau of Reclamation, Columbia-Cascades Area Office,

56-1 I support the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan).

I believe it is our responsibility to restore salmona and steelhead runs in the Yakima basic and elsewhere.

Please try to include specific fishery restoration and habitat protection/restoration objectives.

I am strongly against fishing or fly fishing as these are very cruel practices (especially fly fishing) -- therefore, in my opinion the objectives should be primarily due to our responsibility to restore the damage we have done to these important species and their environment, not the "recreational" benefits for humans.

Thank you

Sincerely,

Raymond Bily
15513 NE 52nd St
Redmond, WA 98052-5149

Comment Letter 57

From: National Wildlife Federation Action Fund on behalf of Don Huling
To: BOR_YRBWEP, sha-UCA
Subject: Draft Programmatic EIS on the Yakima River Basin Integrated Plan
Date: Thursday, December 22, 2011 2:47:39 PM

Dec 22, 2011

Ms. Candace McKinley, U.S. Bureau of Reclamation, Columbia-Cascades Area Office
WA

Dear Ms. U.S. Bureau of Reclamation, Columbia-Cascades Area Office,

It's way past time to fix the Yakima R. minimum flow requirement. I canoed the river in July 1980 from Teanaway to Zillah. With each dam diverting half of the flow for irrigation, we had to walk our canoes as there was so little water left.

I am writing to support the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) which is our best hope for restoring abundant salmon and steelhead in the Yakima basin and positioning wildlife, agriculture and communities for the dwindling snow pack climate change will bring.

57-1 I urge you to include the following key elements missing from the Draft Programmatic Environmental Impact Statement (DPEIS), which should be incorporated into a final Programmatic EIS:

* Add specific fishery restoration and habitat protection goals.

* Evaluate each major Integrated Plan element and its ecological, economic and operational costs and benefits.

* Evaluate the benefits and costs of the Integrated Plan, including ecosystem services and the value of recreation.

Thank you for your consideration.

Sincerely,

Don Huling
17117 SE 329th St
Auburn, WA 98092-2712

Comment Letter 58

From: National Wildlife Federation Action Fund on behalf of Stanley Jones-Umberger
To: BOR YRBWEP, sha-UCA
Subject: Draft Programmatic EIS on the Yakima River Basin Integrated Plan
Date: Thursday, December 22, 2011 10:47:22 AM

Dec 22, 2011

Ms. Candace McKinley, U.S. Bureau of Reclamation, Columbia-Cascades Area Office
WA

Dear Ms. U.S. Bureau of Reclamation, Columbia-Cascades Area Office,

I am writing to support the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) which is our best hope for restoring abundant salmon and steelhead in the Yakima basin and positioning wildlife, agriculture and communities for the dwindling snow pack climate change will bring.

I urge you to include the following key elements missing from the Draft Programmatic Environmental Impact Statement (DPEIS), which should be incorporated into a final Programmatic EIS:

58-1

* No new dams.

* Add specific fishery restoration and habitat protection goals.

* Evaluate each major Integrated Plan element and its ecological, economic and operational costs and benefits.

* Evaluate the benefits and costs of the Integrated Plan, including ecosystem services and the value of recreation.

Thank you for your consideration.

Sincerely,

Stanley Jones-Umberger
37425 SE 39th St
Washougal, WA 98671-9792

Comment Letter 59

From: National Wildlife Federation Action Fund on behalf of Penny Orr
To: BOR YRBWEP, sha-UCA
Subject: Draft Programmatic EIS on the Yakima River Basin Integrated Plan
Date: Wednesday, January 04, 2012 9:31:45 AM

Jan 4, 2012

Ms. Candace McKinley, U.S. Bureau of Reclamation, Columbia-Cascades Area Office
WA

Dear Ms. U.S. Bureau of Reclamation, Columbia-Cascades Area Office,

To whom it may concern:
I did a lot of research on the Pacific salmon as an Ecology graduate student at Case Western University as part of a graduate seminar. Our department chair and former salmon fisherman, Mitsuo Teraguchi, claimed that my paper solved the mystery of the the distribution and abundance of the Pacific salmon species worldwide. These fish-all the salmonids-are critically important to west coast ecosystems and local culture.

59-1 I am writing to support the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) which is our best hope for restoring abundant salmon and steelhead in the Yakima basin and positioning wildlife, agriculture and communities for the dwindling snow pack climate change will bring.

I urge you to include the following key elements missing from the Draft Programmatic Environmental Impact Statement (DPEIS), which should be incorporated into a final Programmatic EIS:

* Add specific fishery restoration and habitat protection goals.

59-2 * Evaluate each major Integrated Plan element and its ecological, economic and operational costs and benefits.

* Evaluate the benefits and costs of the Integrated Plan, including ecosystem services and the value of recreation.

Thank you for your consideration.
Sincerely,

Penny Orr
Immediate Past President Audubon Society of Greater Cleveland

Sincerely,

Penny Orr
10303 Thwing Rd
Chardon, OH 44024-9773

Comment Letter 60

From: National Wildlife Federation Action Fund on behalf of ramona saldana-flores
To: BOR YRBWEP, sha-UCA
Subject: Draft Programmatic EIS on the Yakima River Basin Integrated Plan
Date: Tuesday, January 03, 2012 9:12:51 AM

Jan 3, 2012

Ms. Candace McKinley, U.S. Bureau of Reclamation, Columbia-Cascades Area Office
WA

Dear Ms. U.S. Bureau of Reclamation, Columbia-Cascades Area Office,

Biodiversity protection is a necessary long term investment. Each lost species was a link in an amazing net of natural strength, a gift billions of years in the making, entrusted to us. We have failed up to now to adequately attend to the delicate balance of life, but if the scales are to be tipped back at all, it will be done gram by gram, day by day, mind by mind. Salmon protection is necessary not only for the salmon, but for us. The stronger the weakest in a community, the stronger the community as a whole. Protecting the salmon sends a message to the human community directly affected as well as the global community.

I am writing to support the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) which is our best hope for restoring abundant salmon and steelhead in the Yakima basin and positioning wildlife, agriculture and communities for the dwindling snow pack climate change will bring. 60-1

I urge you to include the following key elements missing from the Draft Programmatic Environmental Impact Statement (DPEIS), which should be incorporated into a final Programmatic EIS:

* Add specific fishery restoration and habitat protection goals.

* Evaluate each major Integrated Plan element and its ecological, economic and operational costs and benefits.

* Evaluate the benefits and costs of the Integrated Plan, including ecosystem services and the value of recreation.

Thank you for your consideration.

Sincerely,

ramona saldana-flores
408 Chapman St
Hutchins, TX 75141-3232

Comment Letter 61

From: priestyman@aol.com
To: BOR YRBWEP, sha-UCA
Subject: Restore the Yakima River and its salmon!
Date: Wednesday, December 21, 2011 1:36:08 PM

Ms. Candace McKinley at the Bureau of Reclamation

- I support moving forward with a comprehensive plan to restore healthy, fishable salmon and steelhead runs numbering in the hundreds of thousands and access to high elevation habitat that will be resilient in the face of climate change
- The EIS should provide costs and benefits for individual water and river/fish restoration projects as well as for the whole package of actions – this will help ensure that the most important and effective projects are funded and implemented first
- The EIS should describe in more detail the Watershed Protection and Enhancement component of the plan, including new Wild and Scenic rivers, Wilderness area additions, and new proposed National Recreation Areas
- The EIS should include more specific targets for salmon and river restoration in its stated "purpose and need." 61-1

For instance, there should be restoration goals for various salmon species as well as specific goals for miles of rivers protected and restored.

Greg Obray
Pocatello, ID 83201

Comment Letter 62

From: Sierra Club on behalf of Jerry Broadbent
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 1:52:51 PM

Dec 20, 2011

U.S. Bureau of Reclamation

Wasteful water practices by the agriculture industry in the Yakima must end. Conservation of water not only benefits man but all the living things that rely on the water.

The BuRec dams need fish ladders or sluices and the Teanaway river and its species need to protected. 62-1

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Mr. Jerry Broadbent
PO Box 146
410 S Main
Bucoda, WA 98530-0146
(360) 278-3277

Comment Letter 63

From: Sierra Club on behalf of Claus & Phyllis Dolph
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 4:26:48 PM

Dec 20, 2011

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). Spotted Owls have been seen at Bumping Lake. There are Flying Squirrels there also. The lake is fine as it is. The ancient trees are one of the wonders of the world! I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams. 63-1

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat. Good grief! We have way too many real estate developments anyway and many homes already there are not selling.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Mrs. Claus & Phyllis Dolph
2320 26th St
Anacortes, WA 98221-2490
(360) 293-5951

Comment Letter 64

From: Sierra Club on behalf of Lars Henrikson
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 10:26:48 PM

Dec 21, 2011

U.S. Bureau of Reclamation

Washington State already has the largest irrigation system in America and possibly the world. There really isn't a need to put any more habitat under water to support an already heavily supported industrial farming program in Washington.

No new dam should even be considered until our agricultural industry does the same kind of least cost planning that we demand of our electricity industry. As with power, water efficiency is far more cost-effective than new impoundment and distribution.

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams. 64-1

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing Bureau of Reclamation dams on the Yakima River were built without passage for salmon. I support salmon passage at all applicable dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This proposal lacks a benefit-cost analysis and does not present a range of alternatives. This analysis should include a thorough comparison of the costs (financial and environmental) of the planned dams and reservoirs to the costs and benefits of implementing a all practical water efficiency measures. 64-2

I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Mr. Lars Henrikson
7956 34th Ave SW
Seattle, WA 98126-3557
(206) 938-1809

Comment Letter 65

From: Sierra Club on behalf of Mark Johnston
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 9:55:56 AM

Dec 20, 2011

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams. 65-1

I am an avid birder and lead trips for Seattle Audubon in shrub-steppe habitat adjacent to the Yakima River. This habitat has been significantly impacted over the last century. As as resulte, shrub-steppe habitat obligate birds have declined precipitously. It is therefore essential that all remaining healthy shrub-steppe habitat be protected. The Wymer Dam would wipe out signifficant sections of it. Consequently I am adamantly opposed to it being built. 65-2

Wasteful water practices by the agriculture industry in the Yakima must end. I've driven through central Washington over the years and have witnessed extreme situations or water waste by agrivulture in the area. The farmers of the area should do with what they already have. No additional water should be made available to agriculture in the area. I am supportive of agricultural production there, but there is already enough of it. Subsidizing futher growth of this industry there is unwarranted and should not be facilitated. I oppose construction of both proposed dams.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams. 65-3

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Mr. Mark Johnston
14818 SE 267th St
Covington, WA 98042-8188
(253) 639-3862

Comment Letter 66

From: Sierra Club on behalf of Kevin & Susan Kane
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Wednesday, December 21, 2011 12:27:34 AM

Dec 21, 2011

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

66-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

66-2 Before you even began the environmental analysis on this you needed to ask how much water is being wasted and how can we better manage tp eliminate waste. Water wasting is the problem, not a need for more storage. Why subsidize this ?
Do we not have enough food ? What crops are we talking about ? Is our government subsidizing any of these crops or the farmers that grow them ? Do we pay farmers not to grow crops in this area ? I wish it was not true, but our government money needs to go to helping people in need not some dollar minded farmer group. Spend money to find out what a stable economy will consist of and then begin to build it. At this time to spend this kind of money when the economy is tubing it is irresponsible. The economy is not on the upswing, but is likely to get even worse, with high inflation and high interest rates and you want to build a dam ? If these are export crops or non-essential crops for human use the demand for them is going to go down as the economy falls off. There is no rush to do this project at this time, just one more pork barrel of Cadillac desert, let's put this on hold for ten years and see where we are and what the need is then. The 5 bil can be better spent elsewhere or put it back in Social Security where it will likely be stolen from.

Doc Hastings, is this one of your projects ? Who is behind this one ?

Sincerely, Kevin Kane

Sincerely,

Mr. Kevin & Susan Kane
200 S Kent Pl
East Wenatchee, WA 98802-5554
(509) 884-6720

Comment Letter 67

From: Sierra Club on behalf of Marc Ladd
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Monday, January 02, 2012 6:57:44 AM

Jan 2, 2012

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

67-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

67-2 Any newly constructed dams should have the ability to produce low cost renewable energy to the area as well as having minimal or even a positive impact on the environment.

Sincerely,

Mr. Marc Ladd
6235 146th Pl SE
Bellevue, WA 98006-4337
(425) 449-8796

Comment Letter 68

From: Sierra Club on behalf of Alec Maclurg
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 1:56:00 PM

Dec 20, 2011

U.S. Bureau of Reclamation

68-1 How much would it cost to implement direct rainwater collection systems, without existing natural waterways, and waterless composting toilet systems? How would this scale up to the agricultural needs from this proposed irrigation?

Supported by the Washington State Department of Health, the Department of Ecology, the EPA, also opponents of the State Biosolids program: http://humanurehandbook.com/downloads/Humanure_Handbook_all.pdf

68-2 New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Mr. Alec Maclurg
9229 Cyrus Ave NW
Seattle, WA 98117-2646
(206) 473-1334

Comment Letter 69

From: Sierra Club on behalf of Judith Night
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 1:53:34 PM

Dec 19, 2011

U.S. Bureau of Reclamation

69-1 New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

69-2 What's wrong with you that you don't give a hoot about what Washington is most famous for, its salmon??????? It's time to stop allowing corporations to rule what happens to our natural resources and get some perspective. I'm not an engineer, but I know that salmon need to swim upriver to spawn. I learned that in grade school. How do you expect fish to negotiate a dam?

Sincerely,

Ms. Judith Night
30801 J Pl
Ocean Park, WA 98640-5062
(360) 665-0085

Comment Letter 70

From: Sierra Club on behalf of Elaine Packard
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Thursday, December 29, 2011 11:50:28 AM

Dec 29, 2011

U.S. Bureau of Reclamation

70-1 I have recently camped and hiked in this pristine corner of Washington. I have also followed the work of the YRBWEP. I have spoken with representatives of the tribes and know that fish passage, which is important, can be achieved without enlarging Bumping Lake. I know that the irrigators are using fish passage as a trading card for more water storage at Bumping Lake. The irrigators have survived off of "limitless" and free water for far too long. We can no longer continue to irrigate the desert. Look to California where water conservation and efficiency plus a re-evaluation of farming practices and crops have addressed the real and pressing issue of water resource management. The Teanaway is important to preserve but is not mitigation for enlarging Bumping Lake.

70-2 New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Ms. Elaine Packard
222 31st Ave
Seattle, WA 98122-6316

Comment Letter 71

From: E.J. Rich
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Monday, December 19, 2011 10:22:44 PM

Dec 20, 2011

U.S. Bureau of Reclamation

71-1 New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

71-2 PLEASE! Help stop the diversion or the impassibility of rivers (DAMS) that have nourished and sustained fresh water for thousands of years for people, plants, and animals - for a short term fix of instant gratification, self indulgences and money worshipers. We are now tearing down mega dams on the Columbia River to bring back the Salmon that is/was on the brink of extinction.

The Nile in Egypt was dammed and diverted by modern technology for years. Now the land beyond the banks are baron - useless. When Nature overflowed the Nile and flooded the lands - crops, vegetation grew prolifically and there was abundance of food for everyone and all the animals. We MODERN GENIUSES think we can improve on Nature. The fallacy of this doesn't show up for years and then we start seeing the regretful damage we do. Unfortunately, the people who profit from these dams never have to come back and share in the expense of restoration for the rivers. These disasters continue to happen all over the world.

Again, I beg you. PLEASE STOP THE DAMS.

Respectfully'
E.J. RICH

Sincerely,

Ms. E.J. Rich
300 17th St
Bellingham, WA 98225-6348

Comment Letter 72

From: Sierra Club on behalf of Jim Scarborough
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Friday, December 23, 2011 5:06:51 PM

Dec 23, 2011

U.S. Bureau of Reclamation

I wish to express my complete and vehement opposition to the proposal to flood the old-growth forest adjacent to Bumping Lake as part of a new dam proposal. To my knowledge, this would be the first time that *any* old-growth forest on federal land in the state of Washington has been systematically removed in at least two decades.

I have visited and enjoyed the forest in question around Bumping Lake and am adamant that flooding the area (nearly 2,000 acres, as proposed) must not be allowed to happen, and should be challenged forcefully if necessary. As this proposal would destroy habitat for ESA-listed species like the northern spotted owl and bull trout, litigation is certain if the Bureau of Reclamation doesn't change course in the Bumping River basin. 72-1

Additionally, the Wymer dam would drown increasingly rare shrub-steppe and sage grouse habitat. I oppose this dam as well. Wasteful water practices by Big Agriculture in the Yakima River basin must end. I instead support the prioritization of water conservation, and it's well past time to do so in this semi-arid region. Aside from this, fish passage is essential at existing Bureau of Reclamation dams on the Yakima River.

Finally, the Teanaway River deserves protection from real estate development, but *not* as mitigation for destroying ancient forests and endangered species habitat elsewhere in the region.

The Bureau's $5 billion proposal lacks a cost-benefit analysis and does not present an adequate range of alternatives. I urge you to withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project and begin again with the above comments in mind. 72-2

Sincerely,

Jim Scarborough
701 N Garden St
Bellingham, WA 98225-5405

Comment Letter 73

From: Sierra Club on behalf of Dottie Simone
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Wednesday, December 21, 2011 12:33:06 PM

Dec 21, 2011

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.
So many ideas seem to show my USA as an example of how to destroy our lands. DO PEOPLE HAVE NO GRANDCHILDREN????THE FUTURE IS not for sale....Is it? How did we end up ready to destroy North America?
Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams. 73-1

WE have already put so many fish on the "Do not feed to children or pregnant women list!" Don't we need less pollution, instead of more!!?? Shouldn't humans heal our earth instead of see it as a garbage dump??

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Ms. Dottie Simone
2828 NE Everett St
Unit 20
Camas, WA 98607-9204

Comment Letter 74

From: Sierra Club on behalf of Sheri Staley
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Wednesday, December 21, 2011 8:29:15 AM

Dec 21, 2011

U.S. Bureau of Reclamation

74-1 I believe alternative plans must be reviewed.

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

74-2 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Mrs. Sheri Staley
320 SE Nighthawk Pl
Shelton, WA 98584-7603
(360) 427-6303

Comment Letter 75

From: Sierra Club on behalf of Peter von Christierson
To: BOR_YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 9:26:43 PM

Dec 20, 2011

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

75-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

75-2 As part of the EIS it is critical that an assessment be made of why other solutions to irrigation cannot be made. One solution might be drip irrigation. And, there are other solutions. We do not need to tear down forests and flood our rivers to provide irrigation.

Sincerely,

Mr. Peter von Christierson
1229 29th St
Port Townsend, WA 98368-6119
(360) 385-1587

Comment Letter 76

From: Sierra Club on behalf of Amy Waterman
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Tuesday, December 20, 2011 4:56:29 PM

Dec 20, 2011

U.S. Bureau of Reclamation

76-1 I urge you to ensure the communities have implemented all of the recommended water conservation practices and any other alternatives before installing new dams on the Yakima river. It doesn't sound as if the DEIS is complete since it does not have alternatives other than "no action."

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

76-2 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Ms. Amy Waterman
4765 34th Ave NE
Seattle, WA 98105-4006
(206) 729-6165

Comment Letter 77

Your address:

Joan Bartz
2902 S. Vancouver St.
Kennewick, WA 99337

Upper Columbia River Group – Sierra Club
P.O. Box 413
Spokane, WA 99210

Send a conservation and fiscal responsibility message for delivery to the U.S. Bureau of Reclamation

9921030413 B028

Dear U.S. Bureau of Reclamation,

77-1 New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Environmental Impact Statement for the Yakima Integrated Water Project.

Additional comments:

77-2 This also will have a negative effect on the Yakima River Scenic Byways.

Thank you,

Joan K Bartz
(signed)

Your address:

B Mrs. Bobbie Ball
1528 Meadows Dr. N
Richland, WA 99352-9201

Upper Columbia River Group – Sierra Club

P.O. Box 413

Spokane, WA 99210

Send a conservation and fiscal responsibility message for delivery to the U.S. Bureau of Reclamation

98210-0413 5025

Dear U.S. Bureau of Reclamation,

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

78-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Environmental Impact Statement for the Yakima Integrated Water Project.

Additional comments: Neither a shrub steppe nor ancients forests are easily replaced. Mitigation is not an ~~option~~ equivalent at least in these two situations I would like to see an EIS 78-2 78-3 that addresses a wide range of alternatives

Thank you.

(signed) Bobbie Ball

address on front

Your address:

Coleman

32 Horseshoe Lane

Republic WA 99166

Upper Columbia River Group – Sierra Club

P.O. Box 413

Spokane, WA 99210

Send a conservation and fiscal responsibility message for delivery to the U.S. Bureau of Reclamation

98210-0413

Dear U.S. Bureau of Reclamation,

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams. The beauty of this area is priceless and worth more to my heart by than any dam.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation. Fish should take priority over irrigators during summer months.

Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams. This should be a top priority - and in part paid for by irrigators.

79-1 The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat. The Teanaway and Yakima should be designated Wild & Scenic Rivers.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Environmental Impact Statement for the Yakima Integrated Water Project.

Additional comments: The free flowing waters of the Yakima and Teanaway should remain free flowing.

Thank you.

(signed) Timothy J. Coleman

Comment Letter 80

Your address:

[redacted]

Upper Columbia River Group – Sierra Club

P.O. Box 413

Spokane, WA 99210

Send a conservation and fiscal responsibility message for delivery to the U.S. Bureau of Reclamation

9821050413 8028

Dear U.S. Bureau of Reclamation,

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

80-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Environmental Impact Statement for the Yakima Integrated Water Project.

Additional comments: Thank you,

80-2 Money should be used to cover existing canals to stop evaporation. Efforts made to conserve. Do not build dams on old growth ground.

(signed)

Comment Letter 81

Your address:

J. Morgan

455 SW Fountain St.

Pullman, WA. 99163

Upper Columbia River Group – Sierra Club

P.O. Box 413

Spokane, WA 99210

Send a conservation and fiscal responsibility message for delivery to the U.S. Bureau of Reclamation

9821050413

Dear U.S. Bureau of Reclamation, *please perform a benefit-cost analysis before considering such a huge risk - not vice versa.

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

81-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams. * very important.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Environmental Impact Statement for the Yakima Integrated Water Project.

Additional comments: The "minute" benefit of installing the dam project does not justify drowning such a large eco-system. There are other solutions to benefitting from free-ocean running waters – such as canal systems that have been succesful in the Wenatchee Valley and Lower Yakima Valley. Thank you,

81-2

(signed)

COMMENTS

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA Draft Programmatic Environmental Impact Statement (PEIS)

December 5, 2011 – Cle Elum, Washington

Name (please print legibly):	Mary Bergstrom
Organization:	(resident of upper county)
Mailing Address:	611 Masterson Rd
City, State, and Zip Code:	Cle Elum WA 98922
Telephone: 509.674.0396	**E-mail:** mbergstrom@cleelum.com

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

X I would like to receive a copy of the **Draft** PEIS: ___CD ___ printed copy X Executive Summary only
X I would like to receive a copy of the **Final** PEIS: ___CD ___ printed copy X Executive Summary only
X I want my name included on the mailing list to receive information on the EIS. MW
___ 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 Draft PEIS are:

Obviously, this was a massive undertaking ---- will make effort to understand the many aspects of this study.

82-1 Request - may I have a copy of the topo map entitled: "Reference Map of the Yakima River Basin" (I spoke to Lynn at the meeting) Thank you very much, Mary Bergstrom

please mail hard copy

(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 January 3, 2012, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

COMMENTS

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA Draft Programmatic Environmental Impact Statement (PEIS)

December 14, 2011 – Yakima, Washington

Name (please print legibly):	Ralph Berthon
Organization:	None
Mailing Address:	360 Coy Lane
City, State, and Zip Code:	Yakima Wa 98908
Telephone: 952 2869	**E-mail:** rmberthon@earthlink.net

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

___ I would like to receive a copy of the **Draft** PEIS: ___CD ___ printed copy ___ Executive Summary only
✓ I would like to receive a copy of the **Final** PEIS: ✓CD ___ printed copy ___ Executive Summary only
✓ 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).

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

83-1 Why not add recreational lots adjacent to your reservoirs for help in cost reduction for project & increase tax revenue for the Counties Counties such & jobs for land owners who build on the recreational sites.

(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 January 3, 2012, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

COMMENTS

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA Draft Programmatic Environmental Impact Statement (PEIS)

December 5, 2011 – Cle Elum, Washington

Name (please print legibly): TOM DAVIES	
Organization: SELF	
Mailing Address: P.O BOX 649	
City, State, and Zip Code: EASTON, WA 98925-0649	
Telephone: 509 656 2451	**E-mail:** N/A

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

- ~~I would like to receive a copy of the **Draft** PEIS: ___CD ~~printed copy ___ Executive Summary only~~
- ✓ I would like to receive a copy of the **Final** PEIS: ___CD ✓ printed copy ___ Executive Summary only
- ✓ 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 Draft PEIS are:

84-1 RESTORE WATER TO UPPER KITTITAS COUNTY. SO WE CAN GET SOME JOBS - NO WATER NO BUILDING

WHO GET THE FISH - THE TRIBES?

(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 January 3, 2012, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

COMMENTS

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA Draft Programmatic Environmental Impact Statement (PEIS)

December 14, 2011 – Yakima, Washington

Name (please print legibly): Jess Heavirlo	
Organization: Dike Dist I + Tax Payer - Landowner	
Mailing Address: 1212 So Keys Rd	
City, State, and Zip Code: Yakima	
Telephone: 5094534340	**E-mail:**

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

- ✓ I would like to receive a copy of the **Draft** PEIS: ___CD ✓ printed copy ___ Executive Summary only
- ✓ I would like to receive a copy of the **Final** PEIS: ___CD ✓ printed copy ___ Executive Summary only
- ___ I want my name included on the mailing list to receive information on the EIS.
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My comments on the Yakima River Basin Integrated Water Resource Management Plan Draft PEIS are:

85-1 We Need water yes - But you've ~~Offer~~ group Needs To Follow Through - if you Say you can do something - do it - don't Keep Passing the desk down the - Road

(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 January 3, 2012, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

COMMENTS

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA Draft Programmatic Environmental Impact Statement (PEIS)

December 14, 2011 – Yakima, Washington

Name (please print legibly):	SCOTT MILLER
Organization:	Bumping Cabin / cabin owner
Mailing Address:	23420 SE BLACK NUGGET RD F-302
City, State, and Zip Code:	ISSAQUAH, WA 98029
Telephone: (425) 802-4120	**E-mail:** lonemiller@comcast.net

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

___ I would like to receive a copy of the **Draft** PEIS: ___CD ___ printed copy ___ Executive Summary only
___ I would like to receive a copy of the **Final** PEIS: X CD ___ printed copy ___ Executive Summary only
X 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 Draft PEIS are:

AS A CABIN OWNER @ BUMPING LAKE I WOULD LIKE TO EXPRESS MY CONCERN ABOUT THE POSSIBILITY OF LOSING A VERY RARE FOREST ENVIRONMENT THAT IS ACCESSABLE TO THE PUBLIC. PLEASE VIEW ATTACHED PHOTOS OF THE FOREST SERVICE CABIN OWNER PROGRAM IN "ACTION", MAKING MEMORIES FOR LITERALLY THOUSANDS OF ~~PEOPLE~~ PEOPLE OF PEOPLE FROM ALL OVER THE STATE.

86-1

(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 January 3, 2012, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

Comment Letter 86

CABIN 1 Burning

Comment Letter 86

COMMENTS

Yakima River Basin Integrated Water Resource Management Plan NEPA/SEPA Draft Programmatic Environmental Impact Statement (PEIS)

December 5, 2011 – Cle Elum, Washington

Name (please print legibly): A.J. Scott	
Organization: Cle Elum City Council	
Mailing Address: Box 1055	
City, State, and Zip Code: Cle Elum, Wa. 98922	
Telephone: 509-674-1976	**E-mail:**

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

___ I would like to receive a copy of the **Draft** PEIS: ___CD ___ printed copy ___ Executive Summary only
___ I would like to receive a copy of the **Final** PEIS: ___CD ___ printed copy ___ Executive Summary only
___ 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).

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

87-1 (1) ENORMOUSLY Complex & Management SHOULD DRIVE THIS PROCESS TOWARD PRACTICAL, NEAR TERM CALLS FOR Action & Legislation. (IT LOOKS LIKE Analysis PARALYSIS)

87-2 (2) WHAT IS STATUS of Hydrology Studies promised to ASSESS THE UPPER county Ground WATER / EXempt well ISSUE?

87-3 (3) YOU SHOULD CONSIDER A SEPARATE FOCUS STRICTLY AROUND WATER CONSERVATION.

(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 January 3, 2012, to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509) 454-5650; email yrbwep@usbr.gov; phone (509) 575-5848, ext. 613.

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

From: National Wildlife Federation Action Fund on behalf of Elise Richman
To: BOR_YRBWEP, sha-UCA
Subject: Draft Programmatic EIS on the Yakima River Basin Integrated Plan
Date: Tuesday, December 20, 2011 8:43:28 PM

Dec 20, 2011

Ms. Candace McKinley, U.S. Bureau of Reclamation, Columbia-Cascades Area Office
WA

Dear Ms. U.S. Bureau of Reclamation, Columbia-Cascades Area Office,

I am writing to support the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan) which is our best hope for restoring abundant salmon and steelhead in the Yakima basin and positioning wildlife, agriculture and communities for the dwindling snowpack climate change will bring.

I urge you to include the following key elements missing from the Draft Programmatic Environmental Impact Statement (DPEIS), which should be incorporated into a final Programmatic EIS: 88-1

* Add specific fishery restoration and habitat protection goals.

* Evaluate each major Integrated Plan element and its ecological, economic and operational costs and benefits.

* Evaluate the benefits and costs of the Integrated Plan, including ecosystem services and the value of recreation.

Thank you for your consideration.

Sincerely,

Elise Richman
608 N Sheridan Ave
Tacoma, WA 98403-1416

National Wildlife Federation Email Comment Letter – List of Submitters

1	Abha Harting	Adina Parsley	Al McCarthy
2	Aileen Taylor	Alex Borton	Alice Thomassen
3	Alicia Jantaas	Alixine Sasonoff	Allie Kerr
4	Alyson Desmond	Akyssa Jones	Amanda Mikalson
5	Amanda Moulton	Amber Peralta	Amy Collins
6	Amy Priest	Amy Shoppert	Andrea Fenwick
7	Anita Gwinn	Anna Chlebowski	Annapoorne Colangelo
8	Anne Baker	Anne Hepfer	Anne Mack
9	Anne Roda	April Atwood	Ariana Martell
10	Ariele Huff	Arwen Dewey	Aubrey Scheel
11	Barbara Bell	Barbara Gross	Barbara Whitney
12	Beatrice Tiersma	Becky McGill Johnson	Benjamin Schreiber
13	Betty Chan	Beverly Deering	Bill Laestadius
14	Bill S	Billie Watkins	Billy Kemp
15	Blair Kangley	Bob Aegerter	Bonnie Miller
16	Brenda Asterino	Brenda Lewis	Brenda Wilbur
17	Brent Naylor	Brent Williamson	Brian Lally
18	Brian Lewis	Brie Gyncild	Brita Brahce
19	Bronwyn Evans	Brookie Jedge	Bruce White
20	Bryan Sabol	C Gross	Cami Cameron
21	Candice Casato	Candice Hartman	Cara Chestnut
22	Carol Kraber	Carol Rolf	Carole Miller
23	Caroline Bowdish	Caroline Sumpter	Carolyn Croshaw
24	Carolyn Langer	Carolyn Marshall	Carrie Ellis
25	Carter Fuehr-Bush	Caryn Tate	Cathy Gruber
26	Cathy O'Donnell	Cathy Seay	Charlene Butler
27	Charles Fornia	Charles Riddle	Charles Van Wey
28	Charmaine Slaven	Charyl R. West	Cheryl Austin
29	Cheryl McCaffery	Cheryl Mussead DanRolczynski	Chris Foster
30	Chris Hawkins	Christa Link	Christopher Bailey
31	Christopher Key	Christopher Lawrence	Christopher Schmit
32	Christy Cornelsen	Clara Jacobson	Clark Pickett
33	Clayton Jones	Colleen Curtis	Connie Arveson
34	Craig Geiger	Dale Kurtz	
35	Dan Stabel	Dana Knutson	Danielle McKenzie
36	Danny Thorn	Danny Watson	David Bixler
37	David Stetler	David Wallesz	David Westphal
38	David Winkel	Dawn Benitez	Dawn Rutherford
39	Debbie Connery	Deborah Cruz	Delilah Jean Williams
40	Delphi Locey	Denee Scribner	Denise Beard
41	Dennis O'Brien	Diana Covington	Diana Cristina
42	Domingo Hermosillo	Don Glickman	Don Johnson
43	Donna Brady	Doug Fleming	Douglas Early
44	Douglas Yearout	Elaine Levy	Eleanor Dowson
45	Elizabeth Herrin	Ellen Sweetin	Erica Eden
46	Erica Olsen	Erik Holmes	Erin DeFilipps

National Wildlife Federation Email Comment Letter – List of Submitters

47	Euli Rath	Evan Sugden	Eve Otten
48	Felicity Devlin	Forrest Rode	Frank Rebecca
49	Frank Watson	Frank Karlson	Galen Davis
50	Galen Hansen	Gary Bennett	Gary Isaac
51	Gene Groom	Geoff Skews	George Everett
52	George Knotek	Gerald Underwood	Gerry Milliken
53	Gill Fahrenwald	Gina Hall	Glen Carroll
54	Glen O. Jacobson	Glendora Thompson	Glenn Eklund
55	Glenn Swanson	Grant Low	Greg Puppione
56	Gregory Kruse	Guadalupe Nickell	Hannah Gardner
57	Harlan Solomon	Harry Gerecke	Heather Ferguson
58	Heather McFarland	Helen Peterson	Helga Riehlein
59	Henry Koepfle	Herlwyn Lutz	Holly Delphinidae
60	Holly Lucas	Ingrid Erickson	J. Churcher
61	J. Gerlings	Jack Stansfield	Jackie Easley
62	Jah'di Levvi	James Greene	James Mulcare
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67	Jeff McConaughy	Jeff Steenbergen	Jeffrey Panciera
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70	Jetta Hurst	Jim Gayden	Jim Guenther
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91	Lee Atwell	Lee Johnston	Lee Markholt
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Comment Letter 88 Signatures

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93	Lesley Ahmed	Leslie Austin	Leslie Harding
94	Leslie Johnson	Linda Andersson	Linda Cain
95	Linda Swan	Lindsay Myers	Lindsey Effner
96	Lisa Tracy	Lisa Vandermay	Lloyd Hedger
97	Lois Butterfield	Lori Roblen Benson	Lorraine D. Johnson
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99	Lynda Wilson	Lynn Ziegler	Lynne Oulman
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107	Matt Hornland	Maureen Freehill	Megaen Kelly
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110	Michael McCall	Michael Oaks	Michael von Sacher-Masoch
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114	Nancy Johnson	Nancy Lewis	Nancy Wagner
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119	P McDavid	Pamela Edwards	Pat Larson
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153	Tim Paschke	Tobi Braverman	Tod Braunwart
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156	Virginia Lindsey	Virginia McGarry	Vivian Lentz
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196	Holly Homan	Nick Page	Wendy L. Hernandez
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198	Amanda Stark	Corinne Thorsell	Gabriela Boscio
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200	Kassi Babich	Katherine Dillon	Neil Aldridge
201	Susie Bily	Tiffany Gancos	Vena Johnson
202	Ana White	Robyn Carmichael	Kerry Koverik
203	Franz Amador	Gladys Chase	Teresa Lyman
204	WernerBergman	Wesley Banks	William Bumgardner
205	Elise Richman		

Comment Letter 89

From: Stan Kaufman
To: BOR_YRBWEP, sha-UCA
Subject: Comments on Yakima River Basin Draft Programmatic Environmental Impact Statement
Date: Saturday, December 31, 2011 9:31:24 AM

Dear U.S. Bureau of Reclamation:

Please include these comments on the Yakima River Basin Integrated Water Resources Management Plan DPEIS.

89-1 The National Environmental Policy Act requires a range of alternatives. This DPEIS only includes an "Integrated Plan" and a "No Action Alternative."

89-2 I oppose new dams that would destroy magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest and in shrub steppe habitat location of the proposed the Wymer Dam.

This $5 billion proposal does not include a benefit-cost analysis. New dams do NOT appear to be cost-effective. Rather than build new irrigation dams, Yakima River Basin irrigation districts should carry out water conservation, water marketing and water reallocation measures.

Existing Bureau of Reclamation dams in the basin block salmon and bull trout from upper watershed habitat. Fish passage should be constructed at these dams.

We need fewer dams, not more.

Thank you.

Stan Kaufman
144 Idora Avenue
San Francisco, CA 94127

From: Sierra Club on behalf of Bette Nelson
To: BOR YRBWEP, sha-UCA
Subject: Yakima River Basin Integrated Water Resources Management Plan
Date: Monday, December 19, 2011 3:52:18 PM

Dec 19, 2011

U.S. Bureau of Reclamation

New dams will drown magnificent ancient forests and endangered species habitat at Bumping Lake within the Wenatchee National Forest (nearly 2000 acres), as well as shrub steppe habitat (the Wymer Dam). I oppose these new dams.

Wasteful water practices by the agriculture industry in the Yakima must end. I support water conservation.

90-1 Existing BuRec dams on the Yakima River were built without passage for salmon. I support salmon passage at the BuRec's dams.

The Teanaway River deserves protection from real estate developments, but NOT as mitigation area for destroying ancient forests and endangered species habitat.

This $5 billion proposal lacks a benefit-cost analysis and does not present a range of alternatives. I request that you withdraw the Draft Programmatic Environmental Impact Statement for the Yakima Integrated Water Project.

Sincerely,

Ms. Bette Nelson
1219 SW 126th St Apt 1
Burien, WA 98146-3049
(206) 226-2478

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5	Andrew Whitmont	Angela Anderson	Angela Basta
6	Angela Smith	Anita Matthay	Anne Roda
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8	Ashley Rowe	Barb Siray-Nieto	Barbara Laudan
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10	Becci Boyd	Bert Sacks	Bethany Ionta
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35	Debbie Burton	Debera LaLande	Deborah Admiral
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41	Douglad DeMers	Edward Davis	Edwin Holmes
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43	Elizabeth Caton-Phelps	Elizabeth Hickman	Elizabeth Siler
44	Ellen Dorfman	Ellen Sweetin	Emily Willoughby
45	Eric Iannelli	Eric Ross	Erin Kilpatrick
46	Erin Powell	Ernest Windberg	Eugene Vigil

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55	Helen Sun	Helena Dworakowski	Henry Koepfle
56	Hieu Nguyen	Hilary Tiefer	Howard Lazzarini
57	Howard Zimmerman	Huda Giddens	Ian Lee-Mckinley
58	Ilene Molinder	Imants Slegelis	Inga Rouches
59	Ingrid Erickson	J F Barnes	J Michel
60	Jack Stansfield	Jacqueline Davis	Jacqueline Dern
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62	James Milstead	James Seibert	James Worthington
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79	John Brown	John Dart	John Davis
80	John Flynn	John Gieser	John Hardtla
81	John Mclain	John Meyer	John Olmstad
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84	Joy Kosola	Joy Marley	Joyce Grajczyk
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87	Julie Houff	Julie Laidlaw	K Alexandra
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89	Karen Pelletreau	Karl Jacobs	Karla Zimmerman
90	Katharine D. Clark	Katharine Evans	Kathleen Claire
91	Kathleen Fellbaum	Kathryn Plitt	Kathryn Shield
92	Katrina Firmin	Katrina Midge	Kay Turner

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101	Lawrence Anderson	Laurie Black	Laurie Werbner
102	Lawrence Schuchart	Lee Atwell	Lee Markholt
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133	Peter Smith	Phyllis Bravinder	Piero Sandri
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136	Renee DeMartin	Rey Villegas	Rhene Johns
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189	Cathryn Russell	Chad Stemm	Charlene Butler
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241	Karen Carbonneau	Karen Gower	Karen London
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252	Laurie Geller	Laurrie Thompson	Leann Fox
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254	Linda Ellsworth	Linda Hale	Linda Kaplan
255	Linda Spellman	Linda Stokes	Lisa Pedersen
256	Lisette Terry	Liz Berggren	Lloyd Weller
257	Lora Lehner	Lori Letts	Lorna Emerich
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259	Luther & Martha Franklin	Lyle Anderson	Lynn Ziegler
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261	Margaret Bright	Marguerite Winkel	Mari Oneill
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264	Marsha Beck	Marsha Hulse	Martha Herzog
265	Mary Bandura	Mary Solum	Matt Wallace
266	Matthew Iskra	Maureen Buckley	Maureen Canny
267	Megan Schmall	Melissa Thyoneus	Merlin Hay
268	Michael Bluske	Michael Brandau	Michael Davis
269	Michael Gary	Michael Lab	Michael Mccall
270	Michael Shurgot	Michel Von Sacher Masoch	Michael Winger
271	Michaelene Manion	Michelle Long	Michelle Mcrae
272	Michekke Saffer	Mike Alexander	Mike Conlan
273	Mike Harburg	Mike Macdougall	Millie Magner
274	Mimi Posselt	Mondonna Danesh	Nancy Vandenberg
275	Nancy White	Nando A	Nicole Sherey
276	Nils Bue	Niki Vogt	Nita Hildenbrand

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278	Patricia & Eric Larson	Patricia Kolstad	Patricia Rodgers
279	Paul Demars	Peggy Page	Penny StJohn
280	Peter Guerrero	Peter Kuentzel	Peter Peterson
281	Peter Rimbos	Philip Chanen	Philip Fenner
282	Rand Guthrie	Randall Schwab	Rebecca Roland
283	Rebecca Wolfe, Phd	Rebekah McClain	Rich Mcallister
284	Richard Noll	Richard Overton	Richard Switzer
285	Robert Becker	Robert Chattin	Robert Gross
286	Robert Jaffe	Robert Lockhorn	Robert Murdock
287	Robert Pitman	Robert Ralph	Robert Rolsky
288	Robert Thompson	Robert Young	Robert Zakula
289	Roberta McBride	Robin Gray	Robin Renfroe
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292	Ruth Tiger	Ruth Tooley	Sallie Teutsch
293	Sally Good	Sally Hodson	Salvatore Ricciardi
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295	Sandra Russell	ShirleyKonizeski Sara Murdock	Sarah Dean
296	Sarah McMahon	Sarah Sanford	Scott Hayes
297	Scott McVay	Sean Tatol	Selim Uzuner
298	Shari Johnson	Sharon Ellard	Sharon Vatne
299	Shelby Phillips	Shelle Bowman	Sheri Kenney
300	Sheryl Clough		Shirley Peters
301	Spencer Selander	Stacey Plumley	Stefani Seiber
302	Stephen Bobb	Steve Green	Steve Langford
303	Steven Rubenstein	Steven Weigner	Stuart Fletcher
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305	Susan Kuhn	Susan Mike	Susan Olson
306	Suzanne Hamer	Suzanne Immonen	Suzi Hokonson
307	Synnove Johnson	T Johnston	Tanya Lasuk
308	Tatiana Sanchez	Taylor Jones	Teri Travis
309	Terrance Ryan	Thomas Dorosz	Thomas Hammond
310	Tiffany Comtois-Dion	Timothy Malcham	Tod Braunwart
311	Tom Bellamy	Tom Swoffer	Toni Franklin
312	Tony Girolami	Tony Jones	Tor Dietrichson
313	Tracy Powell	Tracy Vieting	Tran Phung
314	Tricia Larose	Tristan Higgins	Vic Petertil
315	Victoria Goetz	Vilaihak Khamkeo	Vincenzo Fimiani
316	Vivian Kwan	Wendy Cornell	Wendy Courtemanche
317	William McGunagle	William Sapiens	Wonono Rubio
318	Zimya'toms-trend	Amy Priest	Barbara Brown
319	Bart & Lindell Haggin	Beverly Watts	Buzz Marcus
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321	Dale Randall	Danny Dwinell	David Artemison
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340	Monica Dailey	Monica Zucker	Patricia Henderson
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347	Tim Kadrmas	Vicky Matsui	William Wallace
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349	Beth Rockwell	Betty Manning	Brenda Seifert
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393	Thom Peters	Gail Barton	Margaret Anderson
394	Neil Christensen		
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37 Brian Martin
38 Brian B. Miller
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46 Jerry Pitts

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77 Ms. Cheryl Roberts
78 Ms. Karen Ireland
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80 Ms. Francia Stanton
81 Sylvia Font
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83 Richard & Christy Pospahala
84 Dorothey Stanley
85 ECA Geophysics
86 Marilyn Basler
87 Aryia Campbell
88 Gayle Murray
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139 Ms. Christine Wallin
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141 Leigh Williams
142 Yakio L.
143 Mr. William E. Rupel
144 Mr. Robert Maher
145 Mike and Jody Wende
146 Sandra Jean Hollar

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195 David Robinson
196 K. Bustos

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199 J. Cranford
200 Donald W. & Tina T. Daw
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203 Dr. Sanford Gerber
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205 Keith Johnson
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210 Sarah Iannelli
211 Thomas Havey
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213 Ms. Brenda Lewis
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234 G. Benson
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237 Julie Winter
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239 Mr. Lazarus Pertginides
240 Mr. Kenneth M. Miller
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244 Ms. Nadine Beresford
245 Randy Jones
246 J. Vickery

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254 Shelia Krein
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293 Mary A. Yakabi
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296 Nancy Bierbaum

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299 Wanda L. Couchman
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341 Samantha Maykut
342 Chris Maykut
343 Dr. O Lynne Nelson
344 M. Karen Mulcahy
345 Mr. Robert Vance
346 Trudi L. Shannon/Mikel Swayze

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359 Olof Sander
360 Rose Ruth
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363 James Nason
364 Sally Akan
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392 Janyth R. Arvidson
393 Lyle Collins
394 Derek Freeman
395 J. Casey
396 Nicole Truesdell

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397 Jim Downing
398 Lois Maykut
399 T. J. Lee
400 Jeanie Wagerman
401 Roger Chapman

DEPARTMENT OF ECOLOGY

BUREAU OF RECLAMATION HEARING COMMENTS

Re:)
Yakima River Basin Integrated Water)
Resource Management Plan Planning)
Report/Programmatic EIS)
)

COMMENTS FROM THE PUBLIC

Monday, December 5, 2011
1:30 p.m.
801 West Second Street
Cle Elum, Washington

REPORTED BY: JORI L. MOORE, CCR, RPR

Comment Letters T1-T2

DOE - Bureau of Reclamation Public Comments Session 1 12/5/2011

SPEAKERS APPEARING

Mr. Tracy Rooney
Mr. Phil Hess

--o0o--
December 5, 2011
1:30 P.M.
CLE ELUM, WASHINGTON

--o0o--

MR. ROONEY: Tracy Rooney. Can you help me understand why the existing forest service management issues in the upper Teanaway basin are not in sync with the overall enhancement plans water and habitat goals. In other words, what are the specifics that reclassifying the land currently under federal management to a different designation that makes this all work better? There's approximately 20,000 acres that they want to put into wilderness and I don't see how that helps the specific habitat in water plans there. And if snowmobile and bike excursions are a factor, can you provide the incident reports and data to back up this recommendation?

T1-1

As you know, one errant set of snowmobile tracks in the snow can be visible and reported as additional events for weeks at a time.

Also, will there be increased funding to the area given that excursions are likely to become a more bigger and bigger issue with more land and wilderness designation?

--o0o--

MR. HESS: Phil Hess. This is in regard to

T2-1

Comment Letters T1-T2

DOE - Bureau of Reclamation Public Comments Session 1 12/5/2011

the habitat watershed protection and enhancement element, targeted watershed protection and enhancements. And I'm repeating some of the targeted acquisitions here, just to clarify. Number one is 46,000 acres in the middle and Lower Teanaway, 15,000 acres in the Yakima River Canyon, and 10,000 acres in the head waters of the Little Naches, Ahtanum and Manastash creeks. And I think that -- well, I don't think, my main concern is that these acquisitions are presumably private land that would go into public ownership or some form of ownership. That's my concern is taking land that is potentially part of our tax base and putting it in either an NGO or a government agency that would not be part of the tax base. So I think that's a bad idea. I think that we can achieve the goals of maintaining or improving water supply and quality and protect the resources of cold water and cold water habitat without transferring the land from private to public ownership. I think that's doable.

T2-1

Specifically, I'm concerned with the Teanaway River Basin that is now a working forest, private working forest, and I think the 46,000 acres refers to the land ownership of American Forest Land Company, I'm pretty sure that's what that is. And there's no question that we want to preserve that as a forested watershed either in private or government ownership. And I think it can be

done in private ownership with a conservation easement that would preclude development, you know, for a higher and better use, so that would be my preferred choice for the Teanaway. I think as an alternative if it were to go to government ownership and come off the tax base that there be a caveat that specifies that it be maintained as a working forest. In other words, not managed. In other words, it be continued to be managed for all of the values inherent on a forested landscape, including the commodity values. So that's primarily my concern with Teanaway.

The 15,000 acres of non-forest, you know, presumably that's private ranch land. I think that's probably Eaton Ranch primarily. And again, my concern there is that if it were to transfer to government ownership, the commodity aspect will still be preserved and at the same time maintain the habitat values and the water resource values, which I think can be done with management. In other words, I don't think it is necessary to transfer private land to government ownership in order to maintain the habitat values and the overall watershed values. We can do that in private ownership with a conservation easement.

The 10,000 acres in the head waters of the Little Naches and the Manastash, those are primarily Plumb Creek lands, would that transfer to government ownership?

T2-1

And I think my statements regarding the Teanaway applies to those forested acres as well.

T2-1

Now, my comments are going to focus on the wilderness proposed or the idea of additional proposed wilderness in the Bumping and additional proposed wilderness in the Teanaway, Kachess and Lake Cle Elum areas. I do not think we need any more wilderness in the Yakima basin. That is, you know, designated wilderness, that's not necessary. I fail to see how wilderness designation is going to enhance overall the benefits that we're after, you know, habitat and water quality. Wilderness designation doesn't do that in my mind. In fact, it is counterproductive because without management the unintended consequence inevitably is fire. You know, our forest burns. That's just the way it is. And without management the fires are going to be more intense, they are going to be bigger, and the consequence is less habitat value and less water quality values, so an additional wilderness designation is a bad idea.

T2-2

As far as the wild and scenic river designation, I fail to -- okay, I don't have a problem with that because that essentially puts constraints on the river corridor itself, the river itself and the riparian areas. I'm fine with that. The thing is, you know, with these land acquisitions, that's going to cost money. And

T2-3

T2-3

to me it doesn't buy us anything that we don't already have with let's say a conservation easement, so that money that's saved there can go to the other parts of the enhancement project such as additional storage and, you know, all the fish passage and so forth that would be a far bigger bang for our buck than acquiring more land.

Thank you.

(End of Comments.)

Comment Letters T1-T2

DOE - Bureau of Reclamation Public Comments Session 1 12/5/2011

C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF YAKIMA)

This is to certify that I, Jori L. Moore, Certified Court Reporter and Notary Public in and for the State of Washington, reported the within and foregoing deposition; said deposition being taken before me as a Notary Public on the date herein set forth; that the witness was first by me duly sworn; that said examination was taken by me in shorthand and thereafter under my supervision transcribed, and that same is a full, true and correct record of the testimony of said witness, including all questions, answers and objections, if any, of counsel.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of the cause.

IN WITNESS WHEREOF I have set my hand and affixed my seal this day of , 2011.

JORI L. MOORE, RPR,
CCR NO. 1993
Notary Public in and for the State of Washington
My Commission expires on October 9, 2012

DEPARTMENT OF ECOLOGY

BUREAU OF RECLAMATION HEARING COMMENTS

Re:)
Yakima River Basin Integrated Water)
Resource Management Plan Planning)
Report/Programmatic EIS)
)

COMMENTS FROM THE PUBLIC

Wednesday, December 14, 2011
1:30 p.m.
1401 Arboretum Drive
Yakima, Washington

REPORTED BY: JORI L. MOORE, CCR, RPR

Comment Letters T3-T4

DOE - Bureau of Reclamation Public Comments 12/14/2011

SPEAKERS APPEARING

Mr. Ray Foisy
Mr. Scott Miller

--o0o--
December 14, 2011
1:30 P.M.
YAKIMA, WASHINGTON

--o0o--

MR. FOISY: Ray Foisy. I started out as a young child at Bumping Lake. We know for sure that my grandparents fished it in 1926 because we have a picture of it. I have been involved with it for over 70 years. I first started in the the scouts as a scout up there when I was about 10, then became a hike master, worked for the forest service, volunteered for various things and worked at the marina for a year, so I have got to the point where I know Bumping pretty well. But then in 1959 we acquired a cabin at Bumping Lake. And one of the things that I want people to realize is that the cabin owners don't just go up there and do their own thing. They help in many many ways. We have had such things as I have been involved in search and rescue opportunities, first aid and people that have been injured in the area, and searched for downed aircraft, fished and hiked and then became a geologist looking at all the countryside with great envy. And with that 70 years of contact, there's one thing that I want to be sure that people understand and don't ignore because there's a danger involved and that is that at the northwest corner of

T3-1

T3-2

Bumping Lake there is a landslide of fairly decent magnitude. If you were to look at it on Google Earth it is scarey. I have seen the mudslide produced at the delta and over the 70 years it has increased in size considerably. On the trees the mud has been up to 10 feet high during the mudslides. And my question that I want people to really take a close look at is what will happen when you remove the half mile of buffer zone that now exists? If that's removed what kind of an impact will that have on the lake? Obviously, ones that I'm sure have been talked about considerably are the old growth stands that are going to be knocked out, one on Barton Creek and one North Cedar Creek are both beautiful old growth stands and it would be terrible to see those removed.

Our old friend the bull trout is -- we have got reds in both Deep Creek, Upper Bumping and Barton Creek that would be lost.

The other thing that I think has got to be thought of is those of us that have owned cabins, we have owned a cabin since 1959 and for my family to lose the opportunity to go to Bumping Lake and enjoy it, you can't see it from behind a closed gate, you got to be there and enjoy it.

I have just read Justice Douglas' Of Man and Mountain and also Jack Nellis, We Never Got Away,

T3-2

T3-3

T3-4

T3-4

neither of those gentleman in their writings and in their discussion that I have had with them ever said lock that beautiful country up. They said simply show it to people and enjoy it. So please find another way other than saying just throw the cabins out.

--o0o--

MR. MILLER: Well, I guess I have a few concerns. And I'm a relatively new cabin owner there. I own an historic log cabin, it was built in the 1930s. And a couple of my concerns arise from my lot has many old growth trees in it that are two to 400 years old. And with the raising of the lake as planned, it would destroy literally hundreds of old growth trees near -- on and near the lakefront and my lot. And so that's one of my concerns.

T4-1

Another concern -- I'm just going to say it. By raising the lake we're losing a very rare resource of historic cabins near the lake. The cabin area has an outreach of many thousands of people, not just cabin owners, by providing many guests an opportunity to experience the forest as it was.

And then lastly, please consider while the cabins barely make a dot on the map, please think of generations of families and kids and friends learning the secrets of a forest when you review the options for

T4-1

extra water storage in the area.

Just on an economic sense, I'm concerned about the value of my cabin and lot with the uncertainty of the water storage options that are being considered now and the lack of an exact plan for the relocation buyout or whatever of our area and whether they could truly find a placement area for our cabins that would be a like for like type of exchange.

(End of comments.)

C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF YAKIMA)

This is to certify that I, Jori L. Moore, Certified Court Reporter and Notary Public in and for the State of Washington, reported the within and foregoing deposition; said deposition being taken before me as a Notary Public on the date herein set forth; that the witness was first by me duly sworn; that said examination was taken by me in shorthand and thereafter under my supervision transcribed, and that same is a full, true and correct record of the testimony of said witness, including all questions, answers and objections, if any, of counsel.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of the cause.

IN WITNESS WHEREOF I have set my hand and affixed my seal this day of , 2011.

JORI L. MOORE, RPR,
CCR NO. 1993
Notary Public in and for the State of Washington
My Commission expires on October 9, 2012

Comment Responses

Comment Letter No. 1 – Confederated Tribes and Bands of the Yakama Nation, Department of Natural Resources

1-1	Comments noted. The letter from the Yakama Nation Cultural Resources Program is included in this FPEIS as Comment Letter No. 2.
1-2	Reclamation and Ecology acknowledge the water rights of the Yakama Nation. A new Section 1.6.4.2 has been added to the FPEIS describing Tribal water rights. The Integrated Plan was prepared under authority provided by the Act of December 28, 1979 (93 Stat. 1241, Public Law 96-162). Authorizing language contained in any public law authorizing implementation of the Integrated Plan will be developed by Congress.
1-3	The legislation will not define quantities of water supply dedicated to fish because those quantities vary year to year based on fish needs. However, implementation of the Integrated Plan would improve streamflows for fish and aquatic life.
1-4	Comment noted. See the new Sections 1.6.4.2, in the FPEIS. Reclamation and Ecology acknowledge that Tribal Treaty water rights are senior to the water rights referenced in the 1945 Consent Decree as modified and limited by *Ecology v. Acquavella*.
1-5	A new Section 1.6.4.5 has been included in the FPEIS describing the Quackenbush Decision and the creation of the flip flop and SOAC.
1-6	The section on the adjudication process (now Section 1.6.4.6 in the FPEIS) has been revised per your suggestion. Reclamation and Ecology do not dispute that the Yakama Nation has senior water rights.
1-7	The lands component is included in the Habitat/Watershed Protection and Enhancement element. Additional information from the Lands Subcommittee report about the lands component has been added throughout the FPEIS. The Habitat/Watershed Protection and Enhancement element is considered an integral element of the Integrated Plan.
1-8	The change has been made in the FPEIS to both sections that you reference.
1-9	The change has been made in the FPEIS to both sections that you reference.
1-10	The change has been made in the FPEIS to both sections that you reference.
1-11	Comments noted. The bullet you refer to has been removed from the Executive Summary and Section 1.3 of the FPEIS.
1-12	Reclamation and Ecology intend to implement the Integrated Plan using an adaptive approach as described in Section 2.4.10.
1-13	The No Action Alternative description has been revised for clarity and consistency in the Executive Summary and Section 2.3.
1-14	The suggested change has been made in the FPEIS.
1-15	The suggested change has been made in the FPEIS.
1-16	The suggested change has been made in the FPEIS.
1-17	The suggested change has been made in the FPEIS.
1-18	The suggested change has been made in the FPEIS.
1-19	The suggested change has been made in the FPEIS.
1-20	The suggested change has been made in the FPEIS.

1-21	Comment acknowledged. Standard maps were used in the PEIS. A footnote has been added to the reference to Figure 1-1 in the FPEIS acknowledging that the Yakama Nation disagrees with the reservation boundary depicted.
1-22	Comment noted. Information about funding levels for ongoing projects has been added to the FPEIS.
1-23	Comment noted. The Watershed Management Plan is included in the PEIS because it was part of the years of study that led to recognition of the need to develop an Integrated Plan to resolve water supply and habitat issues in the Yakima basin. Information about the Yakama Nation ceasing participation in the plan has been added to Section 1.7.4 of the FPEIS.
1-24	The suggested change has been made in the FPEIS.
1-25	The suggested change has been made in the FPEIS.
1-26	The suggested change has been made in the FPEIS.
1-27	The suggested change has been made in the FPEIS.
1-28	The text in Section 2.4.6 in the FPEIS has been amended to clarify that the estimates are for the ASR program.
1-29	Comment noted. These are the test sites that have currently been identified. The text in Section 2.4.6 has been revised to clarify that other sites might be identified with further study.
1-30	As the Integrated Plan is implemented, the adaptive approach would be developed with elements commonly included in adaptive management programs. The adaptive approach will be further developed as the Integrated Plan moves forward.
1-31	The section has been revised to clarify that 170,000 acre-feet of water savings does not equate to 170,000 acre-feet of new water supply.
1-32	Surface water rights for Tillman and Spex Arth Creeks were not located in the Ecology water rights database. Table 3-4 has been revised for clarification in the FPEIS.
1-33	The suggested change has been made.
1-34	Section 3.3.5.4 has been revised in the FPEIS to include the necessity of meeting the obligations of the Treaty of 1855.
1-35	Per your comment, Buckskin Slough has been added to the list of streams with coho spawning and rearing.
1-36	Table 3-14 has been revised to include updates on fish passage conditions.
1-37	The steelhead numbers have been updated in Section 3.10.1.2.
1-38	The text of the FPEIS has been modified in response to your comment.
1-39	Comment noted. Further evaluation of groundwater movement in the area will be conducted as part of the groundwater recharge pilot studies.
1-40	See the response to Comment 1-29. It is anticipated that a technical committee would guide the development of the aquifer recharge program. The program would be developed in consultation with the Departments of Ecology and Health.
1-41	Table 5-3 has been revised to remove the “No Significant Change” text. The WIP Priority Measures are included in this analysis.
1-42	The table has been corrected.
1-43	Comment noted.
1-44	Section 3.3.4.5 has been revised in the FPEIS to remove the inconsistent language.
1-45	Reclamation and Ecology agree that future modeling and analysis is needed to further

	define the parameters for use of additional storage and conserved water. Additional modeling and analysis will be performed in future study phases when project-level environmental analysis is conducted. Note that the current process of SOAC recommending reservoir releases and streamflow will continue in the future providing an adaptive approach to meet fish needs. Also note that there is additional carryover storage available that was not utilized in the hydrologic modeling.
1-46	Geomorphic effects were not analyzed in this programmatic EIS, but would be addressed in a project-level study.
1-47	The suggested change has been made.
1-48	Food web benefits of fish passage restoration are described in Section 5.9.2.1 as they more directly relate to the Reservoir Fish Passage Element. The phrase "marine derived" was added to this discussion based on your comment. The suggested change regarding protection of dry site, forest fringe has been added to Section 5.9.2.5.
1-49	The suggested change has been made in the FPEIS.
1-50	Comments noted. The FPEIS has been revised to include additional information about the Habitat/Watershed Protection and Enhancement element and the benefits of land acquisition.
1-51	Your comments about the benefits of floodplain connectivity are noted. Information about these benefits has been added to the FPEIS where appropriate.

Comment Letter No. 2 – Confederated Tribes and Bands of the Yakama Nation, Cultural Resources Program

2-1	Comment noted.
2-2	Comment noted. The cultural importance of these areas is acknowledged in Section 3.19.
2-3	Reclamation and Ecology will continue to consult with the Yakama Nation as projects are implemented. The Yakama Nation Cultural Resources Program will be invited to participate in archaeological and cultural resource surveys, including surveys of Traditional Cultural Properties as the projects move forward.

Comment Letter No. 3 – Confederated Tribes of the Umatilla Indian Reservation, Department of Natural Resources

3-1	Reclamation and Ecology acknowledge the rights and interests of the CTUIR in the Yakima River basin. As noted in Section 6.3, Reclamation and Ecology will consult with the CTUIR as projects are carried forward.
3-2	Comment noted.
3-3	Comment noted. As implementation of the plan moves forward, Reclamation and Ecology will consult with the CTUIR.
3-4	The section on water rights adjudication (now Section 1.6.4.6) has been revised to delete the information you cite. Information about Tribal rights to water, including those of the CTUIR, has been added to Section 1.6.4.

3-5	Your comment about Reclamation's Trust Responsibility applying to the CTUIR is noted. Section 3.3.5.3 of the FPEIS discusses Reclamation's specific responsibility to the Yakama Nation in regard to operation of the Yakima Project.
3-6	Comment noted.
3-7	Section 3.19 of the FPEIS has been revised to include reference to the interests of the CTUIR. Please note that references in Section 3.19 to the Yakama Nation managing cultural resources concerns are specific to areas within reservation boundaries, not ceded boundaries.
3-8	Comment noted. The referenced sections of the FPEIS have been revised to include the CTUIR.
3-9	Comment noted. The CTUIR has been added to Section 6.2.6. Section 6.3 acknowledges that Reclamation will consult with the CTUIR.

Comment Letter No. 3A – Environmental Protection Agency

3A-1	Comment noted.
3A-2	Comment noted.
3A-3	Comment noted. See the responses to your detailed comments below.
3A-4	Comment noted. Sections 4.5.2.3 and 5.5.2.3 of the FPEIS acknowledge potential water quality impacts associated with Wymer Dam and expansion of Bumping Lake Reservoir. Additional information about temperature impacts associated with Wymer Dam releases has been added to Section 5.5.2.3. Additional water temperature and water quality analysis would be conducted as part of project-level environmental review.
3A-5	Federal, State, and local requirements for wetland protection and water quality, such as the Clean Water Act Section 404 (Federal) and Section 401 (State) and Executive Order 11990, will be addressed during project-specific environmental analyses of projects that are carried forward.
3A-6	See Response to Common Issues regarding the programmatic EIS. Wetland impacts will be evaluated for specific projects as they are carried forward.
3A-7	Information about these impacts and changes to existing habitats has been added to the FPEIS where appropriate.
3A-8	Additional studies will be conducted as part of project-level review as projects move forward. Depending upon the type of facility and the location, these studies would include things such as seismic analyses, slope stability analyses, etc., as appropriate.
3A-9	Receipt of the EPA rating system is acknowledged.

Comment Letter No. 4 – Washington Department of Fish and Wildlife

4-1	Your comments in support of the Integrated Plan are noted. Responses to your specific comments are provided below.
4-2	Comment noted. Reclamation and Ecology will continue to work closely with the fishery agencies to ensure that basin bull trout populations benefit from implementation of the Integrated Plan.
4-3	Reclamation and Ecology will develop detailed analysis of impacts to the northern spotted owl at Bumping Lake Reservoir if expansion of the reservoir is carried forward. The agencies will consult with WDFW and the Service to determine the appropriate

	level of studies and mitigation with the intent of achieving a net improvement in conditions for spotted owls.
4-4	Comment noted. Impacts to shrub-steppe habitats and species will undergo project-specific analyses as you note. One of the outcomes of the Integrated Plan is expected to be a net improvement in shrub-steppe habitats and species.
4-5	Your comment in support of the Integrated Plan and continued collaboration among stakeholders is noted.

Comment Letter No. 5 – Washington State Department of Transportation

5-1	Comment noted.
5-2	Comment noted. See the responses to your specific comments about WSDOT programs below.
5-3	Comment noted. A goal of the Integrated Plan is to provide a net improvement in conditions for bull trout.
5-4	Reclamation and Ecology are currently coordinating the Keechelus-to-Kachess Pipeline project with WSDOT and will continue to do so.
5-5	Comment noted. Reclamation and Ecology will consult with WSDOT to avoid impacts to I-90 easements and the Easton State Airport.
5-6	Comment noted. A reference to Scenic Byways Planning and Design Standards is included in Section 5.11.2.3 of the FPEIS.
5-7	The need to reinforce piers is discussed in Section 4.18.2.3. The section has been edited to clarify that coordination with WSDOT will be necessary.
5-8	The potential impact has been added to Section 4.18.2.2. The impact will be investigated further during project-level environmental review.
5-9	Reclamation and Ecology will coordinate with WSDOT throughout all projects and environmental analyses and will obtain all necessary permits.
5-10	The referenced letter is attached to this Comment Letter and therefore is part of the record.
5-11	Comments noted. Both Reclamation and Ecology have determined that the Black Rock Reservoir is not a feasible alternative. It is discussed as an alternative eliminated from detailed study in Section 2.5.1 of the FPEIS.

Comment Letter No. 6 – Washington State Department of Transportation

6-1	Reclamation and Ecology will coordinate with WSDOT on all projects that impact State roads. Section 4.18.2.5 has been edited to list the specific roads mentioned in the comment.

Comment Letter No. 7 – Board of Yakima County Commissioners

7-1	See the Response to Common Issues regarding the programmatic EIS. The lack of specificity about environmental impacts is due to the programmatic level of detail for the elements and projects included in the Integrated Plan. As noted in the FPEIS, additional environmental review will be conducted on individual projects as they are

	carried forward. Reclamation and Ecology intend to develop a Framework for Implementation in the summer of 2012 that will provide additional details on plan implementation (see Section 1.2.2 of the FPEIS). Your comments about the ineffectiveness of this PEIS are noted.
7-2	The hydrologic modeling performed maintained the existing reservoir operations rules, added new rules for new or expanded storage reservoirs, and overlaid new releases for instream flow. See the "*Modeling of Reliability and Flows Technical Memorandum*" (Reclamation and Ecology, 2011k) for a detailed description of how water was allocated to instream flow and water supply in the modeling. In addition, the modeling shows the effects of refilling reservoirs. Additional modeling and analysis will be performed in future study phases when project-level EISs are prepared. More detailed rules for use of stored water will also be developed at that time.
7-3	It was assumed for the hydrologic modeling that the same volume of flood storage would be available in the Yakima Project reservoirs as currently exists. The "*Modeling of Reliability and Flows Technical Memorandum*" (Reclamation and Ecology, 2011k) provides information on the effect on flows and reservoir storage for the 1981 to 2005 period. The specific effect on flood flows and levels was not addressed in this PEIS, but would be addressed in a project-level EIS. Any increased flood control benefits from additional storage in the basin are expected to be incidental. There may be opportunities to increase the flood control benefits without impacting other priority obligations. Those opportunities would be analyzed in the more detailed studies to be done prior to implementation of the specific elements in the Integrated Plan. Reclamation's Yakima Field Office currently uses the Yakima Basin flood-control/refill guide curves, written refill guidance, and real time modeling to make flood control decisions and to determine the minimum amount of flood control space to retain in the reservoirs throughout the flood control season. These practices have been developed over time to increase the certainty of refill while providing flood control benefits. These practices would continue in future operations. The refill potential in the basin would not improve assuming the underlying basin hydrology would stay the same. Refill may actually become more difficult with additional total system storage. It is likely that additional incidental flood control benefits would be realized if the total storage in the basin is increased by the Surface Storage Element of the Integrated Plan since the empty storage would be greater in some future years. With greater incidental vacant system storage during the flood season the system could absorb greater volumes of water and potentially provide a greater reduction to flood flows in certain years, depending on specific snowpack, rainfall, and snowmelt rates in a given year.
7-4	Section 5.4.2.4 of the FPEIS has been revised to include the groundwater impacts you identify. The first step in implementation of the Groundwater Storage element would be a pilot study with detailed evaluation of the effectiveness of the recharge project and of the effects on nearby land use. A statement has been added to the FPEIS acknowledging that potential infiltration sites found to adversely impact existing land use would be avoided or identified impacts would be mitigated.
7-5	The suggested changes have been made.

Comment Letter No. 8 – City of Yakima Wastewater Division

8-1	Comment noted.
8-2	It is not expected that any floodplain restoration projects would impact the treatment plant outfall or mixing zone. Projects would be coordinated with the Yakima Wastewater Division to avoid impacts at the project-specific stage of environmental review.
8-3	See the response to Comment 8-2.

Comment Letter No. 9 – Ahtanum Irrigation District

9-1	Comment noted.
9-2	The Pine Hollow Reservoir project was originally considered for inclusion in the Integrated Plan Alternative, but was eliminated from detailed study as described in Section 2.5.2. The reasons it was not carried forward include lack of support by the Yakama Nation and other Ahtanum basin stakeholders and the limited benefits it would provide to the greater Yakima basin.
9-3	The cost of land acquisitions and the impact of transferring land from private ownership to public ownership are important considerations that Reclamation and Ecology have considered in developing the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan. Land acquisition is an important component of ecological restoration and fish habitat enhancement, which are goals of the Integrated Plan. The land acquisition component is not expected to take forest lands entirely out of timber production. As described in Section 2.4.7, economic uses will be maintained on acquired lands where such uses as timber harvest and grazing are consistent with protection of key watershed functions and aquatic habitat. Transfers of land from private ownership to public ownership would eliminate property taxes paid on those lands. However, this lost revenue could be offset by the improved reliability of water supplies in the Yakima Basin. This could increase the value of agricultural land that relies on proratable water rights. These higher land values are expected to increase tax revenue. Increased recreational activity on the acquired lands is also expected to contribute to local economic activity due to tourism and sales of recreational equipment and supplies which may also increase tax revenues (see Section 5.16.2.5 of the FPEIS).
9-4	Your comment in opposition to the Integrated Plan is noted. Additional information about the allocation of project costs will be developed as the projects are carried forward. Preliminary information about the cost allocation of the Integrated Plan will be included in the Framework for Implementation which is expected to be available in Summer 2012.

Comment Letter No. 10 – Kittitas Reclamation District

10-1	Comment noted.
10-2	The suggested change has been made.
10-3	The suggested change has been made.
10-4	The suggested change has been made.
10-5	Table 3-14 has been revised.

Comment Letter No. 11 – American Rivers, Conservation Northwest, National Wildlife Federation, Trout Unlimited, The Wilderness Society

11-1	Comment noted. See the responses to your detailed comments below.
11-2	The Purpose and Need has been revised for clarity. Additional information about the lands acquisition piece of the Habitat/Watershed Protection and Enhancement Element has been added throughout the document. The Purpose and Need statement in Section 1.3 states that habitat and floodplain functions have been degraded by land use practices and that there is a need to restore ecological functions in the Yakima River basin. One of the purposes listed is to "implement a comprehensive program of water resources and habitat improvements…." Additional discussion is provided in Section 1.5.1. These statements identify needs, to which the watershed protection and land acquisition actions respond. Actions to address the needs are covered separately, in Chapter 2. The connection between action and need is clearly stated in a number of places in the description of the targeted watershed protections and enhancements in Section 2.4.7.1.
11-3	See the Response to Common Issues regarding alternatives. As discussed in that response, Reclamation and Ecology have focused on developing alternatives that meet the Purpose and Need for the proposed action; carrying forward alternatives in the FPEIS that would not meet the Purpose and Need would be disingenuous and not consistent with NEPA or SEPA. The option of not including storage projects was demonstrated to not be feasible through the modeling conducted for the Basin Study. An alternative that does not include the lands acquisition piece of the Habitat/Watershed Protection and Enhancement Element also would not meet the Purpose and Need for the proposed action. The Habitat/Watershed Protection and Enhancement Element is needed to protect the future health of the watersheds that influence water resources throughout the basin. A scaled back version of the plan would not provide adequate water for irrigation, municipal and domestic uses, or instream flow improvements, and therefore would not meet the Purpose and Need. These "straw dog" alternatives do not meet the NEPA or SEPA requirements for consideration of reasonable alternatives (40 CFR 1508.02). The Purpose and Need has been developed at an appropriate level for a broad comprehensive program such as the Integrated Plan. Reclamation and Ecology have reviewed the cases cited in your comment letter, and have determined that the cases in question provide valuable background for consideration of reasonable alternatives. Review of the cases did not lead Reclamation and Ecology to alter the Purpose and

	Need or develop additional alternatives for the Integrated Plan. The Integrated Plan is a program and the Federal action that would result from this NEPA evaluation is a request for Federal authorization and funding to implement the Integrated Plan. All projects and programs will be subject to additional project-level review if funding is authorized. Therefore, the alternative included is appropriate.
11-4	Reclamation and Ecology will be developing a "Framework for Implementation" in 2012 that will include information about project costs, cost allocation, and phasing of the elements and projects (see Section 1.2.2 of the FPEIS). See responses to your specific comments below.
11-5	Additional cost information will be provided as part of the Framework for Implementation document. See Section 1.2.2 of the FPEIS).
11-6	The Integrated Plan includes an adaptive approach (Section 2.4.10) that will allow opportunities for modifying individual elements to increase the benefits and diminish the costs. The adaptive approach will include additional, more detailed analyses to determine the most effective projects or designs.
11-7	Implementation of the Integrated Plan will entail clarifying the location, scope, and timing of designation of land as Wilderness or National Recreation Areas and rivers as Wild and Scenic. Environmental and economic analyses to address the issues raised in this comment will be conducted when these details are known and at an appropriate time to inform decisionmaking. The economic benefits of Wilderness designations have been referenced in Section 5.16.2.5.
11-8	Preliminary cost allocations will be provided in the Framework for Implementation document in Summer 2012 see Section 1.2.2 of the FPEIS).
11-9	The Framework for Implementation will include information about the phasing of projects. Reclamation and Ecology intend that the Integrated Plan be implemented as an integrated package with incremental groupings of projects and programs that capture all seven elements of the Integrated Plan. Any phasing of projects would include groups of projects that collectively advance the Integrated Plan elements.
11-10	Reclamation and Ecology are committed to working with the Service, NMFS, and WDFW to assist in protection and recovery of affected species. As stated in Section 6.2.2, Reclamation will conduct ESA consultation as specific projects are moved forward. Information about the Coordination Act Report, which was not available for the DPEIS, has been added as Appendix G to the FPEIS.
11-11	Site specific species and habitat surveys would be conducted for project-level evaluations where appropriate.
11-12	See the response to Comment 11-2.
11-13	See the response to Comment 11-2 about the habitat and watershed protection piece of the Habitat/Watershed Protection and Enhancement Element. Although the Habitat/Watershed Protection Element in the FPEIS includes more details about the proposal, Reclamation and Ecology do not believe that the changes rise to the level of requiring a supplemental EIS. The DPEIS identified all the major elements of the Habitat/Watershed Protection and Enhancement Element that are included in the final proposal for the Targeted Watershed Protections and Enhancements program except for the designation of National Recreation Areas (NRA) and the identification of some Wild and Scenic River designations. Reclamation and Ecology believe that the NRA

	designations would not result in impacts that are significantly different from those identified in the DPEIS. The new Wild and Scenic River designations also would not result in impacts that are different from those identified in the DPEIS. The FPEIS acknowledges throughout the document that these additional designations would result in improved habitat conditions and increased recreational opportunities. Because these additions do not a represent a substantial change in impacts, Reclamation and Ecology will not issue a supplemental EIS. Reclamation and Ecology do not intend to solicit additional public comment on the PEIS. However, both agencies will accept comments on the FPEIS and Reclamation will consider those comments in developing the Record of Decision on the PEIS.
11-14	The suggested change has been made to the FPEIS.
11-15	National Recreation Area designation information has been added to Sections 2.4.7.1 and 3.16.1.1 of the FPEIS.
11-16	Reclamation and Ecology do not intend to solicit additional public comment on the DPEIS. Revised information has been added to the FPEIS discussing proposed actions regarding National Recreation Area designation, as noted in the response to Comment 11-15. However, both agencies will accept comments on the FPEIS and Reclamation will consider those comments in developing the Record of Decision on the PEIS.
11-17	Background information on Wilderness and Wild and Scenic River designations is included in Section 3.16.1.1. Information on National Recreation Areas has been added as noted in Comment 11-15.
11-18	The list of rivers recommended for Wild and Scenic River designations has been updated in Section 2.4.7.1. More detailed information on the benefits of Teanaway River designation has been included in Section 5.7.2.5.
11-19	See the response to Comment 11-2.
11-20	The Kittitas County economic study was not available prior to publication of the FPEIS.
11-21	Information has been added to Section 2.4.10 of the FPEIS describing periodic reviews and that Reclamation and Ecology would jointly review progress of the Integrated Plan. Opportunities for public participation in the formulation and documentation of the Adaptive Approach would be defined at the time when the Adaptive Approach is developed. Further opportunities for public input on future projects will also be provided during project-specific environmental reviews.
11-22	Habitat restoration at Gold Creek is included in the Integrated Plan. The work includes preparing a hydrogeology report, completing restoration design, and then providing two miles of habitat restoration. See the "*Mainstem Floodplain Restoration Technical Memorandum*" (Reclamation and Ecology, 2011t) for additional detail. A specific bridge project for Gold Creek was not identified in the program, but could be considered for funding as the Targeted Watershed Protection and Enhancement Program is further developed.
11-23	The suggested change has been made.
11-24	The materials you have provided as attachments have been considered in developing responses to your comments and have been kept on file by Reclamation; however, due to space requirements, they are not duplicated in this document."

11-25	The socioeconomic evaluation included in the PEIS is consistent with a broad, programmatic evaluation under NEPA. Reclamation will conduct an economic analysis of the Integrated Plan, consistent with the *Principles and Guidelines*, prior to seeking Congressional authorization. The economic analysis will be included in the Framework for Implementation which Reclamation will complete in Summer 2012. The analysis will reflect the interconnectedness of the different elements of the plan, as well as uncertainty about their specific details. Subsequent analysis, consistent with the *Principles and Guidelines*, will be conducted to inform decisionmakers regarding the implementation of individual elements of the plan.
11-26	As described in the response to Comment 11-25, Reclamation will conduct an economic analysis of the Integrated Plan, consistent with the *Principles and Guidelines* as part of the Framework for Implementation. The analysis of an individual element will consider not just the socioeconomic attributes of that element, but also its connections with other elements.
11-27	See the response to Comment 11-25.
11-28	Your comments about the need for an economic analysis of the Integrated Plan as a whole are noted. See the responses to your previous comments. Although there is a draft revision to the *Principles and Guidelines*, it has not been adopted and therefore cannot be used for the economic analysis of the Integrated Plan. The more detailed economic information developed as part of the Framework for Implementation will be considered, along with the FPEIS, by decisionmakers.
11-29	See the response to Comment 11-2 regarding revisions to the Purpose and Need.
11-30	See the response to Comments 11-6 and 11-9 regarding phasing of the Integrated Plan. Reclamation and Ecology intend to implement all the elements of the plan as equal priority elements. Individual projects under the elements may be prioritized and that information will be included in the Framework for Implementation and subject to the adaptive approach (Section 2.4.10).
11-31	While none of the elements of the Integrated Plan are included in the No Action Alternative, Reclamation and Ecology would continue their agency management activities to manage water resources in the Yakima River basin. Ongoing projects and actions related to habitat improvements and water conservation would continue if funding is available. Reclamation's YRBWEP Phase II projects, as well as Reclamation's ongoing improvements to existing facilities, are expected to contribute to improvements in water management and water supply. The habitat enhancement projects included in the No Action Alternative are expected to provide improvements to fish habitat. These ongoing projects would be implemented on a piecemeal (or individual) basis. The overall long-term effect, while beneficial, would provide much lower basin-wide benefits than would result from implementing a comprehensive and integrated plan. While Reclamation and Ecology would continue to explore other opportunities for funding and implementing water resource and habitat improvement projects, no large-scale actions or projects are likely to occur under the No Action Alternative in the absence of the Integrated Plan. None of the reservoir fish passage or water storage projects are approved and funded, and are therefore not included in the No Action Alternative.

11-32	Detailed information on the potential effects of climate change on water quality in the Yakima Basin is not available. Section 5.13.1 of the FPEIS has been revised to clarify climate change impacts under the No Action Alternative.
11-33	The discussion of impacts of the National Recreation Area designation has been expanded in Section 5.15.2.5.
11-34	The Executive Summary and Section 5.16 acknowledge that changes in land use could occur from restoration projects.
11-35	The longstanding reliance on salmon by Native Americans in the project area is noted in Section 3.19.
11-36	The FPEIS has been revised to clarify that any new or expanded storage projects would not impede fish passage.
11-37	See the response to Comment 11-2 regarding revisions to the Purpose and Need.
11-38	Comment noted. Section 1.3 has been revised to reflect the USGS study.
11-39	Comment noted.
11-40	The suggested change has been made.
11-41	The suggested change has been made.
11-42	Comment noted. See the response to Comment 11-10 regarding Endangered Species consultation.
11-43	Comment noted.
11-44	In addition to a benefit cost analysis, the Wapatox consolidation requires the willing participation of the Naches-Selah Irrigation District, the City of Yakima, and Gleed Ditch. Reclamation and Ecology will continue to study this project and will include it in the Integrated Plan, if appropriate.
11-45	Information about the potential removal of Roza Dam has been added to Section 2.4.5.1.
11-46	Section 2.4.7.1 has been revised to list all rivers proposed for Wild and Scenic River designation and to include National Recreation Area designation recommendations.
11-47	Section 5.15.2.5 has been edited for clarity.
11-48	The value of reducing non-consumptive uses could be examined by the Water Conservation Advisory Committee (Section 2.4.8.2 of the FPEIS) as it moves to implement the Municipal and Domestic Conservation Program.
11-49	The suggested change has been made.
11-50	See the Response to Comment 1-44.
11-51	Table 3-5 was updated to include TWSA values from 2006 to 2011
11-52	Section 3.3.5.2 summarizes irrigation diversions. Additional information on water use is available in the "*Water Needs for Out-of-Stream Uses Technical Memorandum*" (Reclamation and Ecology 2011o).
11-53	As stated in Section 5.5.2.1, the introduction of salmon above reservoirs where there is currently no access would have both positive and negative effects on the environment as the decaying fish release nutrients. Within the reservoir environment, the stagnant water may decrease in water quality due to the growth and decay of algae resulting in reduced dissolved oxygen. However, for areas where fish currently have access, the contribution of nutrients from an increase in salmon runs and the effects (both positive and negative) on the environment is difficult to assume at this level of analysis, but expected to be minor. Section 5.8.2.1 has been revised to include information about the benefits of marine-derived nutrients to vegetation.

11-54	Impacts of the watershed lands proposal on terrestrial recreation activities are described in Section 5.15.2.5. Section 3.15 has been edited to reference these activities.
11-55	The text in Section 3.22.2 has been revised to include information from Griffin (2005).
11-56	Information about TWSA is located throughout the document, including Sections 5.3.2 and 5.3.3. Additional details on water use for the Integrated Plan are part of the RiverWare modeling results in Appendix E of the FPEIS and the "*Modeling of Reliability and Flows Technical Memorandum*" (Reclamation and Ecology, 2011k).
11-57	See the response to Comment 11-45.
11-58	The baseline condition for this study is defined as the No Action Alternative as described in Sections 2.3 and 5.7.1. The Integrated Plan assumes that some projects related to the Integrated Plan would be implemented over time by various entities with or without the Integrated Plan, depending upon available funding.
11-59	The Smolt-to-Adult Returns (SAR) used for the adult sockeye population estimates were based on information reported in a NMFS document entitled "*Factors Affecting Sockeye Salmon Returns to the Columbia River in 2008*" (see Table 2 on page 8 of that document). The calculated average SAR was 3.5 percent based on the 1995 to 2006 period of record, and the highest SAR reported within this period was 8.1 percent.
11-60	Comment noted. The language in this section has been revised.
11-61	Section 5.10.2.3 has been edited to clarify that the total inundation area of Wymer Reservoir is approximately 1,400 acres.
11-62	Additional irrigation supply provided by the Integrated Plan would be used to improve water supply for existing irrigators and would not be used to put new land into agricultural production. The FPEIS has been revised to clarify this.
11-63	The suggested change has been made.
11-64	The information you request is outside the scope of this programmatic EIS evaluation and has not been included. Such information would be included in a project-level review when the project is carried forward.
11-65	As described in the response to Comment 11-25, an economic analysis of the Integrated Plan will be completed as part of the Framework for Implementation in Summer 2012. In addition, future analysis of individual elements of the Integrated Plan will consider not just the socioeconomic effects of each element in isolation, but also the interconnectedness among all the elements and the effects that would result from the contributions each element would make to the implementation of the overall plan.

Comment Letter No. 12 – Alpine Lakes Protection Society, Endangered Species Coalition, Kittitas Audubon Society, Federation of Western Outdoor Clubs, The Mazamas, North Cascades Conservation Council, Sierra Club, Western Lands Project, Western Watersheds Project

12-1	Comment noted.
12-2	Reclamation and Ecology convened a Workgroup to help develop a comprehensive water resources plan for the basin. Participants included representatives of the Yakama Nation; Federal, State, county, and city governments, environmental organizations, and irrigation districts. To form the Workgroup, Reclamation and Ecology invited the selected stakeholders to participate and received confirmation letters back from those intending to participate. Two organizations, the Yakima County Farm Bureau and

	Washington Cattlemen's Association, asked to participate as members of the Workgroup, but were denied because they did not represent proratable irrigation districts, the focus of the Integrated Plan irrigation improvements. Section 1203(c)(3) enumerates the duties of the Conservation Advisory Group (CAG) provided for under Title XII. These duties do not include advising Reclamation or Ecology on the development of an integrated water resource plan for the Yakima Basin. Since advising Reclamation or Ecology on the development of such a plan would exceed the scope of the duties assigned to CAG they were not used for that purpose. Instead, the YRPWEP Workgroup, consisting of stakeholders in the Yakima basin was formed to provide recommendations to Reclamation and Ecology on the development of the plan.
12-3	Reclamation has not spent any money specifically on the Workgroup. All Workgroup members volunteer their time to participate on the Workgroup. Ecology paid for renting the meeting room and provided lunch for non-Federal Workgroup members and has expended approximately $10,000 to $15,000 on this to date.
12-4	Reclamation received your letter requesting an extension to the comment period on November 23, 2011 and mailed a response to you on December 5, 2011. As noted in that letter, Reclamation and Ecology were mindful of the holidays and employed a 49-day comment period. Reclamation noted in the letter that the proposed action has been largely unchanged and the EIS process has remained open for public input since the Scoping Summary Report was issued and distributed in August 2011. As a result, they felt the advertised 49-day comment period was reasonable and sufficient for the public and agencies to formulate a meaningful review. The public meetings on the DPEIS were held in locations determined to provide the majority of people living in the Yakima basin who will be directly affected by the Integrated Plan with easy access to the meetings. In recognition that the public interest in the Integrated Plan extends beyond the boundaries of the Yakima basin, a variety of opportunities were provided for commenting on the DPEIS.
12-5	Subcommittees meetings were typically announced at the public Workgroup meetings and were open to the public. Subcommittee meetings generally focused on specific topics such as out-of-stream water needs, instream flow needs, habitat, and modeling. The Economics Effects Workshop held on December 12, 2010 was open to the public. All Subcommittee meetings are listed at the following website: including, agenda, meeting notes and handouts: http://www.usbr.gov/pn/programs/yrbwep/2010workgroup/meetings/index.html
12-6	The Columbia River Pump Exchange has always been included in the Integrated Plan as a study. During development of the Integrated Plan it was determined that there was no reasonable certainty that such a pump exchange was environmentally or economically feasible or needed at this time. See Section 2.5.1 of the FPEIS. The study is intended to define potential future conditions that that may warrant acceptance and need of a pump exchange or to conclude that a pump exchange has no potential future viability. As described in Section 2.4.5.4 of the FPEIS, if a pump exchange project is determined to be viable and needed at some future time, it would require congressional authorization, environmental analyses, and design prior to construction.

12-7	The FPEIS includes a general description and analysis of the targeted watershed protections and enhancement program. Additional information and analysis has been added to the FPEIS based on the Watershed Lands Subcommittee proposal which was adopted by the Workgroup on December 14, 2011. It is not uncommon to add more detailed information about a project to a final EIS if that information becomes available after issuance of the draft EIS. The proposal adopted by the Workgroup does not differ significantly from the proposal included in the DPEIS. The decision to include additional information was made by Reclamation and Ecology as lead agencies under NEPA and SEPA, respectively.
12-8	Your comments in opposition to new storage projects are noted.
12-9	Comment noted. See the Response to Common Issues regarding Bumping Lake Reservoir expansion.
12-10	See Section 1.6.1 of the FPEIS for a list of the types of crops grown in the Yakima basin. Few of the crops grown are surplus crops. Timothy hay is a primary crop grown in the Kittitas Irrigation District.
12-11	See Section 1.7.2.1 regarding the amount of water conserved under YRBWEP Phase II. Yakima Project irrigation districts have completed a variety of water conservation projects, including lining and piping distribution systems, canal automation, converting irrigation methods from flood or rill methods to sprinkler methods, reregulation reservoirs, and various other projects. The PEIS and supporting documents provide an analysis of water use and cropping patterns. See Section 3.3.5.2 and the Yakima River Basin Study "*Water Needs for Out-of-Stream Uses*" (Reclamation and Ecology 2011o). Operating and maintenance costs for irrigators within irrigation districts vary by individual irrigation districts. Electricity cost to individual irrigators and repayment of projects costs are outside the scope of this PEIS and was not provided. All vineyards in the Yakima River Basin rely on surface or groundwater irrigation.
12-12	The contribution to runoff from clear cuts in the Yakima River basin is outside the scope of this programmatic EIS and halting timber harvest is outside the authority of Reclamation or Ecology.
12-13	Comments noted. See the responses to your specific comments below. Refer to the Response to Common Issues regarding alternatives for a discussion of reasonable alternatives.
12-14	Information on all conservation measures performed in the Yakima River basin is not available. However, diversions of Yakima Project water users were analyzed in the Yakima River Basin Study "*Water Needs for Out-of-Stream Uses*" (Reclamation and Ecology 2011o) and summarized in Section 3.3.5.2 of the FPEIS. In general, the diversion rates for irrigation districts substantially decreased between 1979 and 2009; these decreases are mostly due to implementation of water conservation measures. Information on water conserved under YRBWEP Phase II has been added to Section 1.7.2.1.
12-15	The word "unimpeded" has been deleted from Section 2.4.3.
12-16	The 2006 Settlement Agreement between the Yakama Nation and Reclamation obligates Reclamation to evaluate fish passage at its major storage dams. It does not obligate Reclamation to construct fish passage facilities, nor is any funding provided for constructing fish passage facilities. The Fish Passage Element is included in the Integrated Plan in order to obtain authorization and funding for designing and

	constructing fish passage facilities. An EIS has been completed on the Cle Elum Dam Fish Passage Facilities and Fish Reintroduction project; however, Reclamation has no funding for constructing the facilities. Since there is no funding for the fish passage projects, they do not meet the criteria for projects included in the No Action Alternative (Section 2.3) and are included in the Integrated Plan as a means to move the projects forward.
12-17	Information on fish passage facilities at Cle Elum Dam is described in Section 2.4.3.1. Additional information can be found in the Final EIS on the Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project located on Reclamation's web site at http://www.usbr.gov/pn/programs/eis/cle-elum/final/feis-cle-elum042011.pdf. However, due to lack of funding, final design is not yet complete. Providing detailed information about expected benefits to anadromous and resident fish is outside the scope of this PEIS and is not provided; however, these evaluations are described in general terms. Under current conditions, salmon and steelhead are able to migrate through the lower Yakima River up into the middle and upper parts of the basin. These fish would benefit from restored access to headwater streams above the existing reservoirs. Spring Chinook, fall Chinook, coho and steelhead upstream adult migration is not significantly inhibited by lower Yakima River conditions. For summer Chinook and sockeye, pockets of cool water in the lower river can provide refugia, which along with reduced nighttime water temperatures, allow migration through the lower river. The combined elements of the Integrated Plan are expected to improve migration conditions for adult salmon, which would then benefit from the reservoir fish passage facilities. Return flows from the Groundwater Storage Element would also result in cooler refugia water and additional flow in summer months in the lower river that would further improve conditions. Additional storage would provide increased flexibility to manage water to meet fisheries objectives throughout the river system, and could include the lower Yakima River if fisheries managers in coordination with Reclamation identify additional flow improvements for this area beyond the existing Title XII flow targets already in place (see Section 3.3.5.4). Increased storage, including additional carryover storage, provides flexibility to release flows to improve migration and rearing conditions in the lower Yakima, if desired. Additional flow analysis and refinement of management objectives is expected during Integrated Plan implementation.
12-18	As stated in Section 2.4.3, fish passage facilities have not been designed for any dam except for the appraisal level design for Cle Elum Dam. Therefore, it is not possible to provide information on the location or design of the facilities for Bumping Lake Dam or other proposed fish passage projects. See the response to Comment 12-17 regarding benefits to fish species.
12-19	Neither the costs of installing fish passage facilities at the existing Bumping Lake Dam nor the costs of building a new dam are known at this time. Providing fish passage facilities at the existing dam would allow fish to access headwater areas, but would not provide increased water storage to benefit agricultural water supply or instream flows, and therefore would not meet the Purpose and Need of the project. Removing Bumping Lake Dam would provide benefits to fish; however, the reservoir is needed to meet

	Reclamation's contract obligations to irrigators. Therefore, removal of the dam was not considered in the Integrated Plan.
12-20	Reclamation has not received funding for evaluating fish passage at Tieton, Keechelus, or Kachess Dams. The projects are included in the Integrated Plan as a means of moving the projects forward. See the response to Comment 12-16 regarding the 2006 Settlement Agreement.
12-21	Fish passage facilities at Clear Lake Dam have not yet been designed; therefore, it is not possible to provide detailed information at this time. Section 2.4.3.4 has been revised to clarify how upstream and downstream passage would be provided**.** Sections 5.7.2.1 and 5.10.2.1 of the FPEIS contain information about fish, including bull trout, which would benefit from improved passage at Clear Lake Dam. The Integrated Plan would provide improve instream flows in the Naches River (see Section 5.3 of the FPEIS). See the response to Comment 12-17 regarding the effect of low flows in the lower river on fish passage. Fish passage facilities at Clear Lake Dam are intended to improve passage between Rimrock Reservoir and Clear Lake. Even if fish passage facilities were not built at Tieton Dam, resident fish, including bull trout, would benefit from passage into Clear Lake. However, it is intended that passage at Clear Lake Dam would be built in conjunction with fish passage facilities at Tieton Dam, benefitting anadromous fish, as well as resident fish.
12-22	The Cle Elum Pool Raise project is included in the Structural and Operational Changes Element because it involves modification to an existing dam. It is not included in the No Action Alternative because the project is not sufficiently authorized and there is no funding for the project. Adverse environmental impacts of the project are discussed at a programmatic level in Sections 4.16.2.2 and 5.16.2.2 (land and shoreline use), 4.8.2.2 and 5.8.2.2 (vegetation), 4.7.2.2 and 5.7.2.2 (fish forage habitat) and 4.9.2.2 and 5.9.2.2 (wildlife). The duration of inundation is discussed in Section 5.9.2.2. Impacts to inundated forest/vegetation are discussed in Section 5.8.2.2. The Cle Elum Pool Raise is one of several projects that were not evaluated in the Ecology Integrated Water Resource Management Plan Alternative, but are included in the Integrated Plan and are analyzed in FPEIS based on additional evaluation by Reclamation and Ecology.
12-23	Any transfers of conserved water would be conducted in accordance with Ecology statutory and regulatory authority or *Acquavella* Court transfer procedures. The KRD water right would not change. However, water rights in the Yakima Project area have been adjudicated by the *Acquavella* Court, not by the 1945 Consent Decree. Water captured by the re-regulating reservoir may be exchanged with other users to enhance flows. Refer to Section 1.6.4.2 for a discussion of the 1945 Consent Decree and Section 1.6.4.3 for a discussion of water right adjudication.
12-24	Reclamation and Ecology are coordinating with WSDOT to time the installation of the pipeline with the Interstate 90 construction project should the Integrated Plan move forward.
12-25	Mitigation for power subordination is described in Section 5.6.4.
12-26	See the response to Comment 11-44 regarding the Wapatox Canal Improvements.

	Several of the elements of the Integrated Plan are dependent on voluntary participation, including Enhanced Conservation, the land acquisition component, and some habitat enhancement projects of the Habitat/Watershed Protection and Enhancement Element. Modeling of the benefits of the agricultural conservation program included assumptions that the estimated amount of conservation would be achieved from willing participants and the program includes flexibility about which projects would be included to achieve that amount of conservation. Both the agricultural and municipal and domestic conservation programs include incentives to encourage voluntary participation. For the land acquisition component of the Habitat/Watershed Protection and Enhancement Element, property would only be acquired from willing sellers. The proposal for land acquisition includes several options for property acquisition should one owner not be willing to sell. Some of the mainstem and tributary fish enhancement projects might be dependent on the willingness of property owners to participate, but the program includes several options for enhancement locations if one owner is not willing to participate.
12-27	See the Response to Common Issues regarding alternatives.
12-28	Current evaluations have been based on generalized existing information. Additional studies will be conducted as part of project-level review as projects are authorized to move forward. Detailed seismic analyses would be conducted for any proposed storage facility.
12-29	Design data and project scheduling are currently not sufficient to quantify greenhouse gas emissions from any of the project sites or to quantify the carbon footprint of projects. Ecology's carbon dioxide emission guidance level of 25,000 metric tons is an annual threshold. Annual carbon dioxide emissions associated with operation of the Integrated Plan are expected to be less than this level based on existing generalized information. Annual carbon dioxide emissions associated with construction of the Integrated Plan facilities could exceed the 25,000 metric tons per year level, but this would depend upon the schedule for construction. As stated in Chapter 2 of the FPEIS, Reclamation and Ecology anticipate that the Integrated Plan would be implemented over a period of time ranging from two to 20 years. A more rapid construction schedule would make exceedance of Ecology's guidance level more likely as multiple projects could be under construction simultaneously. A slower construction schedule would make exceedance less likely. Future project-level NEPA and SEPA analysis will analyze greenhouse gases and identify the "carbon footprint" associated with the construction or modification of individual storage projects.
12-30	Impacts of surface water storage on water quality are described in Section 4.5.2.3. Determination of the specific amounts of contaminants associated with new storage facilities is outside the scope of this programmatic EIS evaluation and has not been included. More specific studies will be undertaken during project-level evaluations. Mitigation for construction impacts is discussed in Section 4.5.3.
12-31	The latest 303(d) listings (dated 2008) were used. A proposed 2010 303(d) list is not yet approved by the EPA and only covers marine waters. A new freshwater 303(d) list is currently under development and will be reviewed relative to the Integrated Plan when it is available.
12-32	The questions you ask about water quality are outside the scope of the PEIS and have not been evaluated in detail. General, summary-level water quality information has been included for this programmatic evaluation. For information about water quality

	improvements and TMDLs, contact Ecology's Water Quality Program. Contact information can be found at http://www.ecy.wa.gov/programs/wq/overview.html#contacts. It is unknown whether reducing irrigated agriculture would result in improved water quality in the basin; however, reducing irrigated agriculture is outside the authority of Reclamation and Ecology who are obligated to meet contract and water rights obligations. Construction of reservoirs will meet all Federal and State requirements for water quality as stated in Section 4.28 of the FPEIS.
12-33	Specific methods for meeting anti-degradation provisions will be addressed as part of project-specific environmental analyses conducted for individual reservoir projects. Reclamation and Ecology are committed to meeting all applicable water quality provisions for all projects undertaken.
12-34	Federal, State, and local requirements for wetland protection, such as the Clean Water Act Section 404 Federal), Section 401 (state), and Executive Order 11990 will be addressed during site-specific environmental analyses of projects that are carried forward. This will include avoidance and minimization of direct and indirect impacts to wetlands followed by mitigation for unavoidable impacts. Wetland and riparian restoration is proposed as part of the Habitat/Watershed Protection and Enhancement Element.
12-35	It is not anticipated that any reservoir dredging would be required. Clearing and grading would be required for construction.
12-36	As described in Section 3.1 of the FPEIS, information is provided at a planning level of detail consistent with a programmatic analysis of potential effects. Impacts to fish and their habitat associated with construction are expected to be minimal, temporary, and short-term in duration. Mitigation measures identified in Section 4.7.3 would be implemented in any future action to minimize impacts to fish and their associated habitats. Specifically, best management practices (BMPs) will be employed to minimize effects related to erosion and water quality. Agency prescribed fish work windows will be followed to minimize disturbance sensitive life stages of salmon. More specific BMPs and mitigation measures would be identified during ESA consultation for each individual project.
12-37	Section 6.2.2 states that Reclamation will not carry out Endangered Species Act Section 7 consultation on the Integrated Plan at this time; however, the section also states that Reclamation will conduct Section 7 consultation on individual projects as they are carried forward. The US Fish and Wildlife Service (Service) and NMFS have approved this strategy (see Appendix G of the FPEIS). The majority of project elements will require Section 7 consultation under the ESA and review under the Magnuson Stevens Act. Reclamation has been consulting with the Services under the Fish and Wildlife Coordination Act (see Appendix F of the FPEIS). The *Final Coordination Act Report* (CAR) has been completed and is available at http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

	The CAR evaluates impacts associated with implementing elements of the Integrated Plan at the programmatic level. It provides an assessment of the potential effects of project actions on threatened and endangered species in the affected areas. Recommendations and conservation measures are made under the ESA and other relevant regulations.
12-38	Future studies would include a more detailed assessment of environmental impacts that would likely result from specific projects or activities. This information would include species and habitat information and the potential short-term and long-term effects (both positive and negative) resulting from the proposed project or activity. All existing and available information related to the proposed projects would be used to inform the analysis. In some cases, it may be appropriate for additional data to be generated specific to the project, such as field surveys within the determined study area. All information would be made available to the public. Section 5.7 discusses the benefits that fish passage would provide to anadromous fish by restoring food web interactions between invertebrates, fish, and mammals. To date, predator-prey interaction studies have not been prepared. More specific information on potential effects would be described in future project-specific environmental documentation.
12-39	Mitigation for listed fish and wildlife species will be associated with conservation measures identified during future ESA consultation for specific projects. Critical habitat areas and endangered species recovery plans are identified and described in Section 3.10 for applicable species.
12-40	Providing the requested level of detail about fish and wildlife movement corridors is beyond the scope of a programmatic EIS. As noted, general information is provided in Section 3.9.2.5. More detailed information will be developed when project-level environmental analysis conducted.
12-41	Project specific impacts, including potential fragmentation of habitat, will be examined during project-specific analysis.
12-42	The Service recently released a revised recovery plan for the northern spotted owl that no longer includes the critical habitat designations established by the 2008 plan. Critical habitat designations are expected to be updated by the Service by November 2012 (see Section 3.10.1.8 of the FPEIS for additional details or the Service website available at http://www.fws.gov/oregonfwo/Species/Data/NorthernSpottedOwl/Recovery/). The PEIS acknowledges that there would be impacts to northern spotted owl. Mitigation measures will be developed during project-specific design and implementation.
12-43	Impacts to Pacific lamprey would be similar to bull trout and Middle Columbia River steelhead discussed in Sections 4.10.2 and Sections 5.10.2. The overall impact of the Integrated Plan is expected to be positive for listed species and species of concern because of the removal of passage barriers and increased and restored habitat.
12-44	The placement of infrastructure, construction activity, and noise has the potential to affect the activities of migratory birds. No new field studies were undertaken for this FPEIS due to the programmatic level of detail for the elements and projects included in the Integrated Plan. See also Response to Common Issues regarding the programmatic EIS.
12-45	No site-specific noise analysis has been conducted for this programmatic EIS. Impact

	discussions have been based on available information, but the potential for impacts is acknowledged. Appropriate analysis of noise impacts would be conducted as part of project-level environmental analysis when the projects are carried forward.
12-46	Hazardous materials are discussed throughout Sections 4.5 and 5.5. Determination of specific quantities is outside the scope of this programmatic EIS evaluation and has not been included. Mitigation is discussed in Sections 4.5.3 and 5.5.4.
12-47	No changes to State and Federal land use laws and policies are anticipated. Plans and shoreline permits are discussed in Section 5.16.
12-48	Impacts to Bumping Lake cabins are discussed in Section 5.15.2.3. As described in that section and in Section 5.15.4, Reclamation would coordinated with the USFS to determine appropriate mitigation.
12-49	The land use impacts of Wymer Dam are discussed in Section 5.16.2.3.
12-50	See the response to Comment 12-34. It is anticipated that many of the projects proposed under the Integrated Plan would require Section 404 permits. Specific permit requirements will be determined when projects are carried forward.
12-51	Specific mitigation measures for visual quality impacts would be developed as part of the future project-level reviews. In most cases, areas disturbed by construction would be restored by planting with native plant species appropriate for the site.
12-52	Mitigation of recreational impacts from Bumping Lake Reservoir Enlargement is discussed in Sections 5.15.2.3 and 5.15.4.
12-53	Impacts to transportation are discussed in Section 5.18 based on existing information. Detailed transportation evaluations are outside the scope of this programmatic EIS evaluation and have not been included. The potential for construction-related impacts to transportation is acknowledged in the FPEIS.
12-54	The information you request is outside the scope of this programmatic EIS evaluation and has not been included. Impacts will be assessed as part of project-specific evaluations. Impacts have been described in general terms.
12-55	Evaluations were based on existing information. The information you request is outside the scope of this programmatic EIS evaluation and has not been included. Information on the cultural resources analysis carried out to date and planned for the future is included in Sections 4.19 and 5.19. Section 6.3 describes the future Tribal consultation process, including compliance with Section 106 of the NHPA.
12-56	Section 5.22 assesses the long-term socioeconomic impacts and mitigation measures of the Integrated Plan, i.e., impacts after the economy has adjusted to the initial impacts of implementation actions. The timing of the adjustment will depend on the timing and other details of the different actions, individually and in combination. Future analysis of the socioeconomic effects of individual actions will describe the timing and other characteristics of the economy's expected response. A 100-year time frame was used for the Integrated Plan, including the economic analysis.
12-57	See Section 6.3 of the FPEIS regarding tribal consultation. Reclamation will conduct all required and appropriate consultation when projects are carried forward.
12-58	Local service providers have been notified of the DPEIS publication, and their comments have been solicited. Additional consultation with service providers would be included in future project-level analyses as appropriate.
12-59	Additional studies will be conducted as part of project-level review, including geotechnical analyses.

12-60	The information requested is outside the scope of this programmatic EIS evaluation and has not been included.
12-61	A limited amount of drilling has been conducted for both Bumping Lake, as part of the original construction, and for the proposed Wymer Dam site. Additional geotechnical explorations and studies would be conducted as part of the project-level review for those facilities.
12-62	The greater sage-grouse population in the Wymer Reservoir area is described in Section 3.10.1.9.
12-63	The potential for shoreline erosion within Wymer Reservoir was identified in Section 5.2.2.3 of the FPEIS, but has not been studied in detail. More detailed analyses would be performed as part of a project-level review.
12-64	Any transfers to instream flow purposes would be conducted in accordance with Ecology's statutory and regulatory authority or *Acquavella* Court transfer procedures without injury to water rights as confirmed in *Acquavella*, entitlements or Treaty trust obligations. However, transfers of water rights may not be necessary to enhance instream flows. Enhancing instream flows would not affect irrigation district entitlements or TWSA. New storage reservoirs would hold flows that might be lost to the system and add operational flexibility to enhance flows during favorable periods for fish and more beneficial district irrigation delivery. See the response to Comment 12-23 regarding the *1945 Consent Decree*.
12-65	Lake evaporation rates were obtained from the 1979 Bumping Lake EIS and from the Western Regional Climate Center: (http://www.wrcc.dri.edu/narratives/WASHINGTON.htm). Using evaporation rates of 24 inches per year at Bumping Lake and 42 inches per year at Wymer Reservoir, the estimated annual evaporation rates are 6,400 acre-feet for an enlarged Bumping Lake and 4,700 acre-feet for Wymer Reservoir. Evaporation from the reservoirs was accounted for in the hydrologic modeling.
12-66	According to RiverWare modeling provided in Appendix E of the FPEIS and more completely described in the "*Modeling of Reliability and Flows Technical Memorandum"* (Reclamation and Ecology, 2011k), the enlarged Bumping Lake Reservoir filled from approximately a low of 47,000 acre-feet storage at the end of water year 1994 to completely full in the spring of 1996. Wymer Reservoir filled from a low of 900 acre-feet storage at the end of water year 1994 to completely full in the summer of 1996.
12-67	The Kachess Reservoir inactive storage project is not expected to conflict with fish passage improvements and habitat enhancements that could be implemented above the reservoir. As discussed in the Basin Study and in Section 2.4.3.3 of the FPEIS, identifying upstream and downstream fish passage improvements at Kachess Dam will be subject to further evaluation of alternatives and then development of detailed design to determine the most feasible approach. This evaluation and approach will consider how the project would integrate with inactive storage facilities and operations. When and how inactive storage would be accessed will also require additional analysis and design to determine the most feasible approach. Potential short-term impacts are described in Section 4.10.2.3 of the FPEIS.

	General habitat enhancement actions have been identified for streams above reservoirs and the mouth of streams into reservoirs. Any proposed habitat enhancements for Box Canyon Creek would include a consideration of potential impacts from inactive storage operations on Lake Kachess. As discussed in the Section 5.7.2.3 of the FPEIS, passage from the reservoir into tributaries would be lost during drought years; passage would likely be improved during nondrought operating elevations. Regarding Box Canyon Creek impacts, both the Basin Study and Section 5.7.2.5 of the FPEIS state that the Integrated Plan would result in adverse impacts in the absence of commensurate mitigation. In Section 2.4.5.2 of the FPEIS, this commensurate mitigation is assumed to be part of the inactive storage project improvements. Specific mitigation measures to address fish passage will be identified in the future as part of project-specific analyses.
12-68	See the response to Comment 12-6 regarding the Columbia River Pump Exchange study. There are currently no proposed storage sites for water pumped from the Columbia River. Some locations were discussed during Workgroup meetings, but no feasibility studies have been conducted on them. See Section 2.5.1 regarding the elimination of Black Rock reservoir from further consideration. If the Columbia River Pump Exchange study is undertaken, it would identify all legal and biological constraints to interbasin transfers as described in Section 2.4.5.4 of the PEIS. Section 5.25 describes the cumulative impacts of other water withdrawal proposals from the Columbia River.
12-69	See the response to Comment 12-64 regarding transfers of water to instream flows. The same process would apply to water stored in aquifers.
12-70	Information about the Habitat/ Watershed Protection and Element has been added to the FPEIS as described in the response to Comment 12-7.
12-71	Information on management of acquired lands is included in Section 2.4.7.1. Impacts on fish and wildlife are included in Sections 5.7.2.5, 5.9.2.5, and 5.10.2.5. Some of the information you request is outside the scope of this programmatic EIS evaluation and has not been included. Such information will be provided as part of project-specific review.
12-72	See the response to Comment 12-71.
12-73	See the response to Comment 12-71.
12-74	See response to Comment 12-71.
12-75	Reclamation and Ecology have identified a number of potential alternative sites that could meet the land acquisition goals. However, since the acquisition process is in its preliminary stages and property owners have not been contacted, the locations are not being released at this time.
12-76	No National Forest roadless areas would be inundated by expansion of Bumping Lake Reservoir. The Roadless Area Conservation Rule became effective in 2001. No Reclamation reservoirs have been constructed since that time; therefore, no roadless areas have been inundated. Because no roadless areas would be inundated under the Integrated Plan, no mitigation would be required.
12-77	The detailed information requested on the acreage of roadless areas in the areas recommended for wilderness designation is outside the scope of this programmatic EIS

	evaluation and has not been included. Designation of existing roadless areas as wilderness would assign permanent protection to the areas that have been temporarily protected by the roadless area designation. These designations are not inconsistent. The proposed designation of land in the upper reaches of the Manastash and Taneum Creeks would be on land managed by the USFS.
12-78	There are no known proposals to construct dams on the American, Upper Cle Elum, or Waptus Rivers. Wild and Scenic River designation provides protections to rivers other than prohibiting dams, including protection of a river corridor.
12-79	The information you request is outside the scope of this programmatic EIS evaluation and has not been included.
12-80	See the response to Common Issues regarding conservation. Additional details on the Enhanced Water Conservation Element are available in the "*Municipal and Domestic Water Conservation Technical Memorandum*" (Reclamation and Ecology, 2011l) and the "*Agricultural Water Conservation Technical Memorandum*" (Reclamation and Ecology, 2011r). Additional details on water use are available in the "*Water Needs for Out-of-Stream Uses Technical Memorandum*" (Reclamation and Ecology, 2011o).
12-81	Central Valley Project Improvement Act criteria do not apply to the Yakima River basin irrigation district water conservation plans. The appropriate criteria which are specified in Title XII and Reclamation Directive and Standards have been applied.
12-82	See the response to Comment 12-14. In addition to conservation measures completed under YRBWEP, 260,000 acre-feet of water has remained in a 7.4 mile reach of the Naches River due to Reclamation's purchase of power water rights previously used in the Wapatox Powerplant.
12-83	See the Response to Common Issues regarding conservation.
12-84	Groundwater pumping increased from about 12,000 acre-feet per year for rural domestic and group domestic water use to approximately 20,000 acre-feet per year by 2000. This is an average rate of increase equal to 200 acre-feet per year and is the amount that would be conserved if the new uses were not allowed access to groundwater through reliance on the groundwater permit exemption (USGS, 2009).
12-85	Although some market reallocation is occurring under current Washington water law, there are several institutional impediments to an active water market. The Market Reallocation Element proposes revisions to Washington water law to reduce those impediments and encourage additional market transactions. The existing legal and institutional barriers to market reallocation are described in the 2009 Ecology EIS on the Integrated Water Resource Management Alternative and in the "*Market-based Reallocation of Water Technical Memorandum*" (Reclamation and Ecology, 2011j). No estimate has been made of the current water savings that could occur under existing water law; however, impediments to market transactions have been identified. Ecology would be the responsible agency for market reallocation. See the "*Market-based Reallocation of Water Technical Memorandum*" for addition details on the material presented at the November 19, 2010 meeting.
12-86	See the response to Comment 12-85 regarding information on the amount of water transfers that could occur.
12-87	The calculation of the percentage of proratable delivery has not been made because there are legal barriers to providing equal water deliveries to all irrigation districts.
12-88	Table 3-5 was updated in the FPEIS to include TWSA from 2006-2011.

12-89	See the response to Comment 11-21.
12-90	See the response to Comment 12-2.
12-91	There can be no reallocation of water rights confirmed by the *Acquavella* Court without satisfying State or Court transfer proceedings. However, transfers can include transfers of rights to an instream purpose by the holder of that right. Additionally, the *Acquavella* Court has ruled that the *1945 Consent Decree* is circumscribed by the Yakama Nation's Treaty fish and irrigation rights.
12-92	The formation of the Workgroup is not a consideration under NEPA. Reclamation and Ecology prepared this FPEIS independently from the Workgroup.
12-93	The Executive Committee is made up of representatives from Ecology, Yakima County, the Yakama Nation, NMFS, Reclamation, and Roza Irrigation District. Meetings were typically held the Monday following Workgroup meetings from July 2009 through March 2011. The Implementation Subcommittee is made up of representatives from Ecology, Yakima County, the Yakama Nation, Roza Irrigation District, and American Rivers. Meetings were held on April 27, June 22, July 13, August 31, October 10, and December 1, 2011 and January 9, 2012. Minutes were not taken at meetings for either committee.
12-94	Reclamation and Ecology have reviewed the decision and do not think that the case, which dealt with an interstate water compact, relates to the Yakima basin.
12-95	See the Response to Common Issues regarding alternatives.
12-96	The organizations listed are on Reclamation and Ecology's mailing list and will receive a copy of the FPEIS.

Comment Letter No. 13 – Wise Use Movement

13-1	Your comments in opposition to new storage dams are noted. The articles you reference are included in your comment letter in the FPEIS and as such are part of the record.
13-2	Responses to your detailed comments are provided below. Because this is a joint NEPA/SEPA document, the responses to comments have been developed jointly. Separate responses will not be provided by the two agencies. It should be noted that the EIS being discussed is a programmatic EIS, with the intention of providing a comprehensive understanding of the impacts of implementing the Integrated Plan. It is also intended to be readable and reasonably concise. As such, many of your comments request a detailed response that is beyond the scope of a programmatic EIS.
13-3	The description of the No Action Alternative has been revised for clarity and consistency in the Executive Summary and Section 2.3. As described in Section 2.3, Reclamation and Ecology would continue management activities and ongoing projects to address water resources in the Yakima River basin. These projects would be implemented on a piecemeal (or individual) basis without the benefit of dedicated funding for a comprehensive and integrated approach. The overall long-term effects of the No Action Alternative, while beneficial, would provide much lower basin-wide benefits than would result from implementing the Integrated Plan. The No Action Alternative is expected to result in substantially less benefit to ESA listed fish species than under the Integrated Plan. While some actions to improve habitat would occur under the No Action Alternative, Reclamation and Ecology would not have funding to expand existing programs or implement the measures in the Integrated Plan.

13-4	See the Response to Common Issues regarding alternatives.
13-5	Because groundwater rights, including most municipal and domestic water rights, are junior (newer) to proratable irrigation districts, those districts, Reclamation, or the Yakama Nation could seek curtailment of the newer groundwater rights to reduce or eliminate impairment during times of shortage. Once a court ruled on such a petition to curtail the groundwater uses, it could assume jurisdiction and order curtailment or it could require Ecology to shut off those junior water rights interfering with the senior rights of the party or parties petitioning the Court. If the proratables request the full amount of their water, the curtailment could be more severe than if the threshold was a 70 percent supply (see additional information in Section 2.3). This would cause significant hardship for municipal and domestic users and affect most of the basin's residents. In addition to minimizing agricultural losses during low water years, the 70 percent prorationing level is intended to reduce the potential for shut offs of other water users in the basin. The Yakima River basin generally receives less than 10 inches of precipitation per year, which is not considered adequate for crop growing without irrigation. Conversion to dry land farming would severely limit the type and value of crops that could be grown in the basin. Crop insurance is available in the Yakima basin, but it does not provide a reasonable, adequate, or long-term solution to water supply problems.
13-6	The Habitat/Watershed Protection and Enhancement Element is included to address the habitat restoration goal of the Integrated Plan and is not expected to contribute substantially to irrigation supply.
13-7	The Yakima Basin Integrated Water Resource Management Plan Implementation Account is authorized up to $2 million. To date, no money in the account has been spent on dam studies. The account is not related to the Columbia River Basin Water Supply Development Program account.
13-8	For this analysis, variability in anadromous salmonid runs was accounted for by randomly varying the ocean survival rate within the observed range over the past several years, which are referenced in Section 5.7.2.5 of the FPEIS, and in associated modeling assumptions. See the Yakima River Basin Study "*Fish Benefits Analysis Technical Memorandum*" (Reclamation and Ecology, 2011s) for additional details on modeling approaches.
13-9	See the response to Comment 13-8.
13-10	Fish species and reasons for extirpation and/or population decline are discussed in Section 3.7. Groundwater pumping may have impacts on streamflows, but because fish declines, including those of bull trout, began before groundwater pumping was extensive, it is unlikely to be a significant contributor to fish declines. The details requested on reasons for species declines are outside the scope of this programmatic EIS evaluation and have not been included.
13-11	The focus of the PEIS is to evaluate environmental impacts, so these questions are beyond the scope of this document. Since the Yakama Nation oversees all of the anadromous salmonid hatchery/supplementation programs in the Yakima Basin, the Yakama Nation should be contacted regarding budgetary questions.
13-12	See the response to Comment 12-12 regarding impacts of logging on water supply.
13-13	On November 17, 2010 the Governor signed Executive Order 10-06 (EO 10-06) which

	prohibits non-critical rulemaking. At the Governor's direction, the Office of Financial Management identified criteria that define rules that allow rulemaking to be filed. Ecology has determined at this time that none of the criteria in EO 10-06 apply to a groundwater withdrawal or closure rule similar to WAC 173-539A. Your comment correctly notes that the Washington Supreme Court recently ruled (*Five Corners Family Farms v Washington Department of Ecology*) that stock watering in any amount is exempt from the water right permit requirement under RCW 90.44.050. USGS estimated the annual volume of basin-wide groundwater pumping for stock watering purposes to be slightly more than 7,000 acre-feet in 2002 (USGS, 2009). Groundwater pumping for all uses within the Yakima Basin is estimated to be in the range 250,000 to 350,000 acre-feet annually. The 100,000 acre-foot variation primarily depends on whether the Yakima Project prorations water among its contract holders. When prorationing occurs, additional groundwater is pumped under supplemental/standby rights to offset the reduction in surface water supplies.
13-14	Actions of the USFS are outside the scope of this PEIS.
13-15	Reclamation and Ecology believe the discussion in Section 1.6.4 of the FPEIS (Section 1.5.5 in the DPEIS) is accurate in describing statutory constraints on the water supply. It notes that the Yakima Project is operated within a framework defined by Washington State water law and the *1945 Consent Decree.* That framework requires Reclamation to serve water users based on the priority date of their state water right with senior water right holders being served before those with more junior rights.
13-16	Target flows have been met since 1995 as required by Title XII. See Section 3.3.5.4 of the FPEIS for additional explanation on Title XII target flows. Determining optimum streamflows is not a part of this study, but Reclamation is committed to meeting priority flow targets. Drought years have a minimum target flow of 300 cfs downstream of Sunnyside Diversion Dam.
13-17	Figure 1-2 has been added, showing landowners in the Yakima River basin. Figure 1-3 has been added, showing land ownership distribution. The correction to "Wilderness" has been made. The additional information requested is outside the scope of this programmatic EIS and has not been included.
13-18	Stored water that is carried over for use in the next water year is available for instream flows.
13-19	The information requested is not relevant to this section, but is available elsewhere in the document. See also the "*Water Needs for Out of Stream Uses Technical Memorandum*" (Reclamation and Ecology, 2011o).
13-20	Nonproratable surface water right holders are accounted for in this document. As the water rights are nonproratable, they are not affected by this project in terms of water supply, but they are accounted for in the analyses completed. According to the "*Water Needs for Out-of-Stream Uses Technical Memorandum*" (Reclamation and Ecology, 2011o), there are approximately 420,200 acre-feet of nonproratable surface water entitlements upstream of Parker gage that are non-Yakima Project diversions.
13-21	The cessation of diversions for the Roza Irrigation District and Kittitas Reclamation District during drought years was not part of the analyses and would not meet the contractual obligations with Reclamation. The "*Water Needs for Out-of-Stream Uses Technical Memorandum*" (Reclamation and Ecology, 2011o) provides detailed data on diversions for all Yakima Project water users for drought and nondrought years. In

	recent drought years, Sunnyside Valley Irrigation District and Yakima-Tieton Irrigation District have not used their proratable water supply right and that water is used by other proratable water users. Water marketing (where districts with nonproratable water rights lease water to districts with shortfalls because of their proratable water right) is included as an element in the Integrated Plan.
13-22	The limiting agreements are still in effect although entitlements may have been altered by the *Acquavella* Court or subsequent water use.
13-23	The location and quantities of water rights held by pre-Project water users can be found in the Conditional Final Orders issued by the *Acquavella* Court. Please refer to the Conditional Final Orders issued in the *Acquavella* adjudication for the elements of the senior water rights. Satisfaction of contractual entitlements is consistent with enhancing instream flows. By holding flows previously lost to the system and the flexible operation of storage, instream flows can be regulated to enhance favorable flows for fish and offer a favorable delivery schedule during drought to irrigation districts while satisfying entitlement obligations. Stored water can be used for instream purposes during drought years and not breach the obligations to supply nonproratable and proratable water users because instream use is designated to specific stream reaches and can still be used for irrigation supply or can be used instream by agreement between the holder and the beneficiaries of the water right.
13-24	See the response to Comment 12-11. The costs and repayment by contractors are not affected by the Integrated Plan. Requests for contract information should be obtained through a Freedom of Information Act (FOIA) request. Reclamation can supply contact information for FOIA request. Evaluation of cost increases to contractors is outside the scope of this FPEIS and is not provided.
13-25	The early forecast was not accurate because higher than expected precipitation occurred after initial predictions, causing additional water supply to be available.
13-26	Minimum instream flows for the Yakama Nation treaty rights have not been quantified. The flows you reference are called “target flows” and are described in Section 3.3.5.4 of the FPEIS. See Table 5-3 and 5-4 for instream flow objectives for the Yakima River basin.
13-27	The statement in Section 1.3 that water rights in the basin are fully appropriated includes the 1981 filing. The amount of unappropriated water in the Yakima Basin was not determined in 1981. The statutory withdrawal (RCW 90.40.030) made all unappropriated water no longer subject to new appropriation, thus after the withdrawal there was no remaining unappropriated water. The withdrawal was for YRBWEP purposes, including the increase or maintenance of instream flows.
13-28	Your comment in opposition to the Bumping Lake Reservoir expansion is noted. See the Response to Common Issues regarding the Bumping Lake Reservoir expansion for an explanation of how this proposal differs from earlier proposals submitted to Congress.
13-29	Providing a summary of the USGS analysis is outside the scope of this FPEIS. See the USGS web site (http://wa.water.usgs.gov/projects/yakimagw/summary.htm) for information on the USGS technical reviews and participation in five elements of the Bureau of Reclamation work plan for the YRBWEP Feasibility Study.
13-30	The sentence in Section 1.7.2 has been corrected to indicate that reservoir sites were

	evaluated on the Yakama Reservation. Those sites were eliminated from detailed study for hydrogeologic and environmental considerations. The total amount of Federal and State funds that have been spent on these potential storage sites has spanned many decades and is outside the scope of this programmatic EIS evaluation and has not been included.
13-31	The remaining unscreened diversions are located on tributaries. The water users are not part of the Yakima Project.
13-32	See the response to Comment 12-2.
13-33	See the response to Comment 12-14. The specific information requested is beyond the scope of this FPEIS. Information on water conserved under YRBWEP Phase II has been added to Section 1.7.2.1. Appropriate NEPA compliance was carried out as necessary for these projects.
13-34	Section 1.7.2.3 provides a summary of background information on prior activities and investigations in the Yakima basin. The purpose of this PEIS is not to reanalyze the results of those activities or studies. However, results of these studies are reviewed, summarized, and incorporated into the overall analysis as appropriate. For more detail about the SOAC report on biologically based flows, refer to: http://www.usbr.gov/pn/programs/yrbwep/reports/SOAC_BioBaseFlows.pdf . The duties and responsibilities of SOAC are defined by court order and legislation and do not include advising Reclamation or Ecology on the development of an integrated water resource plan for the basin. It should be noted that all of the parties represented on SOAC were also parties to the Workgroup.
13-35	As described in Section1.5.1, riparian and floodplain degradation has been caused by land development including road construction, diking, gravel mining, and agriculture. There are no data available on the ownership of degraded floodplains.
13-36	The Yakima Project is still operated under the Interim Operating Plan. The percent of irrigated area used for perennial crops has not changed significantly since the 1992 figure. Growing annual crops would likely reduce the risk to irrigators during drought years; however, it would also reduce the value of the crops grown.
13-37	Updating the information in the Interim Operation Plan is outside the scope of this programmatic EIS evaluation and has not been included.
13-38	Estimates for 2010 were not calculated, but according to the "*Water Needs for Out-of-Stream Uses Technical Memorandum*" (Reclamation and Ecology, 2011o), the average nondrought deliveries to farms for the six major Yakima Project districts (1990-2009) was 1.32 million acre-feet, or 74 percent of the estimated 1.77 million acre-feet in diversions. The other 26 percent was lost to evaporation, leakage, or other reasons.
13-39	Providing information about the results of the planning processes is outside the scope of this programmatic EIS evaluation and has not been included.
13-40	The YRBWEP Workgroup decisions are based on consensus and not voting; therefore, there is no "double voting." Updating the information on the Recovery Board activities is outside the scope of this programmatic EIS evaluation and has not been included.
13-41	See the response to Comment 13-10. Information in the PEIS has been included at a summary level. General trends have been described at a level appropriate to a programmatic EIS.
13-42	The No Action Alternative description, including the description of ongoing projects,

	has been revised for clarity and consistency in the Executive Summary and Section 2.3.
13-43	Providing information about the results of these projects is outside the scope of this programmatic EIS evaluation and has not been included. There are some remaining fish screening projects on tributary streams.
13-44	See the response to Comment 13-11.
13-45	See the response to Comment 13-43 regarding the quantifiable benefits of individual fish recovery efforts.
13-46	See the response to Comment 12-16.
13-47	Comments noted. See the Responses to Common Issues regarding alternatives, Bumping Lake Reservoir expansion, and Wymer Dam for an explanation of the alternatives included in the programmatic EIS and differences in the current proposals for Bumping Lake Reservoir and Wymer Dam.
13-48	See the responses to Comments 12-2, 12-3, and 12-5.
13-49	The Integrated Plan is consistent with the objectives of Reclamation's WaterSMART program, which provided funding for the Yakima Basin Study. The guidance for Basin Studies provided in Reclamation's *Basin Study Framework: WaterSMART Program* (December 2009) indicates that Basin Studies should consider "changes to the operation of water supply systems, modifications to existing facilities, development of new facilities, or non-structural changes…". "The desired outcomes are basin-specific plans recommending collaboratively developed solutions that will help meet water demands and foster sustainable development." The Integrated Plan is fully consistent with this guidance.
13-50	Cost estimates are outside the scope of this FPEIS, which is focused on the evaluation of environmental impacts. However preliminary cost estimates are provided in the Basin Study and are further detailed in the "*Cost of the Integrated Water Resource Management Plan Technical Memorandum*" (Reclamation and Ecology, 2011u). These documents are readily available to the public, as indicated in the SEPA Fact Sheet and in Section 1.9.3.1 of the Draft PEIS. Additional cost information will be provided in the Framework for Implementation in Summer 2012 (see Section 1.2.2 of the FPEIS).
13-51	See the response to Comment 12-7.
13-52	See the Response to Common Issues regarding alternatives.
13-53	See the Response to Common Issues regarding the programmatic EIS. As stated throughout the FPEIS, Reclamation and Ecology will conduct the appropriate level of NEPA and/or SEPA analysis on individual projects carried forward. Significant adverse impacts will be analyzed at a project level.
13-54	See the Response to Common Issues regarding alternatives.
13-55	Any additional environmental review would include public involvement and review appropriate to the level of analysis as required by both NEPA and SEPA. Future EIS analysis would include scoping and public comment on the Draft EIS.
13-56	See the response to Comment 13-3.
13-57	See the response to Comment 12-16.
13-58	See the response to Comment 12-14.
13-59	See Section 1.2.1 for a clarification of the type of environmental review that is likely to occur.
13-60	The Habitat/Watershed Protection and Enhancement Element is discussed in Section

	2.4.7.
13-61	The respective impacts of the No Action Alternative and the Integrated Plan on water quantity and water quality are discussed in Sections 5.3 (water quantity) and 5.5 (water quality).
13-62	Additional storage offers additional flexibility to supply irrigation water and enhance flows at times that current storage does not allow. Irrigation district entitlements would be satisfied and uninjured. Reclamation has the operational flexibility to deliver water from the storage system, but does not allocate specific contractors to specific reservoirs. Likewise, that operational flexibility would allow enhancement of instream flows without any specific allocation in the reservoirs.
13-63	See the response to Comment 12-16. The Fish Passage Element meets the Integrated Plan need for improved habitat as described in Section 1.3.
13-64	See the responses to Comments 12-17, 12-18, 12-19, 12-20, and 12-21 regarding fish passage facilities. The fish ladder at Cle Elum Dam is intended to attract adult fish into the trap-and-haul facility. It is not anticipated that upstream fish ladders would be installed at any of the major reservoirs. Studies have indicated that fish ladders would not be feasible at the existing dams. The questions you ask about fish passage facilities are outside the scope of this FPEIS and are not provided. Such issues will be considered in the project-level design of fish passage facilities.
13-65	See the response to Comment 12-16.
13-66	See the response to Comment 12-19.
13-67	The feasibility of dredging Cle Elum Reservoir has not been analyzed. Note that the pool raise will be accomplished by installing flashboards on the existing dam and not by raising the dam. Dredging would not be cost-effective compared to the proposed pool raise. The pool raise would not provide a water supply benefit in an extended drought unless the reservoir completely refills.
13-68	Additional piping projects have been included in the Enhanced Water Conservation Element, including 5 miles in Sunnyside Valley Irrigation District, over 200 miles of improvements in Wapato Irrigation Project, and various improvements in Roza Irrigation District. The Yakama-Tieton Irrigation District's distribution system is already piped.
13-69	See the response to Comment 12-24.
13-70	See the response to Comment 12-6.
13-71	See the response to Comment 13-23.
13-72	Your comments in opposition to Wymer Dam are noted. See the Response to Common Issues regarding Wymer Dam for an explanation of how the proposal in the FPEIS is different. See Chapter 5 of the FPEIS regarding the impacts of Wymer Dam. Text has been added to Section 2.4.5.1 explaining that the Burbank Tunnel is an option for releasing flows from Wymer Dam to the Yakima River.
13-73	The acreage of shrub-steppe habitat that would be inundated is included in Section 5.9.2.3 of the FPEIS.
13-74	Wymer Reservoir would take approximately two years to fill from being completely empty. The reduction in streamflow would be determined in a project-level study. See the response to Comment 12-65 regarding evaporation rates.
13-75	The feasibility of dredging Kachess Reservoir has not been analyzed. As noted in the RiverWare modeling (Appendix E), at the end of the third year in a three-year drought

	(1994), there was approximately 26,000 acre-feet remaining of the 200,000 acre-feet of inactive storage available.
13-76	Comment noted.
13-77	Bumping Lake Reservoir enlargement would not inundate roadless area within the Okanogan-Wenatchee National Forest.
13-78	Bumping Reservoir would take approximately three years to fill from being completely empty, depending on flow into the reservoir. The reduction in streamflow would be determined in a project-level study. See the response to Comment 12-65 regarding evaporation rates.
13-79	Specific habitat enhancement projects have not been identified yet. See Response to Common Issues regarding the programmatic EIS.
13-80	See the response to Comment 12-6.
13-81	The data sources used to compile the map (WDFW, 2010) do not indicate the presence of late-successional forest on the north side of Bumping Lake Reservoir. Site-specific surveys would be conducted as part of any project-level evaluation.
13-82	Maps showing the proposed land acquisition program have been added to the FPEIS (Figure 2-7). The impacts of land acquisition on surface water supply are discussed in Section 5.3.2.5. The 46,000-acre tract in the middle and lower Teanaway River basin is privately owned. Providing information about the amount of remaining old-growth forest is outside the scope of the FPEIS.
13-83	Wilderness and Wild and Scenic River designations are intended to supplement other habitat protection projects included in the Integrated Plan. If the designations are not achieved, the other habitat protection projects would still be implemented and the overall value of the Habitat/Watershed Protection and Enhancement Element would remain the same.
13-84	The purpose of a Wild and Scenic River designation is described in Section 3.16.1.1. Recommended designations are included in the Integrated Plan because they would supplement the benefits of habitat protection included in the Plan and to support and call attention to the proposed designations and increase the likelihood of their implementation.
13-85	See the Response to Common Issues regarding conservation.
13-86	There is currently no comprehensive Municipal and Domestic Conservation Program in the Yakima basin. The proposed program is included in the Integrated Plan to acquire funding for a comprehensive program that would apply to individual domestic users as well as municipalities. Most stock watering use, based on the volume of water pumped, coincides with irrigation uses of groundwater, often using the same water delivery systems. A conservation program directed at stock watering demand would be more logical to combine with the agricultural conservation program.
13-87	The "*Market-Based Reallocation of Water Resources Technical Memorandum*" was published in March 2011 (Reclamation and Ecology, 2011j). That report states that "by itself, the Market Reallocation Element of the Integrated Plan has the potential to offset much, but not all, of the irrigation-related economic losses from a future severe drought." However, water marketing depends on a willing seller to provide water for willing buyers. There is no guarantee of having willing sellers so it is difficult to estimate potential transfers.
13-88	Reclamation and Ecology acknowledge throughout the FPEIS that the Bumping Lake

	Reservoir expansion and Wymer Dam would substantially impact habitats.
13-89	Section 1.7.2 is a summary of storage sites that Reclamation has evaluated over the years. The 30 sites listed in Table 2-1 combined with Black Rock, Pine Hollow, Wymer, and an enlarged Bumping Lake Reservoir total 34 sites. There is no current cost information available on the proposals.
13-90	The adverse impacts referred to are the unnaturally high and low flows on the upper Yakima and Naches Rivers.
13-91	See the Response to Common Issues regarding conservation.
13-92	Table 2-2 has been revised to say "old growth forest."
13-93	See the response to Comment 13-35 regarding floodplain degradation. Potential areas for floodplain restoration were identified in the "Mainstem Floodplain Restoration Technical Memorandum" (Reclamation and Ecology, 2011t). Specific sites are not included in the FPEIS because the program has not been finalized.
13-94	Sections 3.2.1.2, 3.2.3.1, and 3.3.2.1 have been revised to clarify that Lake Kachess, Bumping Lake, and Clear Lake Dams are earthfill dams. Rimrock Reservoir is the reservoir impounded by Tieton Dam. Ecology regularly evaluates the safety of the dams through its Dam Safety Office. Reclamation's Dam Safety Program was officially implemented in 1978 with passage of the Reclamation Safety of Dams Act, Public Law 95-578. Dams must be operated and maintained in a safe manner, ensured through inspections for safety deficiencies, analyses utilizing current technologies and designs, and corrective actions if needed based on current engineering practices. Reclamation's Safety Evaluation of Existing Dams (SEED) program annually performs site evaluations and identifies any potential safety deficiencies on Reclamation and other Department of Interior dams. Reclamation does not believe that the Yakima basin dams are susceptible to the same issues as Teton Dam since those issues were specific to the Teton Dam site.
13-95	See the response to Comment 12-12.
13-96	The statement refers to the Yakima Project system.
13-97	See the response to Comment 12-12.
13-98	The information you request is outside the scope of the PEIS and has not been provided. The area above the proposed acquisition is located on Forest Service land and is proposed for National Recreation Area status in the Habitat/Watershed Protection and Enhancement Element.
13-99	The text on page 3-13 is a direct quote from the source listed which was prepared in 2001. Reclamation and Ecology recognize that groundwater and surface water are interconnected.
13-100	There are no stream gages on Lmuma Creek and there are no known streamflow records available.
13-101	See the response to Comment 12-64.
13-102	Table 3-5 has been updated. April 1 TWSA represents the estimated total water supply available above Parker gage during the period from April 1 to September 30. Although July TWSA is more accurate, April 1 TWSA is used for water supply planning; most planning (especially during droughts) occurs well before July 31.
13-103	See the response to Comment 13-25.
13-104	The Integrated Plan is not expected to affect the non-entitlement diversions and the total diversions from these tributaries are outside the scope of this FPEIS.

13-105	The information you request is outside the scope of this programmatic EIS and is not provided.
13-106	Table 3-8 is a list of actual proration percentages for the Yakima Project and Table 5-1 is a list of modeled proration percentages for the Yakima Project.
13-107	The emergency water right transfer program is still in effect for emergency situations. Emergencies are declared by the Governor of the State of Washington.
13-108	Historical reservoir target flows are minimum flows. Unregulated instream flows are included in Appendix E. Prior to development of the Yakima Project high flows would have been near those shown in Appendix E as unregulated while low flows at Parker and Prosser would have been close to zero as a result of pre-Project diversions. Table 3-11 qualitatively compares current flow to unregulated flow in basin reaches. Table 3-10 is labeled "minimum flow" because the listed flows are the Title XII minimum instream flow targets.
13-109	See the response to Comment 12-24 regarding the *1945 Consent Decree*.
13-110	Figure 1-2 in the Final EIS illustrates land ownership patterns in the Yakima basin. Providing additional detail about land ownership is outside the scope of this programmatic EIS. See the response to Comment 12-12 regarding forest practices.
13-111	See the response to Comment 12-32 regarding water quality.
13-112	See the response to Comment 13-110 regarding land ownership.
13-113	Evaluating the causes of historical water temperature problems is beyond the scope of this PEIS and has not been conducted, although these issues are discussed generally in the FPEIS.
13-114	The information you request is outside the scope of this PEIS and is not provided. Additional analysis of water quality will be conducted when projects are carried forward.
13-115	The information you request is outside the scope of this programmatic EIS and has not been provided.
13-116	The Yakima/Klickitat Fisheries Project is evaluating the potential to reintroduce summer Chinook to the Yakima basin.
13-117	A recovery plan is not required for Federal species of concern. See the response to Comment 12-43 regarding Pacific lamprey.
13-118	Reservoir release levels (and temperatures relating to the release level) would not change in Tieton or Keechelus Reservoirs under the Integrated Plan. Cle Elum Reservoir would add a small additional release at levels closer to the surface than current reservoir releases. Specific reservoir release levels for projects at Bumping, Wymer, and Kachess Reservoirs would be detailed in project-level studies.
13-119	See the response to Comment 13-110 regarding land ownership.
13-120	The information you request is outside the scope of this programmatic EIS and has not been included. Red ants are not a Federal or State protected species and thus no inventory will likely be conducted.
13-121	ESA listed species and potential impacts are discussed in Sections 3.10, 4.10, and 5.10. Also see the response to Comment 12-37.
13-122	See the response to Comment 12-12 regarding forest practices.
13-123	Tables 3-17 and 3-18 represent current conditions. As these comparisons are inflows into reservoirs, "historical" and "current" nomenclature can be interchangeable. "No

	Regulation No Irrigation" represents streamflows as they would have been if there were no reservoirs and no system diversions.
13-124	See the response to Comment 12-78.
13-125	An evaluation of the Shoreline Management Act is outside the scope of this programmatic EIS.
13-126	An evaluation of the Growth Management Act is outside the scope of this programmatic EIS.
13-127	See the response to Comment 13-110 regarding land ownership.
13-128	The No Action Alternative description, including the list of ongoing projects (or individual actions), is included in Section 2.3.
13-129	The need to drawdown the existing reservoir and its impacts would be determined during a more detailed analysis and design of the project as well as during consultation with fish and wildlife agencies. More detailed information would be made available at that time.
13-130	Descriptions of the No Action Alternative have been revised for clarity and consistency.
13-131	Section 4.10.2.3 second and third paragraphs describe some general effects that could occur with steelhead and other species, consistent with the programmatic level of evaluation for this EIS. Section 4.10.3 identifies mitigation measures. More specific best management practices and mitigation measures that would be applied would be identified during ESA consultation for each individual project.
13-132	The text in Section 4.22.2.1 of the FPEIS has been revised to clarify that the economic impacts on jobs and hiring have not yet been conducted for individual projects.
13-133	See the Response to Common Issues regarding the programmatic EIS. As stated in Section 6.2.2, Reclamation will conduct ESA consultation on future projects as they are carried forward. The ESA consultations and future NEPA and/or SEPA analyses will identify cumulative impacts to listed species.
13-134	See the Response to Common Issues regarding the programmatic EIS. This programmatic EIS is consistent with 40 CFR 1502.22, in that it acknowledges that there is incomplete information available about the projects and that more detailed NEPA and or SEPA analysis will be conducted when projects are carried forward and more details are available on the projects. The FPEIS includes summary information about reasonably foreseeable impacts, at a level adequate to evaluate the broad and comprehensive implications associated with implementing the Integrated Plan.
13-135	The purpose of the YRBWEP Workgroup's Implementation Committee is to acquire authorization and funding for the Integrated Plan after completion of the PEIS. The Early Implementation Request would not preclude the completion of project-level environmental review which would still be required. In many cases, the Early Implementation Request would provide funding for additional studies and environmental review so that project-level analysis can occur. The cost figures in the Early Implementation Request are for additional studies and early implementation of some elements of the Integrated Plan. The costs do not reflect the full cost of implementing the Integrated Plan. The Implementation Subcommittee is requesting funding from Congress and the Washington State legislature. The contribution of basin irrigators to Integrated Plan implementation will be included in the Framework for Implementation which will be prepared in 2012 (see Section 1.2.2).

13-136	See the response to Comment 12-28.
13-137	Comment noted. See the Response to Common Issues regarding alternatives.
13-138	See the response to Comment 13-106.
13-139	Not all flow objectives were included because some lower priority flow objectives caused the model to not properly work, indicating that flow objective could not be met without affecting either another flow objective or water supply objective.
13-140	The RiverWare model was set up to utilize the new storage provided if proration levels dropped below 70 percent. After reaching 70 percent proration, additional water was not released and the maximum supply provided was 70 percent.
13-141	See the response to Comment 13-139.
13-142	Table 5-3 summarizes flow objectives for the high-priority reaches. These objectives include increasing minimum flow, but also include reducing flows during months with high flow, adding pulse flows, and changing ramping rates. Optimum flows were not studied for this plan.
13-143	See the response to Comment 13-105.
13-144	See the Responses to Common Issues regarding alternatives and conservation.
13-145	See Tables 5-3 and 5-4 and Appendix E for results regarding changes in streamflow. In general water quality will be improved from additional streamflow, habitat restoration, and water conservation. Additional study will be performed on potential changes to water quality from implementation of elements of the Integrated Plan with project-level EISs. Reclamation and Ecology are not assuming that "dilution is the solution to pollution."
13-146	Section 5.5.2 of the FPEIS has been revised to clarify the potential impacts to water temperature. Section 5.5.2.3 provides additional detail on how temperature impacts might be minimized or mitigated. Any discharge from the reservoirs would need a water quality certification from the State prior to discharge. Both flow and temperature conditions would be addressed in this certification.
13-147	See the response to Comment 13-3.
13-148	Fish passage will allow for the eventual reintroduction of all anadromous species that historically occurred above the reservoirs. Species interactions between anadromous and resident fish are considered beneficial to overall ecosystem health. For example, juvenile sockeye will provide a forage base for bull trout which is an important link in building more resilient bull trout populations in the basin. The additional salmon carcasses provide an important nutrient source to the ecosystem that increases the primary and secondary food sources for all salmonid species. It is common for salmonid species to overlap in their macro-habitat preference, but differ in their micro-habitat preference which minimizes species interactions.
13-149	See the response to Comment 13-23.
13-150	Approximately 3,500 linear feet of Deep Creek would be inundated by the Bumping Lake enlargement project.
13-151	See the response to Comment 13-79.
13-152	See the response to Comment 13-11. The information requested is outside the scope of this programmatic EIS and was not added to Table 5-6.
13-153	Since sockeye are extirpated in the Yakima Basin, all improvements to future sockeye populations would be attributed to hatchery/supplementation programs. The Yakima

	Basin fisheries comanagers decided that it would be advantageous to "jump start" future sockeye populations through hatchery/supplementation reintroduction measures instead of relying solely on recolonization through natural straying, which was determined to be unlikely. Tables 5-7 and 5-8 have not been revised.
13-154	Information about bull trout management actions has been added to Section 5.7.2.5 of the FPEIS.
13-155	Specific mitigation measures would be identified during ESA consultation for the Bumping Lake Reservoir enlargement project and it is expected these would also include consideration of reconnectivity effects from providing fish passage at Bumping Lake Dam, potential habitat restoration measures in the upper Naches, and bull trout population interactions in the upper Naches system. Reclamation and the Service, through the Coordination Act Report (see the response to Comment 12-37) have identified potential on-site and off-site mitigation measures specific to the enlarged Bumping Lake Reservoir project. Development of mitigation for bull trout is in the preliminary stages in the western U.S. Reclamation and Ecology are working with WDFW and the Service to identify appropriate mitigation for bull trout.
13-156	Both Indian Creek and Upper Yakima water bodies will benefit from reconnectivity from the Fish Passage Element. Regarding bull trout impacts to Deep Creek and the Bumping River and and to the Kachess River, and Box Canyon Creek, without mitigation each of these water bodies would be adversely impacted by the Bumping Lake Reservoir expansion and the Kachess inactive storage project respectively. While specific mitigation measures have not been identified at this time, it is expected that either adequate mitigation to satisfy ESA requirements would be achieved or the project(s) would not proceed. Project-specific environmental review and permitting will identify specific impacts, minimization and mitigation measures. See also the response to Comment 13-155.
13-157	The PEIS acknowledges the loss of shrub-steppe and old-growth forest habitat. Mitigation for fish and wildlife species will be associated with conservation measures identified during future project-specific analyses and ESA consultation for specific projects. Reclamation and Ecology acknowledge that mitigation measures are not universally successful and will make every attempt to promote the success of all mitigation undertaken. See the response to Comment 12-37 for more information about the CAR.
13-158	See the response to Comment 13-120.
13-159	See the response to Comment 13-148.
13-160	See the response to Comment 13-157.
13-161	The Bumping Lake Reservoir enlargement would not inundate any roadless areas.
13-162	The Integrated Plan aims to increase the value of many different goods and services derived from the basin's natural resources and, therefore, generate economic benefits for many different groups. It will also generate costs for many different groups. Currently available information indicates that the general pattern of benefits and costs would be similar to the pattern under the No Action Alternative. Some differences in the patterns probably would occur. Future analyses of individual elements of the Integrated Plan will consider this possibility and describe the impact on the distribution of benefits and costs both for each element and for its interaction with other elements.

13-163	The Habitat/Watershed Protection and Enhancement Element is an integral element of the overall Integrated Plan. A goal of the element is to provide overall improvements in conditions for listed species. As described in the response to Comment 13-157, Reclamation and Ecology would work with Federal and State wildlife agencies to determine appropriate mitigation for impacts to listed species.
13-164	Section 5.26 of the FPEIS has been revised for clarity and consistency. Also see the response to Comment 13-157.
13-165	Section 5.28 of the FPEIS has been revised to include this information.
13-166	As required by NEPA, Chapter 6 only describes the consultation and coordination process undertaken for the NEPA EIS, not for the preparation of the Integrated Plan. See the response to Comments 12-2 and 12-4 regarding the Workgroup public involvement process.
13-167	See the response to Comment 12-7 regarding ESA consultation and Comment 13-135 with regard to the Early Implementation Request.
13-168	The DPEIS inadvertently omitted listing Robert Barwin of the Department of Ecology as a contributor. His name and information has been added in the FPEIS.
13-169	Comment noted. Your name is included on Reclamation's and Ecology's distribution list and you will receive a copy of the FPEIS.
13-170	As requested in Comment 13-1, these articles are included in your comment letter.

Comment Letter No. 14 – Yakima Basin Fish and Wildlife Recovery Board Staff

14-1	Comment noted.
14-2	The suggested change has been made in the FPEIS.
14-3	Comment noted. Reclamation and Ecology are developing plans for implementation of the Integrated Plan in the Framework for Implementation which will be developed in Summer 2012. Your suggestion will be considered.
14-4	See response to Comment 11-50.
14-5	Section 3.3.4.9 of the FPEIS has been revised per your suggestion.
14-6	The suggested correction has been made to the FPEIS.
14-7	Section 3.5.4 has been revised per your suggestion.
14-8	Section 3.7.1.1 of the FPEIS has been revised to include Cle Elum and Teanaway Rivers as spring Chinook spawning locations.
14-9	Table 3-14 has been updated in the FPEIS.
14-10	That sentence was deleted from the FPEIS per your recommendation.
14-11	The Channel Conditions section has been revised to indicate there are barriers above the reservoirs.
14-12	The steelhead numbers have been updated in the FPEIS; see response to Comment 1-37.
14-13	Comment noted. The percentage given is based upon a review of actual spawning locations in Deep Creek.
14-14	The Executive Summary and Sections 5.10.2.3, and 5.10.3 have been revised to include this information. Sections 5.10.4, 5.24, and 5.26 are overall program descriptions and this level of detail is not appropriate.
14-15	Comment noted. See the response to Comment 1-45.
14-16	The formatting has been repaired on Page E-28.

Comment Letter No. 15 – Sierra Club Washington Chapter

15-1	Comment noted.
15-2	Comments noted. See responses to specific comments below.
15-3	See the response to Comment 12-17.
15-4	Your comments about climate change impacts are noted. One of the purposes of the Integrated Plan is to provide flexibility to respond to climate change (See Section 1.3). Reclamation and Ecology believe that the improvements to water supply provided by storage, conservation, structural modifications and market reallocation combined with fish passage and habitat protection and improvements included in the Integrated Plan will help meet the challenges of climate change.
15-5	As described in Section 2.5.4 and the Response to Common Issues regarding conservation, the Enhanced Water Conservation Element does not provide adequate water to meet all the identified needs in the basin. Also refer to Section 2.4.8.1 in the FPEIS for a discussion of the benefits and limitations of conservation. See the response to Comment 12-17 regarding the benefits of fish passage and flows in the lower Yakima River.
15-6	See the Response to Common Issues regarding the programmatic EIS. The lack of specificity about the purchase strategy for habitat conservation is due to the programmatic level of detail for the elements and projects included in the Integrated Plan. For more information about wildlife habitat impacts, see Responses to Common Issues regarding Bumping Lake Reservoir expansion and Wymer Dam.
15-7	Information about wolverine and potential impacts has been added to the FPEIS. See also the response to Comment 15-6.
15-8	Your comments about impacts from the Bumping Lake Reservoir expansion and Wymer Dam and noted. As you note, Reclamation and Ecology acknowledge the substantial impacts that could occur as a result of these projects throughout the FPEIS. Additional evaluation of impacts would be undertaken as part of project-level environmental analysis when projects are carried forward.
15-9	Your comments in opposition to the Integrated Plan are noted. See the Response to Common Issues regarding conservation. Additional information on the Habitat/Watershed Protection and Enhancement Element has been added to the FPEIS. See the response to Comment 15-4 regarding climate change.
15-10	Your name is included on Reclamation and Ecology's distribution list.

Comment Letter No. 16 – Seattle Audubon Society

16-1	Comment noted.
16-2	See the response to Comment 15-6. The PEIS acknowledges that elements of the Integrated Plan would result in substantial impacts to the northern spotted owl and greater sage-grouse.
16-3	Benefits of the land acquisition program for wildlife are described in Sections 5.9.2.5 and 5.10.2.5. More detailed information is outside the scope of the programmatic EIS evaluation and has not been included, but would be evaluated as part of project-level analyses. See Response to Common Issues regarding the programmatic EIS.

16-4	Your comments about the expansion of Bumping Lake Reservoir are noted. See the Response to Common Issues regarding Bumping Lake Reservoir expansion for an explanation of how this proposal differs from earlier Bumping Lake expansion proposals.
16-5	Comment noted.

Comment Letter No. 17 – The Mountaineers

17-1	Comment noted.
17-2	Your comments in opposition to storage projects are noted.
17-3	Your comments in support of habitat protection and improvement are noted.
17-4	The protection of property in the Teanaway River basin is included in the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan to meet the plan's purpose of habitat protection and enhancement. Appropriate mitigation for adverse impacts would be identified separately in project-level environmental review when projects are carried forward. See the Response to Common Issues regarding alternatives. See the response to Comment 7-1 regarding inclusion of the cost benefit analysis in the Framework for Implementation. See the Response to Common Issues regarding the programmatic EIS.
17-5	See the Response to Comment 12-4 regarding extension of the comment period. Your name is included on Reclamation and Ecology's distribution list for the project.

Comment Letter No. 18 – American Whitewater

18-1	Comment noted.
18-2	See the response to Comment 12-4 regarding the comment period and process.
18-3	Your comments in support of habitat protection and enhancement are noted. See the response to Comment 11-45 regarding the removal of Roza Dam.
18-4	The suggested change has been made in the FPEIS.
18-5	The suggested change has been made in the FPEIS.
18-6	The suggested change has been made in the FPEIS.
18-7	Comment noted.

Comment Letter No. 19 – Federation of Western Outdoor Clubs

19-1	Comment noted. See the Response to Comment 17-2.

Comment Letter No. 20 – North Yakima Conservation District

20-1	Comment noted.
20-2	The land acquisition component of the Habitat/Watershed Protection and Enhancement Element of the Integrated Plan is intended to meet the plan's goal of habitat improvements (Section 1.3 of the FPEIS) and has always included a land acquisition component. As noted in Section 2.4.7 of the FPEIS, properties would only be acquired

	from willing sellers. Reclamation and Ecology believe that including land acquisition is necessary to provide overall improvements to habitat in the Yakima basin.
20-3	Your comment in opposition to land acquisition is noted. The text in Section 2.4.7 of the FPEIS has been edited to clarify that both acquisition and conservation easements will be considered. Reclamation and Ecology intend to implement the Integrated Plan as a comprehensive program and will not prioritize any of the elements of the plan.
20-4	Your comments about the difficulties of managing the acquired lands are noted. Reclamation and Ecology will work with other agencies and entities to determine the best management strategy for the lands and to acquire adequate funding for managing the lands. It is anticipated that many of the lands will be managed by the U.S. Forest Service.
20-5	Your comments in opposition to land acquisition are noted. See the response to Comment 9-3 regarding impacts to the tax.
20-6	See the response to Comment 9-2 regarding Pine Hollow Reservoir.

Comment Letter No. 21 – Yakima County Farm Bureau

21-1	Comment noted.
21-2	Comments noted. The Integrated Plan includes several storage proposals including new storage at Wymer Dam, expansion of Bumping Lake Reservoir, the Keechelus-to-Kachess pipeline, and raising the level of Cle Elum Reservoir.
21-3	As described in Section 2.4.1, Reclamation and Ecology intend to implement the Integrated Plan in an integrated manner by advancing groups of projects that collectively advance the Integrated Plan elements. No single element will be advanced ahead of others.
21-4	Comment noted.
21-5	See the responses to Comments 20-2, 20-4, and 20-5.
21-6	Comment noted.

Comment Letter No. 22 – Yakima County Cattlemen's Association

22-1	Comment noted.
22-2	See the response to Comment 9-3.
22-3	See the response to Comment 9-2.
22-4	Comment noted. See the response to Comment 9-4.

Comment Letter No. 23 – Yakima Basin Storage Alliance

23-1	Comment noted.
23-2	Your comments about water needs in the Yakima basin are noted.
23-3	Your comments about surface water supply are noted. Reclamation and Ecology believe that the Integrated Plan meets the needs identified for the Yakima basin. The Integrated Plan also includes an adaptive approach (Section 2.4.10 of the FPEIS) that would determine if the proposed projects meet the identified Purpose and Need and would adjust projects as needed to meet changing conditions.

23-4	See the response to Comment 12-17.
23-5	Section 2.4.5.4 of the FPEIS identifies the process for implementing the Columbia River Basin Pump Exchange Study.
23-6	Comment noted.
23-7	Evaluating the potential for electricity production in connection with a Columbia River Pump Exchange could be included in the initial screening study.
23-8	Your comments about energy integration are noted.
23-9	See the response to Comment 12-17.
23-10	Comment noted. Additional economic analysis of the Integrated Plan will be conducted as part of the Framework for Implementation (see Section 1.2.1 of the FPEIS).
23-11	The description of the Columbia River Pump Exchange Study in the PEIS is a summary of the larger description presented in the Yakima River Basin Study.
23-12	Your comments in support of wind integration are noted.
23-13	The issues you raise about water availability in the Columbia River would be part of the Step 1 study of the Columbia River Pump Exchange.
23-14	Water can be passed from the Yakima River through the KRD system (specifically the South Branch Canal system) to provide tributary flow enhancement. The flow would reenter the Yakima River and not affect downstream water deliveries. This could occur in all years including drought years.
23-15	Reclamation and Ecology determined appropriate instream flows through analyses conducted in consultation with basin fisheries experts. These are summarized in Section 5.3 of the FPEIS. As described in Section 2.5.4 and 5.3 of the FPEIS, it is not expected that water conservation alone can provide enough water to meet instream flow needs.
23-16	These economic questions will be evaluated as part of the Framework for Implementation expected to be completed in the summer of 2012.

Comment Letter No. 24 – Back Country Horsemen of Washington

24-1	Comment noted.
24-2	Comment noted.
24-3	As described in Section 1.3 of the FPEIS, the Integrated Plan is designed to meet four needs identified by Reclamation and Ecology: resident and anadromous fish, irrigation supply, municipal and domestic water supply, and climate change flexibility. The Federal and State authority for developing and implementing the Integrated Plan is detailed in Section 1.4.
24-4	Section 2.4.7.1 has been edited to clarify that public access and recreational opportunities would be maintained or improved where possible.
24-5	Impacts of the Bumping Lake Reservoir enlargement on roads are discussed in Section 5.18.2.3.
24-6	Section 3.16.1.1 describes the Wild and Scenic Rivers Act of 1968. The designation is designed to protect the river corridor and its resources, including recreational and fish and wildlife resources. Positive impacts of Wild and Scenic River designations are discussed throughout Chapter 5.
24-7	Comment noted. Reclamation and Ecology will keep your organization informed of the process through its mailing list.

24-8	Comment noted. See response to you Comment 24-3.
24-9	Comment noted.

Comment Letter No. 25 – Central Washington Resource Energy Collaborative

25-1	Your comments in support of clean energy generation are noted. The Integrated Plan does not include the production of power at this time, but the potential for installing hydroelectric facilities at new or modified storage facilities may be evaluated in the future.

Comment Letter No. 26 – Yakima County Democratic Central Committee

26-1	Your comments in support of the Integrated Plan are noted.

Comment Letter No. 27 – Friends of Miller Peninsula State Park

27-1	Your comments in opposition to the Integrated Plan are noted.

Comment Letter No. 28 – Kenneth A. Hammond

28-1	Comment noted.
28-2	Your comments in support of water marketing are noted. Details about the Market Reallocation Element can be found in the Ecology's 2009 Integrated Water Resource Management Alternative Final EIS and its supporting documents and in the "*Market-based Reallocation of Water Technical Memorandum*" (Reclamation and Ecology, 2011j). Ecology considered a wide range of marketing options and the Integrated Plan proposes the removal of legal barriers to implementing an open water marketing system. A rotation fallow program is included in the Long-Term Option for the Market Reallocation Element.
28-3	Your comments regarding definition of the problem are noted. Section 1.3 has been revised to clarify the problem statement and Purpose and Need. See also the Response to Common Issues regarding alternatives.
28-4	Your comments about demand versus need are noted. See the Response to Common Issues regarding alternatives.
28-5	Comment noted.
28-6	The Integrated Plan includes an adaptive approach to modify Integrated Plan projects as conditions change. See Section 2.4.10. Refer to Section 1.3 and the Response to Common Issues regarding alternatives for a discussion of how the amount of water needed was defined.
28-7	Reclamation and Ecology focused the Integrated Plan on irrigation districts within the Yakima Project area. However, private irrigation districts would benefit from a number of the Elements in the Integrated Plan including Enhanced Water Conservation and Market Reallocation.
28-8	The No Action Alternative description has been modified in the FPEIS to clarify what projects are included (Section 2.3). Information about the amount of water that has been

	conserved under YRBWEP Phase II has been added to Section 1.7.2.1. Also refer to Section 2.4.8.1 for a discussion of the benefits and limitations of conservation.
28-9	The impacts of floodplain habitat restoration and groundwater infiltration on streamflows are described in Section 5.3. Additional analysis will be conducted when projects are carried forward for project-level environmental review.
28-10	Most of the organizations you mention were represented on the YRBWEP Workgroup or regularly attended Workgroup meetings and contributed information. See Comment 12-5.
28-11	Comment noted. See the Response to Common Issues regarding alternatives.
28-12	No non-storage projects or programs were considered and rejected. See the response to Comment 28-2 regarding types of water marketing included in the Integrated Plan.
28-13	The PEIS acknowledges that areas of both shrub-steppe habitat and old growth forests would be inundated under the Surface Storage Element and that the inundation would constitute a long-term or permanent impact. The PEIS proposes that the integrated management approach of structural and operation changes, habitat protection and acquisition, and restoration is more likely to achieve system wide benefits for vegetation.
28-14	The PEIS acknowledges that there would be significant impacts to shrub steppe habitat and old-growth forests. Mitigation strategies for those losses will be evaluated when projects undergo future environmental evaluation. Reclamation and Ecology acknowledge that it may not be possible to fully mitigate those losses. The Habitat/Watershed Enhancement and Protection Element is included in the Integrated Plan to provide overall improvements to habitat for listed species.
28-15	The basalt daisy is restricted to crevices in basalt cliffs. There is one known population in Washington that is scattered over an area approximately 10 by 2 miles along the Yakima River and Selah Creek at elevations between 1,250 feet and 1,500 feet. The proposed elements of the Integrated Plan are not expected to directly disturb or result in indirect impacts to this species because there would be no construction in the area and the changes in water flows would not affect the habitat. Major threats to this species include basalt mining, and railroad and highway construction.
28-16	See the Responses to Common Issues regarding Bumping Lake Reservoir expansion and Wymer Dam for an explanation of how the proposals in this FPEIS differ from earlier proposals. Because the Integrated Plan will be implemented as a comprehensive package, economic analysis will be conducted on the plan as a whole and not on individual projects.
28-17	See the Response to Common Issues regarding conservation. Multiple droughts have been experienced in recent history, including 1992, 1993, 1994, 2001, and 2005. The facilities would have been used in each of those years. Instream flows proposed are described in Tables 5-3 and 5-4. See the Response to Common Issues regarding alternatives. See the "*Water Needs for Out-of-Stream Uses Technical Memorandum*" (Reclamation and Ecology, 2011o) for additional details on water needs. See Section 3.2 in the Basin Study and "*Costs of the Integrated Water Resource Management Plan Technical Memorandum*" (Reclamation and Ecology, 2011u) for additional information on cost estimates. Also refer to Section 2.4.8.1 for a discussion of the benefits and limitations of conservation.
28-18	As noted, this is an issue that could affect sockeye reintroduction in the reservoir. In a

	drought year, the Kachess sockeye population could be impacted. Further evaluation of how sockeye reintroduction would occur, along with potential impacts from drawdown will be considered in future project-level evaluations. Impacts and benefits and long-term population targets will also be identified.
28-19	Comment noted. The location of the Teanaway River has been corrected.
28-20	The past 20 years include the 1991 to 2010 period. Since 1970, prorationing has occurred 11 times. In addition, instream flows to protect fish, as established by passage of the Title XII legislation in 1994, were increased starting about 20 years ago. The past 20 years are representative of current operational practices that are required to meet both instream flows and irrigation water supply demands. New storage reservoirs will be used to provide additional instream flow as described in the PEIS. These instream flows will be released every year and will have a significant beneficial effect on fisheries every year. It is true that storage for irrigation water supply will be released during drought years, which occur on average about once every four years. The volume of water needed is identified in the FPEIS and Integrated Plan; the elements of the Integrated Plan were formulated to meet those needs. A financing and repayment plan has not been developed for the Integrated Plan. A preliminary funding allocation plan will be included in the Framework for Implementation. See Section 1.2.1 of the FPEIS.
28-21	Participants who developed the land acquisition proposal were well aware of land acquisition actions under consideration by other parties outside the context of the Integrated Plan. The land acquisition proposal was developed in a series of meetings involving many of the organizations active in land conservation in Washington State, including Cascade Land Conservancy, The Nature Conservancy, Conservation Northwest, the Trust for Public Lands, the Wilderness Society, and several other groups. This was supplemented by discussions to refine the proposal in Fall 2011, which included Tribal, Federal, and State staff active in land and habitat conservation in the Yakima basin. Updated contact with key conservation groups also occurred at that time. The conservation groups consulted agree that the land acquisitions proposed in the Integrated Plan exceed the ecosystem benefits of other potential land acquisitions for the Yakima basin that have been identified outside of the Integrated Plan and that offer realistic opportunities for being implemented in the near future.
28-22	Construction impacts related to the Keechelus-to-Kachess pipeline are discussed throughout Chapter 4. In particular, see Sections 4.2.2.2 (Earth), 4.5.2.2 (Water Quality), 4.7.2.2 (Fish), 4.8.2.2 (Vegetation), 4.9.2.2 (Wildlife), and 4.10.2.2 (Threatened and Endangered Species).
28-23	Soil types and productivity in the basin were not considered. Calculations of irrigation needs were based on currently irrigated lands in the Yakima Project.
28-24	Reclamation and Ecology used quantitative information on the value associated with using water for irrigation during a severe drought, fish production, and municipal use (Reclamation and Ecology (2011v). Irrigation-related information included current data on crops, crop-irrigation requirements, crop prices, and variable crop-production costs, which was used to compare annual net farm earnings of irrigators within the Yakima Project with and without the Integrated Plan. Fish-related information included estimates of the overall value of potential changes in salmon/steelhead populations in

	the Columbia River Basin. Municipal-related information included Reclamation's estimate of the wholesale price of municipal water in the Pacific Northwest Region. Information about unquantified benefits that likely would accrue from uses of water under the Integrated Plan was also used. This included unquantified benefits associated with: irrigation, increases in salmon/steelhead populations, increases in the populations of other valuable species, increases in the net value of recreational opportunities, improved resiliency and adaptability of the water system, and climate-change.
28-25	The groundwater infiltration basins would be located in areas with geology and soils conducive to fast infiltration. The "*Groundwater Infiltration Appraisal-Level Study Technical Memorandum"* (Reclamation and Ecology, 2011e) provides more detail on the proposed locations and operations. It was assumed water would be diverted to the groundwater infiltration basins between the beginning of November and the end of March. The amount of water diverted to the infiltration basins and the time to recharge 100,000 acre-feet would be dependent on flows in the Yakima River and required instream flows.

Comment Letter No. 29 – James H. Davenport

29-1	Your comments about the Columbia River Pump Exchange as an alternative are noted. See responses to your detailed comments below.
29-2	Comments noted. See responses to your detailed comments below.
29-3	Refer to the Response to Common Issues regarding alternatives for a discussion of the development of alternatives for the PEIS. The discussion of the No Action Alternative has been expanded in the FPEIS to describe in more detail the implications of the No Action Alternative. The Integrated Plan includes seven elements to improve water resources in the basin: Reservoir Fish Passage; Structural and Operational Changes; Surface Water Storage; Groundwater Storage; Habitat/Watershed Protection and Enhancement; Enhanced Water Conservation; and Market Reallocation. As described in Section 2.4.1, these elements are intended to be implemented in a comprehensive manner, as a total package. The projects outlined in Section 2.4.5 are intended to collectively meet a water supply goal; none of these projects can independently meet the goals for water supply and should not be considered as mutually exclusive "alternatives." This PEIS evaluates the range of impacts associated with implementing the Integrated Plan and is not an evaluation of specific storage projects. As noted in Section 2.4.5, additional study is required for all of the proposed projects in order to determine their feasibility as well as environmental impacts. The Columbia River Pump Exchange Study is a study, not a proposed project at this time. It may be evaluated in the future if deemed viable and future conditions in the basin warrant further investigation as described in Section 2.4.5.4 of the FPEIS. Interbasin transfer has been considered in the development of the alternatives for this FPEIS, including evaluations of the Black Rock Reservoir and the Wymer Dam Plus Pump Exchange alternatives in Reclamation's 2008 Yakima River Basin Water Storage Feasibility Study Final PR/EIS. A brief summary of those alternatives is provided in

	Section 1.9.1. The reasons for not carrying a Columbia River Pump Exchange project forward at this time are described in Section 2.5.1 of the FPEIS. Discussion about the Black Rock Reservoir alternative was included in the DPEIS. Information about the Wymer Dam Plus Pump Exchange Alternative has now been reviewed for the FPEIS. The Wymer Dam Plus Pump Exchange alternative yielded the worst cost benefit ratio of any alternative in the 2008 Final PR/EIS and had operational costs more than 10 times higher than the pumping costs associated with Wymer. Given the current level of understanding about conditions in the basin, the existing elements of the Integrated Plan meet the identified water supply needs. Adding the Columbia River Pump Exchange to the Integrated Plan or replacing the Bumping Lake Reservoir Enlargement with the Columbia River Pump Exchange would make meeting the water supply needs more expensive. Consequently the alternatives you suggest have been considered but eliminated from detailed study. The Columbia River Pump Exchange Study is included in the Integrated Plan to be considered for future evaluation if conditions within the basin warrant. It has not been eliminated from further consideration, and it is included as a part of the overall adaptive approach for implementation of the Integrated Plan (Section 2.4.10 of the FPEIS). During development of the PEIS, Reclamation and Ecology closely followed the requirements of 40 CFR 1502.14, as well as WAC 197-11-440. As described in Section 2.2 of the FPEIS, the process to identify, explore, and objectively evaluate all reasonable alternatives builds upon more than 30 years of studies and evaluations. Alternatives considered but eliminated from detailed analysis are discussed in Section 2.5; Section 2.5 has been expanded in the FPEIS. As noted throughout the FPEIS, the Integrated Plan is a comprehensive assemblage of elements to address water management in the Yakima River Basin. The extensive process conducted over the past 30 years has led to an adaptive approach that incorporates seven elements, all of which are needed to address the current and projected water management needs in the basin. The only approach considered reasonable to address the full range of issues in the basin is a comprehensive, adaptive approach that includes all seven of the identified elements. As such, the Integrated Plan represents the only reasonable alternative to fully address the purpose and need for the action. The proposed action alternative is described in as much detail as appropriate for a programmatic evaluation. See the Response to Common Issues regarding the programmatic EIS. Because the elements are at varying stages of consideration and development, some elements are more developed, but the PEIS includes information at a level to allow informed, comparative evaluation of the elements, as well as a comparison of the Action Alternative to the No Action Alternative. As described above, the analysis of the No Action Alternative has been expanded for the FPEIS. The Integrated Plan includes recommendations for actions that are not within the jurisdiction of Reclamation or Ecology, such as the potential for designation of Wilderness, Wild and Scenic Rivers, and National Recreation Areas. The preferred alternative has been identified as the Integrated Plan. Mitigation measures have been identified at a

	programmatic level; most of these are included in the proposed action, to be developed in more detail as projects move forward.
29-4	The process for evaluating a pump exchange project is described in Section 2.4.5.4 of the FPEIS as noted. Step 1 of the study is an initial screening of the physical and legal constraints to transferring Columbia River water to the Yakima basin, as well as identification of potential configurations for routing and storing the water in the Yakima basin. That appraisal level study does not trigger NEPA analysis. If a pump exchange project is deemed potentially viable and carried forward to Step 2, NEPA compliance would subsequently be required and would be conducted on the configurations for routing and storing water that would have been identified in Step 1 as described in Section 2.4.5.4 of the FPEIS and in more detail in the Yakima River Basin Study (Reclamation and Ecology, 2011w). At this time, Reclamation and Ecology in coordination with the YRBWEP Workgroup have determined that the Integrated Plan, as currently assembled, is sufficient to address the identified Purpose and Need for the project. The Plan's adaptive approach will allow the various elements to be implemented if detailed evaluations determine that they are feasible, needed, and cost-effective. Your comments regarding the demand for water in the Yakima Basin are noted. As described in Section 1.3 and the Response to Common Issues regarding alternatives, Reclamation and Ecology worked with the YRBWEP Workgroup to identify irrigation needs in the basin. The 70 percent prorationing level was determined to be the appropriate level of irrigation water supply needed to meet the Purpose and Need for the project. With respect to cumulative impacts, while a study of a Columbia River Pump Exchange is part of the Integrated Plan, it does not follow that implementation of a pump exchange is reasonably foreseeable, so it has not been included in the cumulative impacts analysis.
29-5	Your comments about Bumping Lake Enlargement are noted. The Watershed/Habitat Protections and Enhancements Element is an integral part of Integrated Plan intended to provide overall habitat improvements. Mitigation for specific projects would be developed as part of project-level environmental analysis in the future.
29-6	The FPEIS does not evaluate the effects of climate change on the Columbia River Basin because there are no projects in the Integrated Plan that are located outside the Yakima River basin. The Columbia River Pump Exchange Study would include an evaluation of climate change conditions in the Columbia River Basin.
29-7	Reclamation and Ecology have developed the Integrated Plan in a collaborative manner, including and considering input from the YRBWEP Workgroup. Reclamation and Ecology serve as the lead agencies under NEPA and SEPA, respectively, and are responsible for conducting environmental review. The YRBWEP Workgroup does not have decisionmaking capability in this process. The NEPA action under consideration is a determination to request Federal authorization and funding for implementation of the Integrated Plan. The FPEIS is the environmental compliance document for the process, in accordance with NEPA and SEPA.
29-8	The Integrated Plan, as described in Section 1.1, is a comprehensive "approach to water

	management and habitat enhancement in the Yakima River basin." It is an adaptive approach that includes seven major elements that are intended to be implemented collectively, including potential projects, programs (such as conservation, market reallocation, land acquisition, and recommendations for protective Federal designations) and recommendations for areas of future study. This type of program is appropriately considered as a programmatic or tiered environmental evaluation. Refer to the Response to Common Issues regarding the programmatic EIS for additional discussion on this issue. As noted in 40 CFR 1501.2, "Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts." 40 CFR 1502.20 notes that "Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review." The mixing of programs, plans and potential projects or early action items is not prohibited by NEPA or SEPA. The current evaluation is broad, evaluates basin-wide implications of implementing the Integrated Plan, and identifies future, more detailed evaluations, consistent with 40 CFR 1508.28. The Federal "action" being considered in the PEIS is a determination by Reclamation and Ecology to forward the Integrated Plan to Congress for consideration for Federal authorization and funding. The PEIS is intended to provide Federal decisionmakers with a broad understanding of the full range of implications associated with the implementation of the Integrated Plan. The adaptive approach presented by the Integrated Plan will ensure that the elements will be considered collectively as funding becomes available.
29-9	Refer to Section 5.28 of the FPEIS for an expanded discussion of Irreversible and Irretrievable Commitment of Resources.

Comment Letter No. 30 – David E. Ortman

30-1	The programmatic EIS does not include photographs of any of the affected areas. More detailed analyses of visual resources would be conducted during project-level evaluation and appropriate photographs would likely be included associated with those analyses. The photos you provided are attached to your letter and therefore are part of the record.

Comment Letter No. 31 – Larry Vinsonhaler

31-1	Comments noted. See responses to your detailed comments below.
31-2	Comments noted. See responses to your detailed comments below.
31-3	Comments noted.
31-4	Comments noted.
31-5	Comments noted. All other entities account for 3 percent of the total proratable

	entitlements upstream of Parker. They were included with the Roza, KRD, and WIP demands for the Integrated Plan proration calculation.
31-6	Municipal and industrial demands were increased to future conditions in the RiverWare modeling.
31-7	Comments noted.
31-8	A portion of the September 30 carryover would be used to meet October demands, but in drought years those diversions are not large. It has not been determined exactly what volume of carryover storage would be utilized for dry year supply or instream flows; however, with a large amount of carryover storage remaining, it can be assumed that the storage could be used for both purposes. The hydrologic modeling performed, as described the "*Modeling of Reliability and Flows Technical Memorandum*," (Reclamation and Ecology, 2011k) provides detailed information on water supply and instream flows provided as well as carryover storage available through a period of years, including drought years.
31-9	RiverWare modeling data, including the Kachess inactive pool, is available in Appendix E of the FPEIS and the "*Modeling of Reliability and Flows Technical Memorandum*," (Reclamation and Ecology, 2011k).
31-10	Comments noted.
31-11	The Integrated Plan would not increase Title XII instream target flows. The accounting of TWSA under existing conditions would still occur to determine what Title XII instream target flows would be released under Integrated Plan conditions. However, additional instream flow would be released for specific reaches as described in Section 5.3 of the FPEIS.
31-12	See the response to Comment 12-17. Although hydrologic modeling does show a slight decrease in lower Yakima flows, all potential flow scenarios were not modeled and additional carryover storage was identified as a source of flow for the lower Yakima River. Seasonal and annual flow prioritization will be made by Reclamation in consultation with fisheries managers.
31-13	Comment noted.
31-14	See the response to Comment 31-12.
31-15	Comments noted.
31-16	Your comments about the timing of the Columbia River Pump Exchange Study are noted.
31-17	Your comments about climate change are noted. Refer to Section 2.4.10 for a discussion of the Adaptive Approach of the Integrated Plan.
31-18	Future analysis of individual elements of the Integrated Plan will determine if they, individually and in combination, meet the economic, financial, and cost sharing criteria of Federal and State water resources projects. The PEIS addresses these criteria for the overall Integrated Plan, given current information.
31-19	See the response to Comments 1-2 and 1-4 regarding Tribal treaty water rights.
31-20	Your comments about the continuing controversy are noted.
31-21	The No Action Alternative has been clarified in Section 2.3 of the FPEIS. As described in the response to Comment 12-22, some previously identified projects are included in the Integrated Plan as a means to acquire funding and move the projects forward. The Market Reallocation Element is intended to remove institutional barriers to water

	transfers between willing buyers and sellers and is not the same as the Title XII program allowing Reclamation to purchase or lease land, water, or water rights. As stated in Section 2.4.7.2, the Mainstem Floodplain and Tributary Fish Habitat Enhancement Project is intended to provide funding to fully implement the Steelhead Recovery Plan.
31-22	The effects of the Enhanced Water Conservation Element alone on the items listed in your comment were not modeled for this PEIS or the Integrated Plan. The overall effect of the Integrated Plan on those items is documented in the "*Modeling of Reliability and Flows Technical Memorandum*," (Reclamation and Ecology, 2011k). Also see the response to Comment 31-11.
31-23	Comments noted.
31-24	Comments noted. Land acquisitions are intended to enhance habitat throughout the basin. The Integrated Plan proposal submitted to Congress would request authorization to purchase land in the basin. Determining the expenditures you request is outside the scope of this programmatic EIS and has not been included, but would be provided as part of project-level evaluations.

Comment Letter No. 32 – William Parker

32-1	Impacts on cabins are discussed in Section 5.15.2.3. Notice of these impacts and determination of potential compensation would occur as part of project-level evaluations. Potential increased fees to cabin users is part of a separate process being undertaken by the Forest Service.
32-2	Impacts to roads from Bumping Lake enlargement are discussed in Sections 4.18.2.3 and 5.18.2.3. Impacts will be analyzed in further detail in future project-level environmental review if the project is carried forward.
32-3	See the response to Comment 32-2.
32-4	Mitigation for transportation impacts is discussed in Sections 4.18.3 and 5.18.4. Impacts and mitigation will be analyzed in further detail in future project-level environmental review. See the Response to Common Issues regarding the programmatic EIS.
32-5	Impacts to surface water from Bumping Lake enlargement are discussed in Section 5.3.2.3. Impacts will be analyzed in further detail in future project-level environmental review. See Response to Common Issues regarding the programmatic EIS.
32-6	Hydropower generation at Bumping Lake Reservoir or other Integrated Plan projects is not part of the Integrated Plan, but may be evaluated in the future. If pursued in the future, separate environmental analysis would be done. As described in Section 5.6.4, subordination of power at Roza and Chandler powerplants would be coordinated with BPA, Reclamation, and the affected irrigation districts.
32-7	Congressional designation of Wilderness is discussed in Section 2.4.7.1.
32-8	Impacts will be analyzed in further detail in future project-level environmental review. See the Response to Common Issues regarding the programmatic EIS.
32-9	Bumping Lake enlargement would not inundate any roadless areas within the Okanogan-Wenatchee National Forest.
32-10	The discussion of Socioeconomic impacts is appropriate for a programmatic EIS. See the Response to Common Issues regarding the programmatic EIS. Additional economic analysis of the Integrated Plan will be included in the Framework for Implementation

	that will be available in Summer 2012. See Section 1.2.2 of the FPEIS.
32-11	Comment noted.
32-12	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. Reclamation's Yakima Field Office operates the dam and reservoir and the USFS manages recreation; both agencies jointly manage the land use around the reservoir.
32-13	Comment noted.

Comment Letter No. 33 – John W. Couch

33-1	Comments noted. Your proposal to install fish pens behind Columbia River dams is located outside the Yakima River basin and outside the scope of this EIS.

Comment Letter No. 34 – C. J. Klarich

34-1	Comment noted.
34-2	Comments noted. Costs of the projects and a cost benefit analysis will be further evaluated in the Framework for Implementation anticipated in the summer of 2012. See Section 1.2.1 of the FPEIS.
34-3	The acquisition of properties in the Habitat/Watershed Protection and Enhancement Element is included to provide overall improvement of conditions for listed species meeting the habitat improvement purpose of the Integrated Plan.
34-4	Your comments about the Columbia River Pump Exchange Study are noted. The exchange was evaluated but not carried forward except to the extent that it would be studied further to determine if it was a viable concept that might merit further detailed evaluation and congressional authorization in the future. See Section 2.4.5.4 and Comment Letters 28 and 29 for additional detail.
34-5	Modeling of the Integrated Plan was conducted using the same model that Reclamation uses for river operations. The model concluded that the Integrated Plan meets the identified Purpose and Need of the project, including improved water supply for agriculture, municipal and domestic uses, and habitat improvements.

Comment Letter No. 35 – W.F. Hendrix and Kathleen Hendrix

35-1	Your comment in opposition to the Integrated Plan is noted.
35-2	See the response to Comment 20-2.
35-3	See the response to Comment 9-2 regarding the Pine Hollow Reservoir.
35-4	Comment noted.

Comment Letter No. 36 – Margie Van Cleve

36-1	Comment noted. A number of other environmental groups were involved in developing the Habitat/Watershed Protection and Enhancement Element. See the response to Comment 28-21.

36-2	See the Response to Common Issues regarding alternatives.
36-3	Preservation of land in the Teanaway River Basin is an integral part of the Integrated Plan. It addresses the habitat improvement need identified in Section 1.3.
36-4	A cost benefit analysis of the Integrated Plan will be conducted as part of the Framework for Implementation anticipated in the summer of 2012. See Section 1.2.2 of the FPEIS.
36-5	Comment noted.

Comment Letter No. 37 – Teresa Lorenz

37-1	Your comments in opposition to expanding Bumping Lake Reservoir are noted.
37-2	The PEIS acknowledges that there would be long-term impacts on terrestrial wildlife. Additional detail has been added to the FPEIS based on a review of the program by the Service. The Service noted that "with the understanding that each of the seven elements would need additional project-level environmental compliance to analyze, identify, and evaluate environmental impacts, [they] recommend the Action Alternative. The Service is of the opinion that the Action Alternative has greater probability of improving fish and wildlife resources beyond what currently exists within the Yakima River basin than the No Action Alternative." The Final Coordination Act Report (CAR) has been completed and is available at: http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html
37-3	The Fish Passage at Major Reservoirs Element is included in the Integrated Plan because it is an essential component of improving ecosystem health and fish habitat, a stated purpose of the Integrated Plan. Reclamation currently has no authorization or funding for further studies or implementation of fish passage facilities and the Integrated Plan is intended to move the projects forward.
37-4	Section 2.4.5.3 of the FPEIS has been edited to clarify that Bumping Lake enlargement would not encroach on the designated Wilderness.
37-5	The description of Wilderness designation recommendations is in Section 2.4.7.1 of the FPEIS.
37-6	See the response to Comment 12-29.

Comment Letter No. 38 – Camille Bennett

38-1	Comment noted. Agricultural and municipal and domestic conservation is included in the Integrated Plan. See the Response to Common Issues regarding conservation.
38-2	Impacts of storage projects on fish are discussed in Section 5.7.2.3 of the FPEIS and long term sediment load impacts are discussed in Section 5.2.2.3.
38-3	Impacts to water quality, including temperature, are described in Section 5.5.2.3 of the FPEIS.
38-4	Your comment in opposition to storage projects is noted. See Response to Common Issues regarding conservation.

Comment Letter No. 39 – Raelene Gold

39-1	Comments noted.
39-2	Comments noted. See the response to Comment 19-2.

Comment Letter No. 40 – Edward M. Henderson

40-1	Comments noted. See the response to Comment 17-1.
40-2	Comment noted. The Integrated Plan includes conservation and water marketing elements as well as storage elements.
40-3	Your comments regarding Bumping Lake Reservoir expansion and Wymer Dam are noted. See the response to Comment 17-2.
40-4	See the response to Comment 17-3.
40-5	Your comment regarding real estate development is noted. See the response to Comment 17-4.
40-6	See the Response to Common Issues regarding alternatives.
40-7	See the response to Comment 12-4.
40-8	Comment noted.

Comment Letter No. 41 – Pat Kelleher

41-1	Comments noted. Reclamation and Ecology will implement the plan jointly.
41-2	"Critical water year" was used in Section 5.5.2.6 and is meant to be the same as a drought year. The term "critical" was changed to "drought" in that section of the FPEIS for clarity. Normal water supply is defined in Chapter 173-166-030 WAC as: (6) "Normal water supply" is: (a) For the purpose of the determination of drought conditions, the average amount of water available to a geographical area on an annual basis, based upon evaluation of precipitation, streamflow, snowpack and other hydrological and meteorological factors. The last drought declaration was made in 2005.
41-3	Fish population and habitat conditions in the project area are discussed throughout Section 3.7.
41-4	Land ownership is shown in Figures 1-2 and 1-3 of the FPEIS. Floodplain and stream buffers are not shown because they would not show up at a basin-wide scale. However, they will be considered during project-level evaluation.
41-5	As with several of the projects proposed in the Integrated Plan, Reclamation has lacked authorization and funding to adequately evaluate and implement the Kachess Reservoir inactive storage project.
41-6	Your comment in opposition to the Bumping Lake Reservoir expansion is noted.
41-7	The Market Reallocation Element is intended to remove barriers to water marketing and create a flexible system for reallocating water rights. Junior water rights holders could purchase senior water rights, water rights used on marginal lands could be purchased and

	that land removed from production. Your comment about using 3 to 1 to move water through the system is unclear.
41-8	Black Rock Reservoir is discussed in Section 2.5.1 of the FPEIS as an alternative eliminated from detailed evaluation along with a description of why the project is not included in the Integrated Plan.
41-9	The recreation information included in Section 3.15.2 of the FPEIS is for existing Reclamation reservoirs. Providing additional detail on recreational uses is outside the scope of this programmatic EIS. Recreation impacts are discussed in greater detail in Sections 4.15 and 5.15. Section 2.4.7.1 of the FPEIS describes how the Targeted Watershed Protections and Enhancements project would create recreation opportunities.
41-10	Comment noted. The Integrated Plan is a complicated process and Reclamation and Ecology have attempted to make it as clear as possible in the PEIS. Sections in the FPEIS have been revised for clarity. See Section 1.2.2 of the FPEIS regarding the Framework for Implementation.
41-11	A discussion of pending FERC applications has been added to Section 3.17 of the FPEIS.
41-12	Comment noted. See the response to Comment 41-10.

Comment Letter No. 42 – Bennett Pearson

42-1	Your comment in support of the Integrated Plan is noted.

Comment Letter No. 43 – Richard Rutz

43-1	See the Response to Common Issues regarding alternatives.
43-2	Water conservation and market reallocation are included as elements of the Integrated Plan. See the Responses to Common Issues regarding alternatives and conservation.
43-3	Your comments in opposition to expanding Bumping Lake Reservoir and construction Wymer Dam are noted.
43-4	Comment noted. The Integrated Plan does include conservation and environmental restoration elements. A benefit cost analysis will be included in the Framework for Implementation which will be released in 2012. See Section 1.2.2 of the FPEIS.
43-5	Providing fish passage facilities at existing dams is included in the Integrated Plan as a means to provide funding for evaluation and implementation of the projects.

Comment Letter No. 44 – Ronald Eber

44-1	Your comments in opposition to storage projects are noted. The Integrated Plan includes fish passage projects and water conservation. Residential development in the Yakima basin is compliant with the Growth Management Act. Additional project-level environmental review will be conducted if projects are carried forward. A Framework for Implementation will be developed in the summer of 2012 which will include a benefit cost analysis. See Section 1.2.2 of the FPEIS.

Comment Letter No. 45 – Daniel Martinez

45-1	Your comments in opposition to storage projects are noted.

Comment Letter No. 46 – Doyle McClure

46-1	Your comments in opposition to storage projects are noted.

Comment Letter No. 47 – Jiri Petold

47-1	Your comment in opposition to storage projects is noted.

Comment Letter No. 48 – Robert B. Smythe

48-1	See the Response to Common Issues regarding alternatives.
48-2	Your comment in opposition to storage projects is noted.

Comment Letter No. 49 – Elisabeth Tutsch

49-1	Your comment in opposition to Bumping Lake Reservoir enlargement is noted.

Comment Letter No. 50 – James B. Dougherty

50-1	See the Response to Common Issues regarding alternatives.
50-2	See the response to Comment 44-1. The Teanaway River acquisition is part of the Integrated Plan's overall habitat improvement goal.

Comment Letter No. 51 – Thomas, Susan, Christina, Cather, Clark, Virginia, and William Cyr

51-1	Your comment in opposition to Bumping Lake Reservoir enlargement is noted.

Comment Letter No. 52 – David Huycke

52-1	Your comment in opposition to Bumping Lake Reservoir enlargement is noted.

Comment Letter No. 53 – Glenda Carper

53-1	Your comment in opposition to storage projects is noted. Conservation is included as an element of the Integrated Plan.

Comment Letter No. 54 – Peg Altman

54-1	Your comment in opposition to dams is noted.

Comment Letter No. 55 – Mrs. Mike Nykreim

55-1	Comment noted.

Comment Letter No. 56 – Raymond Bily

56-1	Your comment in support of the Integrated Plan is noted. Fishery and habitat restoration objectives are described in Section 1.3.

Comment Letter No. 57 – Don Huling

57-1	Your comment in support of the Integrated Plan is noted. Additional environmental and economic analyses will be conducted on the Integrated Plan elements and projects as they are carried forward. A preliminary cost benefit analysis will be available in summer 2012 in the Framework for Implementation. See the response to Comment 7-1.

Comment Letter No. 58 – Stanley Jones-Umberger

58-1	Your comment in support of the Integrated Plan but in opposition to dams is noted. See the response to Comment 57-1.

Comment Letter No. 59 – Penny Orr

59-1	Comment noted.
59-2	See the response to Comment 57-1.

Comment Letter No. 60 – Ramona Saldana-Flores

60-1	Your comment in support of salmon habitat protection and of the Integrated Plan is noted. See the response to Comment 57-1.

Comment Letter No. 61 – Greg Obray

61-1	Comment noted. Additional detail on the Watershed Protection and Enhancement component has been added to the FPEIS. See the response to Comment 57-1.

Comment Letter No. 62 – Jerry Broadbent

62-1	Your comments in opposition to dams and in favor of conservation, fish passage, and watershed protection are noted. See the response to Comment 44-1.

Comment Letter No. 63 – Claus and Phyllis Dolph

63-1	Your opposition to storage projects is noted. See response to Comment 44-1.

Comment Letter No. 64 – Lars Henrikson

64-1	Your comments in opposition to dams and in favor of conservation, fish passage, and watershed protection are noted. See the response to Comment 44-1.
64-2	Reclamation and Ecology believe that the Integrated Plan is the most effective approach to improving water supply and habitat conditions in the Yakima River basin and do not plan to withdraw the DPEIS. See response to Comment 44-1. A Framework for Implementation will be developed in the summer of 2012 which will include a benefit cost analysis. See Section 1.2.2 of the FPEIS.

Comment Letter No. 65 – Mark Johnston

65-1	Your comment in opposition to dams is noted.
65-2	Your comment in opposition to Wymer Dam is noted.
65-3	See response to Comment 44-1. See also the Response to Common Issues regarding conservation.

Comment Letter No. 66 – Kevin and Susan Kane

66-1	Your comment in opposition to dams is noted. See response to Comment 44-1.
66-2	Comments noted. See Response to Common Issues regarding conservation.

Comment Letter No. 67 – Marc Ladd

67-1	See response to Comment 44-1.
67-2	Comment noted. See the response to Comment 32-6.

Comment Letter No. 68 – Alec Maclurg

68-1	Comment noted. The projects you suggest would not significantly contribute to lessening the water needs in the Yakima basin.
68-2	See response to Comment 44-1.

Comment Letter No. 69 – Judith Night

69-1	See response to Comment 44-1.
69-2	The Integrated Plan includes measures to protect fish and improve habitat.

Comment Letter No. 70 – Elaine Packard

70-1	Comment noted. The Integrated Plan includes a conservation element. See response to Comment 44-1.
70-2	See response to Comment 44-1.

Comment Letter No. 71 – E.J. Rich

71-1	See response to Comment 44-1.
71-2	Your comments in opposition to storage projects are noted.

Comment Letter No. 72 – Jim Scarborough

72-1	Your comments in opposition to dams and in favor of conservation and fish passage are noted. Conservation and fish passage are included as elements of the Integrated Plan.
72-2	See the response to Comment 44-1.

Comment Letter No. 73 – Dottie Simone

73-1	See response to Comment 44-1. Impacts of the Integrated Plan on water quality are discussed in Sections 4.5 and 5.5.

Comment Letter No. 74 – Sheri Staley

74-1	See Response to Common Issues regarding alternatives.
74-2	See response to Comment 44-1.

Comment Letter No. 75 – Peter von Christierson

75-1	See response to Comment 44-1.
75-2	Your comments in opposition to storage are noted. Many of the irrigators in the Yakima basin already use drip irrigation.

Comment Letter No. 76 – Amy Waterman

76-1	See Responses to Common Issues regarding conservation and alternatives.
76-2	See response to Comment 62-1.

Comment Letter No. 77 – Joan Bartz

77-1	See response to Comment 44-1.
77-2	Impacts on the Yakima River Scenic Byway and other visual resources are discussed in Section 5.11 of the FPEIS.

Comment Letter No. 78 – Bobbie Bull

78-1	See response to Comment 44-1.
78-2	The FPEIS acknowledges that the Integrated Plan would cause substantial impacts to shrub-steppe habitat and old-growth forests.
78-3	See the Response to Common Issues regarding alternatives.

Comment Letter No. 79 – Timothy J. Coleman

79-1	See the response to Comment 44-1. Providing instream flows for fish habitat is a key focus of the Integrated Plan as described in Section 1.3 of the FPEIS. How instream flows would be managed for the benefit of fish habitat is discussed in Section 5.7.3. Wild and Scenic River designation for the Teanaway is recommended in the Integrated Plan. Designation of the Yakima River as Wild and Scenic River is not recommended in the Integrated Plan. The river has been highly altered and is unlikely to quality for designation.

Comment Letter No. 80 – Danna Dal Porto

80-1	See response to Comment 44-1.
80-2	Your comments in opposition to storage projects are noted. Upgrades to existing canals to stop evaporation is included in several projects in the Integrated Plan: Kittitas Reclamation District Canal Modifications (Section 2.4.4.2), Wapatox Canal Improvements (Section 2.4.4.5), and the Enhanced Water Conservation Element (Section 2.4.8).

Comment Letter No. 81 – Justin Morgan

81-1	Your comments in opposition to storage projects are noted. See response to Comment 44-1.
81-2	A Framework for Implementation will be developed in the summer of 2012 which will include a benefit cost analysis. See Section 1.2.1 of the FPEIS.

Comment Letter No. 82 – Mary Bergstrom

82-1	Comment noted. Reclamation has contacted you in response to your map request.

Comment Letter No. 83 – Ralph Berthon

83-1	Your suggestion is noted.

Comment Letter No. 84 – Tom Dryden

84-1	Comment noted. The Integrated Plan includes projects that would facilitate the acquisition of water rights for residential building in upper Kittitas County. Improved habitat conditions would benefit the entire Yakima basin.

Comment Letter No. 85 – Jess Heaverlo

85-1	Comment noted.

Comment Letter No. 86 – Scott Miller

86-1	Your comments about the cabins at Bumping Lake Reservoir are noted. The photographs you submitted are attached to your comment form and therefore are part of the record.

Comment Letter No. 87 – A.J. Scott

87-1	Comment noted.
87-2	The upper Kittitas County groundwater study started in April 2011.
87-3	See Response to Common Issues regarding conservation.

Comment Letter No. 88 – National Wildlife Federation Form Email

88-1	See the response to Comment 57-1.

Comment Letter No. 89 – Sierra Club Form Email #2

89-1	See Response to Common Issues regarding alternatives.
89-2	See the response to Comment 44-1.

Comment Letter No. 90 – Sierra Club Form Email and Postcard

90-1	See the response to Comment 44-1.

Public Hearing Transcript No. 1 – Tracy Rooney

T1-1	The purpose and benefits of the Wilderness designation recommendations are discussed in Section 2.4.7.1 and throughout Chapter 5, particularly in Sections 5.7.2.5, 5.8.2.5, 5.9.2.5, and 5.10.2.5.

Public Hearing Transcript No. 2 – Phil Hess

T2-1	The Integrated Plan would pursue conservation easements over land acquisition where appropriate, as discussed in Section 2.4.7.1. Historic uses of the property would be maintained where they are compatible with watershed functions and aquatic habitat.
T2-2	Your comments about wilderness designation are noted.
T2-3	See response to Comment 89-1.

Public Hearing Transcript No. 3 – Ray Foisy

T3-1	Comment noted.
T3-2	Your comment about the landslide near Bumping Lake Reservoir is noted. Additional studies, including geotechnical evaluations, would be conducted prior to design and construction.

T3-3	The bull trout population upstream of Bumping Lake Reservoir would benefit from the reestablishment of historic connectivity associated with the fish passage component of the enlargement project. Impact of the project on bull trout populations is described in Section 5.7.2.3 and 5.10.2.3. Impact of the overall Integrated Plan on fish populations is described in Section 5.7.3.
T3-4	See the response to Comment 12-48 regarding cabins at Bumping Lake Reservoir.

Public Hearing Transcript No. 4 – Scott Miller

T4-1	See the response to Comment 12-48 regarding cabins at Bumping Lake Reservoir. Determination of potential cabin buyout process would occur as part of a project-level analysis.

LIST OF PREPARERS

LIST OF PREPARERS

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Corey Carmack Native American Affairs Coordinator	M.S., Cultural Resource Management, Central Washington University 9 years experience in environmental compliance	Bureau of Reclamation	Indian Trust Assets and Indian Sacred Sites

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All locations are in the State of Washington, unless otherwise noted.

U.S. Congressional Delegation

United States Senate

Honorable Maria Cantwell, Richland, Seattle; Washington DC
Honorable Patty Murray, Seattle, Tacoma, Yakima; Washington DC

House of Representatives

Honorable Richard Hastings, Pasco, Yakima; Washington DC

Governor of Washington

Honorable Christine Gregoire, Olympia

Indian Tribes

Confederated Tribes and Bands of the Yakama Nation, Toppenish
Confederated Tribes of the Umatilla Indian Reservation, Pendleton, Oregon

Washington State Legislature

13th Legislative District

Senator Janea Holmquist, Olympia
Representative Bill Hinkle, Olympia
Representative Judy Warnick, Olympia

14th Legislative District

Senator Curtis King, Olympia
Representative Charles Ross, Olympia
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Senator Jim Honeyford, Olympia
Representative Bruce Chandler, Olympia
Representative David Taylor, Olympia

8th Legislative District

Senator Jerome Delvin, Olympia
Representative Brad Klippert, Olympia
Representative Larry Haler, Olympia

Federal Agencies

Department of Agriculture
Forest Service, Cle Elum, Naches, Wenatchee
Department of Defense
Department of the Army
Corps of Engineers, Seattle
Yakima Training Center, Yakima
Department of Energy
Bonneville Power Administration, Portland, Oregon
Office of River Protection
Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service, Ellensburg, Seattle
Department of the Interior
Bureau of Indian Affairs, Toppenish; Portland, Oregon
Bureau of Land Management, Spokane Valley
Fish and Wildlife Service, Lacey, Wenatchee, Yakima; Arlington, Virginia
Geological Survey, Tacoma; Fort Collins, Colorado
Department of Transportation
Federal Highway Administration, Olympia
Environmental Protection Agency, Seattle; Washington, DC

State and Local Government Agencies

State of Washington

Department of Ecology, Yakima
Department of Ecology SEPA Unit, Olympia
Department of Agriculture, Olympia
Department of Commerce, Olympia
Department of Fish and Wildlife, Yakima, Olympia
Department of Natural Resources, Olympia

Department of Transportation, Yakima, Olympia
Department of Archaeology & Historic Preservation, Olympia
Washington State Parks and Recreation Commission, Olympia
Recreation and Conservation Office, Olympia

Local Agencies

Benton County
    Commissioners, Prosser
City of Cle Elum
City of Roslyn
City of Ellensburg
City of Kennewick
City of Pasco
City of Richland
City of Sunnyside
City of West Richland
City of Yakima
Town of Naches
City of Selah

Kittitas County
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    Public Works, Ellensburg
    Kittitas County Conservative District, Ellensburg
Port of Benton, Richland
Port of Sunnyside, Sunnyside
Yakima County
    Commissioners, Yakima
    Planning Department, Yakima
    Public Services, Yakima
    Yakima Regional Clean Air Agency, Yakima
Yakima Valley Conference of Governments

Irrigation Districts

Ahtanum Irrigation District
Benton Irrigation District, Benton City
Cascade Irrigation District, Ellensburg
Columbia Irrigation District, Kennewick
Kennewick Irrigation District, Kennewick
Kittitas Reclamation District, Ellensburg
Naches-Selah Irrigation District, Selah
Roza Irrigation District, Sunnyside
Selah-Moxee Irrigation District, Selah
Sunnyside Valley Irrigation District, Sunnyside

Union Gap Irrigation District, Wapato
Wapato Irrigation Project, Wapato
Yakima-Tieton Irrigation District, Yakima

Libraries

Benton City Library, Benton City
Carpenter Memorial Library, Cle Elum
Ellensburg Public Library, Ellensburg
Kennewick Library, Kennewick
Kittitas Public Library, Kittitas
Mid-Columbia Library, Kennewick
Pasco Library, Pasco
Prosser Library, Prosser
Richland Public Library, Richland
Roslyn Public Library, Roslyn
Sunnyside Public Library, Sunnyside
Toppenish Library, Toppenish
Wapato Library, Wapato
Washington State Library, Olympia
West Richland Library, Richland
Yakama Nation Library, Toppenish
Yakima Valley Regional Library, Yakima

Organizations

Alpine Lakes Protection Society, Seattle
American Rivers, Seattle
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National Wildlife Federation, Seattle
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Sierra Club, Seattle
Tapash Sustainable Forest Collaborative, Ellensburg
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Trout Unlimited, Seattle
Western Lands Project, Seattle
Western Watersheds Project, Boise, ID
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Yakima Basin Joint Board, Sunnyside
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Media

Ellensburg Daily Record, Ellensburg
North Kittitas County Tribune, Cle Elum
Tri-City Herald, Tri-Cities
Yakima Herald Republic, Yakima

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REFERENCES

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GLOSSARY

GLOSSARY

acre-foot	The volume of water that could cover 1 acre to a depth of 1 foot. Equivalent to 43,560 cubic feet or 325,851 gallons.
active capacity	The reservoir capacity or quantity of water which lies above the inactive reservoir capacity and normally is usable for storage and regulation of reservoir inflow to meet established reservoir operating requirements.
alluvial	Composed of clay, silt, sand, gravel, or similar material deposited by running water.
anadromous	Fish that hatch and develop to adolescence in rivers and migrate to saltwater to feed, then migrate from saltwater to freshwater to spawn.
appurtenant	An accompanying part or feature of something; accessory.
aquifer	A water-bearing stratum of permeable rock, sand, or gravel.
benthic	Relating to the bottom of a sea or lake or to the organisms that live there.
cfs	Flow rate in cubic feet per second.
connectivity	The relationship between groundwater and surface water.
cumulative effect	For NEPA purposes, these are impacts to the environment that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such action.
economic benefits	An economics term measuring national economic welfare based on net values (e.g., net willingness-to-pay or consumer surplus for consumers and profit for producers).
economic feasibility	An economics term stemming from the results of the benefit-cost analysis. If a project's benefits exceed its costs, the project is deemed economically feasible.
emergence	Refers to the fry lifestage of the salmon when they swim up through the substrate from their incubation nest (red) to live along the stream edge.

endangered species	Under the Endangered Species Act, a species that is in danger of extinction throughout all or a significant portion of its range. To term a run of salmon "endangered" is to say that particular run is in danger of extinction.
Environmental Justice	The fair treatment of people of all races and incomes with respect to actions affecting the environment. Fair treatment implies that there is equity of the distribution of benefits and risks associated with a proposed project and that one group does not suffer disproportionate adverse effects.
escapement	The act of adult salmon and steelhead successfully arriving at their spawning areas by avoiding harvest and predation.
eutrophication	The process by which a body of water becomes enriched in dissolved nutrients that stimulate the growth of aquatic plant life, usually resulting in the depletion of dissolved oxygen.
feasibility study	Detailed investigation specifically authorized by the Congress to determine the desirability of seeking congressional authorization for implementation of a preferred alternative, normally the NED Alternative, which reasonably maximized net national economic development benefits.
flip-flop	An operational action in the upper Yakima River basin in late summer to encourage anadromous salmon to spawn at lower river state levels so that the flows required to keep the redds watered and protected during the subsequent incubation period are minimized.
flow	The volume of water passing a given point per unit of time.
flow objectives	The desired monthly streamflow used to guide RiverWare model operation criteria. Also used to evaluate alternative performance in terms of how closely they meet the desired monthly streamflow.
freshet	A great rise or overflowing of a stream caused by heavy rains or snowmelt.
fry	The life stage of fish between the egg and fingerling stages. Depending on the fish species, fry can measure from a few millimeters to a few centimeters in length (see also fingerling and smolt).

habitat	The combination of resources and the environmental conditions that promotes occupancy by individuals of a given species and allows those individuals to survive and reproduce.
historic property	Any building, site, district, structure, or object (that has archeological or cultural significance) included in, or eligible for inclusion in, the National Register.
hydraulic conductivity	The rate at which the water can move through an aquifer.
inactive capacity	The reservoir capacity or quantity of water which lies beneath the active reservoir capacity and is normally unavailable for withdrawal because of operating agreements or physical constraints.
Indian Sacred Site	A specific, discrete, narrowly delineated location on Federal land that is identified by an Indian Tribe or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion.
Indian Trust Assets (ITA)	Legal interests in property held in trust by the United States for Indian Tribes or individuals. They are rights that were reserved by or granted to American Indian Tribes or Indian individuals by treaties, statutes, and Executive orders. These rights are sometimes further interpreted through court decisions and regulations.
instream flows	Waterflows for designated uses within a defined stream channel, such as minimum flows for fish, wildlife, recreation, or aesthetics.
interbed	Term given to the sediments deposited between basalt flows in the Columbia Plateau Basalt Group.
junior water rights	Proratable water rights that, in water-short years, receive less than their full right on a prorated basis.
metamorphic rock	Refers to rocks that have changed in form from their original rock type (sedimentary or igneous) in response to extreme changes in temperature, pressure, or chemical environment (i.e. limestone into marble).
natural flow	Riverflow that originates from a source other than reservoir storage.

net benefits	In an economic benefit-cost analysis, Net benefits reflect the difference between the present value of the benefits and the present value of the costs (i.e., present value benefits minus present value costs). For a project to be economically justified, net benefits should be positive.
nonproratable water rights	Pre-Yakima Project senior water rights related to natural flows that are served first and cannot be reduced until all the proratable rights are regulated to zero.
normative flows	Flows that mimic the natural frequency, duration, and magnitude in the rise and fall of the river stage to the greatest extent possible giving the cultural, legal, and operational constraints associated with river basin development.
oligotrophic	Lacking plant nutrients and usually containing plentiful amounts of dissolved oxygen without stratification.
proratable water rights	Newer junior water rights related to storage water that, in water-short years, receive less than their full right on a prorated basis.
prorationing	The process of equally reducing the amount of water delivered to junior (i.e., “proratable”) water right holders in water-deficient years.
redd	The nest that a spawning female salmon digs in gravel to deposit her eggs.
riparian	Relating to, living in, or located on a water course.
salmonid	A family of soft-finned fishes of cold and temperate waters that includes salmon, trout, chars, freshwater whitefishes and graylings.
sediment	Any very finely divided organic or mineral matter deposited by water in nonturbulent areas.
senior water rights	Nonproratable water rights that are served first and cannot be reduced until all the proratable rights are regulated to zero.
shrub-steppe	A vegetation type consisting of a mix of woody shrubs, grasses, and forbs, generally dominated by Wyoming big sagebrush and blue bunch wheatgrass.

smolt	Adolescent salmon or steelhead, usually 3 to 7 inches long, that are undergoing changes preparatory for living in saltwater (see also fry and fingerling).
spawner	Adult salmon that has left the ocean and entered a river to spawn.
target flows	Flows quantified in Title XII of the Act of October 31, 1994, for two points in the Yakima River basin (Sunnyside and Prosser Diversion Dams).
terrestrial	Of or relating to land as distinct from air or water.
threatened species	Under the Endangered Species Act, a species that is likely to become endangered within the foreseeable future.
Title XII target flows	Specific instream target flows established for Yakima Project operations at Sunnyside and Prosser Diversion Dams by Title XII of the Act of October 31, 1994 (Public Law 103–464).
total water supply available (TWSA)	The total water supply available for the Yakima River basin above the Parker gage for the period April through September.
ungulate	A four-legged, hoofed animal.
unregulated flows	The flow regime of a stream as it would occur under completely natural conditions; that is, not subjected to modification by reservoirs, diversions, or other human works.
waterway	A channel for conveying or discharging excess water.
water year	The 12-month period from October through September. The water year is designated by the calendar year in which it ends and which includes 9 of the 12 months. For example, the year ending September 30, 1992, is called the “1992 water year.”
watershed	The total land area draining to any point in a stream.
wet water year	A water supply in the Yakima River basin greater than 3,250,000 acre-feet.
wetland	Generally, an area characterized by periodic inundation or saturation, hydric soils, and vegetation adapted for life in saturated soil conditions.

Appendix A

NOTICE OF ADOPTION

NOTICE OF ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT

Description of current proposal: Yakima River Basin Integrated Water Resource Management Plan Programmatic Environmental Impact Statement (EIS)

Proponent: Washington State Department of Ecology

Location of current proposal: Yakima River Basin, State of Washington

Title of documents being adopted:

Yakima River Basin Water Storage Feasibility Study Final Planning Report/EIS (Reclamation, 2008f)

Yakima River Basin Integrated Water Resource Management Alternative Final EIS (Ecology, 2009)

Lake Roosevelt Incremental Storage Releases Final Supplemental EIS (Ecology, 2008a)

Columbia River Water Management Program Final EIS (Ecology, 2007b)

Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS (Reclamation and Ecology, 2011c)

Date adopted documents were prepared: January 2008, June 2009, August 2008, February 2007, April 2011

Description of documents being adopted:

The Yakima River Basin Water Storage Feasibility Study Final Planning Report/EIS is a National Environmental Policy Act (NEPA) document prepared by the U.S. Bureau of Reclamation (Reclamation). It evaluated three storage alternatives – Black Rock, Wymer, and Wymer Plus Pump Exchange. The Final Planning Report/EIS recommends the No Action Alternative as the preferred alternative. Reclamation concluded that the benefits of the storage alternatives, when weighed against the impacts and costs, did not provide justification for moving forward with any of the three alternatives. The Final Planning Report/EIS is adopted because it includes impacts of constructing a new reservoir at the Wymer site.

The Yakima River Basin Integrated Water Resource Management Alternative Final EIS is a State Environmental Policy Act (SEPA) document prepared by the Washington Department of Ecology (Ecology). It evaluated the impacts of an integrated approach to provide water for agriculture, municipal and domestic uses, and fish benefits. The integrated approach evaluated in the EIS includes seven elements: fish passage, modifying existing structures and operations, new surface storage, groundwater storage, fish habitat enhancement, and market-based reallocation of water resources. These seven

elements formed the basis for the seven elements included in the Integrated Plan and the EIS is adopted because it provided the initial analysis included in this Programmatic EIS.

The Lake Roosevelt Incremental Storage Releases EIS is a SEPA document prepared by Ecology that evaluates the impacts of releasing additional water from Lake Roosevelt to provide water to benefit municipal and industrial supply, the Odessa Subarea interruptible water right holders, and instream flows. The EIS is adopted to document cumulative impacts to water demand in the Columbia River Basin.

The Columbia River Water Management Programmatic EIS is a SEPA document prepared by Ecology. It evaluates the potential impacts of the State of Washington's program to aggressively pursue water storage and conservation and to provide additional water for instream flows. The EIS is adopted to document cumulative impacts to water demand in the Columbia River Basin.

The Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project EIS is a joint NEPA/SEPA document prepared by Reclamation and Ecology. It evaluates potential impacts of constructing fish passage facilities at the dam and reintroducing fish above the dam. It is adopted to document the potential impacts of fish passage facilities, one of the elements of the Integrated Plan.

If the document being adopted has been challenged (WAC 197-11-630), please describe:

N/A

The document is available to be read at (place/time): All of the adopted documents were distributed to agencies with jurisdiction, Tribes and other interested parties when they were released. The documents may be viewed at Department of Ecology offices during normal business hours (8:00 a.m. to 5 p.m., Monday to Friday) at the following locations:

Department of Ecology Headquarters
300 Desmond Drive
Lacy, WA 98503

Department of Ecology Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, WA 98902-3452

The adopted documents can be viewed on-line at the following locations.

Yakima River Basin Water Storage Feasibility Study Final Planning Report/EIS:

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

Yakima River Basin Integrated Water Resource Management Alternative Final EIS:

http://www.ecy.wa.gov/programs/wr/cwp/cr_yak_storage2.html#seis

Lake Roosevelt Incremental Storage Releases Final Supplemental EIS:

http://www.ecy.wa.gov/programs/wr/cwp/images/pdf/finalseis/seis_cvr_tc.pdf

Columbia River Water Management Program Final EIS:

http://www.ecy.wa.gov/programs/wr/cwp/eis.html

Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project Final EIS:

http://www.usbr.gov/pn/programs/eis/cle-elum/index.html

EIS REQUIRED: The lead agency has determined the Yakima River Basin Integrated Water Resource Management Plan is likely to have significant adverse impact on the environment. To meet the requirements of RCW 43.21C.030(2)(c), the lead agency is adopting portions of the NEPA and SEPA documents described above, in addition to preparing a stand-alone NEPA/SEPA Programmatic EIS for the proposal, to fulfill its requirements under SEPA.

The lead agency has determined that this document is appropriate for the proposal and will accompany the proposal to decision makers.

Nam of agency adoption document: Washington State Department of Ecology

Responsible Official: Derek I. Sandison

Position/title: Director, Office of Columbia River

Address: 303 S. Mission Street, Suite 200
Wenatchee, WA 98801

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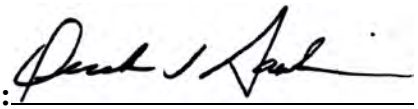
Date: October 22, 2011 **Signature:** 

Appendix B

FISH HABITAT TABLE

Table B-1 Fish Habitat

Reach Name	Flow and Habitat Conditions	
Mainstem River Reaches		
Yakima River from Keechelus Dam to Lake Easton	*Spring*:	Flow pulses are reduced in the spring (except when the YFO responds to a request for a pulse flow from SOAC) due to runoff being captured by Keechelus Reservoir. Lower flows reduce available rearing and overwintering habitat into early spring in dry years.
	Summer:	Currently, flows are too high from July through early September when juvenile Chinook and steelhead (and potentially coho if reestablished) are rearing in this reach. Juvenile salmon seek protection against high-velocity flows to avoid being pushed downstream into less desirable habitat and to minimize energy expenditures, which can affect growth rates. The negative effects on rearing juvenile salmonids from high summer flow conditions in this reach occur during all water year types but are most significant in wet years. Flows in summer during a wet year such as 2002 average about 1,000 cfs.
	Fall:	Lower flows reduce available rearing and overwintering habitat throughout the fall.
	Winter:	During winter, flows are lower than unregulated due to runoff being captured by Keechelus Reservoir. Lower flows reduce available rearing and overwintering habitat throughout the winter.
Easton Reach, Yakima River	*Spring*:	In the spring flow pulses are dampened or absent due to the main runoff being captured in Keechelus and Kachess reservoirs and the small unregulated drainage area in this reach affecting outmigration for spring Chinook, steelhead, sockeye and coho.
	Fall/ Winter:	Lower flows in the fall and winter result in reduced available spawning, rearing and overwintering habitat.
Cle Elum River	*Spring*:	Flows are lower than desired for fish, and flow pulses are absent in the spring. Lower flows result in reduced available rearing and overwintering habitat extending through early spring. Flow pulses that mimic natural conditions in spring are needed to support juvenile outmigration.
	Summer:	Under present operations, summer flows are too high. High summer flows reduce the amount of suitable rearing habitat for these species as a result of high water velocities.

Reach Name	Flow and Habitat Conditions	
Mainstem River Reaches		
	Fall/ Winter:	Flows are lower than desired for fish. Lower flows result in reduced available rearing and overwintering habitat throughout the fall and winter. Low flows and a lack of flow variation in fall and winter limits access to available side channels when juvenile Chinook and steelhead (and potentially coho if reestablished) are rearing in this reach. Juvenile salmon seek low-velocity habitat as protection against being pushed out of a reach and to minimize energy expenditures.
Yakima River from Cle Elum to Teanaway River	*Summer*:	Under present operations, flows are too high in summer when juvenile Chinook and steelhead are rearing in this reach. Once reestablished, juvenile coho would also be rearing in this reach. High summer flows reduce the amount of suitable rearing habitat for these species as a result of high water velocities. Juvenile salmon seek low-velocity habitat as protection against being pushed out of a reach and to minimize energy expenditures. The negative effects on rearing juvenile salmonids from high summer flow conditions in this reach occur during all water year types, but are most significant in wet years.
	Fall:	Under present operations, flows are too high in early fall when juvenile Chinook and steelhead are rearing in this reach. Once reestablished, juvenile coho would also be rearing in this reach.
Yakima River from Teanaway River to Roza Dam (Ellensburg Reach)	*Summer*:	Currently, flows are too high from July through early September when juvenile Chinook, steelhead, and coho are rearing in this reach. High summer flows reduce the amount of suitable rearing habitat for these species as a result of high water velocities. Juvenile salmon seek low-velocity habitat as protection against being pushed out of a reach and to minimize energy expenditures. The negative effects on rearing juvenile salmonids from high summer flow conditions in this reach occur during all water year types, but are most significant in wet years.

Reach Name	Flow and Habitat Conditions	
Mainstem River Reaches		
Yakima River from Roza Dam to Naches River	*Spring*:	Currently flows limit fall and winter spawning and rearing for spring Chinook, steelhead, and coho. Flow pulses are absent in the spring affecting outmigration.
	Summer/ Winter:	Currently flows limit fall and winter spawning and rearing for spring Chinook, steelhead, and coho.
	Fall:	Currently flows limit fall and winter spawning and rearing for spring Chinook, steelhead, and coho. Flows in the fall are low and need to be increased to support spawning and rearing, and the movement of fish from this reach to the lower river.
Tieton River	*Spring*:	Under present operations, winter flows are low with limited variation into early spring.
	Fall:	In the fall, flows are too high as a result of flip-flop operations (reducing flows in the upper arm of the Yakima River and increasing flows in the Naches River with increased water releases from Rimrock Reservoir).
	Winter:	Under present operations, winter flows are low, limiting spring Chinook and steelhead rearing, and early adult steelhead migrants. Steelhead adults migrate into the Tieton River from February through May.
Lower Naches River	*Spring*:	The ramping rate from high spring flows to summer flows is abrupt, negatively affecting rearing conditions for steelhead, coho and spring Chinook. Coho spawn in this reach from mid-September to mid-December.
	Summer/ Fall:	Summer and fall flows are low and the ramping rate from high spring flows to summer flows is abrupt, negatively affecting rearing conditions for steelhead, coho and spring Chinook. Coho spawn in this reach from mid-September to mid-December. Lower flows affect available spawning habitat and migration conditions, including water temperature during summer (spring Chinook and sockeye). Juvenile salmonids that rear in the lower Naches River can be pushed out of this area by high flows during flip-flop operations (Haring, 2001).

Reach Name	Flow and Habitat Conditions	
Mainstem River Reaches		
Yakima River from Naches River to Parker	*Summer*:	High summer flow conditions exist in this reach, when juvenile Chinook, steelhead, and coho are rearing. High summer flows can reduce the amount of suitable rearing habitat for these species as a result of high water velocities.
Yakima River from Parker to Prosser Dam	*Spring*:	Flow pulses in this river section are dampened or absent in the spring of most years due to reservoir refill operations, affecting outmigration for all salmonid smolts produced upstream in the basin (spring and fall Chinook, steelhead, coho, and sockeye).
Yakima River from Prosser Dam to Mouth	*Spring*:	Flow pulses in this river section are dampened or absent in the spring of most years due to reservoir refill operations, affecting outmigration for all salmonid smolts produced upstream in the basin (spring and fall Chinook, steelhead, coho, and sockeye).
	Summer:	Summer flows are low, negatively affecting salmonid rearing and migration conditions.
Tributaries		
Above-Reservoir Tributaries	*Year-round*:	Flow conditions above the reservoirs typically remain unaltered with unregulated flow regimes, notwithstanding effects on flow from forest practices, roads, grazing, fire, and other land use influences. Flow variability is retained due to geographic surroundings and persistent flow contributions from springs and smaller drainages. Streams that have experienced flow alterations include Gold Creek, which drains to Keechelus Reservoir, and tributaries to the Kachess River, which become dewatered due to low flows or go subsurface as reservoirs are drawn down (Haring, 2001).

Reach Name	Flow and Habitat Conditions	
Mainstem River Reaches		
Yakima River Tributaries	*Year-round*:	Yakima River tributaries frequently experience low flow in downstream portions as a result of irrigation withdrawals during the late summer and early fall. These flow conditions often preclude salmonids from occupying stream habitat, as do impassable barriers. When diversions for irrigation do not exist, flow conditions tend to remain adequate for fish. However, low precipitation can result in natural low-flow conditions and dry stream channels during the summer and fall. Several streams do not typically experience low-flow conditions. Wilson Creek, which is fed by several tributaries including Naneum Creek, provides year-round flow in the lower reaches despite upstream irrigation withdrawal. Downstream irrigation return flows are largely responsible for these flow conditions (KCCD, 1999). Ahtanum and Cowiche Creeks typically have good flows during the spring, but occasionally experience low flow or variable summer flow due to diversions (Ecology, 2005a; CBSP, 1990). For Ahtanum Creek, the most significant flow reductions occur in these seasons, but the Ahtanum Irrigation Diversion (AID) diverts water year-round and flows are also reduced somewhat in winter.

Appendix C

SPECIAL STATUS SPECIES TABLE

Table C-1. Special Status Species in the Vicinity of the Individual Elements Proposed for the Yakima River Basin Integrated Resources Water Management Plan

	Yakima River (main stem)	Keechelus Lake	Kachess Lake	Cle Elum Lake	Naches River (main stem)	Bumping Lake	Rimrock Lake	**Naches River Tributaries**	Bumping River	Tieton River	**Yakima River Tributaries**	Cle Elum River	Kachess River	Big Creek	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Ahtanum Creek	Toppenish Creek	Satus Creek	Cowiche Creek
PRIORITY SPECIES																							
Mammals																							
Gray wolf (*Canis lupus)*; SE, FE		X	X				X																
Wolverine (*Gulo gulo)*; SCAN, FSOC			X			X																	
Lynx (*Lynx canadensis)*; ST, FT						X			X														
Marten (*Martes americana)*; SNONE, FNONE							X			X													
Fisher (*Martes pennanti)* SE, FCAN																X							
Western gray squirrel (*Sciurus griseus)*; ST, FSOC										X											X	X	
Townsend's ground squirrel (*Spermophilus townsendii)*; SCAN, FSOC	X																						
Grizzly bear (*Ursus arctos)*; SE, FT			X	X									X			X							
Reptiles and Amphibians																							
Western toad (*Bufo boreas)*; SCAN, FSOC		X				X	X												X				
Sharptail snake (*Contia tenuis)*; SCAN, FSOC	X																						
Larch mountain salamander (*Plethodon larselli)*; SSEN, FSOC			X	X																			
Columbia spotted frog (*Rana luteiventris)*; SCAN, FNONE	X						X									X							

Table C-1. Special Status Species in the Vicinity of the Individual Elements Proposed for the Yakima River Basin Integrated Resources Water Management Plan

	Yakima River (main stem)	Keechelus Lake	Kachess Lake	Cle Elum Lake	Naches River (main stem)	Bumping Lake	Rimrock Lake	**Naches River Tributaries**	Bumping River	Tieton River	**Yakima River Tributaries**	Cle Elum River	Kachess River	Big Creek	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Ahtanum Creek	Toppenish Creek	Satus Creek	Cowiche Creek
Birds																							
Northern Goshawk (*Accipiter gentilis)*; SCAN, FSOC		X	X	X	X	X	X		X	X			X	X		X			X				
Golden eagle (*Aquila chrysaetos)*; SCAN, FNONE	X									X													
Great blue heron (*Ardea herodias)*; SNONE, FNONE	X		X										X		X						X		
Vaux's swift (*Chaetura vauxi)*; SCAN, FNONE																			X				
Pileated woodpecker (*Dryocopus pileatus)*; SCAN, FNONE							X									X							
Merlin (*Falco columbarius)*; SCAN, FNONE				X												X							
Prairie falcon (*Falco mexicanus)*; SNONE, FNONE	X						X			X						X							
Peregrine falcon (*Falco peregrinus)*; SSEN, FSOC					X		X																
Common loon (*Gavia immer)*; SSEN, FNONE					X	X																	
Bald eagle (*Haliaeetus leucocephalus)*; SSEN, FSOC	X			X			X					X								X			
Harlequin duck (*Histrionicus histrionicus)*; SNONE, FNONE					X					X		X											
Lewis' woodpecker (*Melanerpes lewis)*; SCAN, FNONE										X													
Black-crowned night-heron (*Nycticorax nycticorax)*; SNONE, FNONE	X																						

Table C-1. Special Status Species in the Vicinity of the Individual Elements Proposed for the Yakima River Basin Integrated Resources Water Management Plan

	Yakima River (main stem)	Keechelus Lake	Kachess Lake	Cle Elum Lake	Naches River (main stem)	Bumping Lake	Rimrock Lake	**Naches River Tributaries**	Bumping River	Tieton River	**Yakima River Tributaries**	Cle Elum River	Kachess River	Big Creek	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Ahtanum Creek	Toppenish Creek	Satus Creek	Cowiche Creek
Mountain quail (*Oreortyx pictus)*; SNONE, FNONE			X															X					
White-headed woodpecker (*Picoides albolarvatus)*; SCAN, FNONE							X			X													
Black-backed woodpecker (*Picoides arcticus)*; SCAN, FNONE															X								
Spotted owl (*Strix occidentalis)*; SE, FT		X	X	X		X	X		X			X		X		X							
Plants																							
Tall agoseris (*Agoseris elata*); SS, FNONE																			X				
Pauper milkvetch (*Astragalus misellus* var *pauper*); SS, FNONE	X																						
Ahtiana pallidula (*Ahtiana pallidula*)																X							
Fewflower sedge (*Carex pauciflora*); SS, FS		X																					
Thompson's pincushion (*Chaenactis thompsonii*); SS, FNONE				X								X											
Gray cryptantha (*Cryptantha leucophaea*); SS, FSOC	X																						
Clustered lady's slipper (*Cypripedium fasciculatum*); SS, FSOC				X										X		X							
Basalt daisy (*Erigeron basalticus*); ST, FSOC	X																						
Piper's fleabane (*Erigeron piperianus*); SS, FNONE	X				X																		

Table C-1. Special Status Species in the Vicinity of the Individual Elements Proposed for the Yakima River Basin Integrated Resources Water Management Plan

	Yakima River (main stem)	Keechelus Lake	Kachess Lake	Cle Elum Lake	Naches River (main stem)	Bumping Lake	Rimrock Lake	**Naches River Tributaries**	Bumping River	Tieton River	**Yakima River Tributaries**	Cle Elum River	Kachess River	Big Creek	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Ahtanum Creek	Toppenish Creek	Satus Creek	Cowiche Creek
Swamp douglasiana (*Gentiana douglasiana*); SS, FNONE		X																					
Oregon false goldenaster (*Heterotheca oregona*); ST, FNONE									X														
Longsepal wild hollyhock (*Iliamna longisepala*); SS, FNONE																			X				
Hoover's desertparsley (*Lomatium tuberosum*); SS; FSOC	X																						
Coyote tobacco (*Nicotiana attenuate*); SS, FNONE																						X	
Small phacelia (*Phacelia minutissima*); SE, FSOC																			X				
Tacky goldenweed (*Pyrrocoma hirta* var *sonchifolia*); SS, FNONE																			X				
Oregon white oak (*Quercus garryana*)																X							
Mountain blue-eyed grass (*Sisyrinchium sarmentosum*); ST, FSOC						X	X																
Creamy lady's tresses (*Spiranthes porrifolia*); SS, FNONE			X																				
American waterawlwort (*Subularia aquatica* var a*mericana*); SR1, FNONE			X										X										
Hoover's umbrellawort (*Tauschia hooveri*); ST, FSOC																							X
PRIORITY HABITAT TYPES																							
Bald eagle	X		X							X			X										X

Table C-1. Special Status Species in the Vicinity of the Individual Elements Proposed for the Yakima River Basin Integrated Resources Water Management Plan

	Yakima River (main stem)	Keechelus Lake	Kachess Lake	Cle Elum Lake	Naches River (main stem)	Bumping Lake	Rimrock Lake	**Naches River Tributaries**	Bumping River	Tieton River	**Yakima River Tributaries**	Cle Elum River	Kachess River	Big Creek	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Ahtanum Creek	Toppenish Creek	Satus Creek	Cowiche Creek
Burrowing owl	X																						
Big game			X	X																			
Big horn sheep					X													X					
Cliffs/Bluffs	X	X	X	X	X		X		X	X			X			X		X	X				
Elk	X	X	X	X	X	X	X		X	X		X		X	X	X	X	X	X	X			
Ferruginous hawk	X																						
Golden eagle	X									X													
Great blue heron	X																					X	
Harlequin duck										X													
Mountain goat		X	X	X		X	X					X	X										
Mule and Black-tailed deer	X				X					X					X	X		X		X			
Mule deer	X						X									X			X				
Oak woodlands	X									X						X							
Old Growth		X							X			X											
Riparian Zones	X		X	X	X					X		X	X	X	X	X	X	X	X	X	X	X	X
Rocky mountain big horn sheep	X				X					X													
Rocky mountain elk							X		X	X									X				
Rural Natural Open Space	X																						
Sharptail snake	X																						
Shrub-steppe	X																						
Spotted Owl Critical Habitat		X	X	X		X	X		X	X		X	X			X	X		X				

Table C-1. Special Status Species in the Vicinity of the Individual Elements Proposed for the Yakima River Basin Integrated Resources Water Management Plan

	Yakima River (main stem)	Keechelus Lake	Kachess Lake	Cle Elum Lake	Naches River (main stem)	Bumping Lake	Rimrock Lake	**Naches River Tributaries**	Bumping River	Tieton River	**Yakima River Tributaries**	Cle Elum River	Kachess River	Big Creek	Teanaway River	Swauk Creek	Taneum Creek	Manastash Creek	Naneum Creek	Ahtanum Creek	Toppenish Creek	Satus Creek	Cowiche Creek
Talus slopes					X	X	X		X														
Urban Natural Open Space	X				X													X					X
Waterfowl concentrations	X						X																
Wetlands	X	X	X	X	X	X	X		X						X								
White-tailed deer				X																			
Wood duck	X				X					X		X			X								X

Legend

FE=Federally endangered
FT=Federally threatened
FCAN=Federal candidate species
FS=Federal sensitive species
FSOC=Federal species of concern
FNONE=No listing

SE=State endangered
ST=State threatened
SCAN=State candidate species
SS=State sensitive species
SSOC=State species of concern
SNONE=No listing
SR1=Review group 1. Of potential concern but needs more field work to assign another rank.

Appendix D

STREAMS REGULATED BY THE SHORELINE MANAGEMENT ACT

Table D-1 Rivers and Streams Protected under the Shoreline Management Act, 1972.

Benton County (WAC 173-18-070)	
Yakima River	**From Benton-Yakima County line (Sec.7, T8N, R24E) downstream to mouth on Columbia River Sec.19, T9N, R29E).**
Yakima County (WAC 173-18-430)	
Ahtanum Creek	**From confluence of North and South Forks of Ahtanum Creek (Sec.17, T12N, R16E) downstream to mouth at Yakima River (Sec.17, T12N, R19E) excluding those reaches within Yakima Indian Reservation**
Ahtanum Creek (North Fork)	**From confluence of Ahtanum Creek North Fork and Ahtanum Creek Middle Fork (Sec.24, T12N, R14E) downstream to confluence with S. Fork of Ahtanum Creek (Sec.17, T12N, R16E)**
Ahtanum Creek (South Fork)	**From confluence of unnamed creek and Ahtanum Creek South Fork (Sec.24, T12N, R15E) downstream to confluence with N. Fork of Ahtanum Creek.**
Swauk Creek	**From the boundary (Sec.10, T20N, R17E) downstream (excluding all Federal lands) to confluence with Yakima River (Sec.20, T19N, R17E).**
Cowiche Creek (South Fork)	**From an approximate point (NW1/4 of NE1/4 Sec.33, T14N, R16E) downstream through Cowiche Creek to confluence with Naches River (Sec.9, T13N, R18E).**
Bumping River	**From U.S.G.S. gaging station (Sec.23, T16N, R12E) downstream to confluence with Naches and Little Naches rivers (Sec.4, T17N, R14E). Excluding Federal lands.**
Little Naches River	**From confluence of N. Fork and M. Fork Little Naches River (Sec.36, T19N, R12E) downstream to confluence with Naches River (Sec.4, T17N, R14E). Excluding Federal lands.**
Naches River	**From confluence of Little Naches River and Bumping River (Sec.4, T17N, R14E) downstream to confluence with Yakima River (Sec.12, T13N, R18E). Excluding Federal lands.**
Rattlesnake Creek	**From Snoqualmie National Forest boundary (Sec.6, T15N, R15E) downstream to mouth at Naches River (Sec.3, same township).**
Tieton River	**From west section line (Sec.29, T14N, R15E) downstream to confluence with Naches River (Sec.35, T15N, R16E). Excluding Federal lands.**
Tieton River (South Fork)	**From the south section line (Sec.23, T12N, R12E) downstream to mouth at Rimrock Lake (Sec.7, T13N, R14E). Excluding Federal lands.**
Yakima River	**From the Kittitas County line (Sec.33, T15N, R19E) downstream, excluding all Federal lands and Yakima Indian Reservation, to Benton County line (Sec.7, T8N, R24E).**

Kittitas County (WAC 173-18-230)	
Big Creek	**From the Okanogan-Wenatchee National Forest (OWNF) boundary (Sec.35, T20N, R13E) downstream (excluding Federal lands) to confluence with Yakima River (Sec.21, T20N, R14E).**
Cabin Creek	**From the OWNF boundary (Sec.19, T20N, R13E) downstream to confluence with Yakima River (Sec.9, T20N, R13E).**
Cle Elum River	**From the OWNF boundary crossing Cle Elum Lake (Sec.33, 34 & 35, T21N, R14E) downstream to confluence with Yakima River (Sec.32, T20N, R15E).**
Kachess River	**From the OWNF boundary (Sec.3, T20N, R13E) downstream through Lake Easton State Park and to confluence with Yakima River (same section).**
Little Creek	**From the OWNF boundary (Sec.33, T20N, R14E) (excluding all Federal lands) downstream to confluence with Yakima River (Sec.22, T20N, R14E)**
Log Creek	**From confluence of Log Creek and unnamed creek (NW1/4, SW1/4 Sec.31, T20N, R13E) downstream to confluence with Cabin Creek (Sec.19, T20N, R13E)**
Manastash Creek	**From confluence of N. and S. Forks Manastash Creek (Sec.17, T17N, R17E) downstream to confluence with Yakima River (Sec.4, T17N, R18E)**
Manastash Creek (South Fork)	**From the OWNF boundary (Sec.31, T18N, R16E) downstream to confluence with Manastash Creek (Sec.17, T17N, R17E).**
Taneum Creek	**From OWNF boundary (Sec.30, T19N, R16E) downstream (excluding all Federal lands) to mouth on Yakima River (Sec.33, T19N, R17E).**
Teanaway River	**From the confluence of the M. Fork and the W. Fork Teanaway River (Sec.6, T20N, R16E) downstream to Yakima River (Sec.3, T19N, R16E).**
Teanaway River (Middle Fork)	**From the OWNF boundary (Sec.15, T21N, R15E) downstream to confluence with Teanaway River (Sec.6, T20N, R16E).**
Teanaway River (North Fork)	**From the OWNF boundary (Sec.4, T21N, R16E) downstream (excluding all Federal lands) to the Teanaway River (Sec.6, T20N, R16E).**
Teanaway River (West Fork)	**From the OWNF boundary (Sec.30, T21N, R15E) downstream (excluding all Federal lands) to the Teanaway River (Sec.6, T20N, R16E).**
Wilson Creek	**From confluence with Naneum Creek (Sec.30, T17N, R19E) downstream to confluence with Yakima River (Sec.31, T17N, R19E).**
Yakima River	**From the OWNF boundary (Sec.15, T21N, R12E) downstream (excluding all Federal lands) to the Yakima Co. line (Sec.33, T15N, R19E).**

Table D-2 Lakes Protected under the Shoreline Management Act, 1972

Name	Location	Area (Acres)	Use[1]
Benton County (WAC 173-20-090)			
No Lakes in Project Area			
Kittitas County (WAC 173-20-400)			
Manastash Lake	**Sec. 3, T17N, R15E**	**23.5**	**R**
Lake Easton	**Sec. 11, T20N, R13E**	**237.6**	**R, I**
Lost Lake	**Sec. 3, T21N, R11E**	**144.8**	**R**
Cooper Lake	**Sec. 2, T22N, R13E**	**119.7**	**R**
Tucquala Lake	**Sec. 3, T23N, R14E**	**63**	**R**
Unnamed Lakes	**Sec. 14, T21N, R12E**	**60**	**R**
Lakes of Statewide Significance (WAC 173-20-400)			
Cle Elum Lake	**Sec. 10, T15N, R23E**	**4810.0**	**R, I**
Keechelus Lake	**Sec. 12, T21N, R11E**	**2560.0**	**R, I**
Kachess Lake	**Sec. 34, T21, R13E**	**4540.0**	**R, I**
Yakima County (WAC 173-20-800)			
Byron Ponds (Res.)	**Sec. 12, T8N, R23E**	**50**	**R**
Horseshoe Pond	**Sec. 22, T9N, R22N**	**59**	**R**
Morgan Pond	**Sec. 25, T9N, R22E**	**24.6**	**R**
Giffin Lake	**Sec. 26, T9N, R22E**	**104.8**	**R**
Oleys Lake	**Sec. 7, T9N, R22E**	**35.4**	**R**
Freeway Lake	**Sec. 7, T13n, R19E**	**23.2**	**R**
Wenas Lake	**Sec. 2, T15N, R17E**	**61.4**	**R, I**
Unnamed Lake	**Sec. 31, T14N, R19E**	**22.3**	**R**
Unnamed Lake	**Sec. 11, T13N, R18E**	**21.4**	**R**
Unnamed Lake	**Sec. 11, T13N, R18E**	**21.3**	**R**

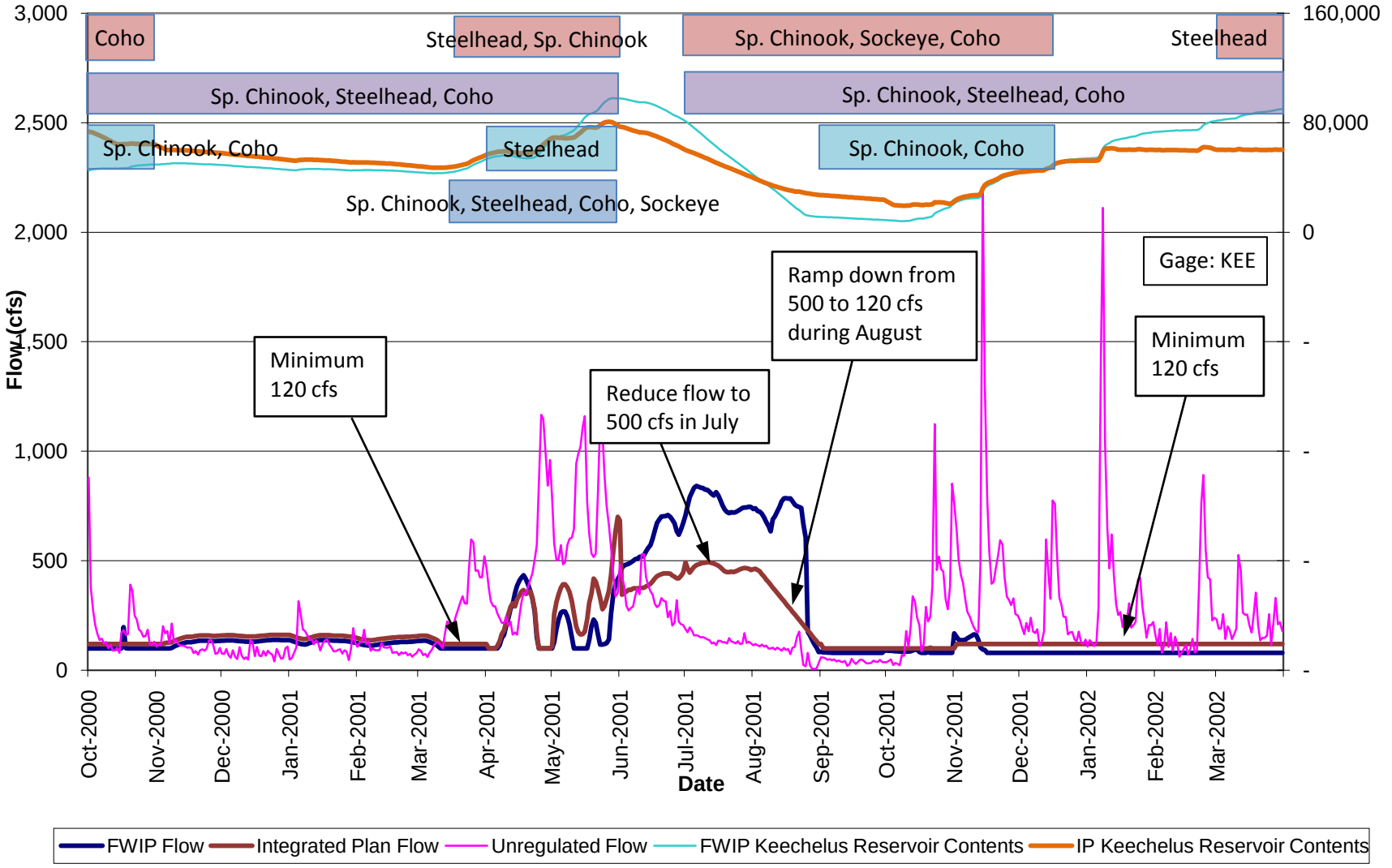
[1] R = Recreation – wildlife, general public use, beautification, fishing, etc.; I = Irrigation (WAC 173-20-040)

Appendix E

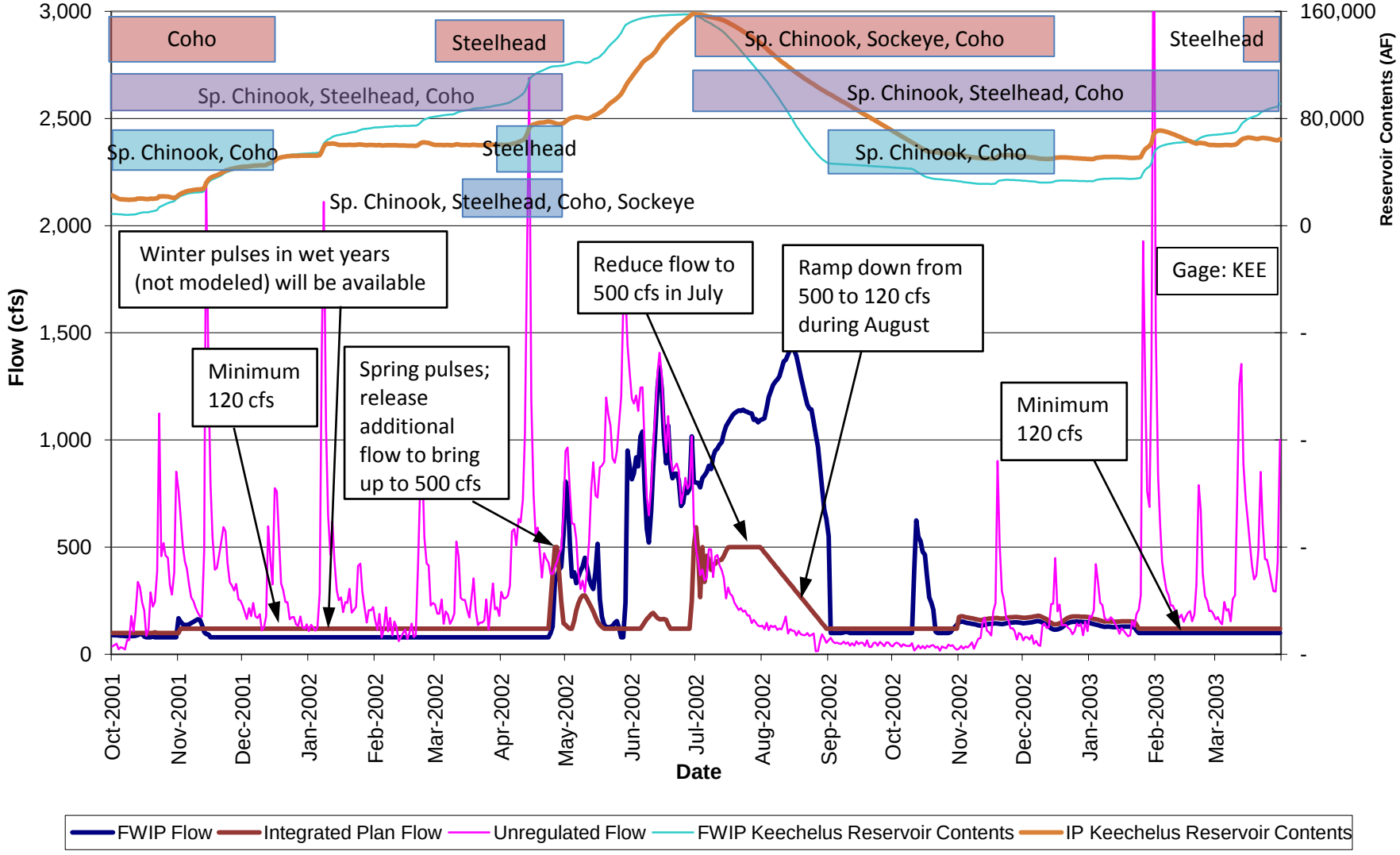
RiverWare Modeling

Conducted for the Yakima River Integrated Water Resource management Plan, Yakima River Basin Study and Yakima River Basin Integrated Plan Programmatic EIS

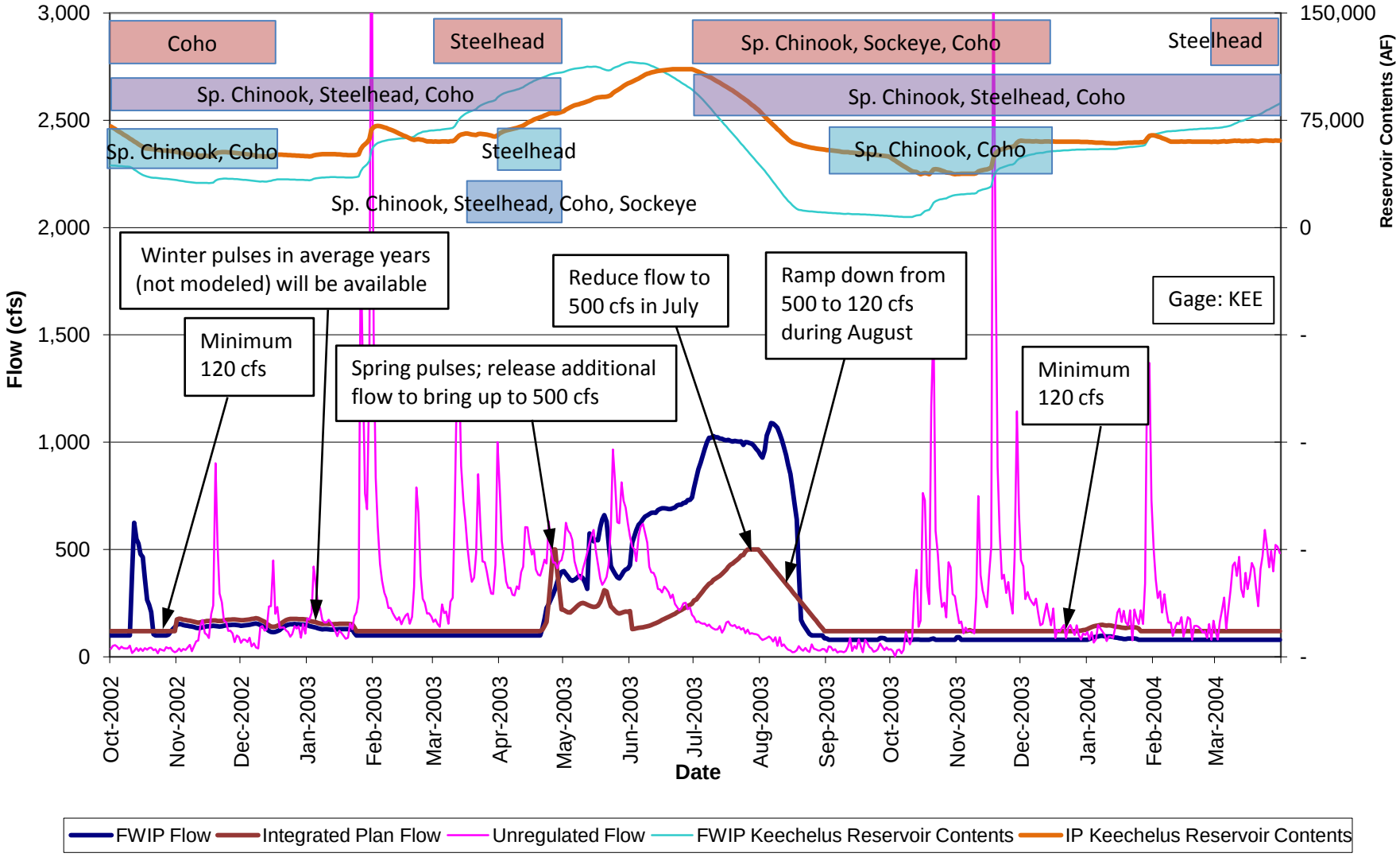
Flow Effects of Integrated Plan on Yakima River, Keechelus Reservoir to Lake Easton Reach for 2001 (Drought Year)



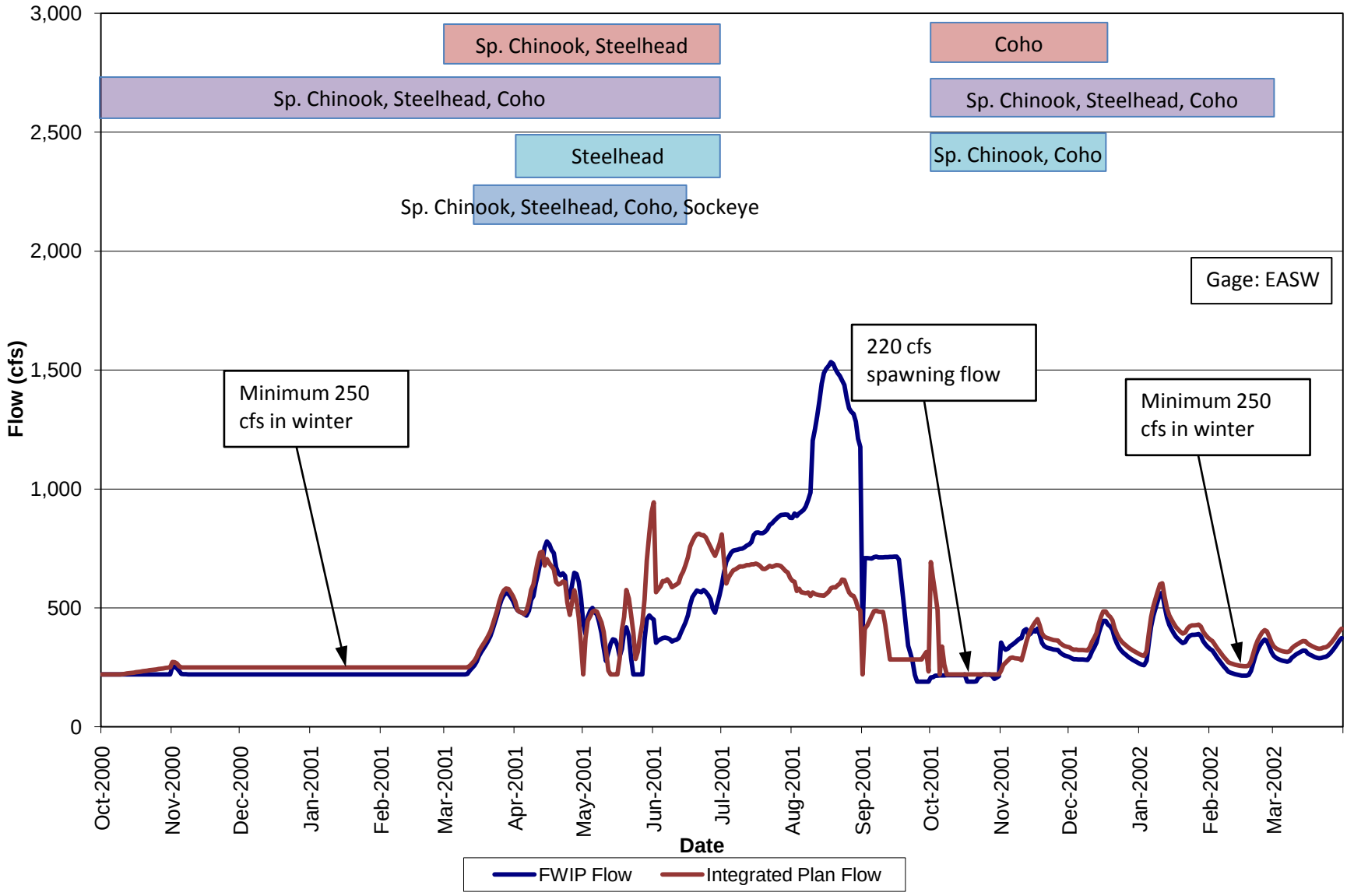
Flow Effects of Integrated Plan on Yakima River, Keechelus Reservoir to Lake Easton Reach for 2002 (Wet Year)



Flow Effects of Integrated Plan on Yakima River, Keechelus Reservoir to Lake Easton Reach for 2003 (Average Year)

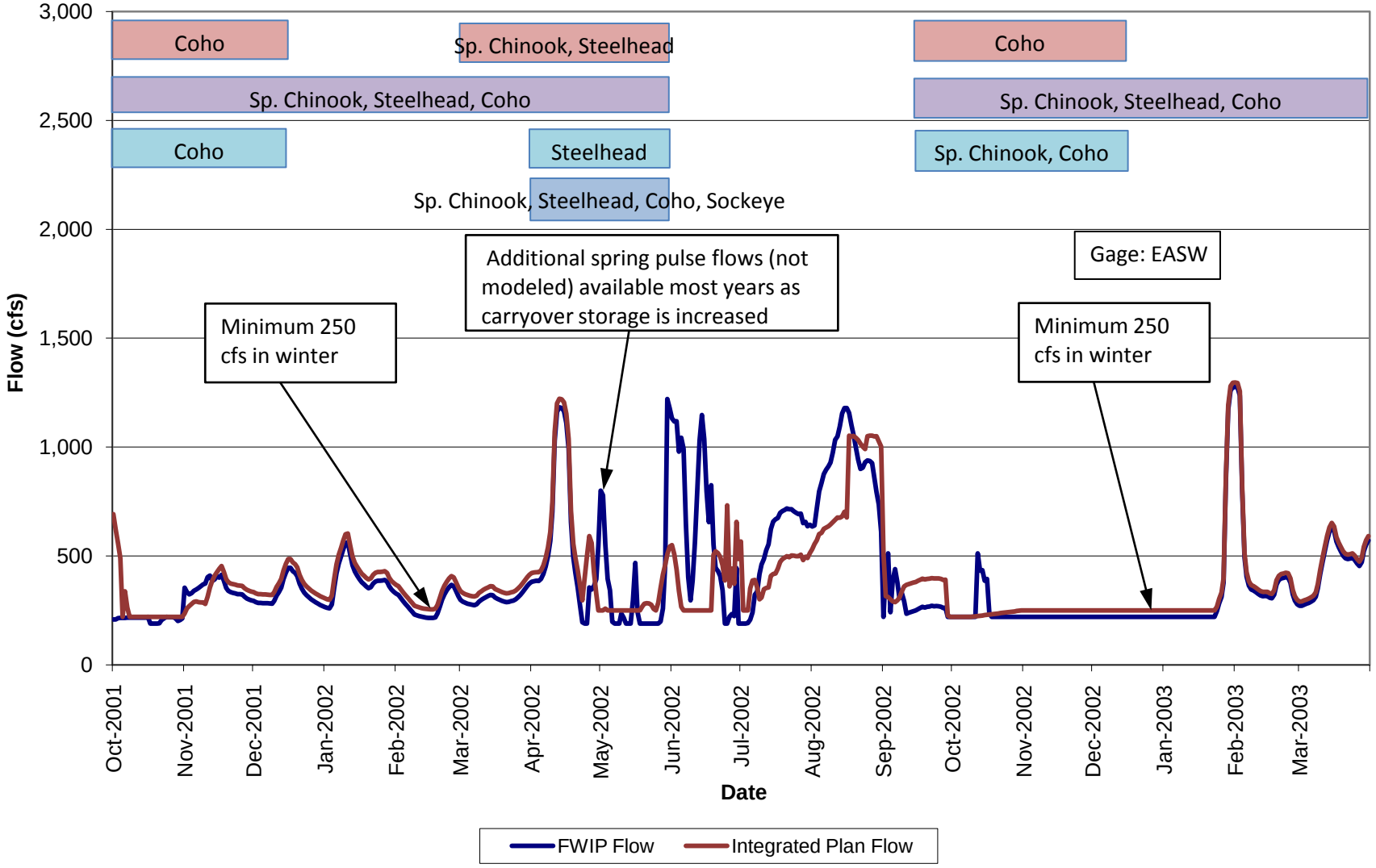


Flow Effects of Integrated Plan on Yakima River, Easton Reach for 2001 (Drought Year)

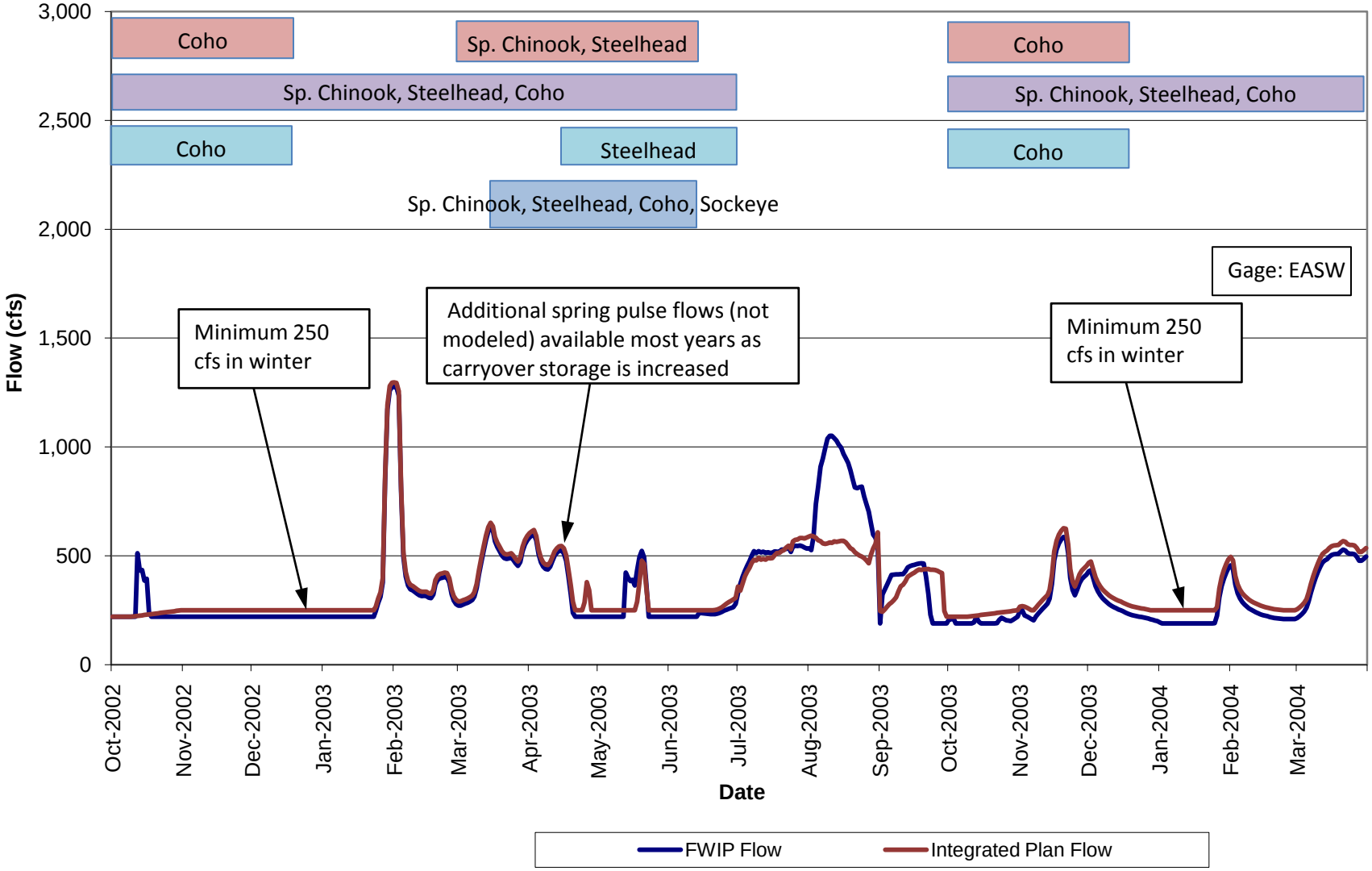


Adult migration | Rearing | Spawning | Smolt outmigration

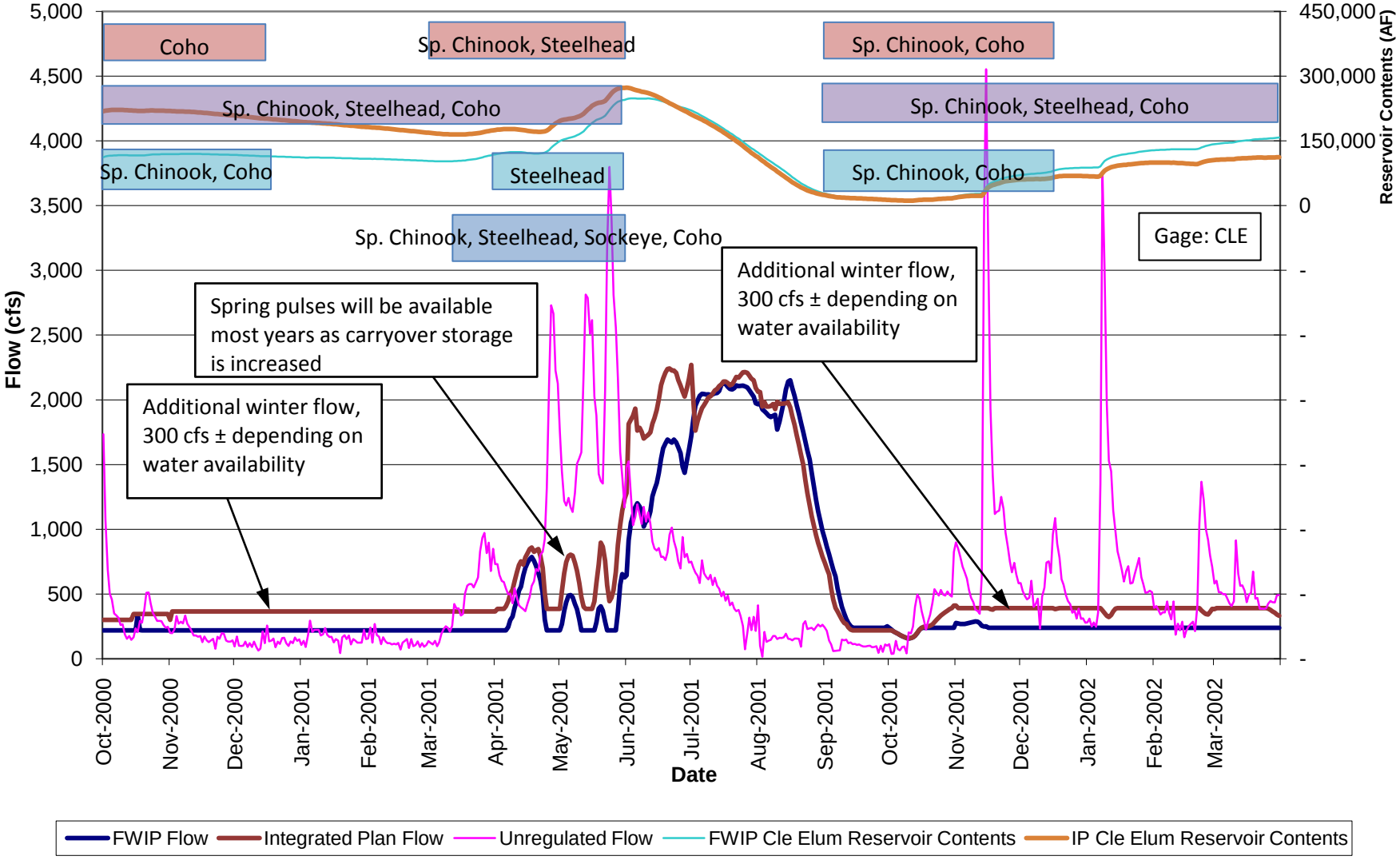
Flow Effects of Integrated Plan on Yakima River, Easton Reach for 2002 (Wet Year)

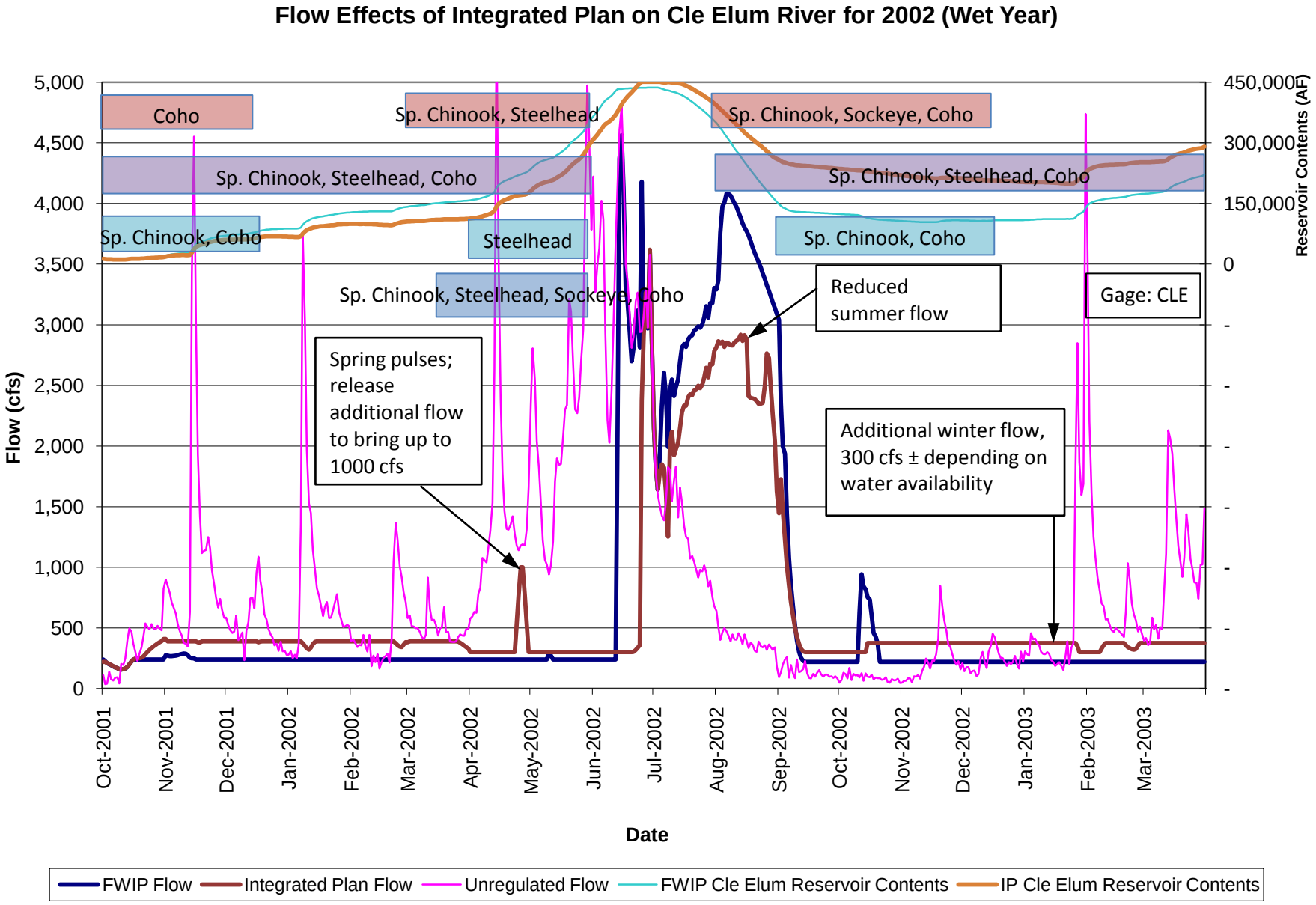


Flow Effects of Integrated Plan on Yakima River, Easton Reach for 2003 (Average Year)

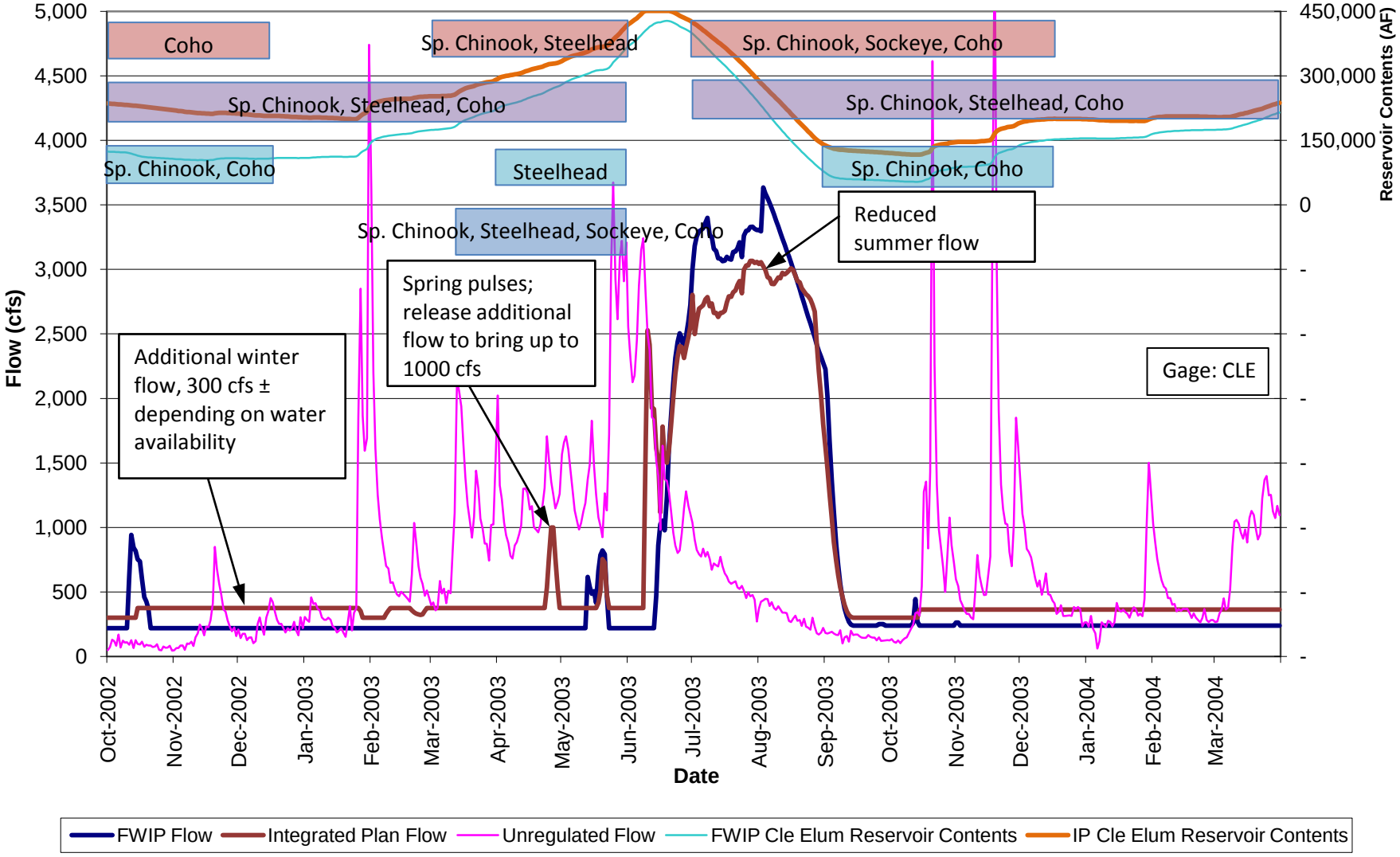


Flow Effects of Integrated Plan on Cle Elum River for 2001 (Drought Year)

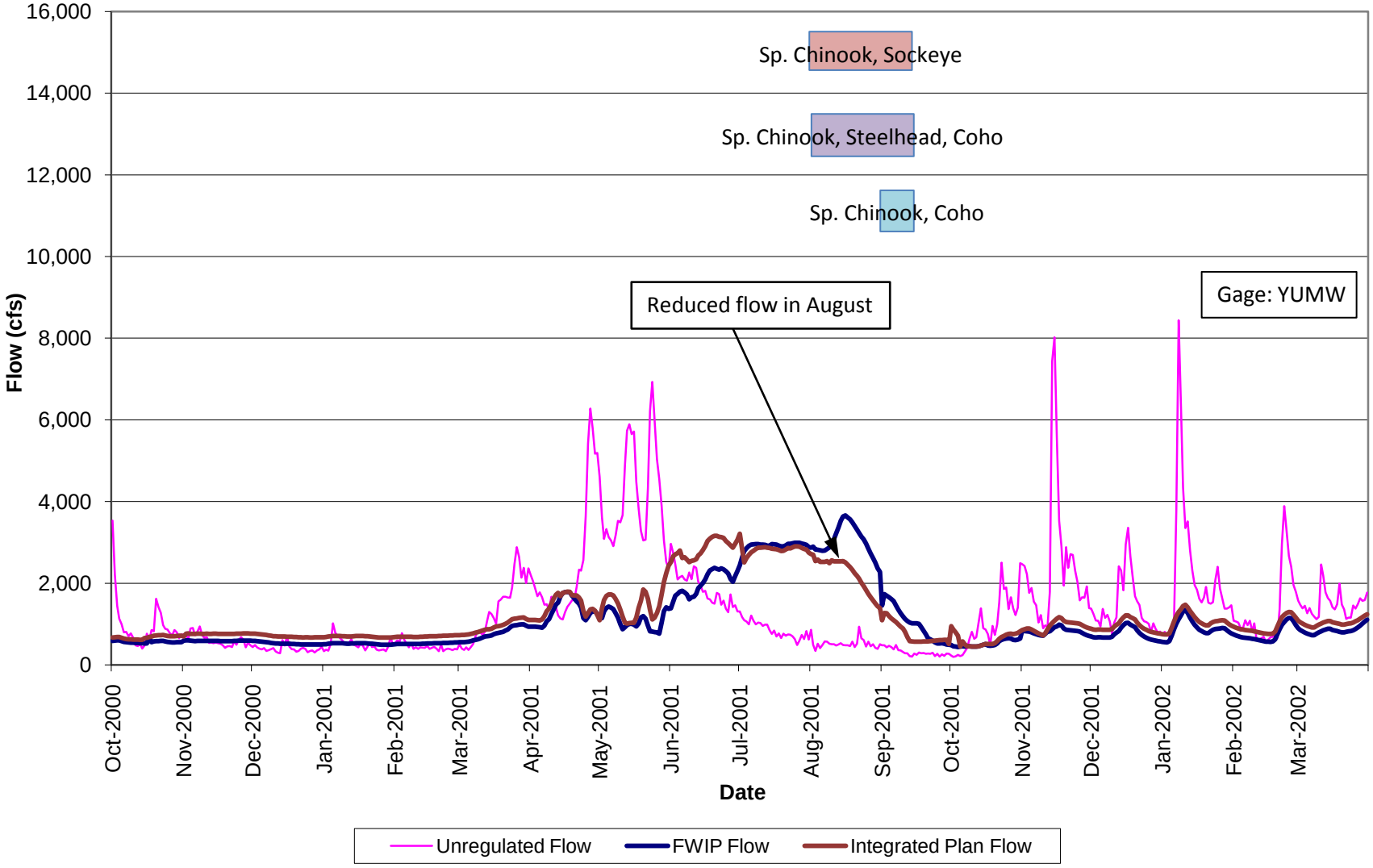



Flow Effects of Integrated Plan on Cle Elum River for 2002 (Wet Year)
Flow (cfs)
Reservoir Contents (AF)
Date
Coho
Sp. Chinook, Steelhead
Sp. Chinook, Sockeye, Coho
Sp. Chinook, Steelhead, Coho
Sp. Chinook, Steelhead, Coho
Sp. Chinook, Coho
Steelhead
Sp. Chinook, Coho
Sp. Chinook, Steelhead, Sockeye, Coho
Reduced summer flow
Gage: CLE
Spring pulses; release additional flow to bring up to 1000 cfs
Additional winter flow, 300 cfs ± depending on water availability
FWIP Flow
Integrated Plan Flow
Unregulated Flow
FWIP Cle Elum Reservoir Contents
IP Cle Elum Reservoir Contents

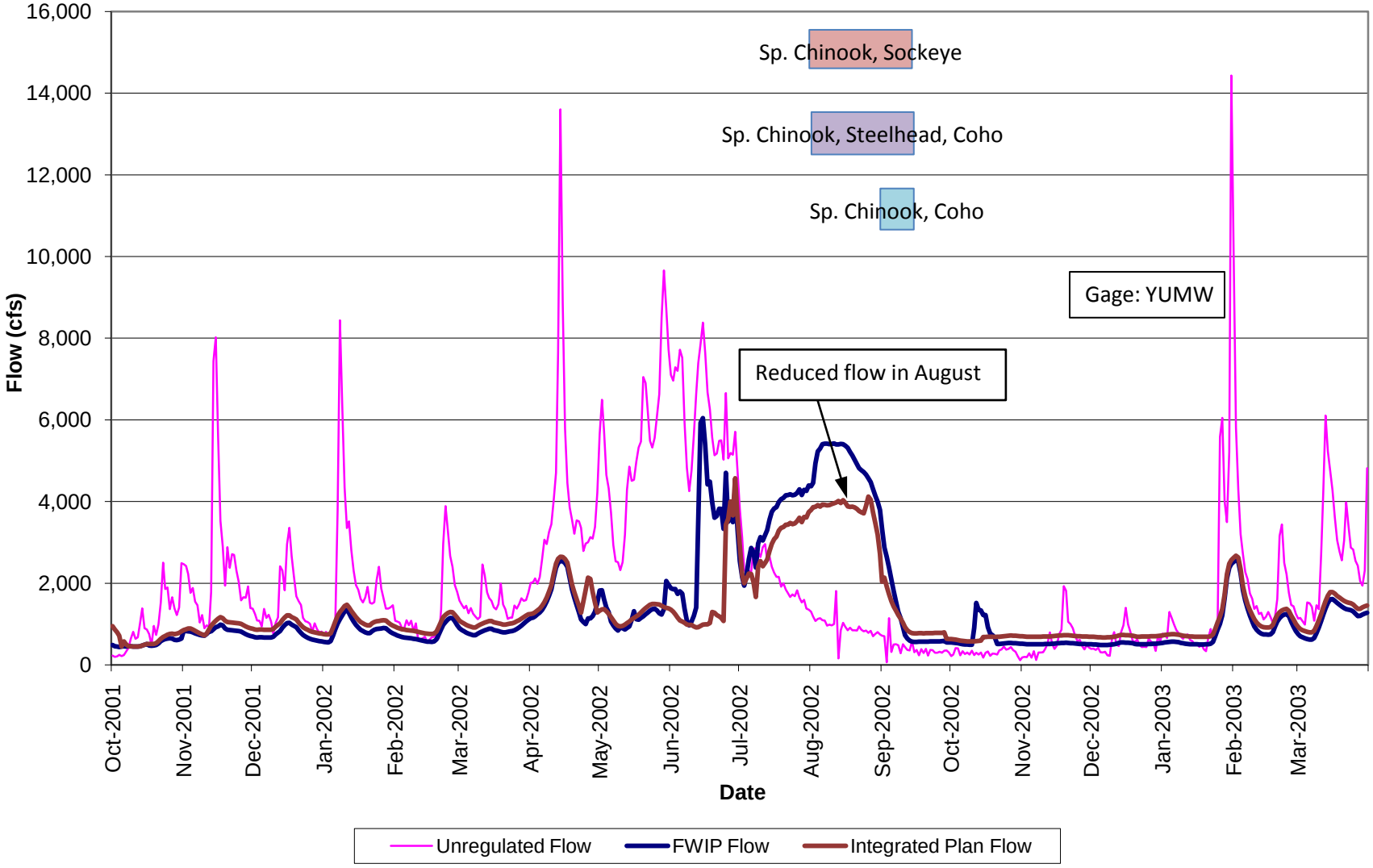
Flow Effects of Integrated Plan on Cle Elum River for 2003 (Average Year)



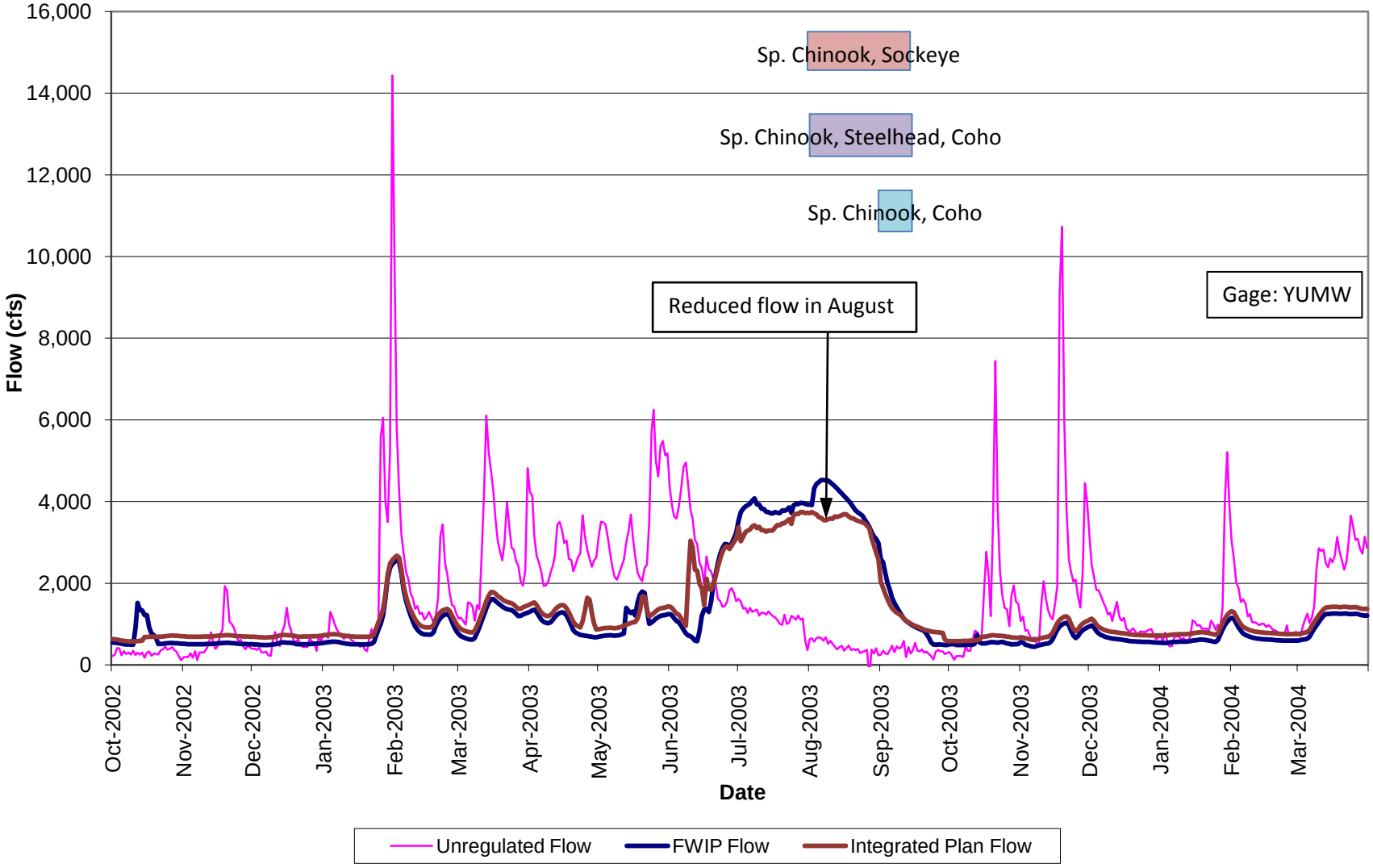
Flow Effects of Integrated Plan onYakima River, Cle Elum to Teanaway River Reach for 2001 (Drought Year)



Flow Effects of Integrated Plan on Yakima River, Cle Elum to Teanaway River Reach for 2002 (Wet Year)

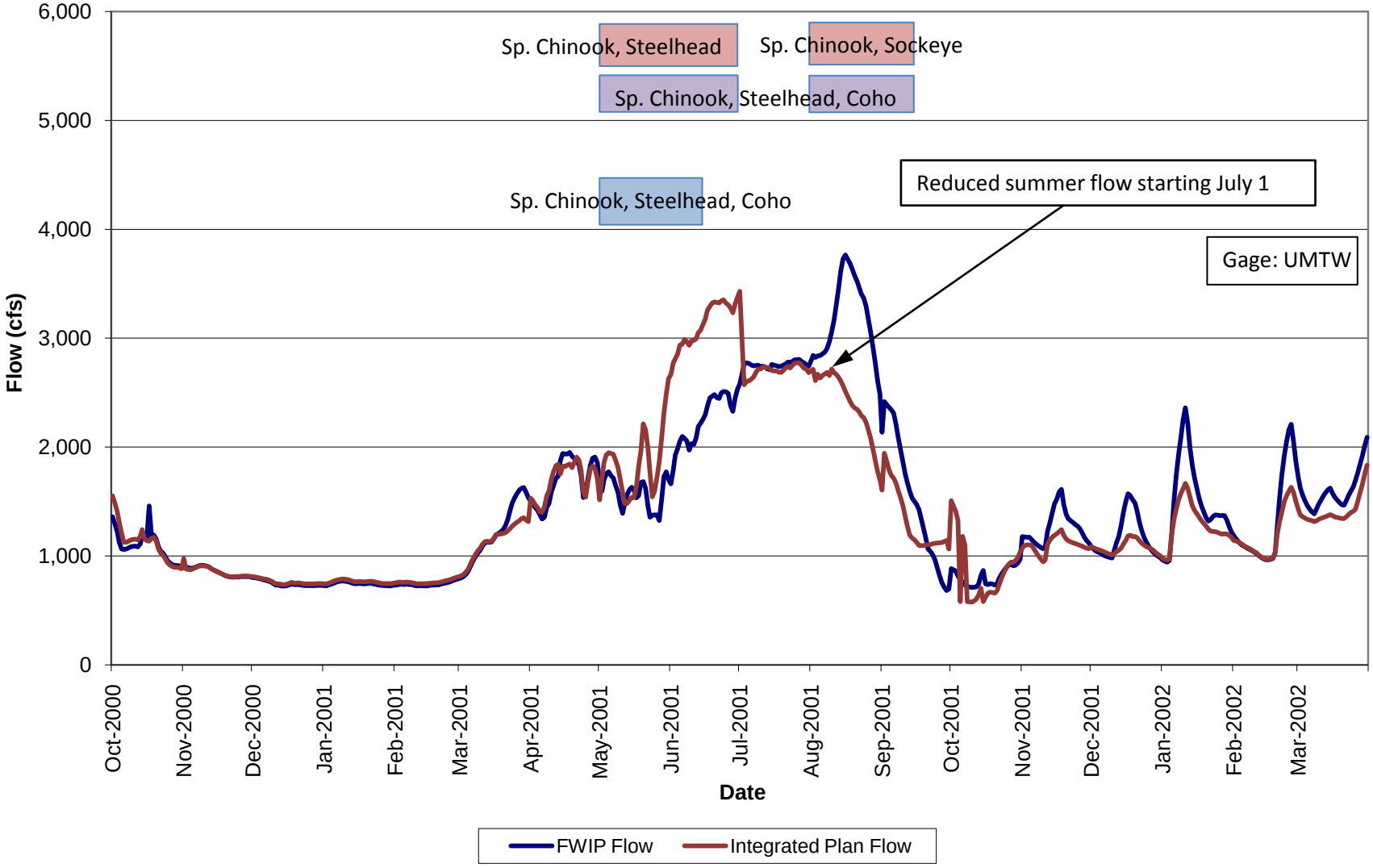


Flow Effects of Integrated Plan on Yakima River, Cle Elum to Teanaway River Reach for 2003 (Average Year)



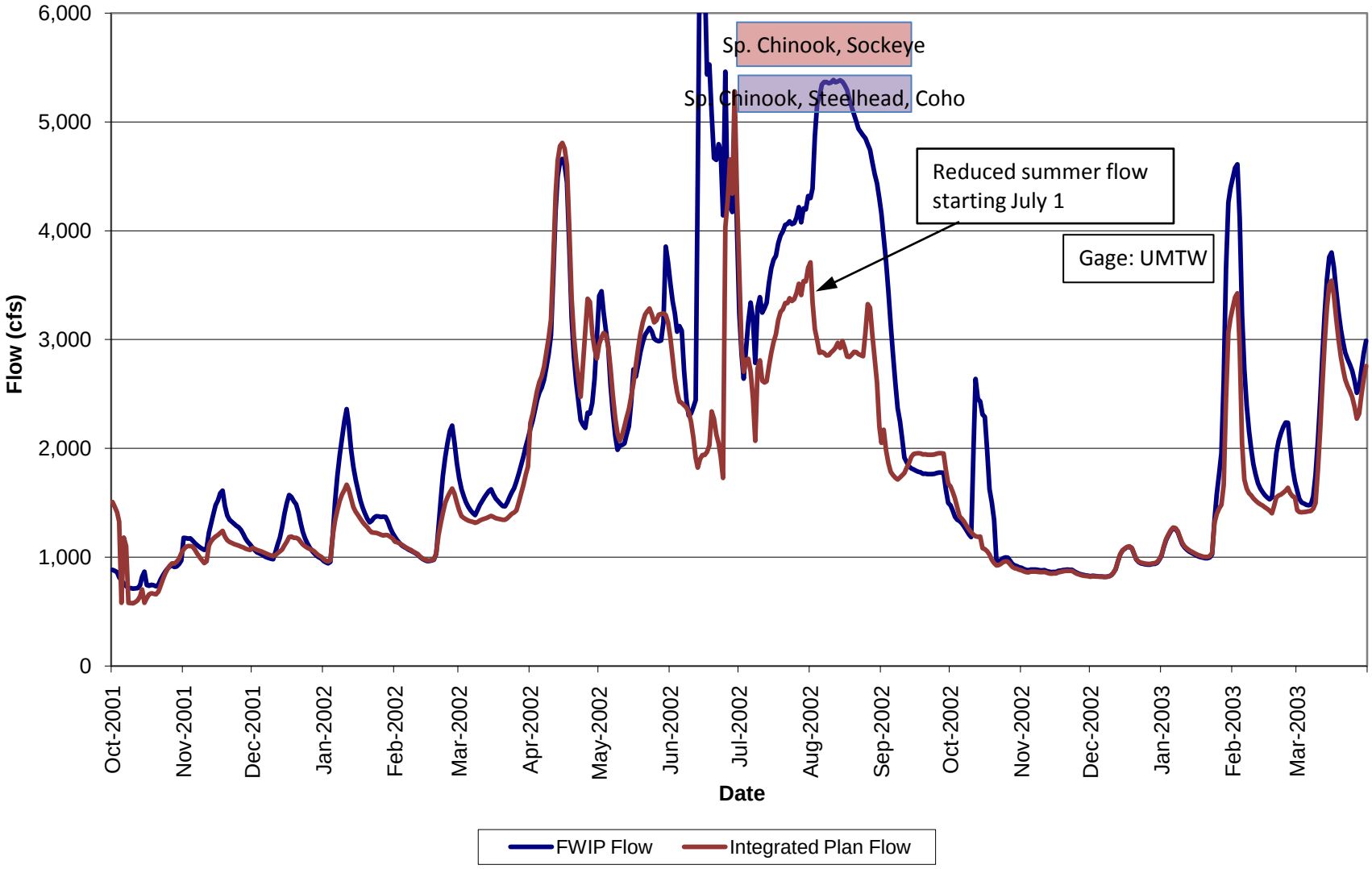
Adult migration | Rearing | Spawning | Smolt outmigration

Flow Effects of Integated Plan onYakima River, Teanaway to Roza (Ellensburg) Reach for 2001 (Drought Year)

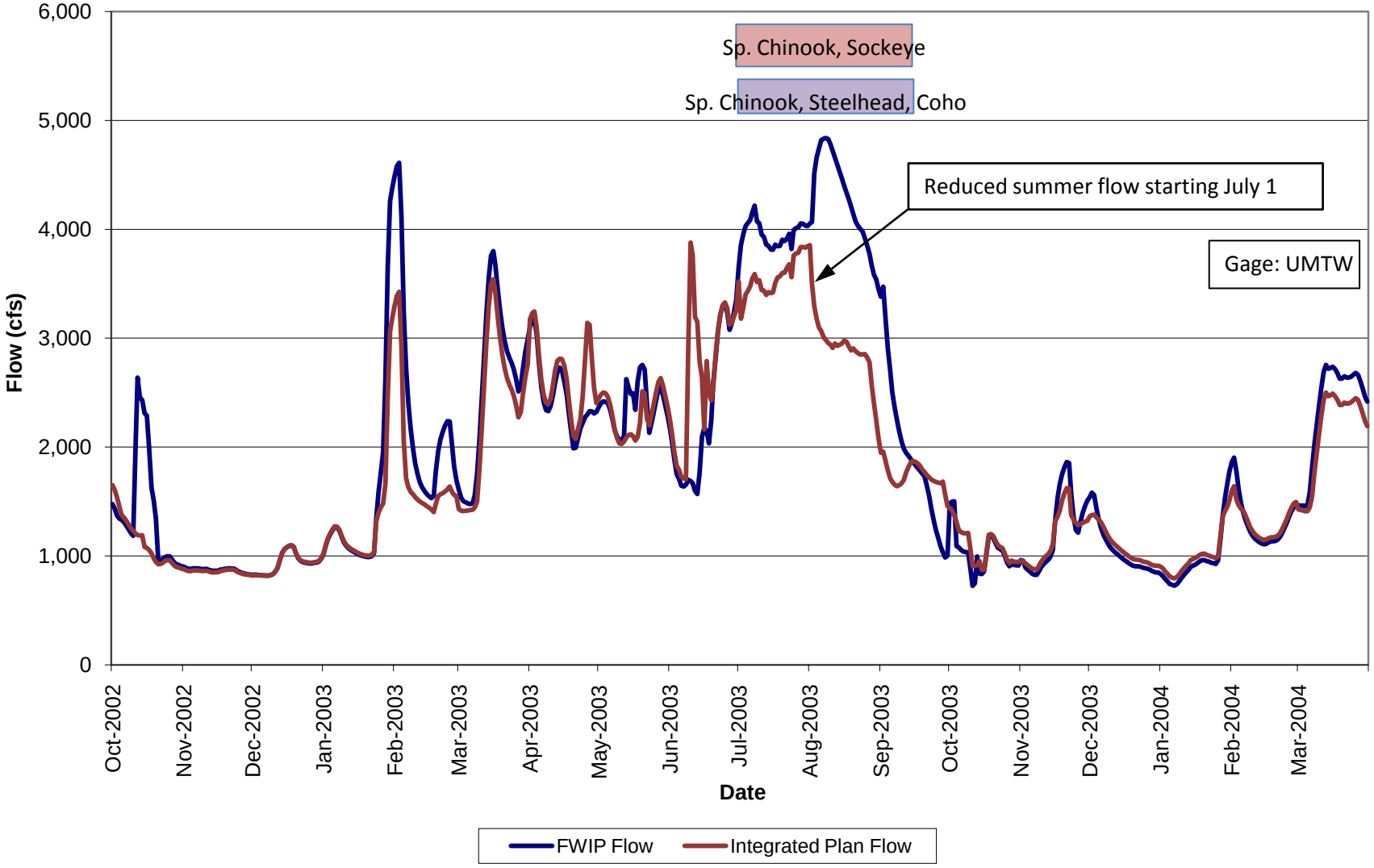


Adult migration | Rearing | Spawning | Smolt outmigration

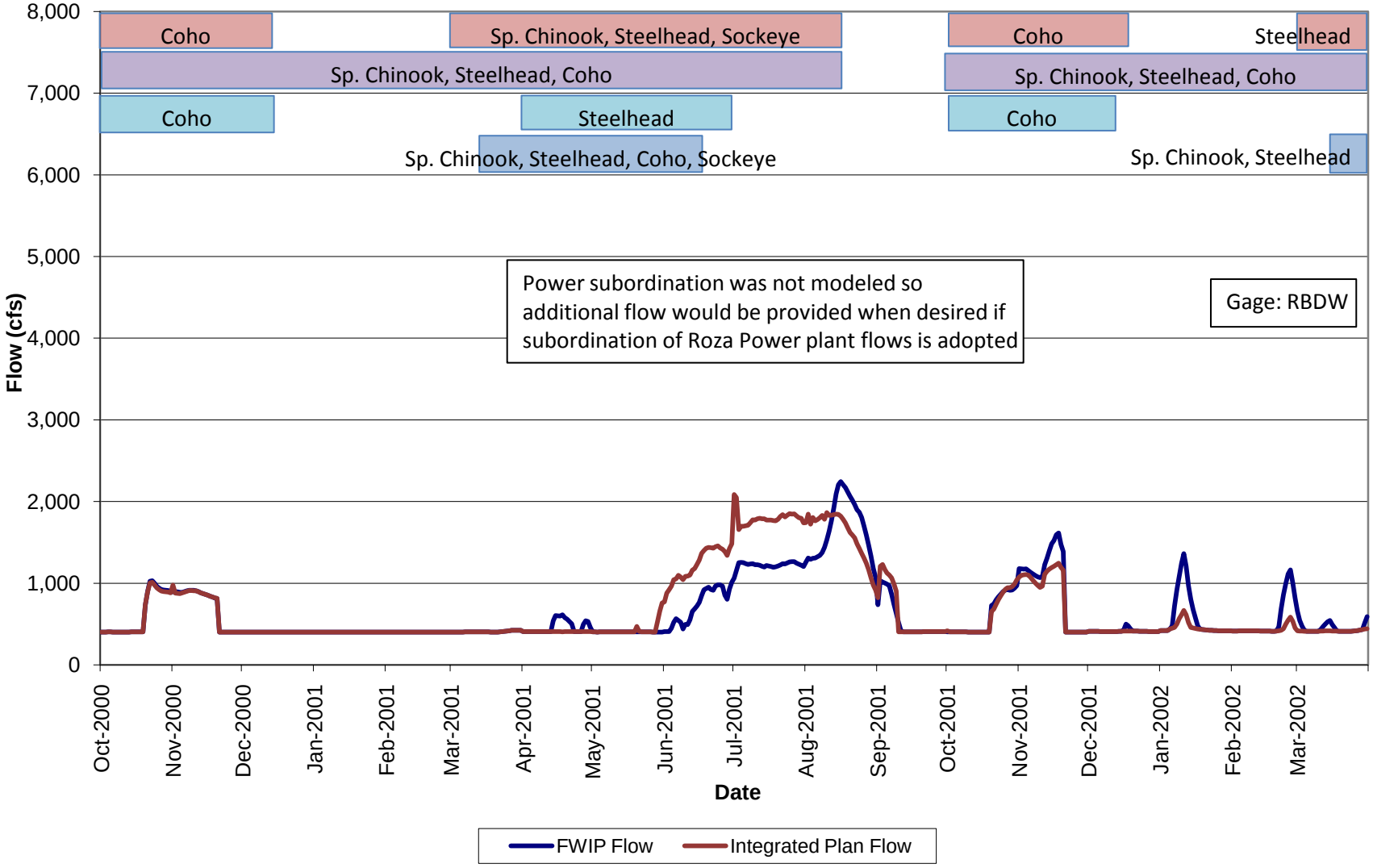
Flow Effects of Integrated Plan on Yakima River, Teanaway to Roza (Ellensburg) Reach for 2002 (Wet Year)



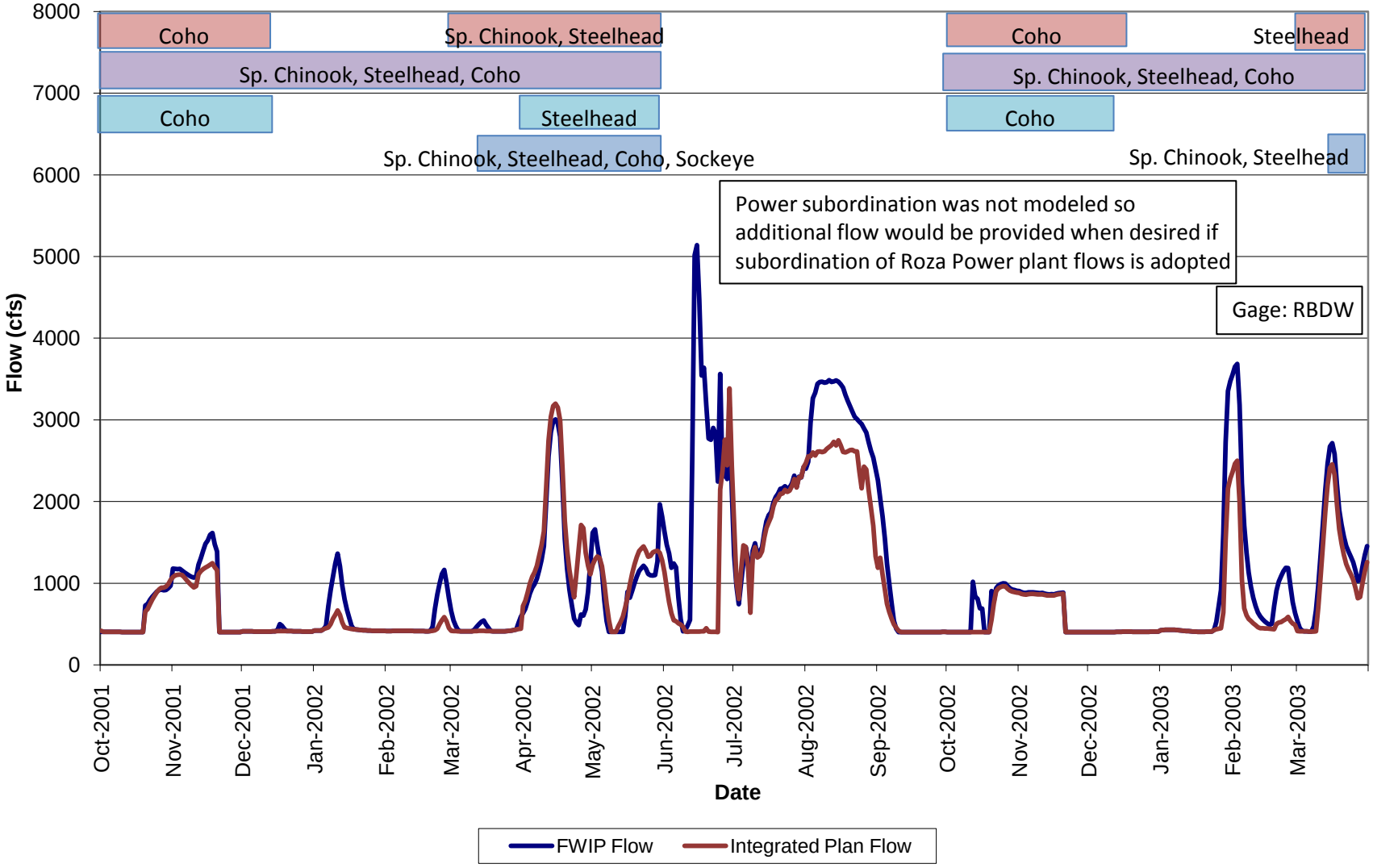
Flow Effects of Integrated Plan on Yakima River, Teanaway to Roza (Ellensburg) Reach for 2003 (Average Year)



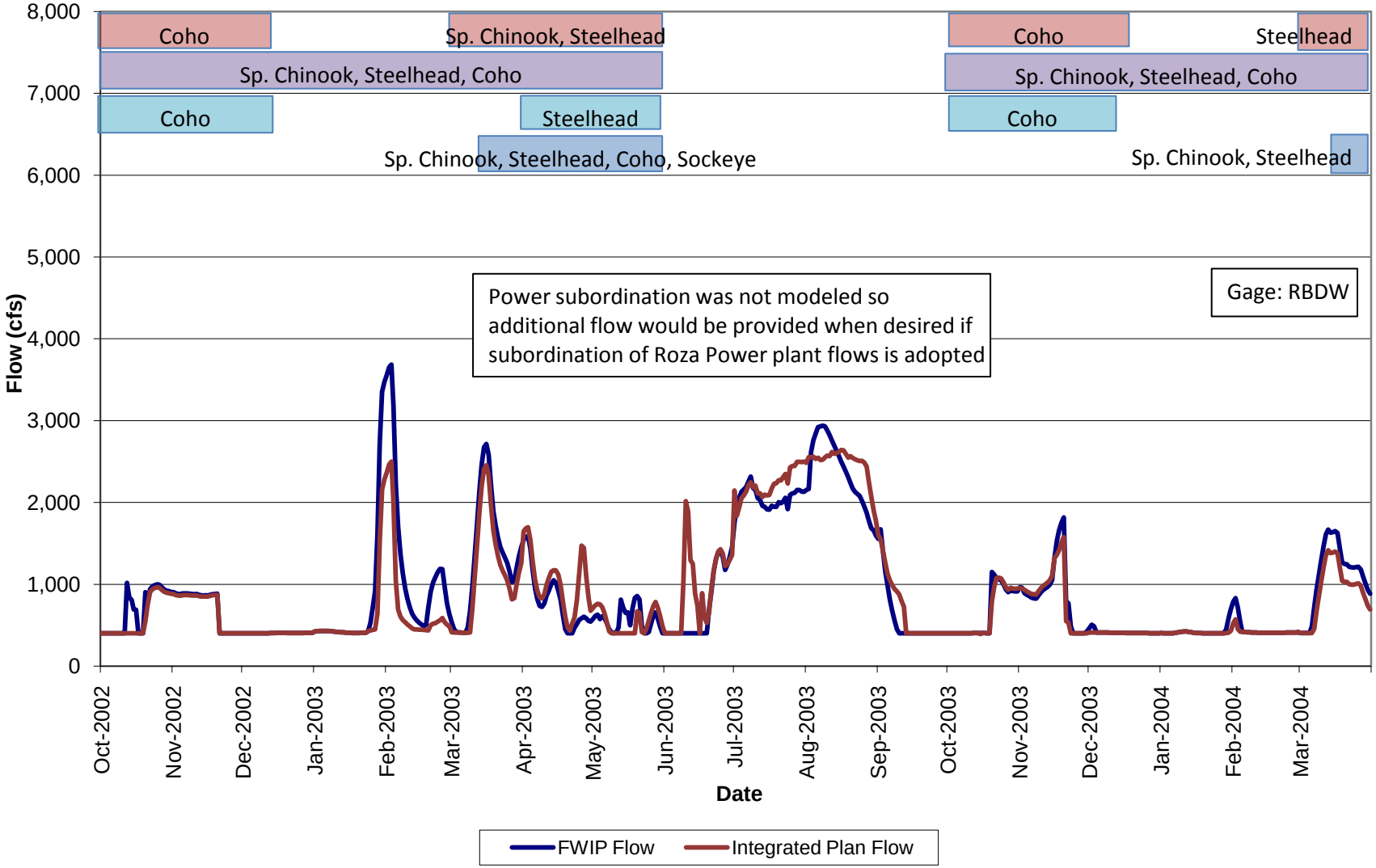
Flow Effects of Integrated Plan on Yakima River, Roza to Naches Reach for 2001 (Drought Year)



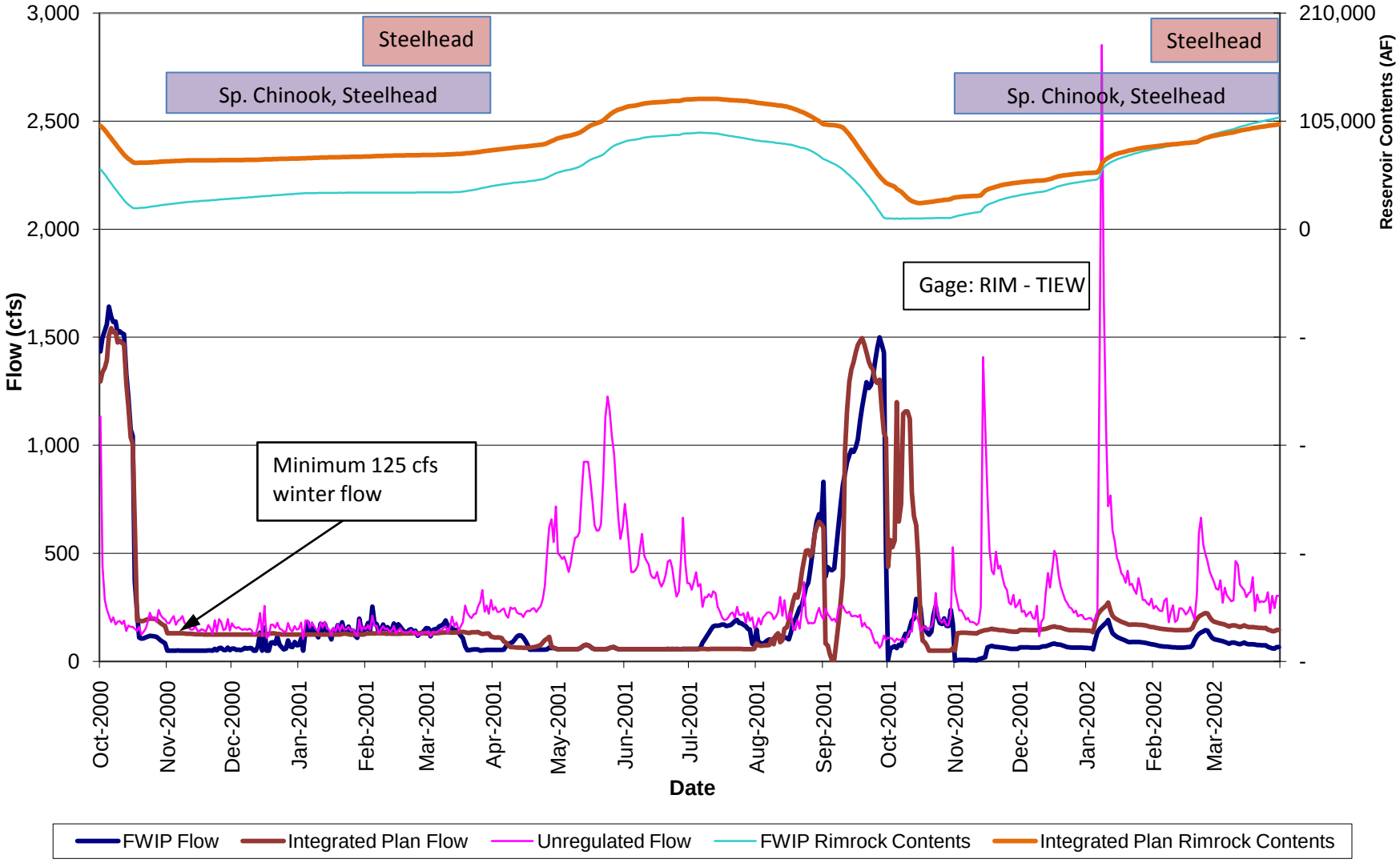
Flow Effects of Integrated Plan on Yakima River, Roza to Naches Reach for 2002 (Wet Year)



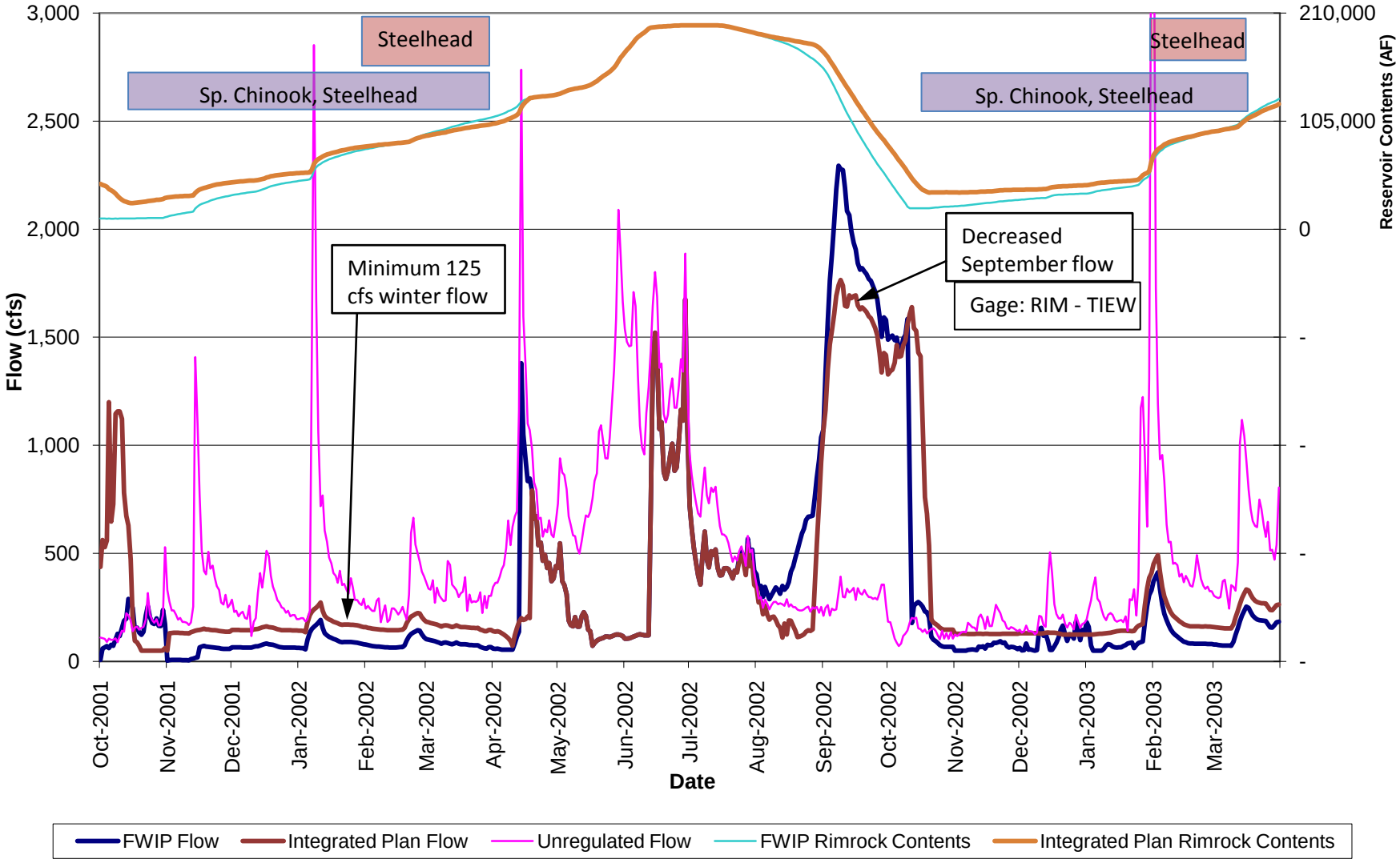
Flow Effects of Integrated Plan on Yakima River, Roza to Naches Reach for 2003 (Average Year)



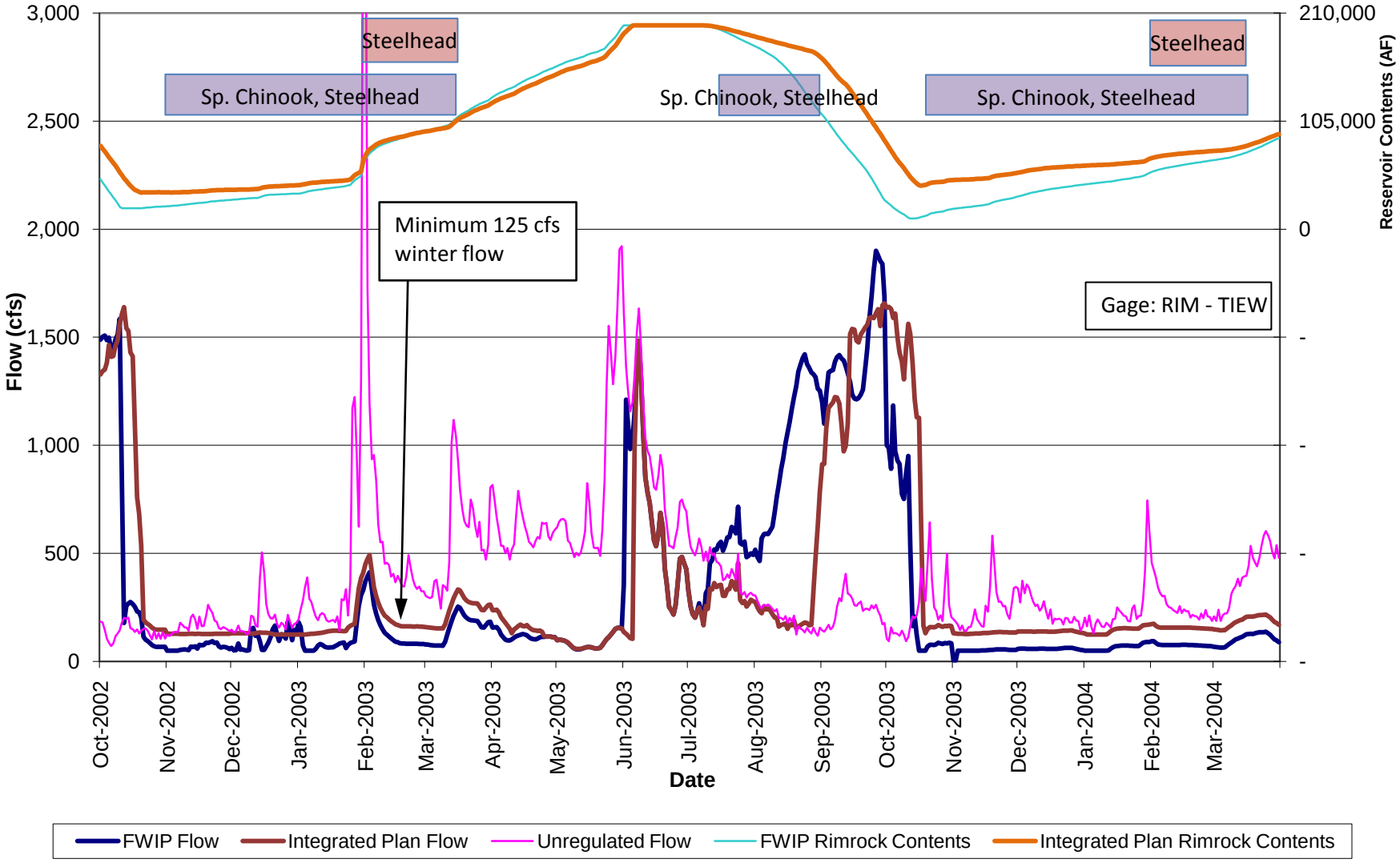
Flow Effects of Integrated Plan on Tieton River Reach for 2001 (Drought Year)



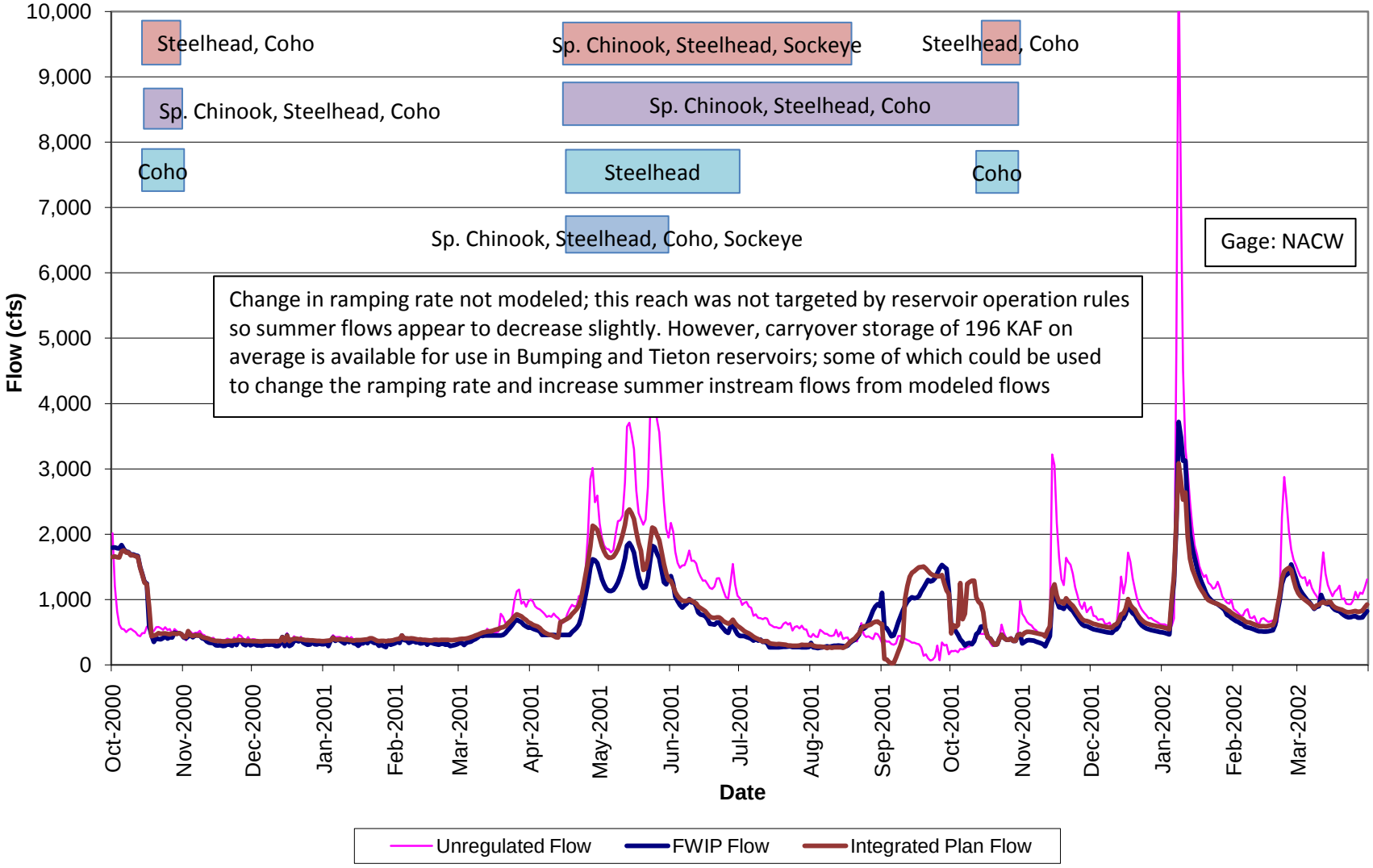
Flow Effects of Integrated Plan on Tieton River Reach for 2002 (Wet Year)



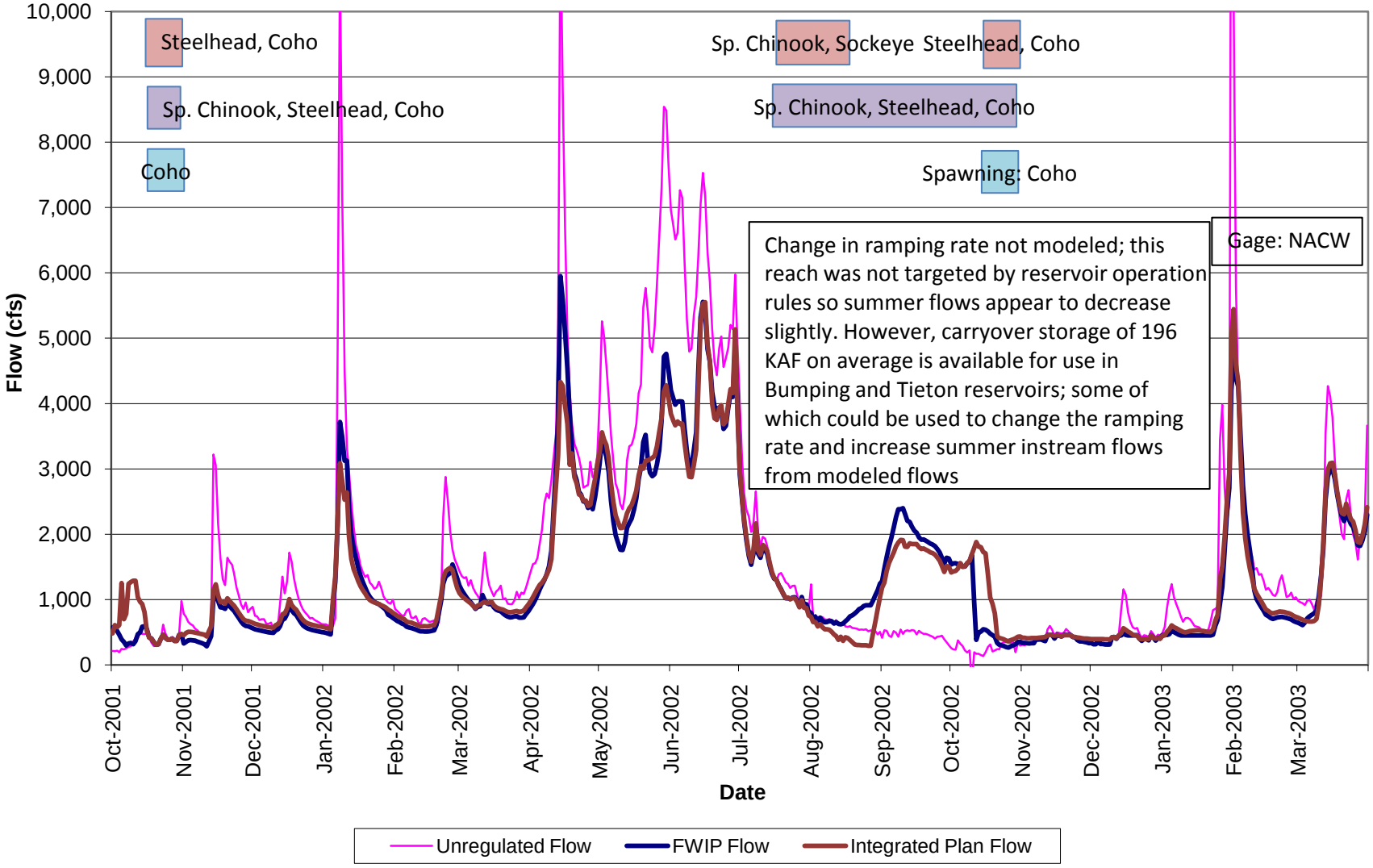
Flow Effects of Integrated Plan on Tieton River Reach for 2003 (Average Year)



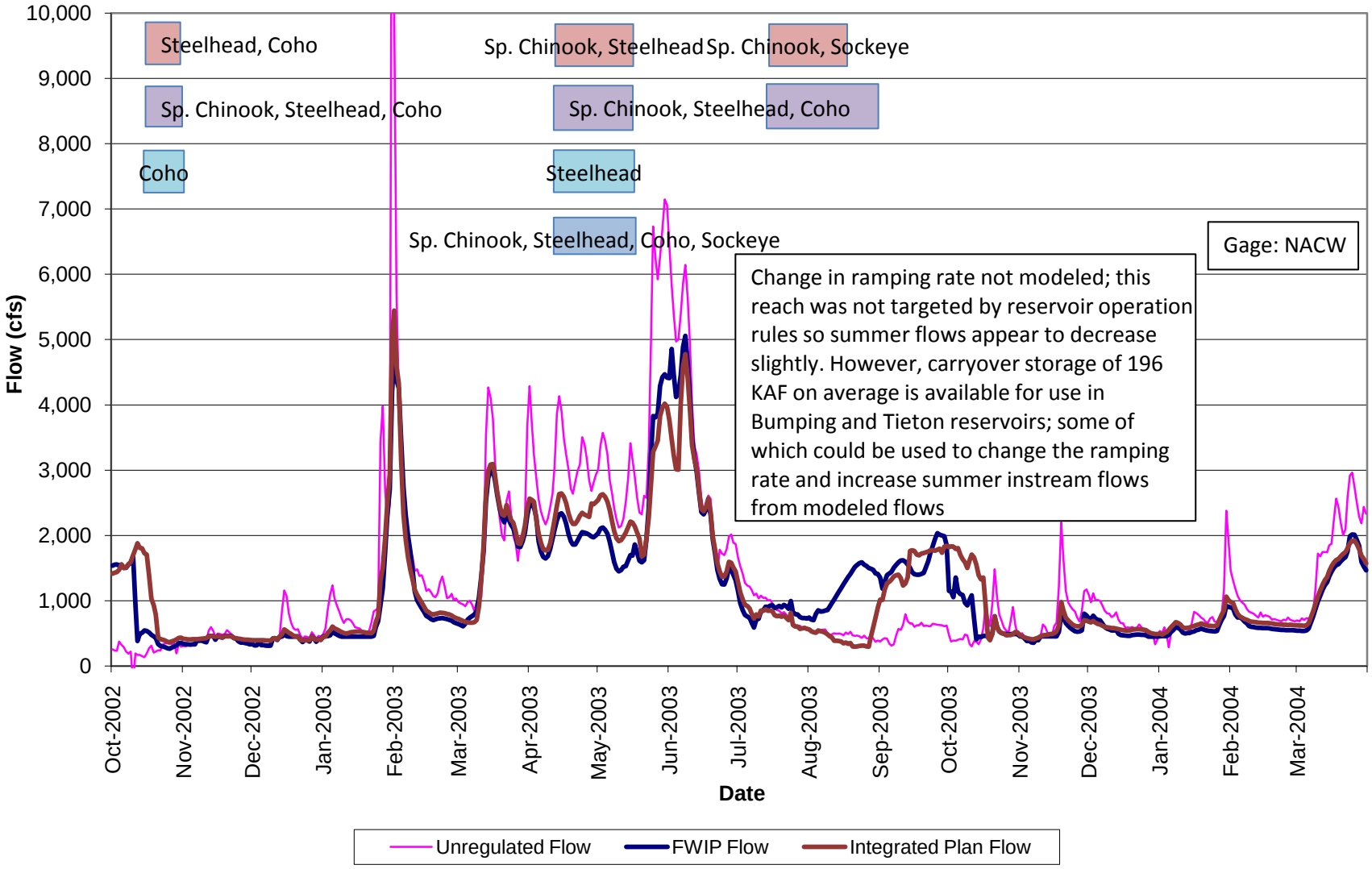
Flow Effects of Integrated Plan on Lower Naches River Reach for 2001 (Drought Year)



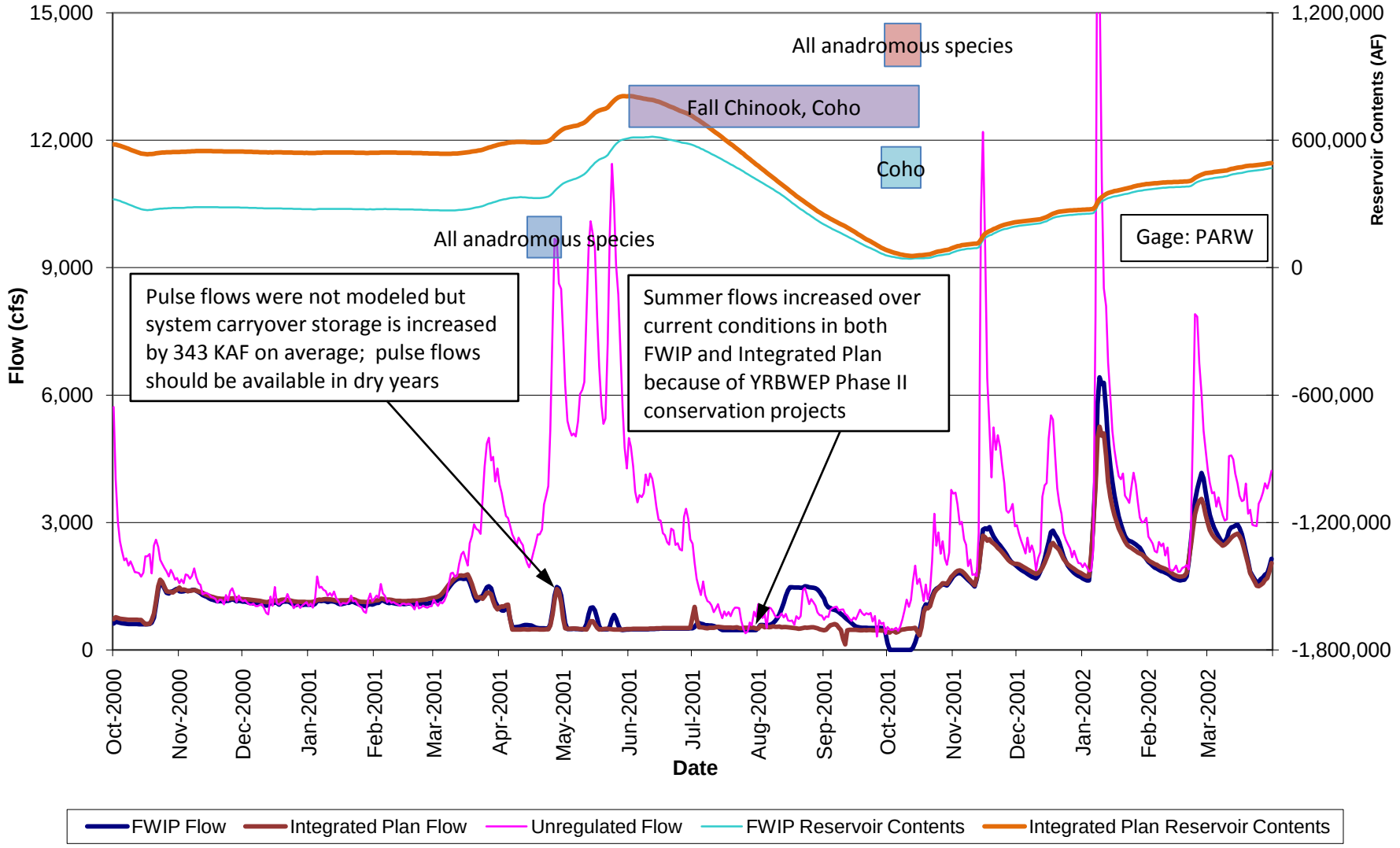
Flow Effects of Integrated Plan on Lower Naches River Reach for 2002 (Wet Year)



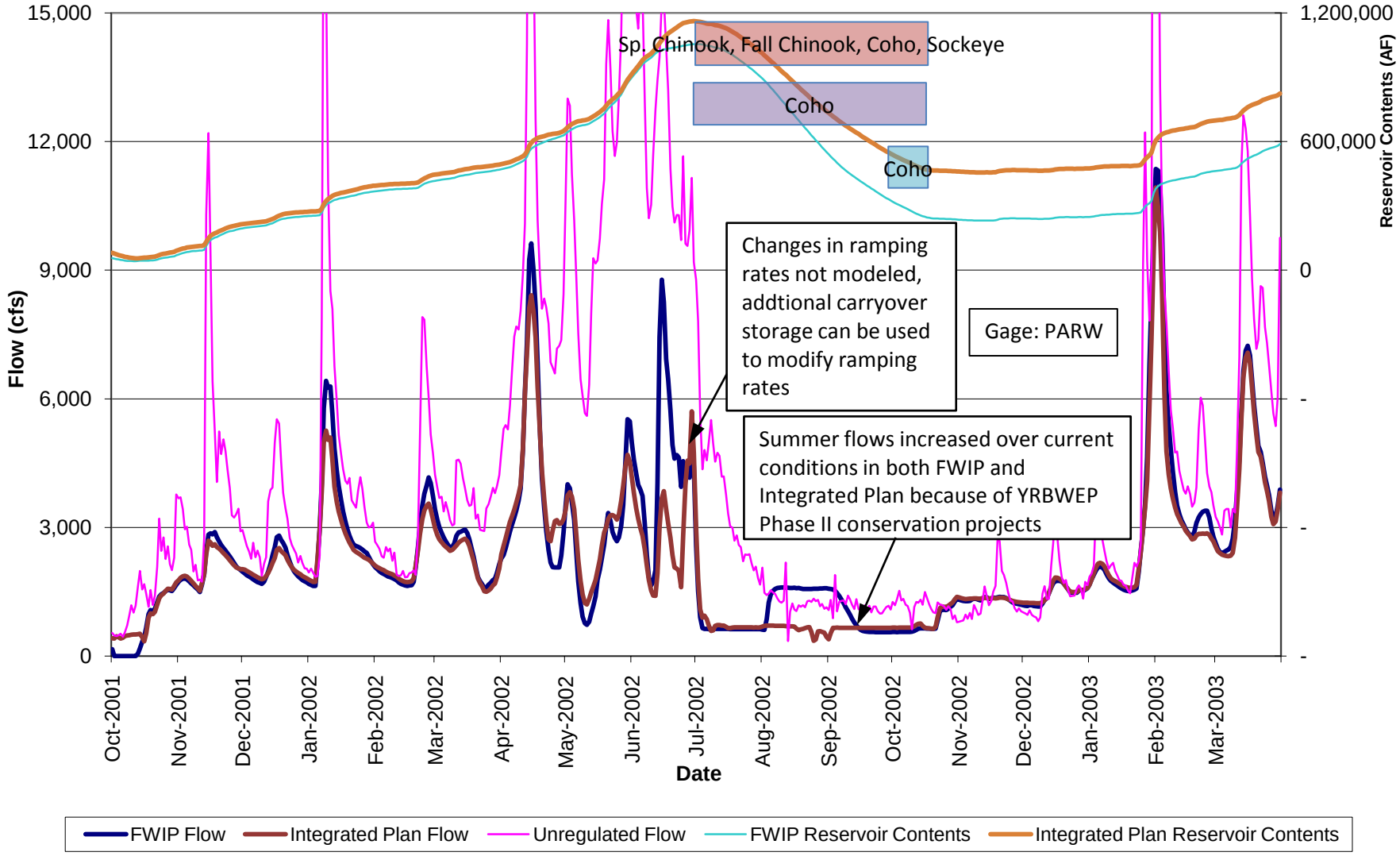
Flow Effects of Integrated Plan on Lower Naches River Reach for 2003 (Average Year)



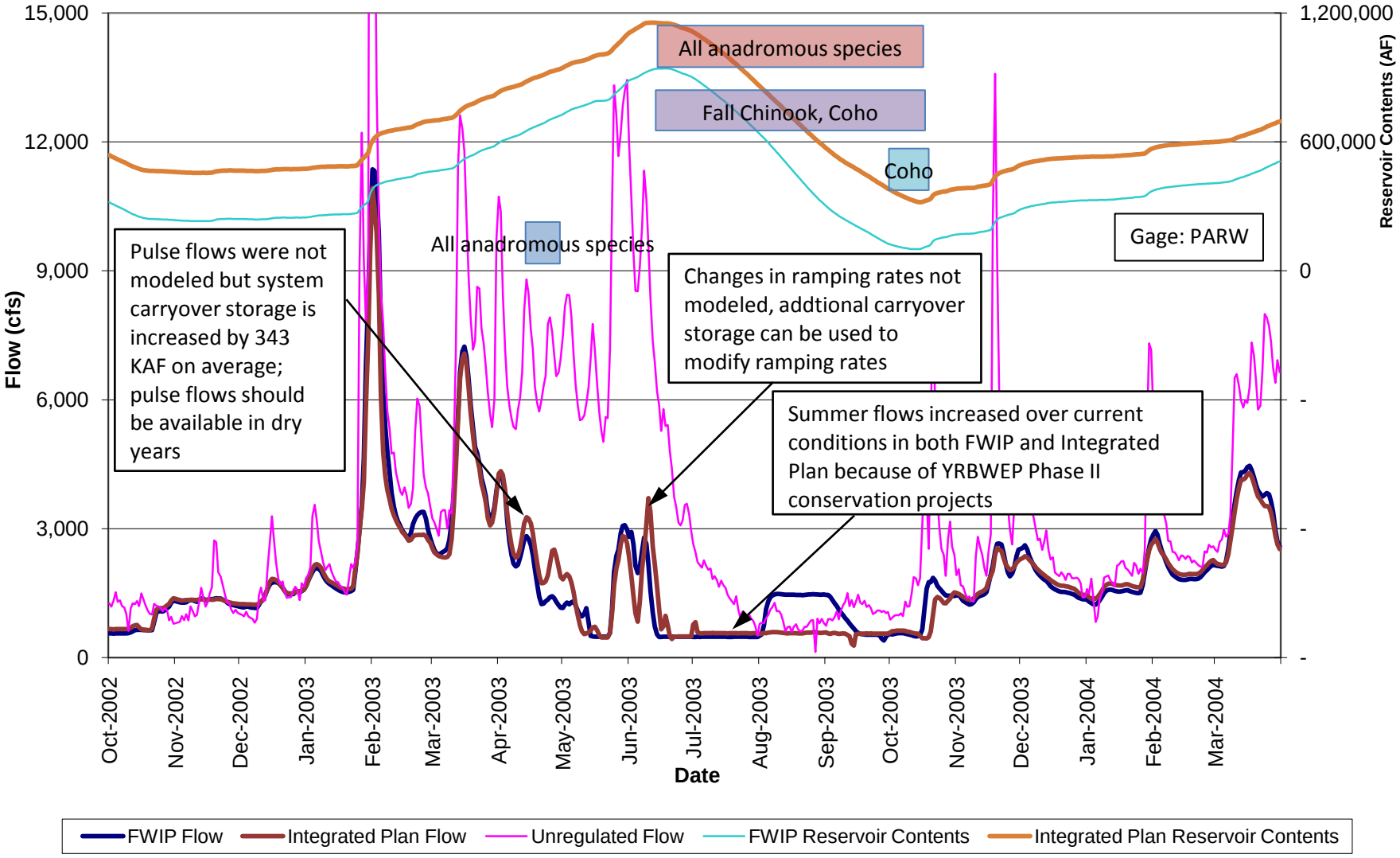
Flow Effects of Integrated Plan on Yakima River, Parker to Toppenish (Wapato) Reach for 2001 (Drought Year)



Flow Effects of Integrated Plan on Yakima River, Parker to Toppenish (Wapato) Reach for 2002 (Wet Year)



Flow Effects of Integrated Plan on Yakima River, Parker to Toppenish (Wapato) Reach for 2003 (Average Year)



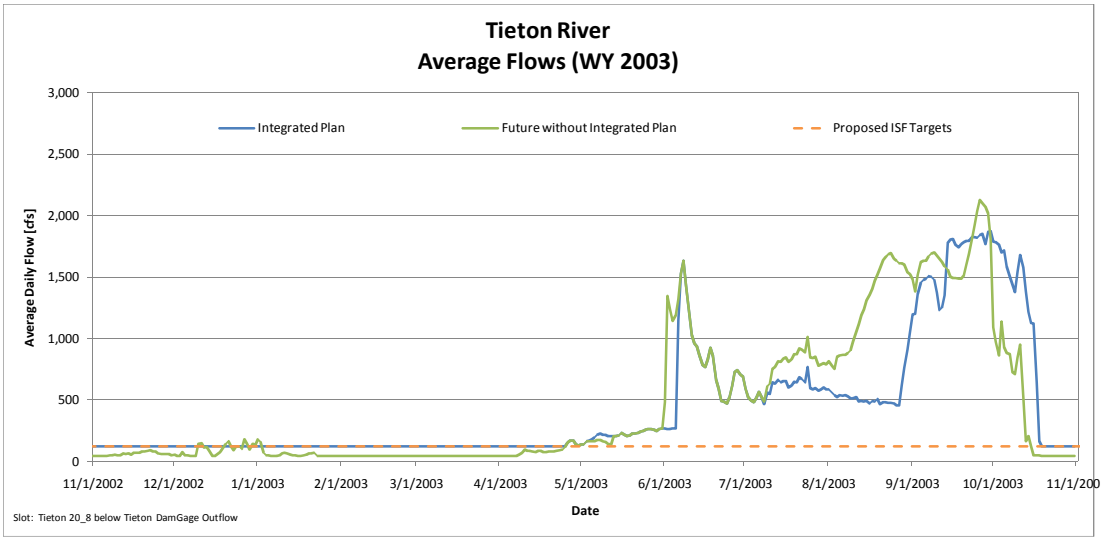
Hydrologic Indicator	Integrated Plan					Future without Integrated Plan				
	Average 1981-2005	Drought Year 1994	Drought Year 2001	Drought Year 2005	Wet Year 1997	Average 1981-2005	Drought Year 1994	Drought Year 2001	Drought Year 2005	Wet Year 1997
April 1 TWSA (maf)	3.00	2.22	2.45	2.32	4.73	2.79	1.74	1.76	1.71	4.52
April-September flow volume at Parker gage (kaf)	605	245	198	181	1937	644	313	252	245	1937
March-October flow volume at Parker gage (kaf)	907	400	335	310	2638	940	456	377	366	2603
April-September diversion volume upstream of Parker gage (maf)	1.69	1.52	1.55	1.53	1.73	1.61	1.23	1.29	1.25	1.71
September 30 non-Bumping or Wymer reservoir contents (kaf)	348	-121	75	-19	709	218	41	48	62	510
October 31 non-Bumping or Wymer reservoir contents (kaf)	329	-120	74	-26	802	213	65	67	56	619
September 30 Bumping and Wymer reservoir contents (kaf)	229	56	145	144	267	15	7	11	14	18
April-September flow volume at mouth of Yakima River (kaf)	867	349	272	293	2262	888	386	300	333	2245
Irrigation proration level (percent)[1]	92%	70%	70%	70%	100%	80%	21%	32%	28%	100%

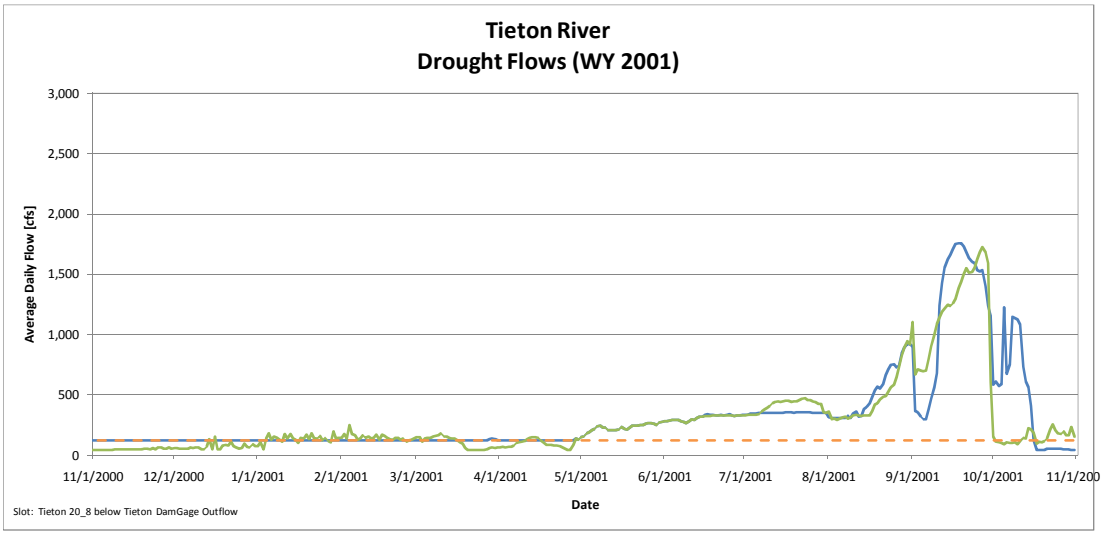
Resource indicator (measurement)	Integrated Plan	Future without Integrated Plan
WATER RESOURCES		
Average for water years 1981–2005 (maf)		
Water supply		
April 1 total water supply available (TWSA)	3.00	2.79
Water distribution		
April–September Parker flow volume	0.60	0.64
April–September diversion	1.69	1.61
September 30 reservoir contents	0.58	0.24
April–September flow volume at mouth of Yakima River	0.87	0.89
1994 dry-year (maf)		
Water supply		
April 1 TWSA	2.22	1.74
Water distribution		
April–September Parker flow volume	0.25	0.31
April–September diversion	1.52	1.23
September 30 reservoir contents	-0.06	0.05
April–September flow volume at mouth of Yakima River	0.35	0.39
Irrigation proration level	70%	21%

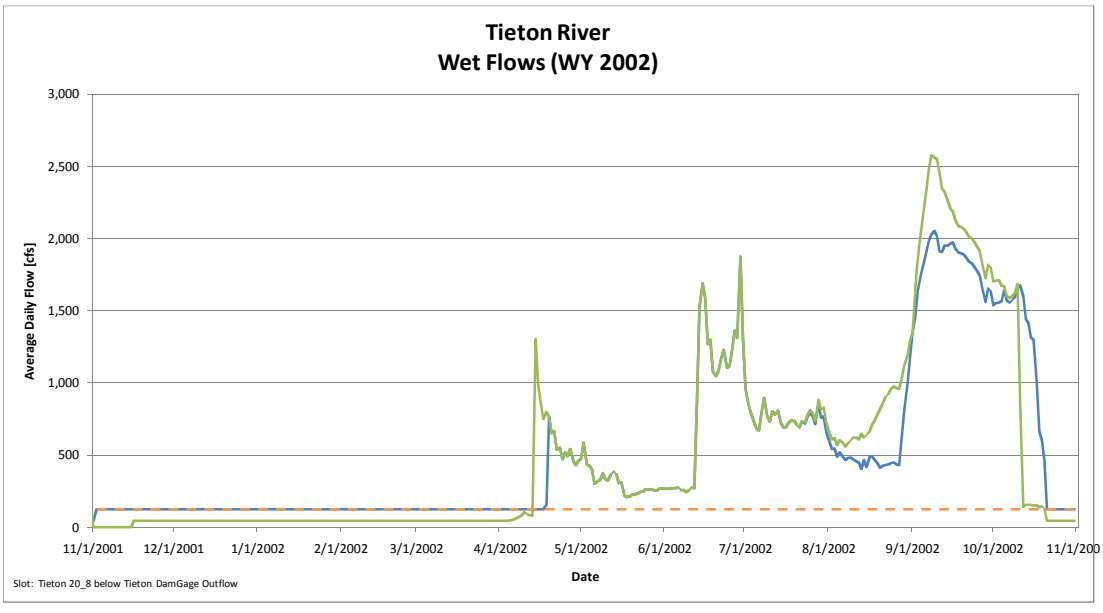
Resource indicator (measurement)	Integrated Plan	Future without Integrated Plan
ANADROMOUS FISH		
Rate of change in flow during flip-flop (average cfs/day August 16–September 14)		
Easton reach	-7	-21
Ellensburg reach	-45	-103
Lower Naches River reach	31	33
Pre- (August 1-15) and post- (September 14-28) flip-flop flow and absolute change in flow		
Easton reach		
Pre-flip-flop flow (cfs)	574	890
Post-flip-flop flow (cfs)	364	287
Absolute change in flow (cfs)	-211	-603
Ellensburg reach		
Pre-flip-flop flow (cfs)	2,867	4,346
Post-flip-flop flow (cfs)	1,574	1,364
Absolute change in flow (cfs)	-1,293	-2,982
Lower Naches River reach		
Pre-flip-flop flow (cfs)	644	824
Post-flip-flop flow (cfs)	1,548	1,776
Absolute change in flow (cfs)	904	953

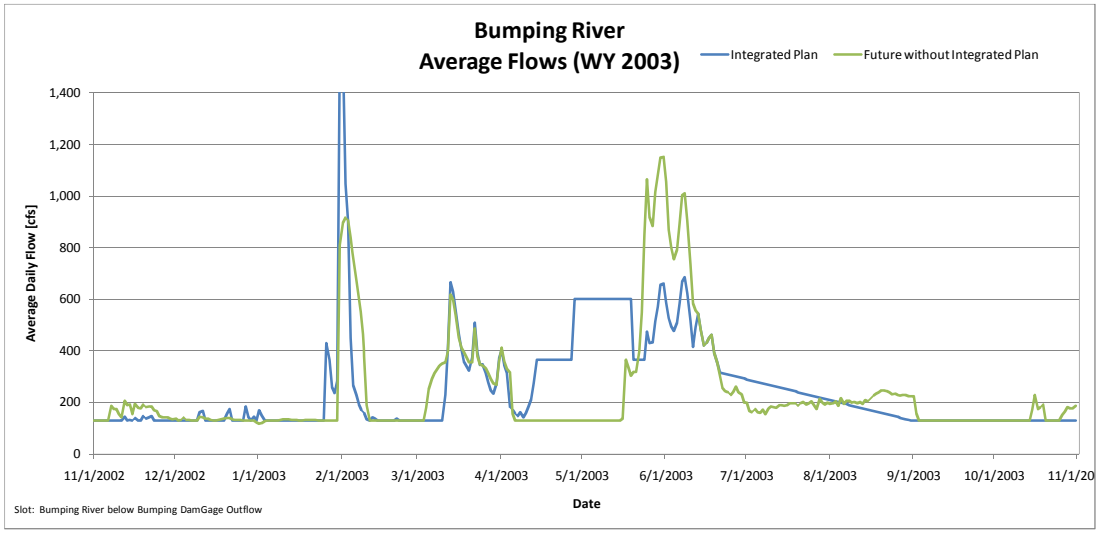
Average, minimum, and maximum reservoir elevation (feet) during bull trout spawning migration: July 15–September 15 (feet)		
Kachess Lake	2235.41 2146.99-2261.96	2239.13 2198.02-2261.96
Keechelus Lake	2476.7 2432.28-2516.96	2465.38 2432.44-2516.88
Rimrock Lake	2914.66 2801.26-2926	2905.93 2846.64-2926

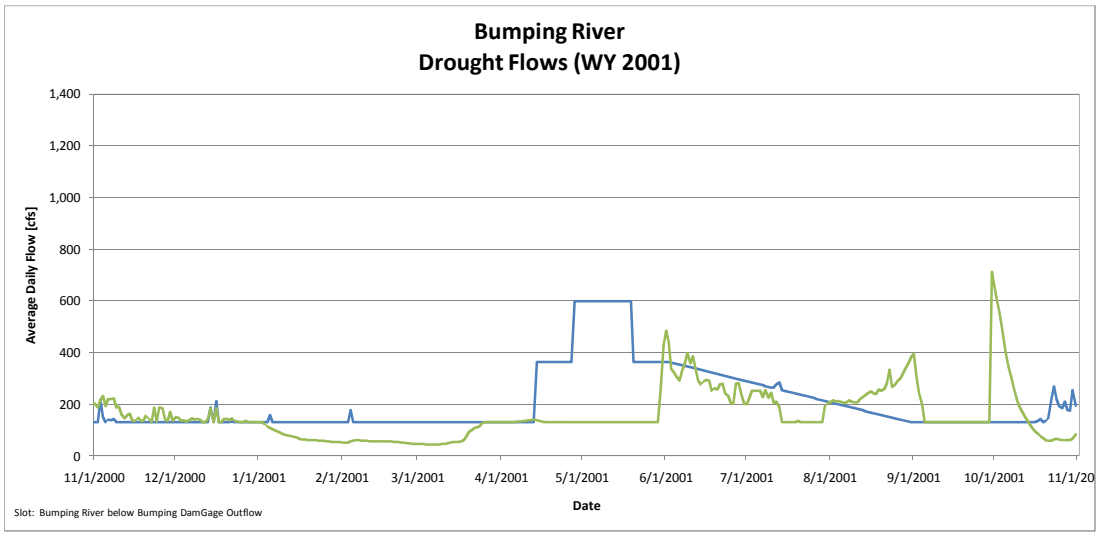
Item	Future without Integrated Plan	Integrated Plan	Improvement
Average 1981-2005			
TWSA [April 1, kaf]	2789.0	3004.9	215.9
March-October flow volume at Parker gage [kaf]	940.2	906.7	-33.6
Drought Year 1994			
TWSA [April 1, kaf]	1740.3	2215.7	475.4
March-October flow volume at Parker gage [kaf]	456.2	399.8	-56.4
Drought Year 2001			
TWSA [April 1, kaf]	1762.1	2453.2	691.1
March-October flow volume at Parker gage [kaf]	377.4	335.5	-41.9
Drought Year 2005			
TWSA [April 1, kaf]	1706.3	2320.8	614.5
March-October flow volume at Parker gage [kaf]	365.7	310.2	-55.5
Wet Year 1997			
TWSA [April 1, kaf]	4517.9	4728.6	210.7
March-October flow volume at Parker gage [kaf]	2603.3	2638.3	35.0

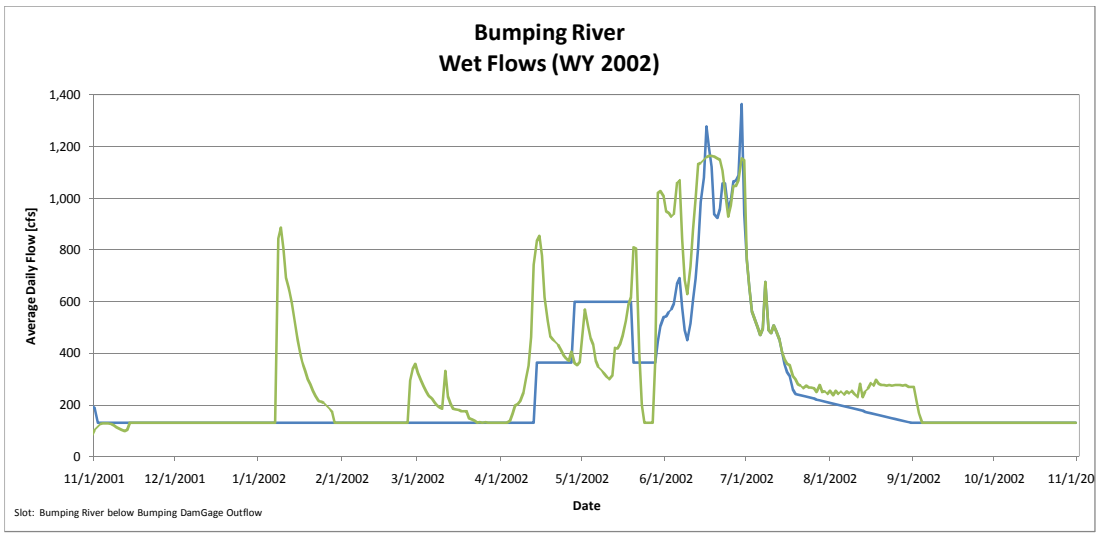

Tieton River
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Proposed ISF Targets
Average Daily Flow [cfs]
3,000
2,500
2,000
1,500
1,000
500
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Tieton 20_8 below Tieton DamGage Outflow

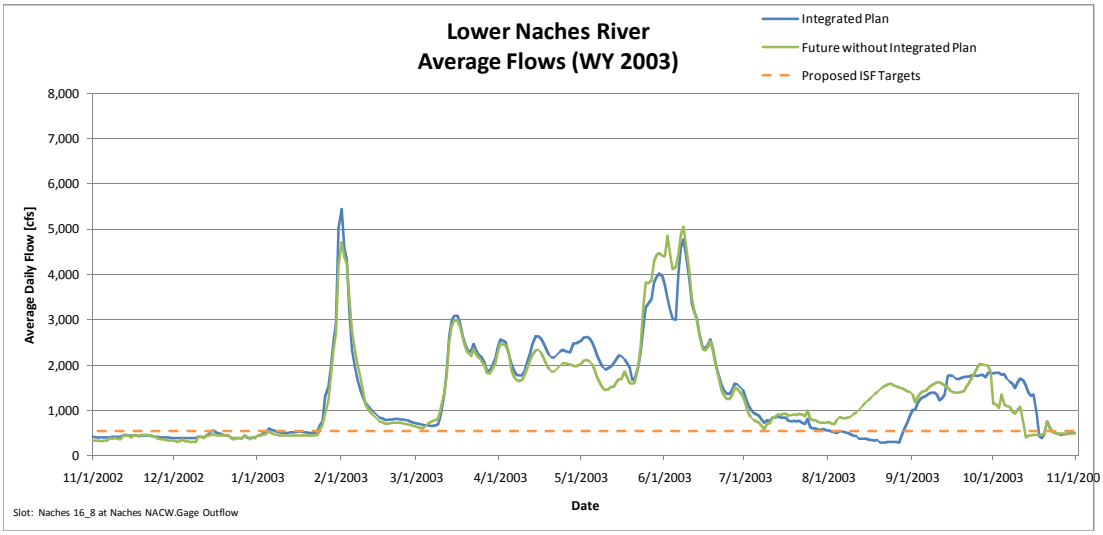

Tieton River
Drought Flows (WY 2001)
Average Daily Flow [cfs]
3,000
2,500
2,000
1,500
1,000
500
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Tieton 20_8 below Tieton DamGage Outflow

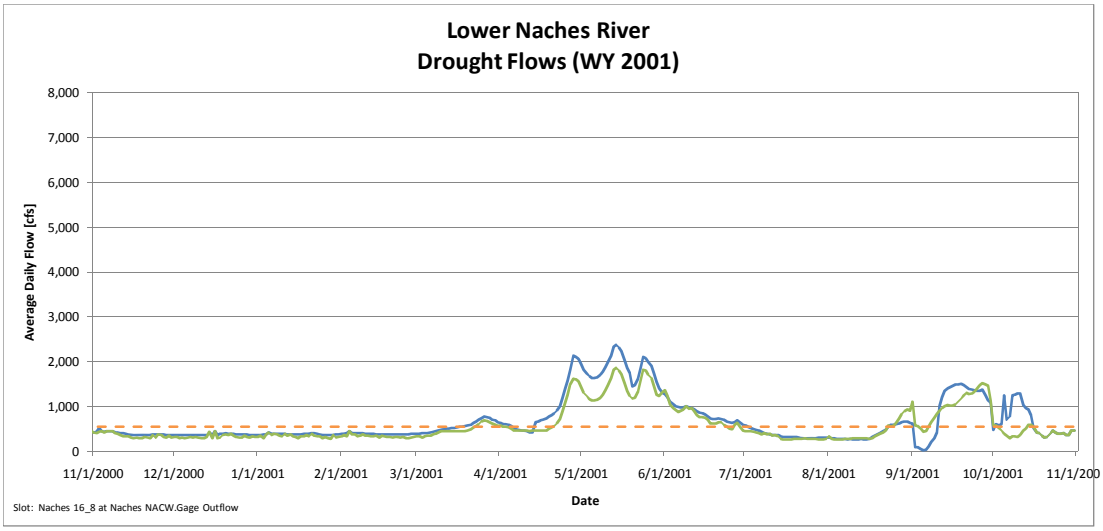

Tieton River
Wet Flows (WY 2002)
Average Daily Flow [cfs]
3,000
2,500
2,000
1,500
1,000
500
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Tieton 20_8 below Tieton DamGage Outflow

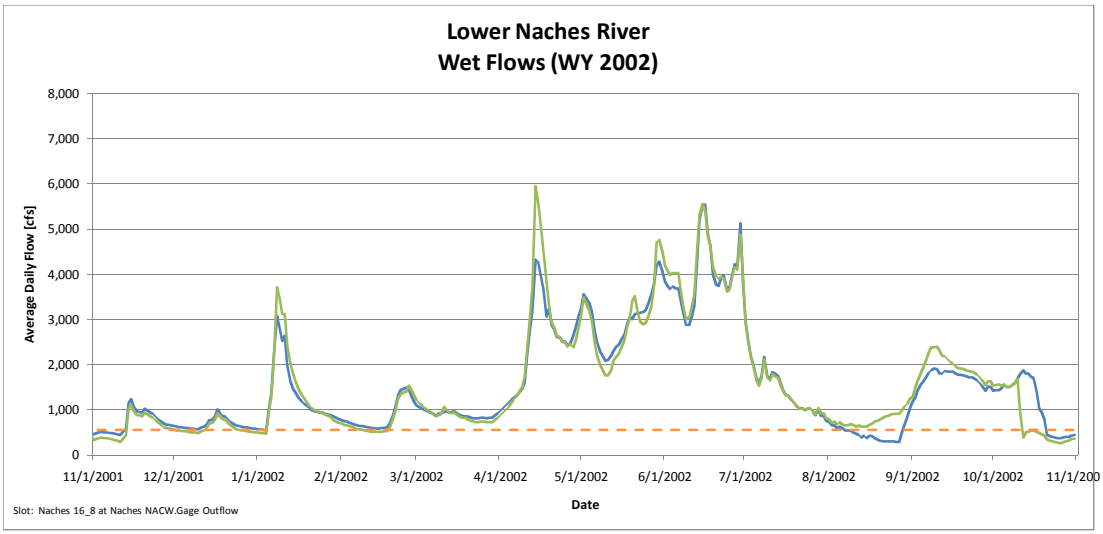

Bumping River
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Average Daily Flow [cfs]
1,400
1,200
1,000
800
600
400
200
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/20
Date
Slot: Bumping River below Bumping DamGage Outflow

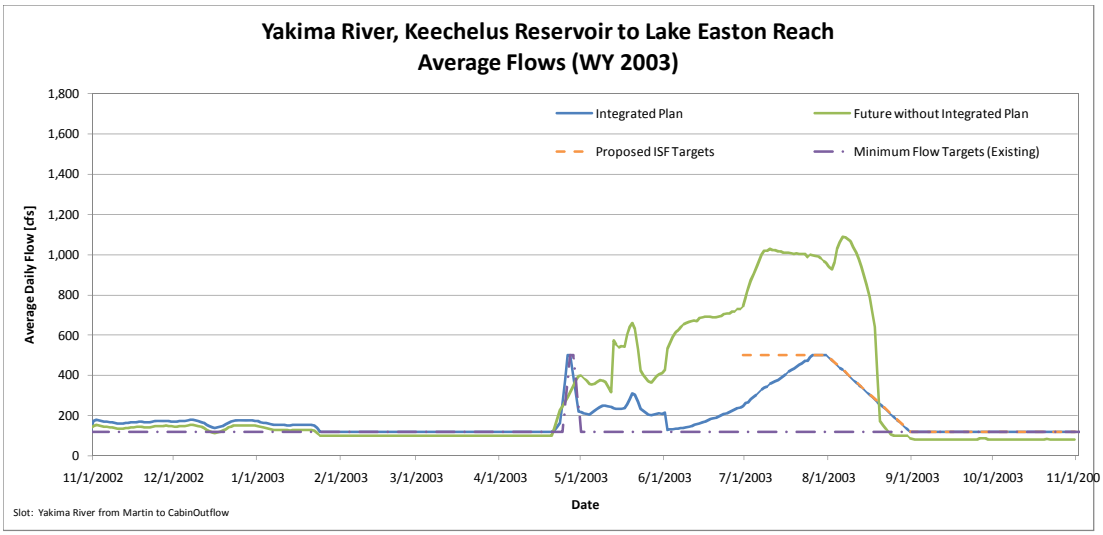

Bumping River
Drought Flows (WY 2001)
Average Daily Flow [cfs]
1,400
1,200
1,000
800
600
400
200
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/20
Date
Slot: Bumping River below Bumping DamGage Outflow

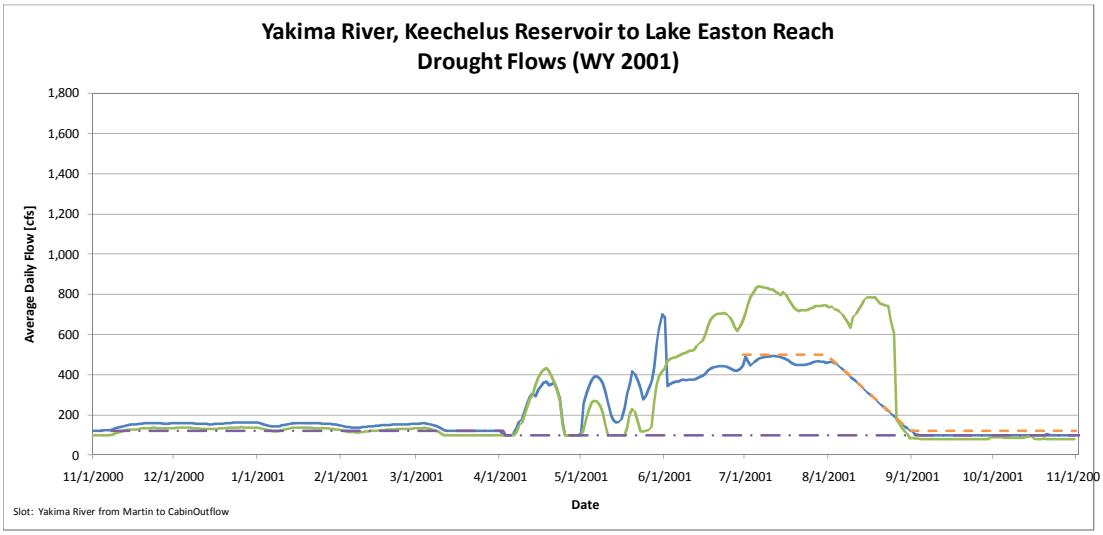

Bumping River
Wet Flows (WY 2002)
Average Daily Flow [cfs]
1,400
1,200
1,000
800
600
400
200
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/20
Date
Slot: Bumping River below Bumping DamGage Outflow

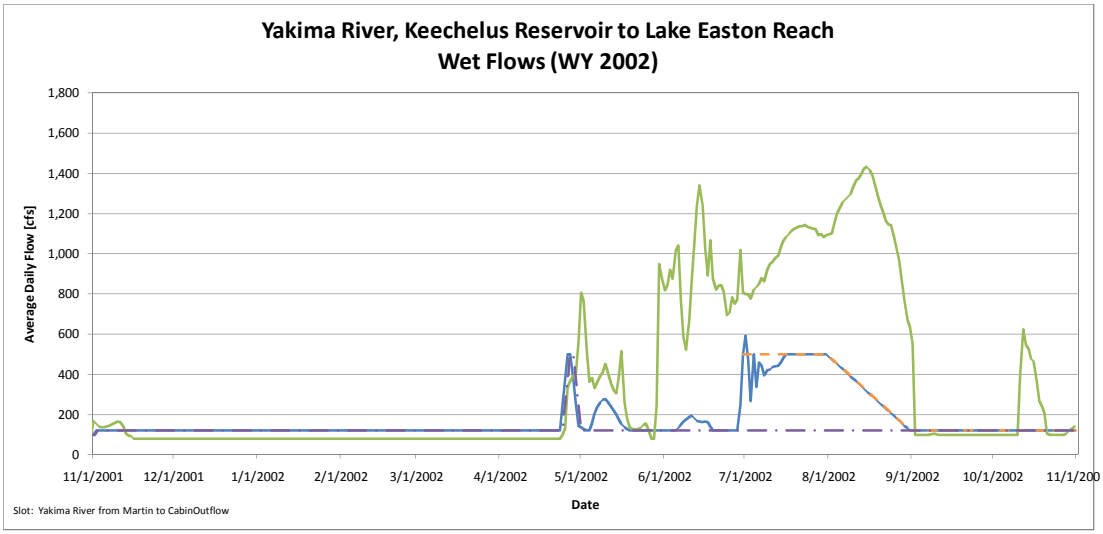

Lower Naches River
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Proposed ISF Targets
Average Daily Flow [cfs]
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Naches 16_8 at Naches NACW.Gage Outflow

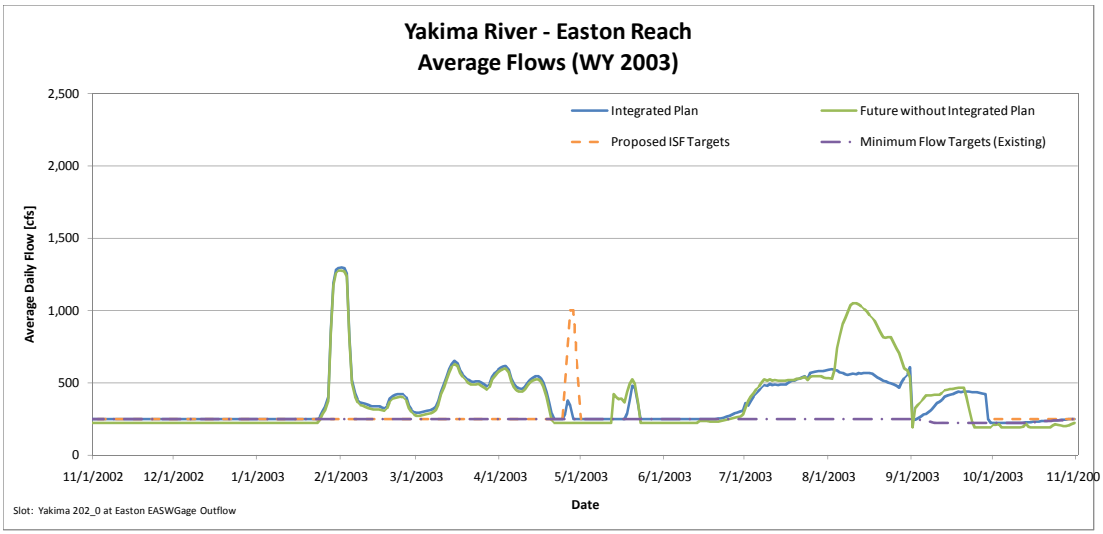

Lower Naches River
Drought Flows (WY 2001)
Average Daily Flow [cfs]
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Naches 16_8 at Naches NACW.Gage Outflow

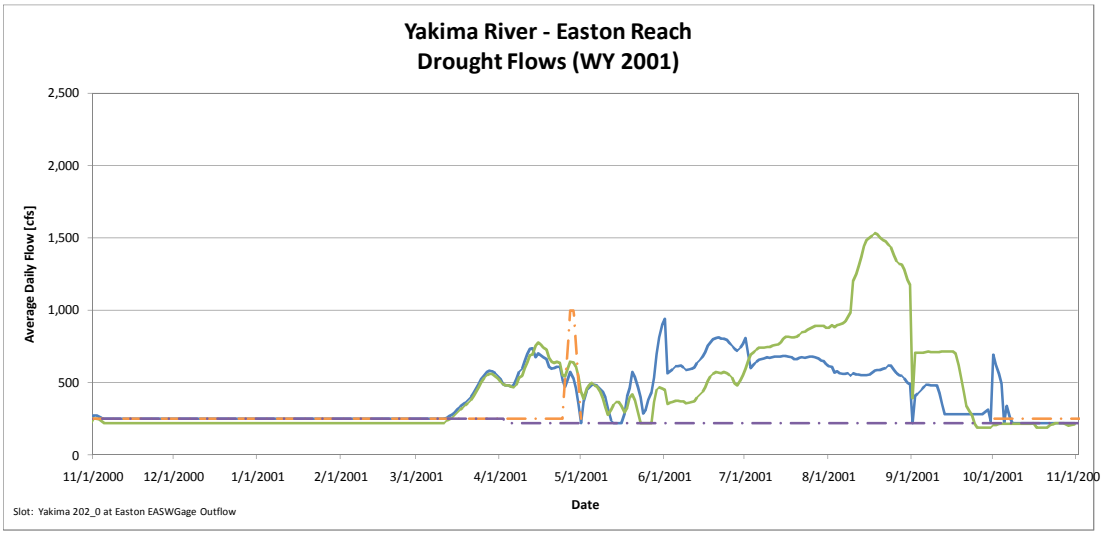

Lower Naches River
Wet Flows (WY 2002)
Average Daily Flow [cfs]
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Naches 16_8 at Naches NACW.Gage Outflow

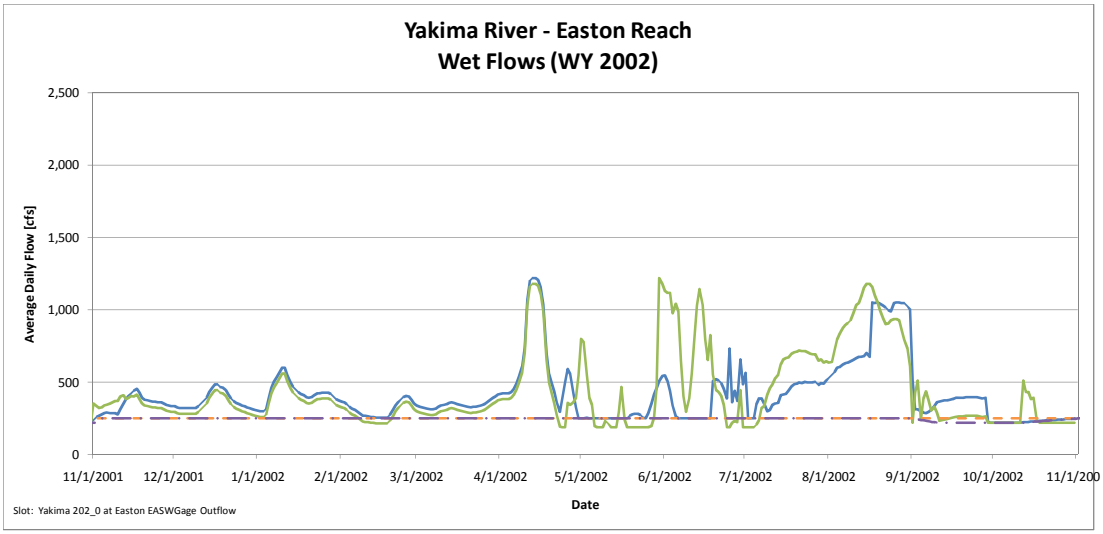

Yakima River, Keechelus Reservoir to Lake Easton Reach
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Proposed ISF Targets
Minimum Flow Targets (Existing)
Average Daily Flow [cfs]
1,800
1,600
1,400
1,200
1,000
800
600
400
200
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Yakima River from Martin to CabinOutflow

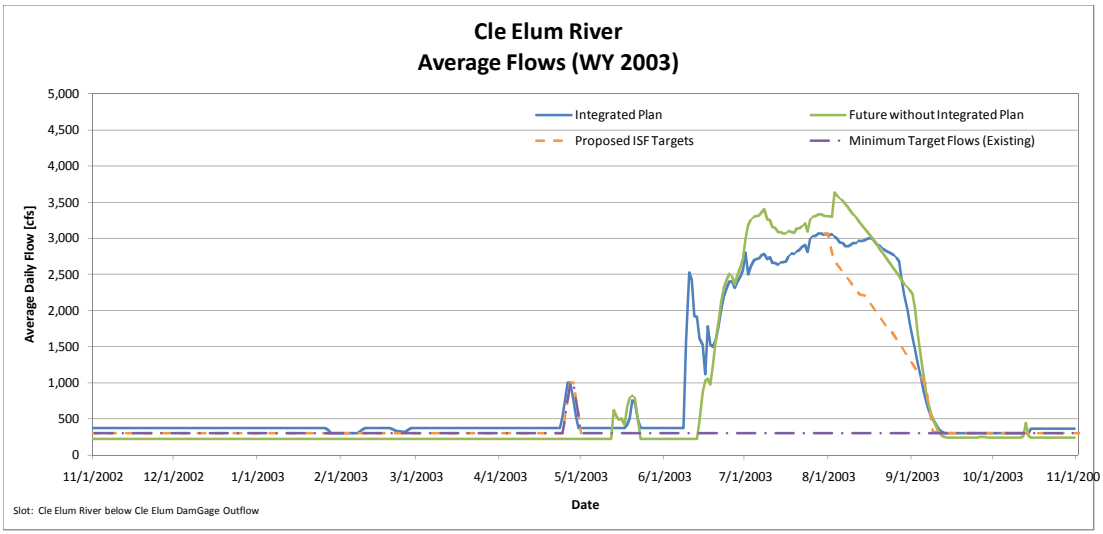

Yakima River, Keechelus Reservoir to Lake Easton Reach
Drought Flows (WY 2001)
Average Daily Flow [cfs]
1,800
1,600
1,400
1,200
1,000
800
600
400
200
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Yakima River from Martin to CabinOutflow

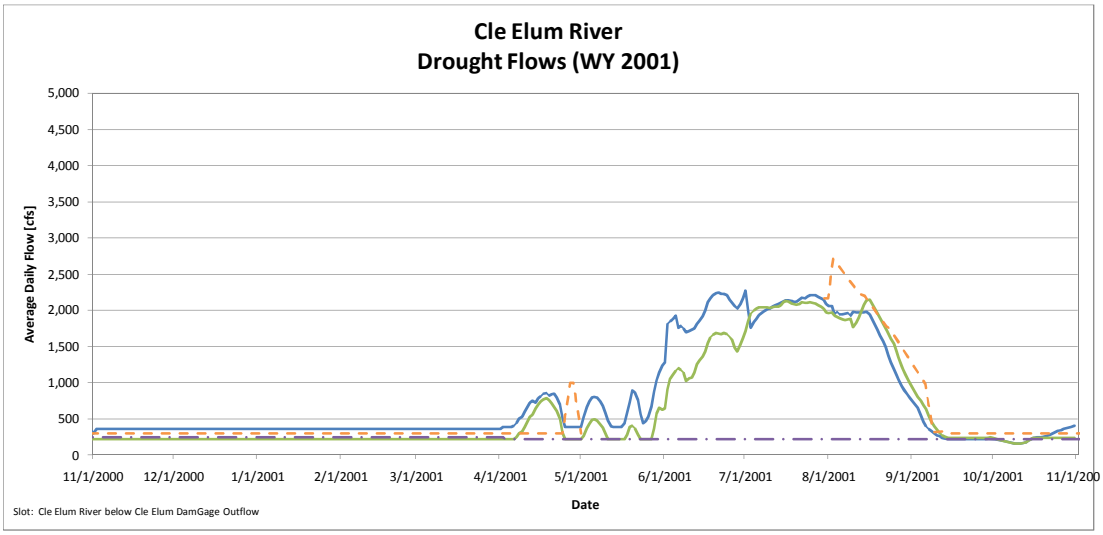

Yakima River, Keechelus Reservoir to Lake Easton Reach
Wet Flows (WY 2002)
Average Daily Flow [cfs]
1,800
1,600
1,400
1,200
1,000
800
600
400
200
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Yakima River from Martin to CabinOutflow

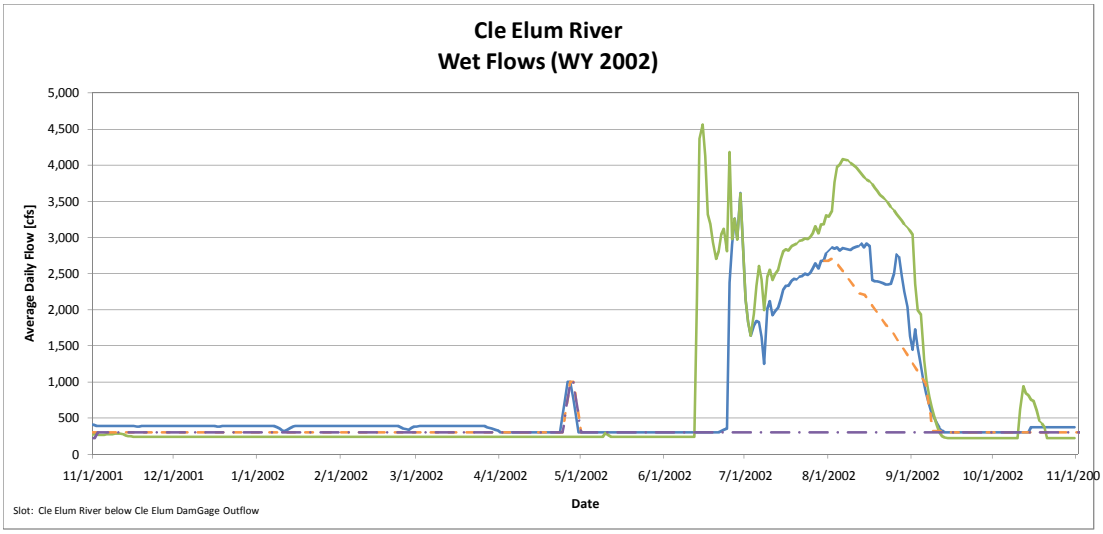

Yakima River - Easton Reach
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Proposed ISF Targets
Minimum Flow Targets (Existing)
Average Daily Flow [cfs]
2,500
2,000
1,500
1,000
500
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Yakima 202_0 at Easton EASWGage Outflow

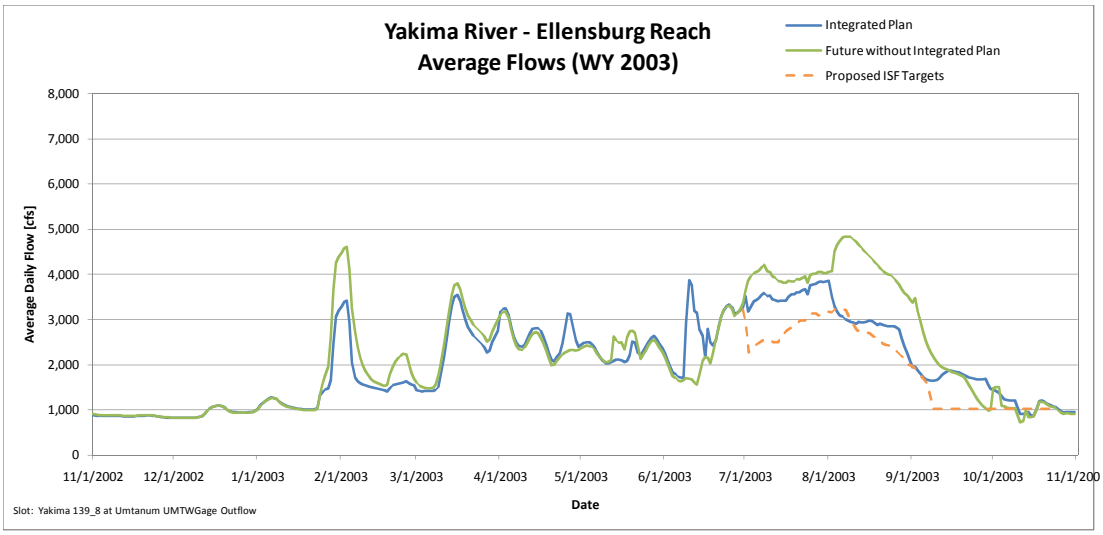

Yakima River - Easton Reach
Drought Flows (WY 2001)
Average Daily Flow [cfs]
2,500
2,000
1,500
1,000
500
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Yakima 202_0 at Easton EASWGage Outflow

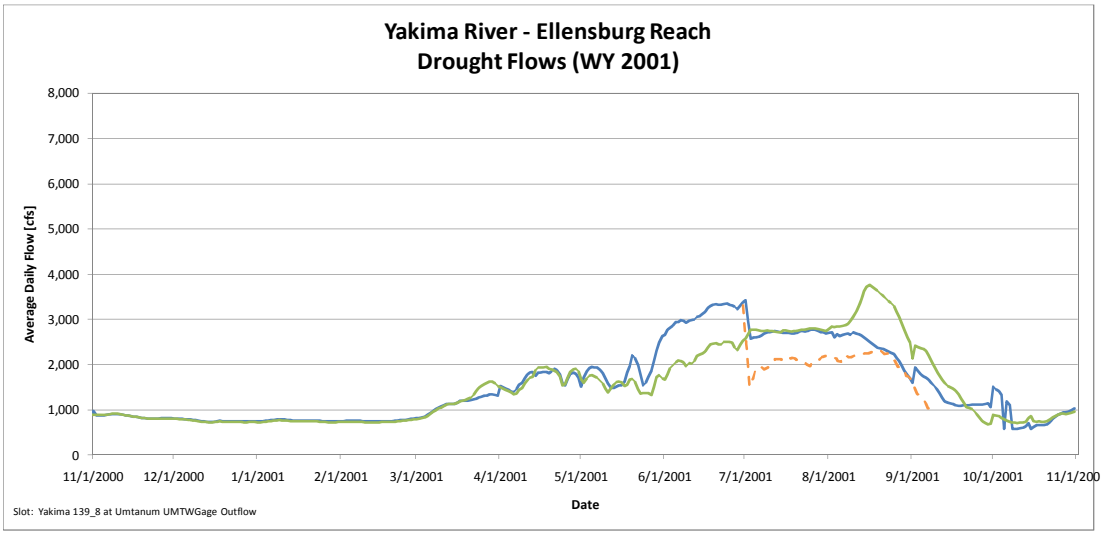

Yakima River - Easton Reach
Wet Flows (WY 2002)
Average Daily Flow [cfs]
2,500
2,000
1,500
1,000
500
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Yakima 202_0 at Easton EASWGage Outflow

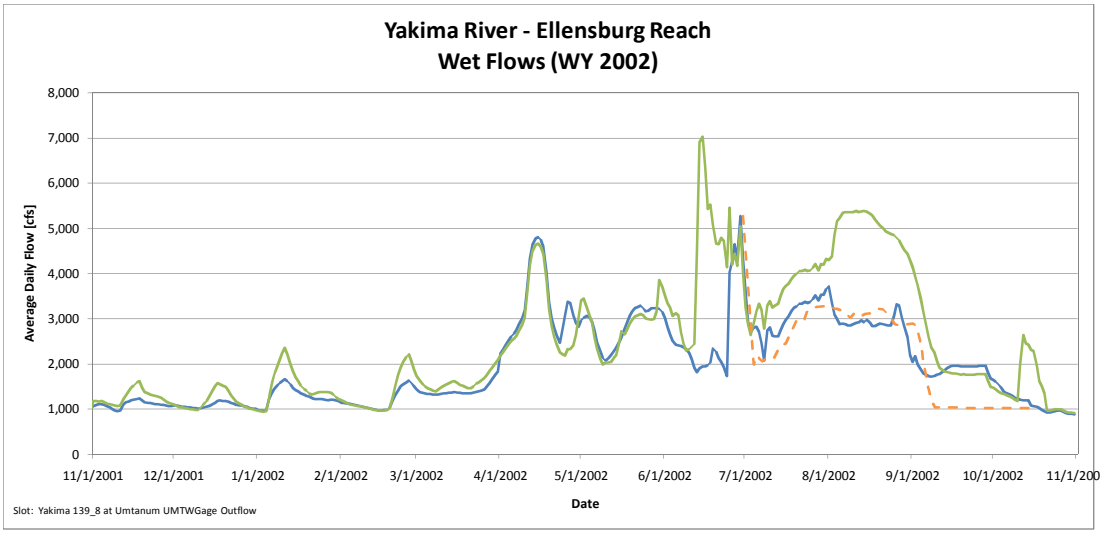

Cle Elum River
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Proposed ISF Targets
Minimum Target Flows (Existing)
Average Daily Flow [cfs]
5,000
4,500
4,000
3,500
3,000
2,500
2,000
1,500
1,000
500
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Cle Elum River below Cle Elum DamGage Outflow

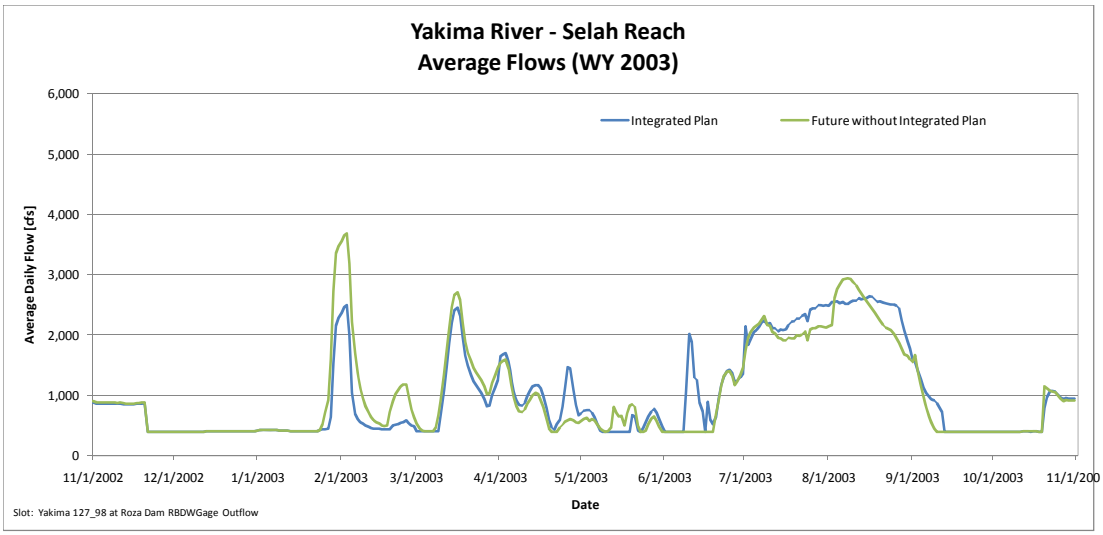

Cle Elum River
Drought Flows (WY 2001)
Average Daily Flow [cfs]
5,000
4,500
4,000
3,500
3,000
2,500
2,000
1,500
1,000
500
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Cle Elum River below Cle Elum DamGage Outflow

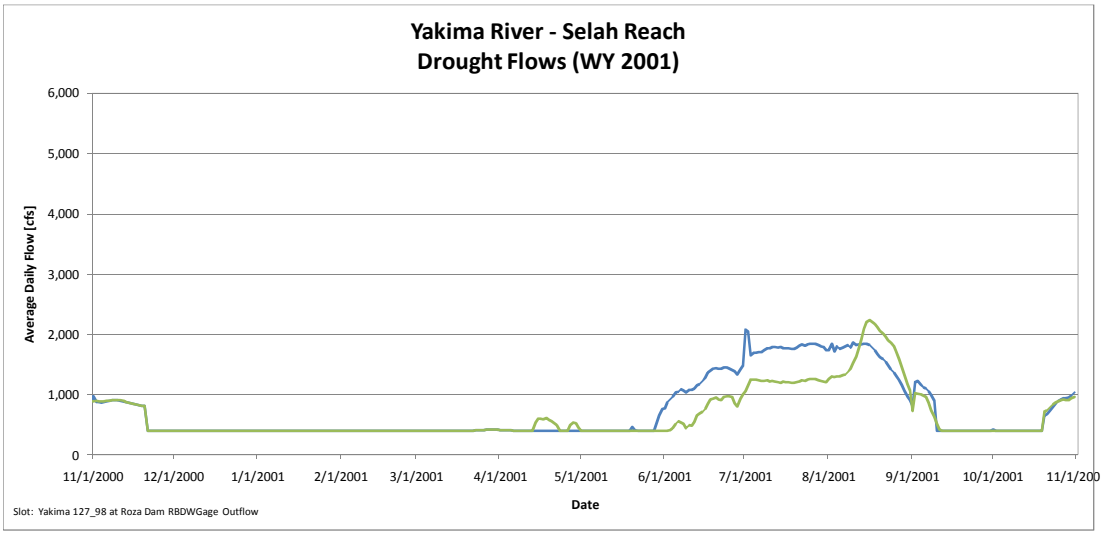

Cle Elum River
Wet Flows (WY 2002)
Average Daily Flow [cfs]
5,000
4,500
4,000
3,500
3,000
2,500
2,000
1,500
1,000
500
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Cle Elum River below Cle Elum DamGage Outflow

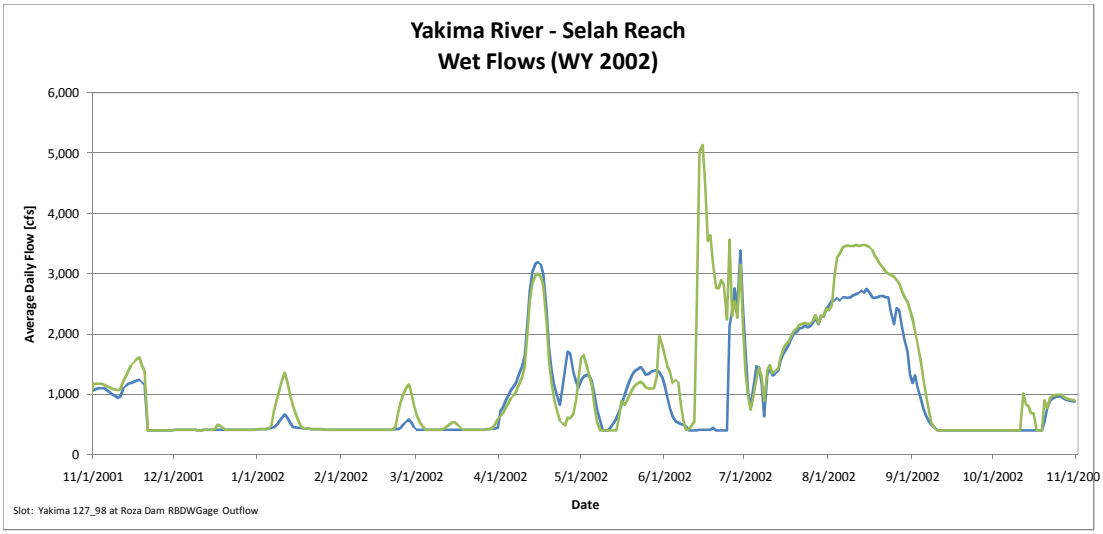

Yakima River - Ellensburg Reach
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Proposed ISF Targets
Average Daily Flow [cfs]
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Yakima 139_8 at Umtanum UMTWGage Outflow

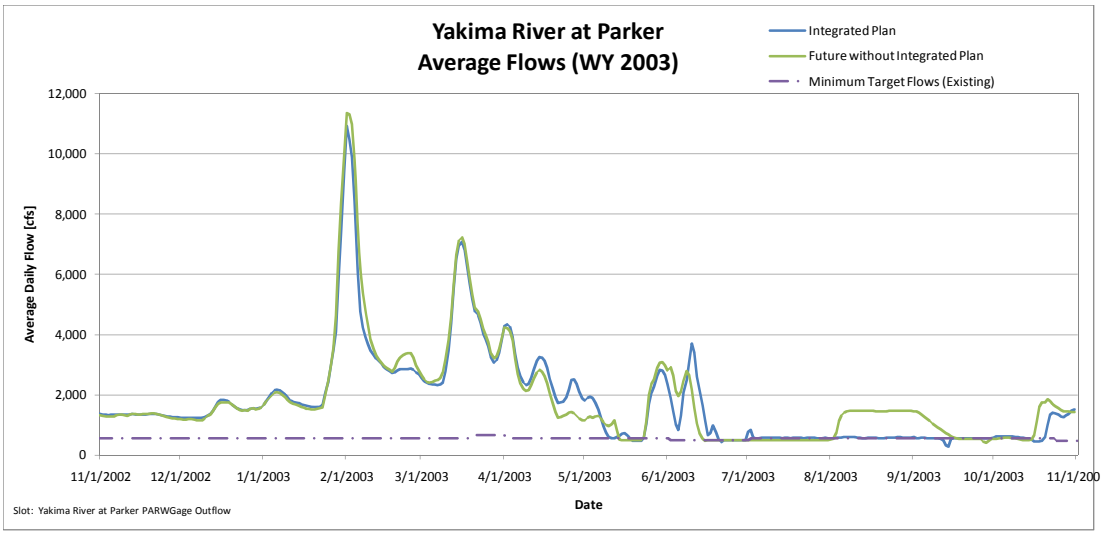

Yakima River - Ellensburg Reach
Drought Flows (WY 2001)
Average Daily Flow [cfs]
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Yakima 139_8 at Umtanum UMTWGage Outflow

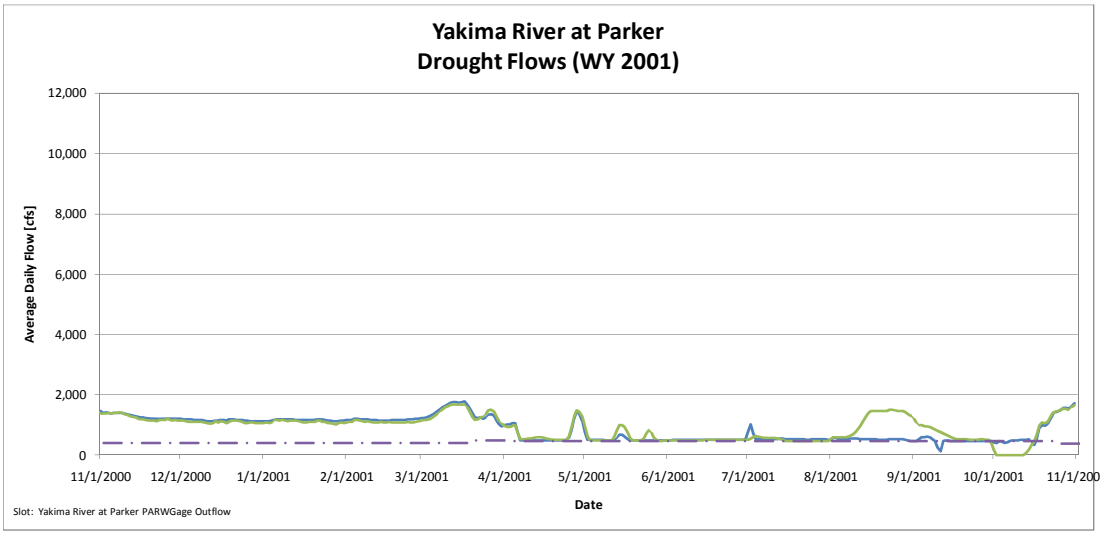

Yakima River - Ellensburg Reach
Wet Flows (WY 2002)
Average Daily Flow [cfs]
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Yakima 139_8 at Umtanum UMTWGage Outflow

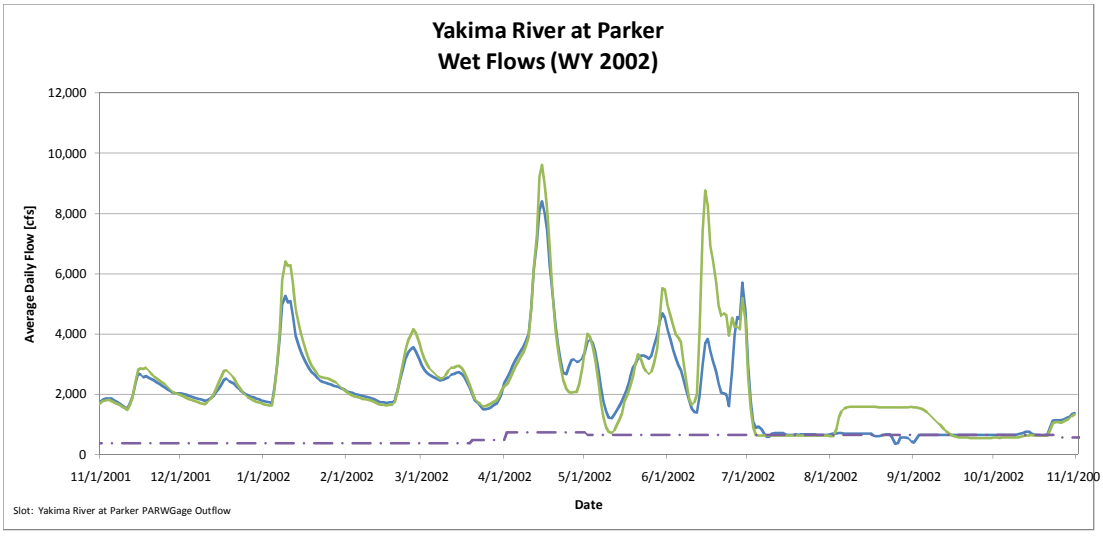

Yakima River - Selah Reach
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Average Daily Flow [cfs]
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Yakima 127_98 at Roza Dam RBDWGage Outflow

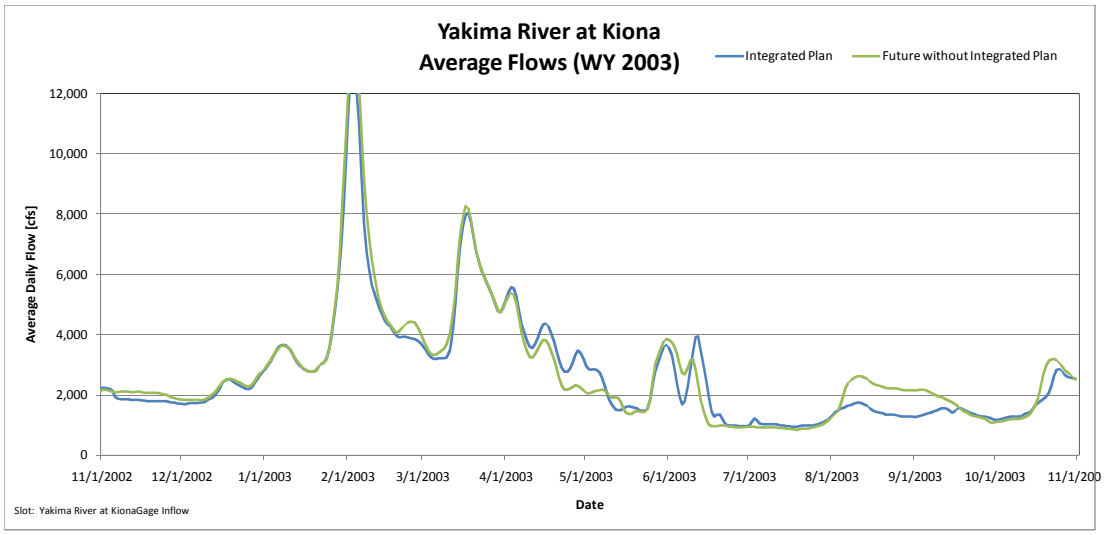

Yakima River - Selah Reach
Drought Flows (WY 2001)
Average Daily Flow [cfs]
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Yakima 127_98 at Roza Dam RBDWGage Outflow

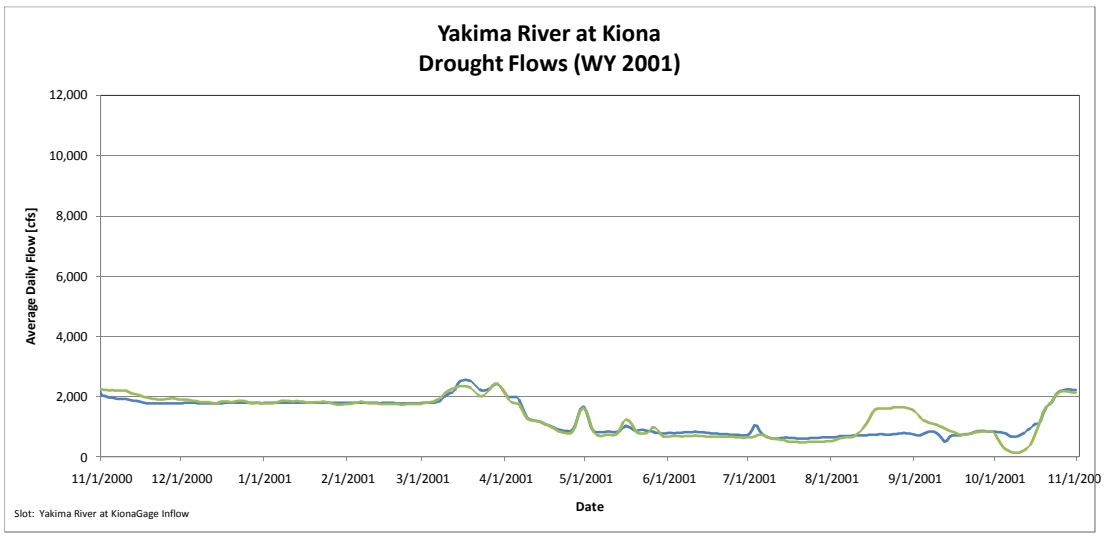

Yakima River - Selah Reach
Wet Flows (WY 2002)
Average Daily Flow [cfs]
6,000
5,000
4,000
3,000
2,000
1,000
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Yakima 127_98 at Roza Dam RBDWGage Outflow

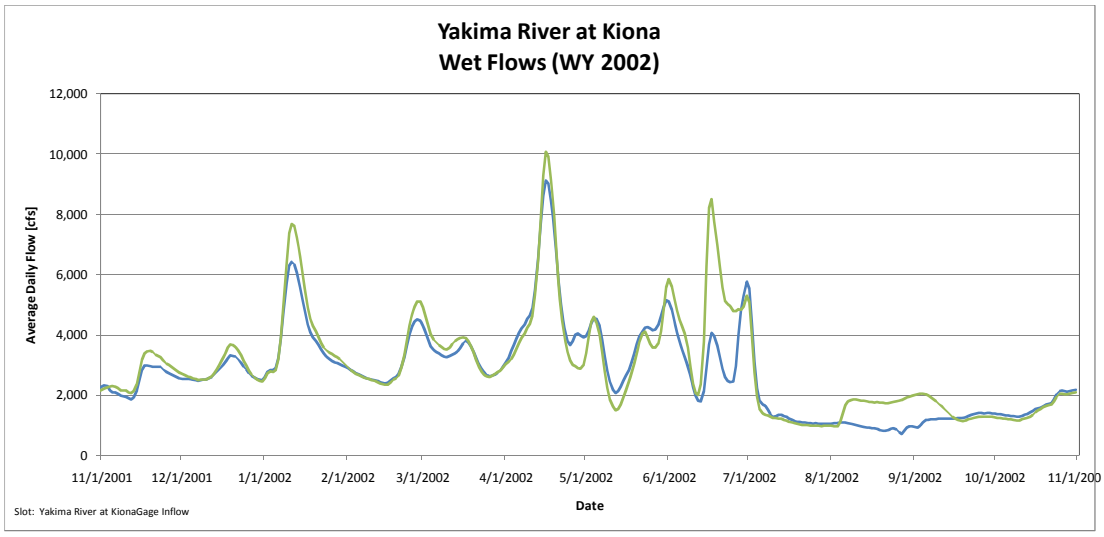

Yakima River at Parker
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Minimum Target Flows (Existing)
Average Daily Flow [cfs]
12,000
10,000
8,000
6,000
4,000
2,000
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Yakima River at Parker PARWGage Outflow

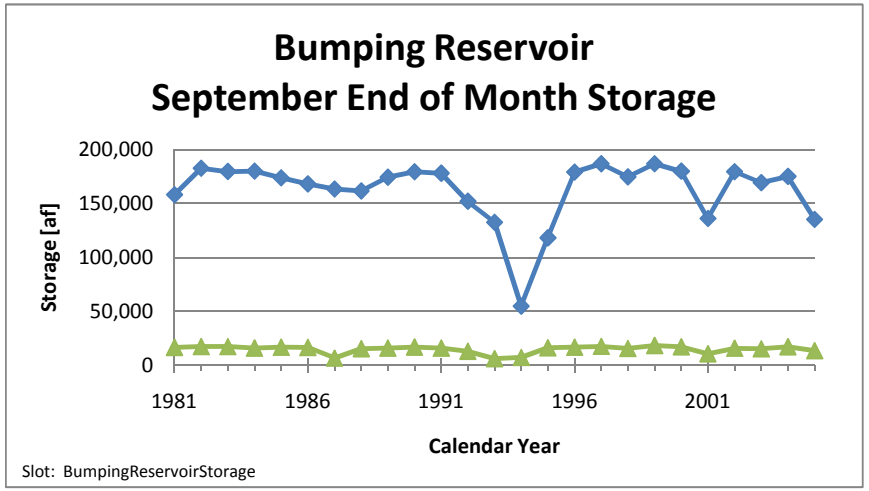

Yakima River at Parker
Drought Flows (WY 2001)
Average Daily Flow [cfs]
12,000
10,000
8,000
6,000
4,000
2,000
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Yakima River at Parker PARWGage Outflow

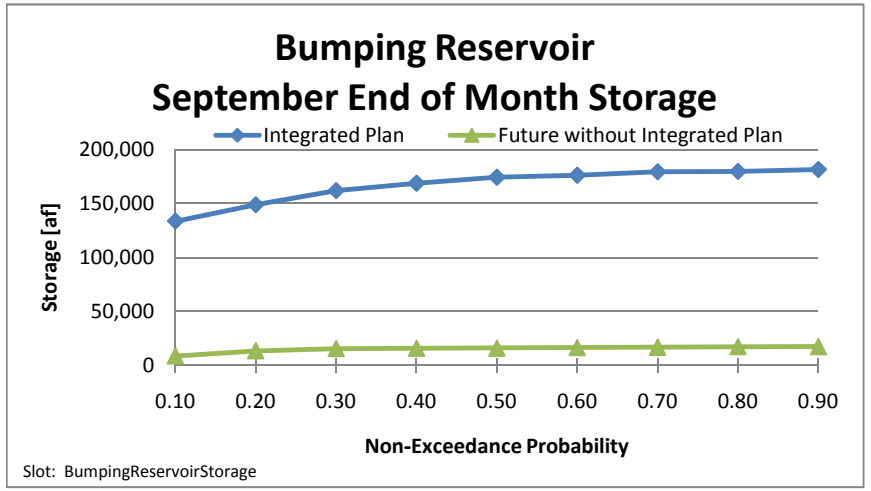

Yakima River at Parker
Wet Flows (WY 2002)
Average Daily Flow [cfs]
12,000
10,000
8,000
6,000
4,000
2,000
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Yakima River at Parker PARWGage Outflow

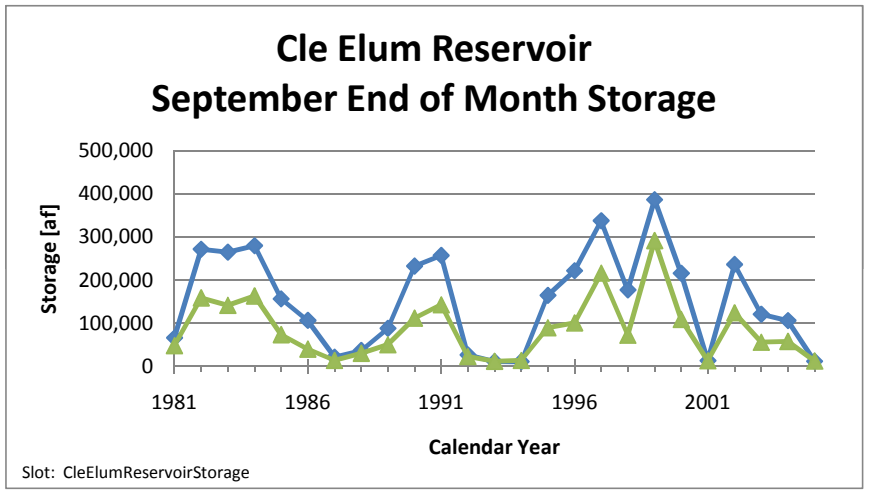

Yakima River at Kiona
Average Flows (WY 2003)
Integrated Plan
Future without Integrated Plan
Average Daily Flow [cfs]
12,000
10,000
8,000
6,000
4,000
2,000
0
11/1/2002
12/1/2002
1/1/2003
2/1/2003
3/1/2003
4/1/2003
5/1/2003
6/1/2003
7/1/2003
8/1/2003
9/1/2003
10/1/2003
11/1/200
Date
Slot: Yakima River at KionaGage Inflow

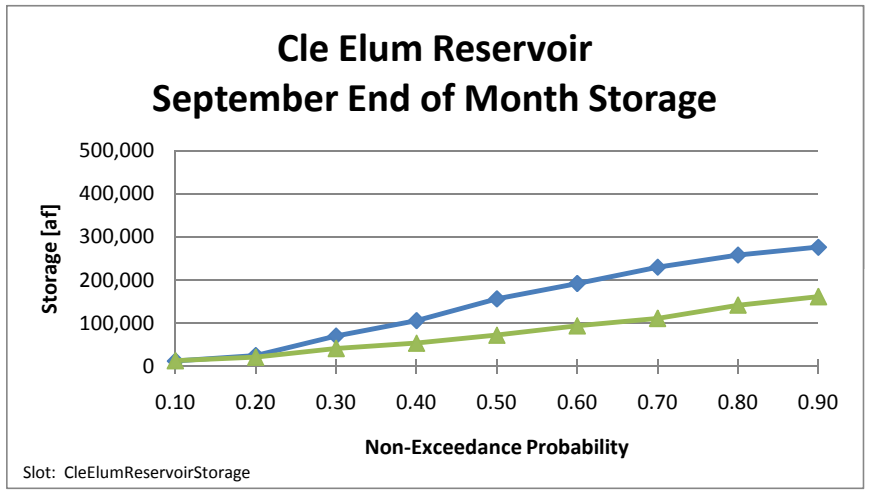

Yakima River at Kiona
Drought Flows (WY 2001)
Average Daily Flow [cfs]
12,000
10,000
8,000
6,000
4,000
2,000
0
11/1/2000
12/1/2000
1/1/2001
2/1/2001
3/1/2001
4/1/2001
5/1/2001
6/1/2001
7/1/2001
8/1/2001
9/1/2001
10/1/2001
11/1/200
Date
Slot: Yakima River at KionaGage Inflow

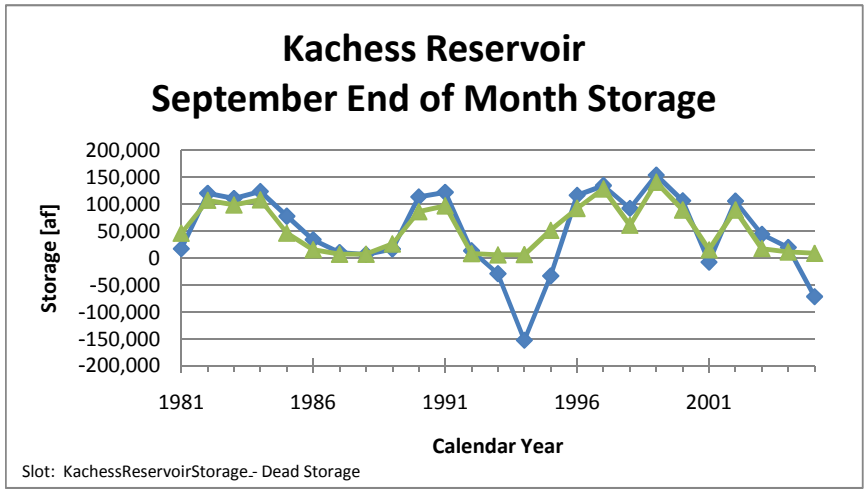

Yakima River at Kiona
Wet Flows (WY 2002)
Average Daily Flow [cfs]
12,000
10,000
8,000
6,000
4,000
2,000
0
11/1/2001
12/1/2001
1/1/2002
2/1/2002
3/1/2002
4/1/2002
5/1/2002
6/1/2002
7/1/2002
8/1/2002
9/1/2002
10/1/2002
11/1/200
Date
Slot: Yakima River at KionaGage Inflow

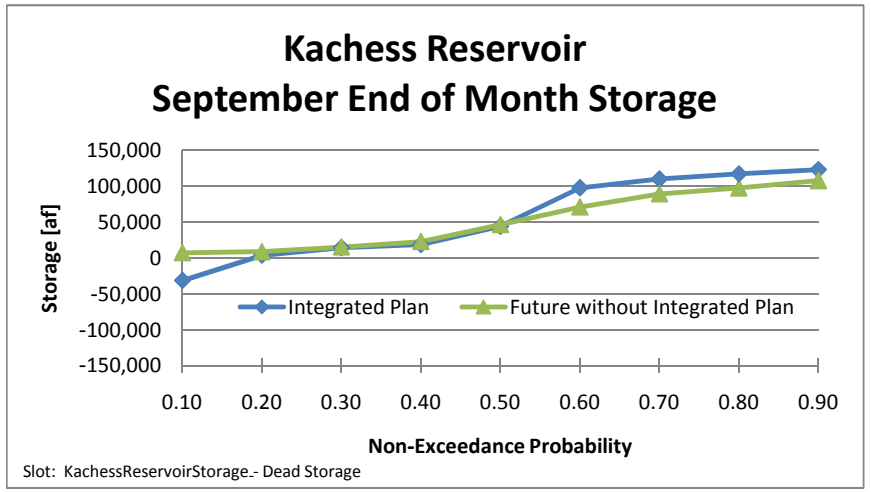

Bumping Reservoir
September End of Month Storage
200,000
150,000
100,000
50,000
0
Storage [af]
1981
1986
1991
1996
2001
Calendar Year
Slot: BumpingReservoirStorage

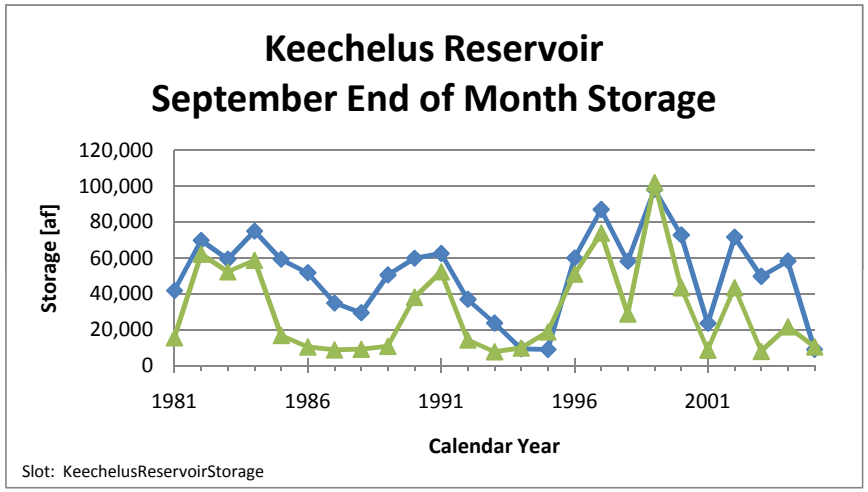

Bumping Reservoir
September End of Month Storage
Integrated Plan
Future without Integrated Plan
200,000
150,000
100,000
50,000
0
Storage [af]
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
Slot: BumpingReservoirStorage

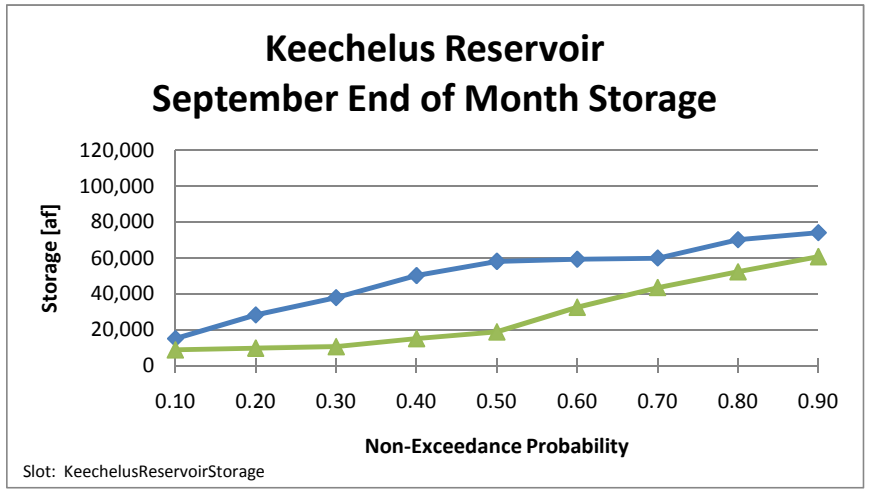

Cle Elum Reservoir
September End of Month Storage
500,000
400,000
300,000
200,000
100,000
0
Storage [af]
1981
1986
1991
1996
2001
Calendar Year
Slot: CleElumReservoirStorage


Cle Elum Reservoir
September End of Month Storage
500,000
400,000
300,000
200,000
100,000
0
Storage [af]
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
Slot: CleElumReservoirStorage


Kachess Reservoir
September End of Month Storage
Storage [af]
200,000
150,000
100,000
50,000
0
-50,000
-100,000
-150,000
-200,000
1981
1986
1991
1996
2001
Calendar Year
Slot: KachessReservoirStorage.- Dead Storage


Kachess Reservoir
September End of Month Storage
Storage [af]
150,000
100,000
50,000
0
-50,000
-100,000
-150,000
Integrated Plan
Future without Integrated Plan
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
Slot: KachessReservoirStorage.- Dead Storage


Keechelus Reservoir
September End of Month Storage
Storage [af]
120,000
100,000
80,000
60,000
40,000
20,000
0
1981
1986
1991
1996
2001
Calendar Year
Slot: KeechelusReservoirStorage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September End of Month Storage
Storage [af]
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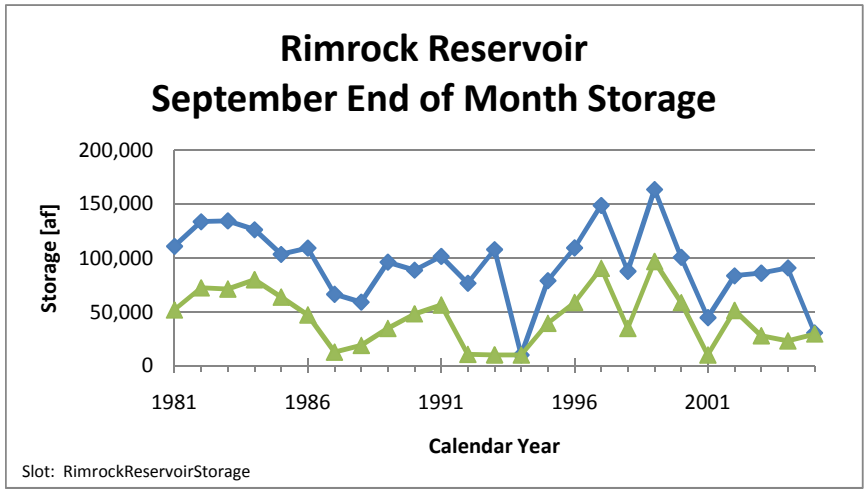
100,000
80,000
60,000
40,000
20,000
0
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
Slot: KeechelusReservoirStorage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150,000
100,000
50,000
0
1981
1986
1991
1996
2001
Calendar Year
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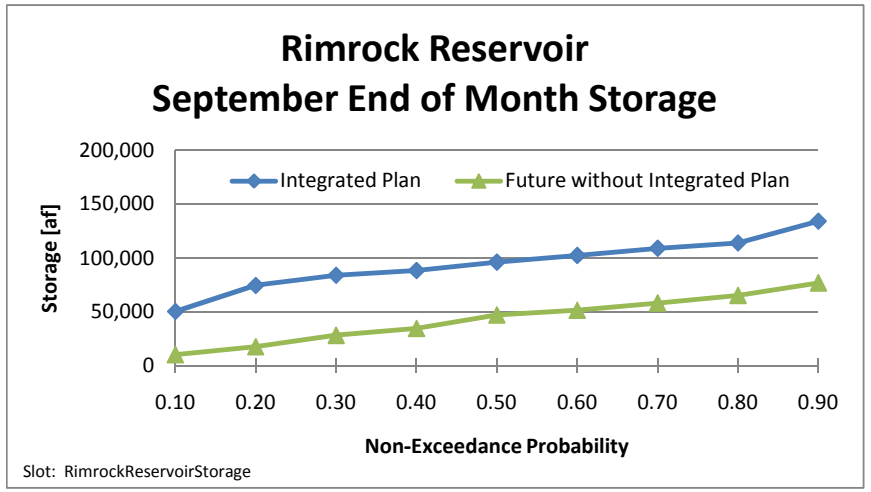
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150,000
100,000
50,000
0
Integrated Plan
Future without Integrated Plan
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
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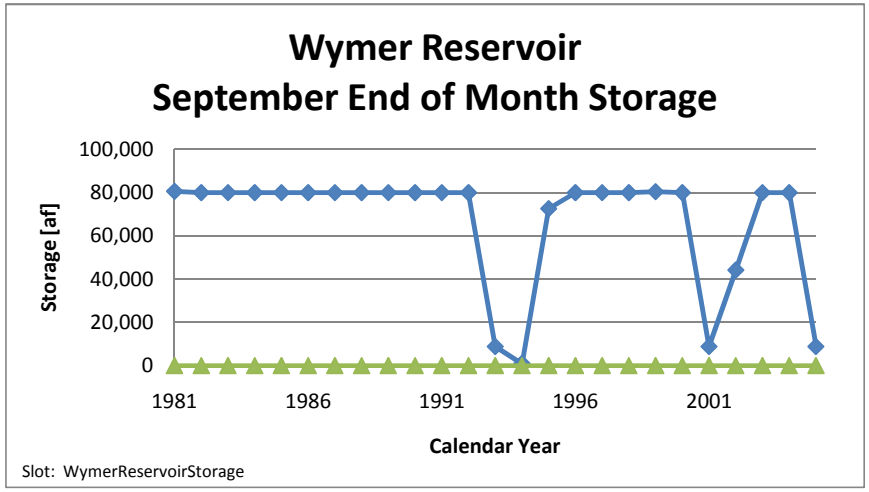
Wymer Reservoir
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Storage [af]
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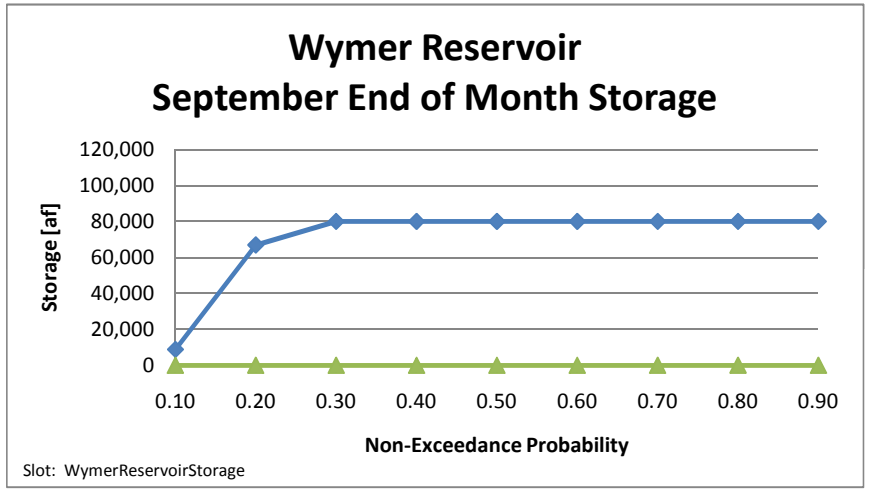
60,000
40,000
20,000
0
1981
1986
1991
1996
2001
Calendar Year
Slot: WymerReservoirStorage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0.10
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0.40
0.50
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0.70
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0.90
Non-Exceedance Probability
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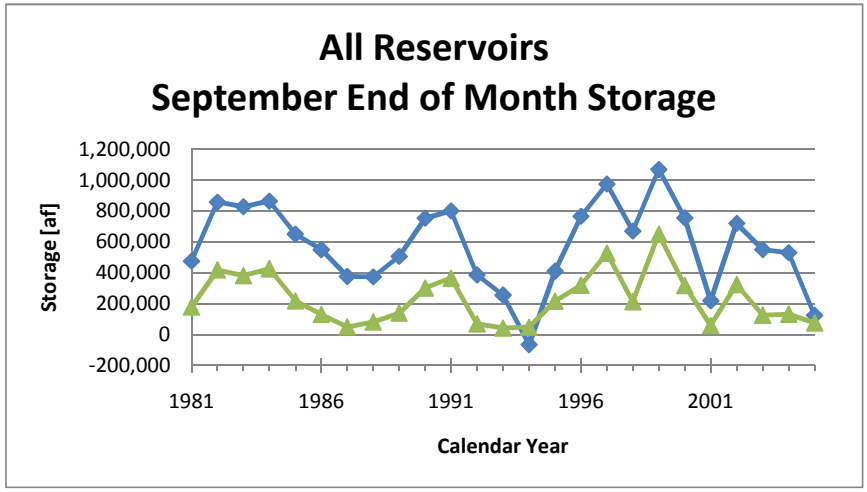
All Reservoirs
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Storage [af]
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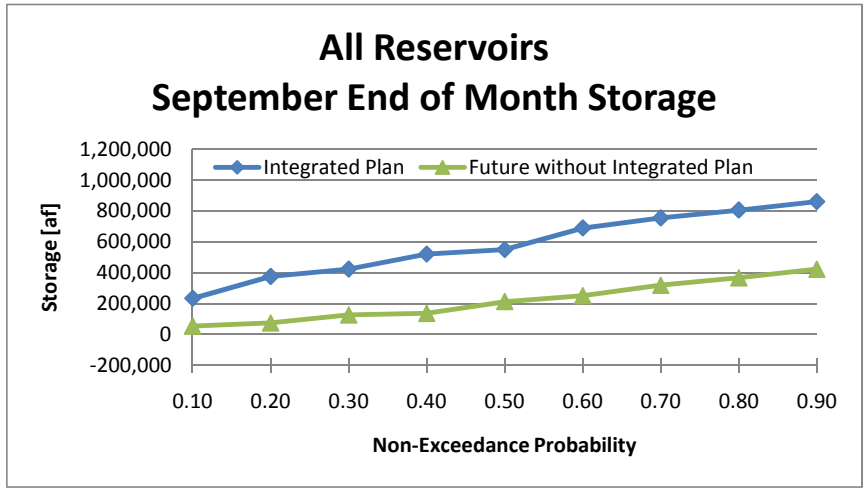
800,000
600,000
400,000
200,000
0
-200,000
1981
1986
1991
1996
2001
Calendar Year


All Reservoirs
September End of Month Storage
Integrated Plan
Future without Integrated Plan
Storage [af]
1,200,000
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200,000
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0.50
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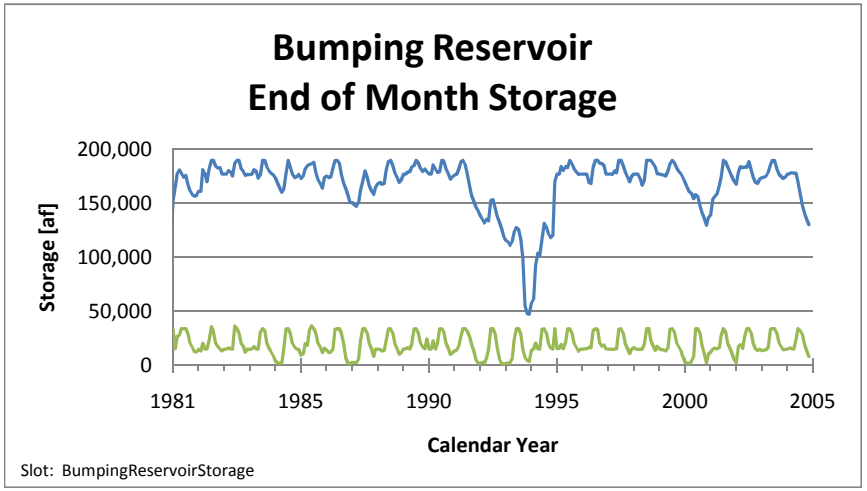
0.70
0.80
0.90
Non-Exceedance Probability



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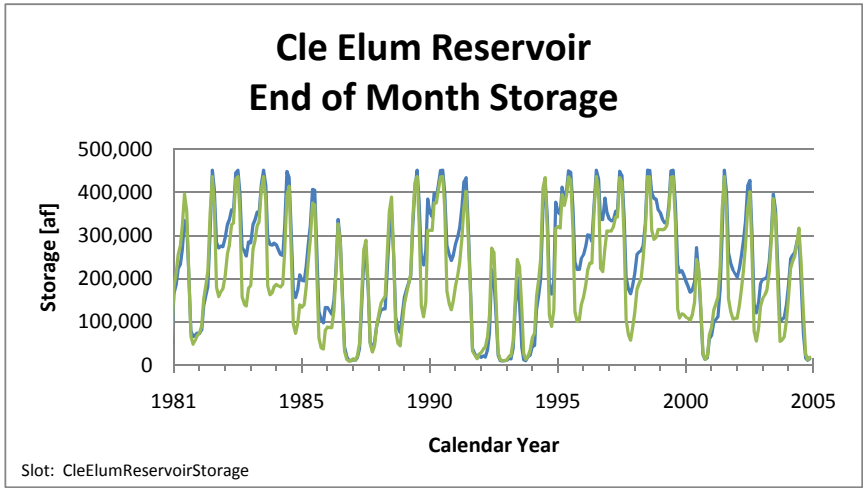
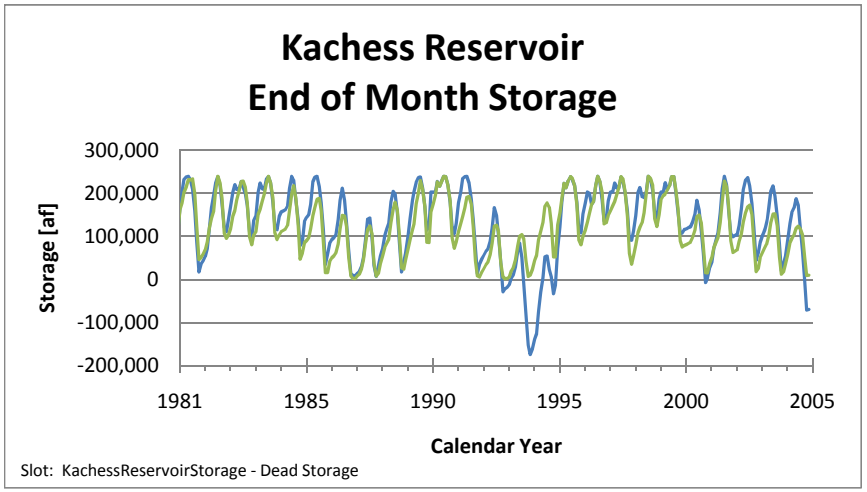


Slot: CleElumReservoirStorage



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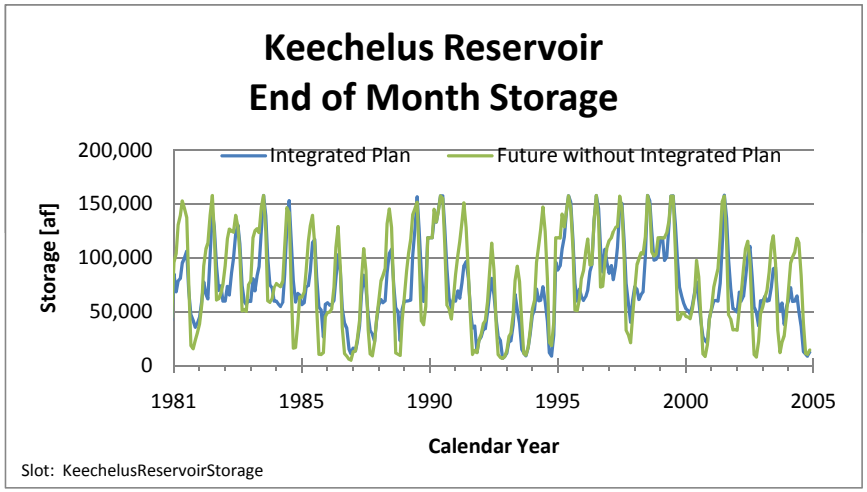

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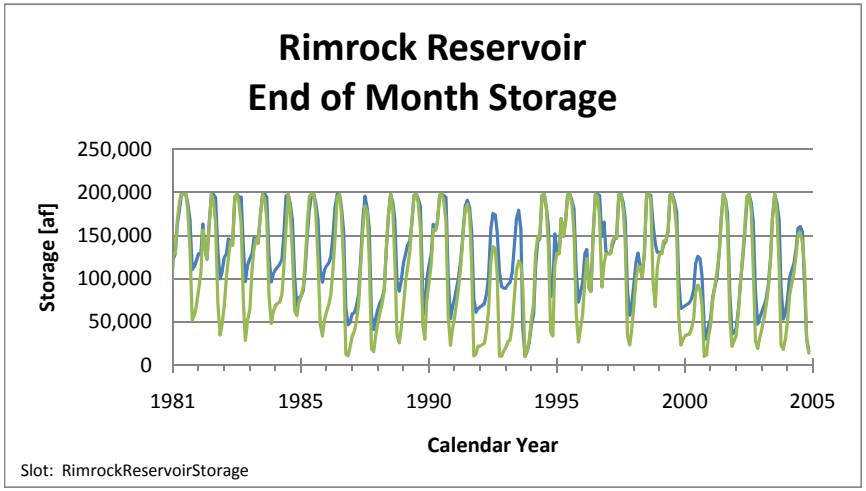

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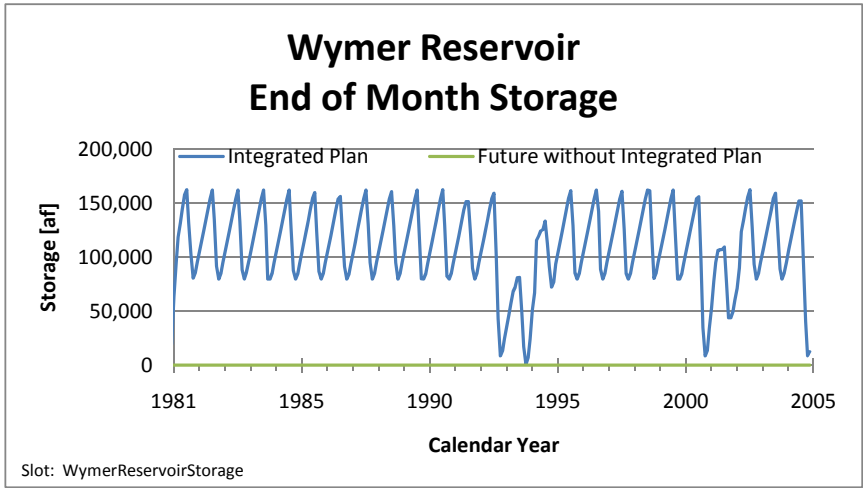

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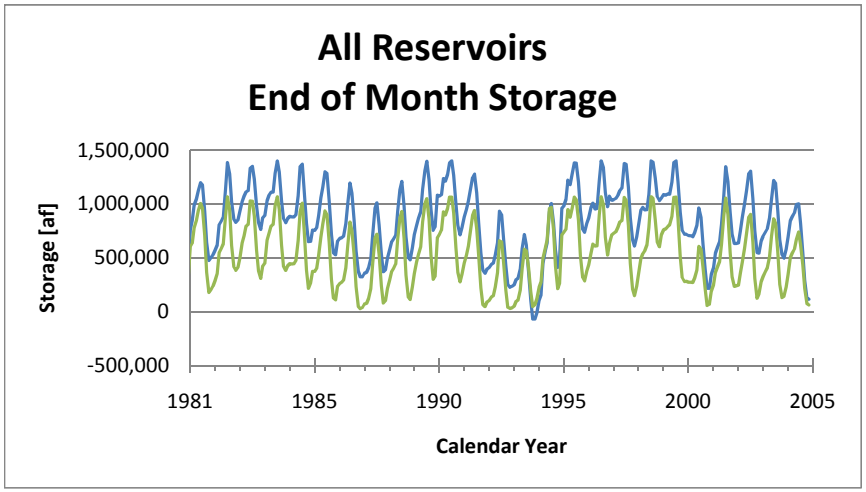

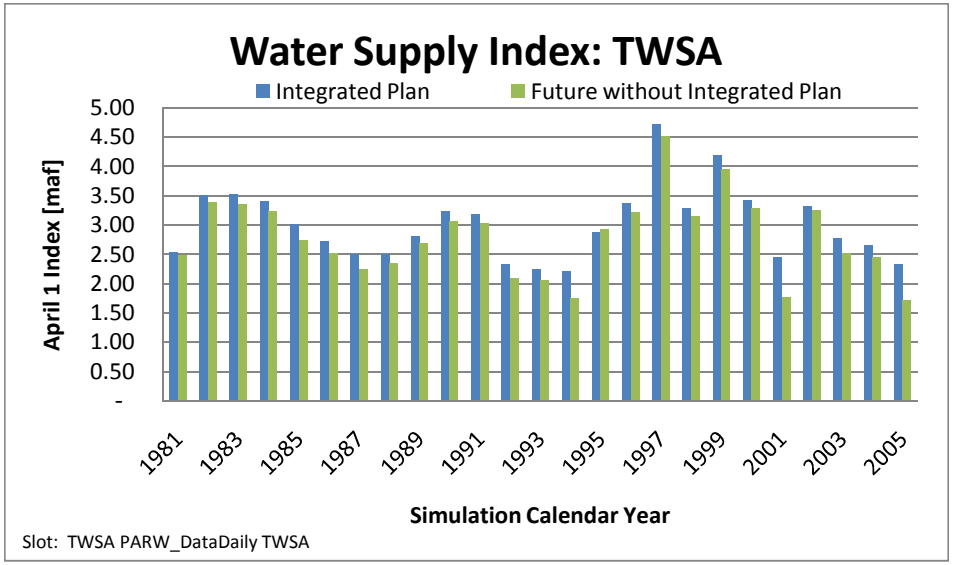
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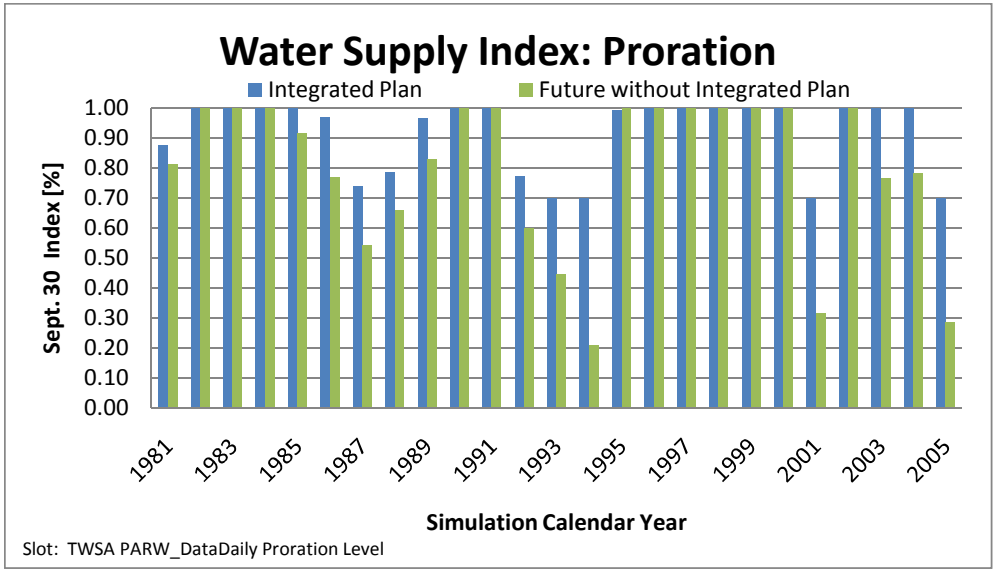
Integrated Plan
Future without Integrated Plan
April 1 Index [maf]
5.00
4.50
4.00
3.50
3.00
2.50
2.00
1.50
1.00
0.50
-
1981
1983
1985
1987
1989
1991
1993
1995
1997
1999
2001
2003
2005
Simulation Calendar Year
Slot: TWSA PARW_DataDaily TWSA


Water Supply Index: Proration
Integrated Plan
Future without Integrated Plan
Sept. 30 Index [%]
1.00
0.90
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
1981
1983
1985
1987
1989
1991
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1995
1997
1999
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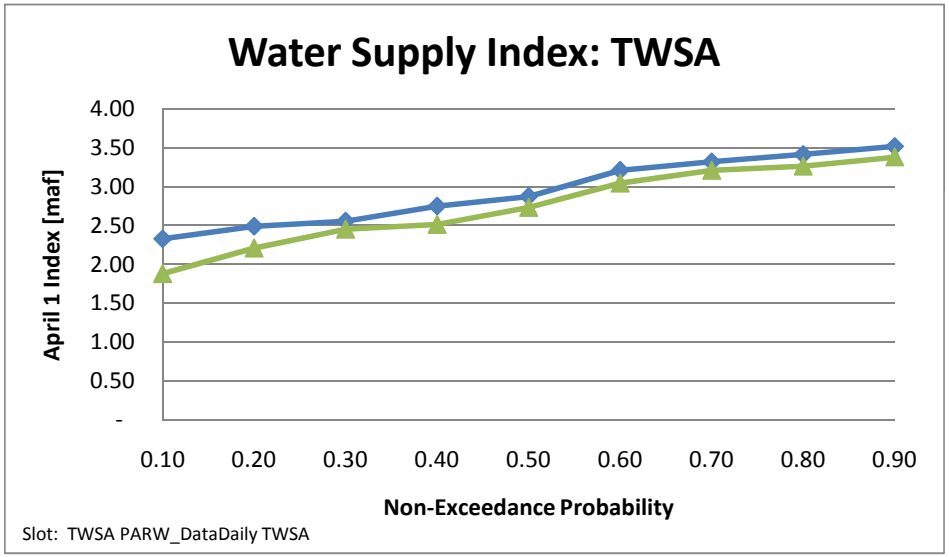
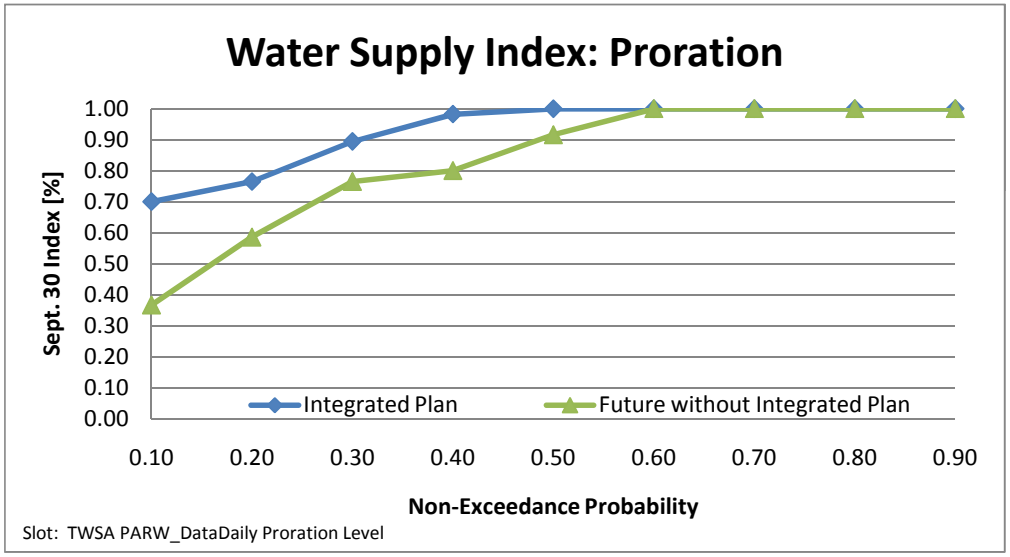
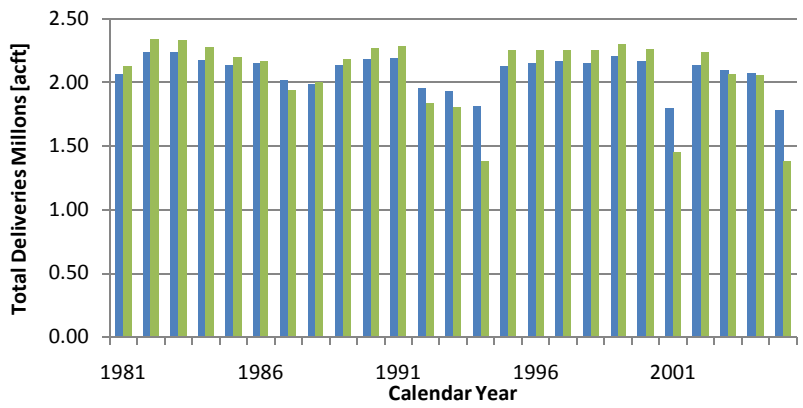
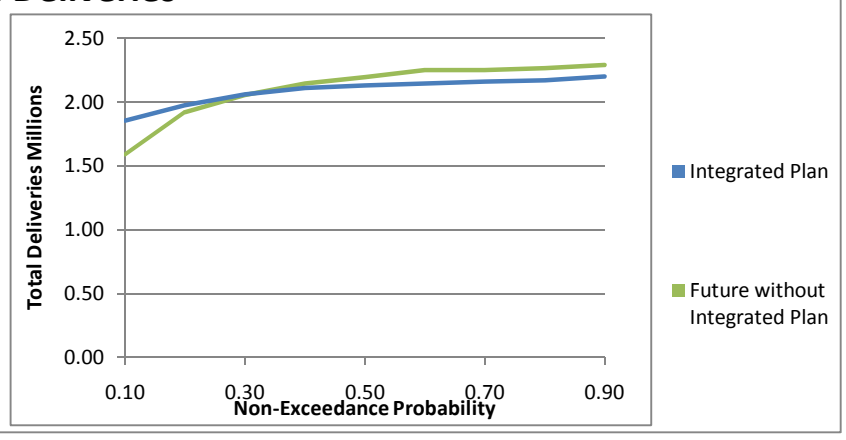
2003
2005
Simulation Calendar Year
Slot: TWSA PARW_DataDaily Proration Level


Water Supply Index: TWSA
April 1 Index [maf]
4.00
3.50
3.00
2.50
2.00
1.50
1.00
0.50
-
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
Slot: TWSA PARW_DataDaily TWSA

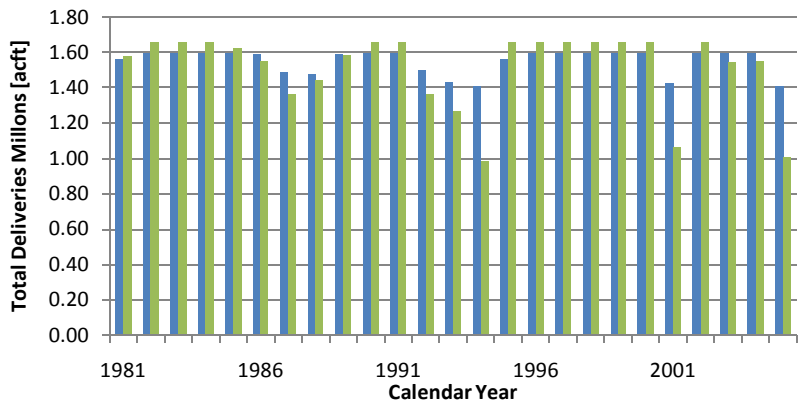

Water Supply Index: Proration
Sept. 30 Index [%]
1.00
0.90
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
Integrated Plan
Future without Integrated Plan
0.10
0.20
0.30
0.40
0.50
0.60
0.70
0.80
0.90
Non-Exceedance Probability
Slot: TWSA PARW_DataDaily Proration Level

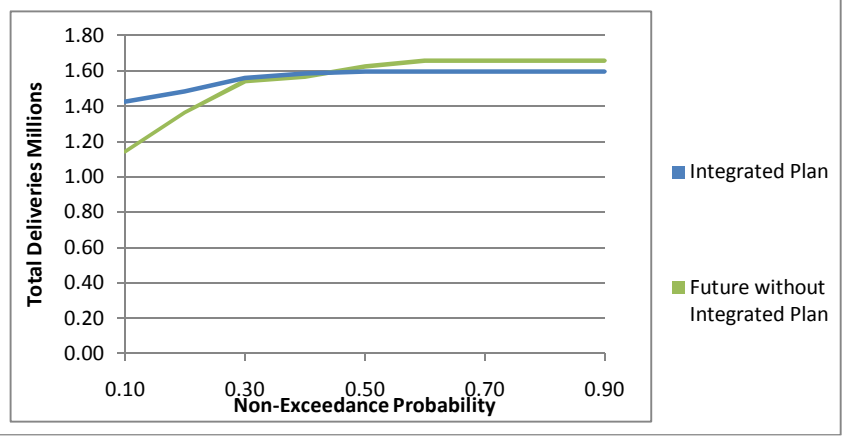
Main Canal Deliveries



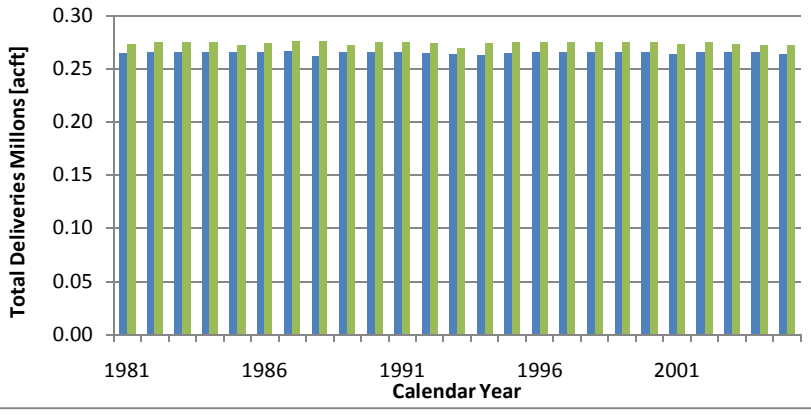


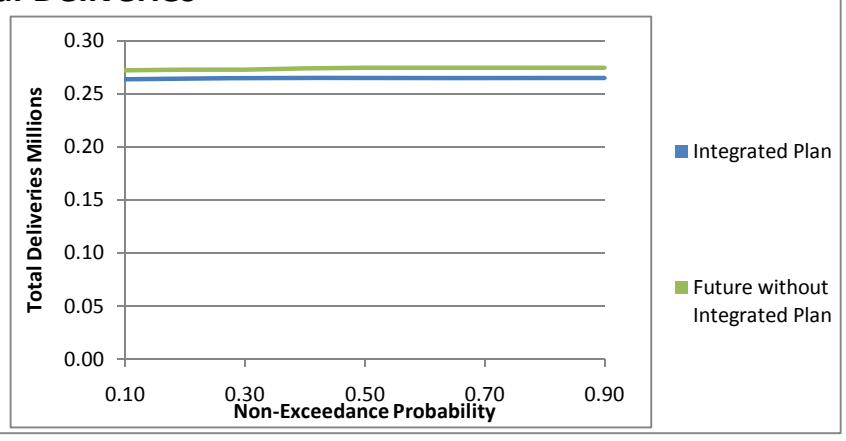
Sunnyside, KRD Irrigation, Roza Irrigation, New Reservation Canal, Tieton, and Kennewick Deliveries



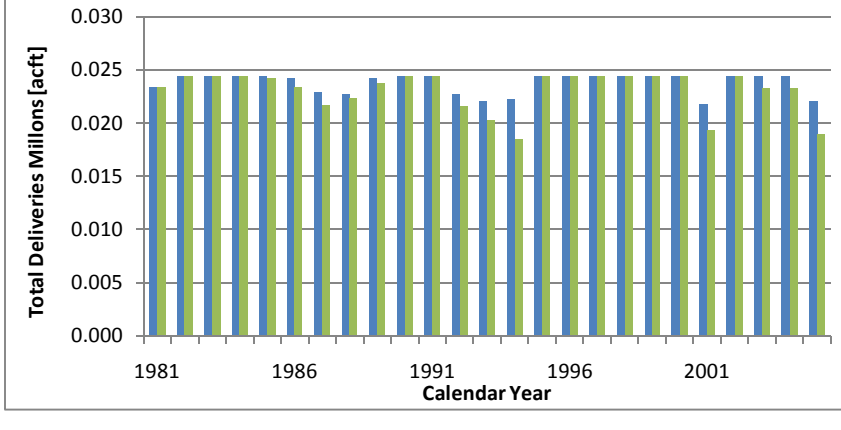


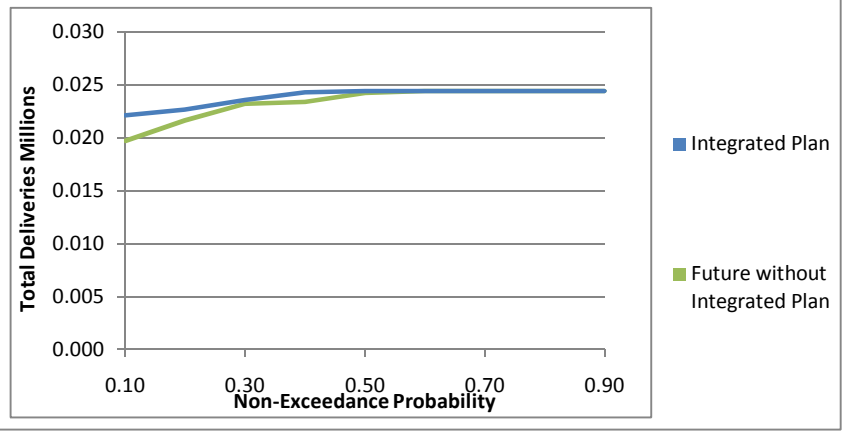
Smaller Canal Deliveries





M&I Surface Water Deliveries





Appendix F

RECLAMATION RESPONSE TO COORDINATION ACT REPORT RECOMMENDATIONS

Reclamation Response to Coordination Act Report Recommendations

This attachment includes Reclamation's responses to recommendations included in Section X of the *Yakima River Basin Integrated Water Resource Management Plan Fish and Wildlife Coordination Act Report* (CAR), February 10, 2012, prepared by the U.S. Fish and Wildlife Service, Central Washington Field Office, Wenatchee, Washington.

The CAR discusses the Yakima River Basin Integrated Water Resource Management Plan Alternative (Integrated Plan) with respect to the environment and offers recommendations and conservation measures from the Service regarding mitigating impacts to the environment.

The entire CAR report is available on the Yakima River Basin Water Enhancement Project Website:
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html.

Reclamation Response to the U.S. Fish and Wildlife CAR

In most cases, the recommendations are relatively general, which is in keeping with the programmatic nature of the proposal. Where specific recommendations are made, such as ensuring protection for the gray wolf as part of the Keechelus-to-Kachess pipeline project, a project-specific response will be deferred to the specific environmental review that will occur.

For the more general recommendations, we find that most are consistent with and supportive of the elements included in the Integrated Plan such as the Fish Passage Element, the Habitat Protection and Enhancement Element, and the Water Conservation Element. If implementation of the Integrated Plan moves forward, we believe most of those recommendations can be addressed during development of projects under those elements.

We are also cognizant of the Service's recommendations for coordination if implementation of the Integrated Plan occurs. The Integrated Plan has been developed in a very collaborative manner, and Reclamation expects to maintain that approach with the Service, Bull Trout Recovery Team, Bull Trout Action Team, and others, during follow-on coordination and implementation.

Reclamation also takes note of the Service's recommendation regarding the priority of various proposed actions and will take those into account when an implementation schedule is developed.

Finally, in response to the Service's request to develop consultation schedule, we look forward to continuing work with the Service on those matters.

Excerpt: Section X, U.S. Fish and Wildlife CAR

Following is an excerpt from Section X, *Fish and Wildlife Recommendations and Conservation Measures*, from the CAR:

The following Service conservation measures and recommendations were developed to avoid or alleviate potential impacts or support environmental enhancements identified as elements of the Integrated Plan. If the sequencing of the proposed actions is subsequently modified, the Service may modify conservation measures and recommendations as appropriate.

Endangered and Threatened Species and Critical Habitat

Endangered Species

1. The proposed action has the potential to affect the gray wolf within the K to K Pipeline project footprint. The Service recommends that Reclamation work with the Service at the project design stage to ensure that wolves, as well as other wildlife, have sufficient means to disperse into areas south of I-90.
2. The Service recommends that Reclamation work with the Service and WDFW at the project design stage to identify and implement strategies to reduce interference with wolf prey species such as elk and deer.

Threatened Species

1. Expansion of the Bumping Lake Reservoir will inundate old growth forest that provides habitat for northern spotted owls. The Service supports implementation of Element 5 – *Habitat Protection and Enhancement* of the Integrated Plan, as a means to acquire lands that may contribute to long term conservation of northern spotted owls. The Service recommends that Reclamation work with the Service to monitor and evaluate northern spotted owl populations in any newly acquired habitat. The Service will evaluate impacts to northern spotted owls within the Bumping Lake footprint at the project planning stage.
    a. Efforts should be made to evaluate current barred owl populations in areas where northern spotted owl habitat is proposed to be restored, enhanced or acquired for protection to determine the likelihood of northern spotted owls use of areas and the areas' potential for meeting project wildlife objectives.
    b. Efforts should be made to update northern spotted owl population data and to inventory nesting sites within the Yakima River basin.
2. It is unknown at this time if and how marbled murrelets and their habitat will be impacted as result of implementing the Integrated Plan. The Service will evaluate impacts to marbled murrelets and their habitat at the project planning stage.
3. Continue efforts to protect steelhead critical habitat within the basin and implement actions designed to reconnect habitat to promote gene flow (i.e. provide fish passage), restore ecological processes, and restore access. The Service supports the fish passage projects identified for steelhead in the Integrated Plan and recommends that Reclamation continue to coordinate with the Service on the fish passage implementation schedule.
4. The Service recommends Reclamation coordinate with NOAA and the Yakima Basin Fish and Wildlife Recovery Board to assure habitat restoration projects are

implemented as recommended in the Yakima Steelhead Recovery Plan (NMFS 2009). The Service supports implementation of Element 5 of the Integrated Plan – *Habitat Protection and Enhancement* as a means to create improved spawning, incubation, rearing, and migration conditions for steelhead.

5. Implement the following bull trout conservation measures and recommendations which expand on and are in addition to activities identified in Element 1 – *Fish Passage* and Element 5 – *Habitat Protection and Enhancement*:

    a) Improve habitat connectivity for all life stages of bull trout in the Yakima River Basin. Evaluate and modify dams, including diversion structures and their associated fishways, through structural and operational changes, as needed. Reconnecting habitat to promote gene flow, support ecological processes, and provide access to and from spawning habitat for bull trout is vital to the recovery of bull trout in the Yakima Basin. Passage is a Primary Constituent Element (PCE) of bull trout critical habitat that will need to be fully addressed in project level planning. The Service supports the fish passage projects identified in the Integrated Plan and recommends that Reclamation continue to coordinate with the Service on the fish passage implementation schedule and on project elements that could provide improved passage for all life stages of bull trout in the basin.

    b) The Service recommends implementing Element 6 of the Integrated Plan - *Enhanced Water Conservation* as soon as possible to increase water availability in the basin, which may result in improved habitat conditions for the bull trout. Water quantity and quality are PCEs of bull trout critical habitat, and these habitat conditions may improve with increased water availability.

    c) Continue to coordinate with the Bull Trout Recovery Team and the Bull Trout Action Team to develop a schedule to sequence activities described in the Integrated Plan to alleviate impacts to and enhance restoration opportunities for bull trout populations. This sequencing will assist in implementation of the final *Yakima Basin Bull Trout Action Plan* and the Service's 2002 *Draft Bull Trout Recovery Plan*. Storage projects will impact bull trout populations and its critical habitat, in particular above Bumping and Kachess Dams. The sequencing of activities identified in the Integrated Plan is necessary for ESA compliance of some project elements.

    d) Coordinate with the Bull Trout Recovery Team and the Bull Trout Action Team to implement restoration projects to protect and improve habitat for bull trout and its critical habitat. Acceleration of improvements to habitat and connectivity for bull trout at all life stages will be needed for the species to withstand future negative impacts from Integrated Plan elements planned for the future. Implementing activities which improve habitat and reduce direct impacts to bull trout as soon as possible has the potential to reduce current declines of bull trout in the basin and will assist in future project ESA compliance.

e) Continue to coordinate with the Bull Trout Recovery Team and the Bull Trout Action Team to protect spawning and rearing habitat in headwater area and foraging, migration, and overwintering habitats within watersheds as identified in the on-going bull trout recovery planning process.

f) Evaluate the feasibility of using supplementation to restore declining bull trout populations within the Yakima River basin historically known to bear bull trout.

g) The presence of nonnative fishes (e.g., lake trout) may have contributed significantly to the decline of the Cle Elum Lake bull trout local population. The Service recommends assessing the feasibility of non-native fish removal to advance bull trout recovery efforts.

h) Conduct a study to investigate the feasibility of improving bull trout habitat and access to habitat in Gold Creek. Gold Creek, a tributary of Keechelus Lake, becomes dewatered during late summer/fall. As a result, bull trout are prevented from moving between Keechelus Lake and Gold Creek to spawn. Assessing the feasibility of restoring habitat connectivity to Gold Creek/Keechelus Lake is a necessary step in recovering bull trout. The Service recommends coordinating with the Bull Trout Recovery Team and the Bull Trout Action Team to study, develop, implement, and monitor a long-term solution to this habitat connectivity issue.

i) Improve water quality for bull trout by evaluating the feasibility of releasing cooler water from dams to temper stream and rivers segments that exceed temperatures required by bull trout to rear and spawn and implementing water releases to address this issue (i.e., many reaches in the Yakima Basin are 303(d) impaired waters due to elevated temperatures). Water quality may also be improved by implementing actions that result in a more "naturalized" hydrograph in the Yakima River. The Service recommends that Reclamation continue to investigate the feasibility of moderating the peak and base flows through project operations to mimic the natural hydrograph to the maximum extent practicable, in order to support the recovery of bull trout.

Candidate Species

1. Protect shrub-steppe habitat through implementation of Element 5 – *Habitat Protection and Enhancement* of the Integrated Plan. The proposed Wymer Reservoir will be located within existing sage-grouse habitat that is likely occupied for at least portions of the year and could provide habitat for future sage-grouse populations. Land protection proposed as part of the Integrated Plan will mitigate for shrub-steppe habitat loss due to the proposed construction of Wymer Reservoir at a ratio of approximately 3:1.

2. Restore, enhance and protect shrub-steppe habitat from wildfire within the Yakima Basin, particularly shrub-steppe habitat acquired for long term conservation. Much of the existing shrub-steppe habitat in the basin needs understory vegetation restoration and enhancement, barrier removal and other sage-grouse threats

addressed to some degree. The Service recommends that wildfire protection plans be developed and implemented for large shrub-steppe areas on lands acquired under Element 5 of the Integrated Plan – *Habitat Protection and Enhancement* for long-term habitat protection. The Service also recommends that Reclamation explore funding options to develop management plan(s) for shrub-steppe habitat, including a fire protection plan, that is acquired as part of the Integrated Plan and to implement the plan(s), including a fire protection plan.

3. Inventory and monitor sage-grouse in any newly acquired lands to determine the location of areas used by sage-grouse, population size, habitat use, and how sage-grouse using the area might be displaced by proposed construction. The Service will evaluate impacts to sage-grouse within the Wymer footprint at the project planning stage.

Fisheries Resources

1. Improve habitat connectivity by implementing the fish passage projects identified in the Integrated Plan. The Service recommends that Reclamation continue to coordinate with the Service and other fish managers to refine the fish passage implementation schedule illustrated in the Integrated Plan. Reconnecting habitat to promote gene flow, ecological processes, and access to spawning, rearing, and over-wintering habitat for anadromous and resident fish is a high priority for the Service and WDFW.

2. The Service recommends implementing Element 6 of the Integrated Plan - *Enhanced Water Conservation* as soon as possible to increase water availability in the basin, which may result in improved habitat conditions for fisheries resources. Water quantity and quality are important aspects of aquatic habitats, and these habitat conditions may improve with increased water availability.

3. The Service supports early implementation of acquiring headwater lands described in Element 5 of the Integrated Plan – *Habitat Protection and Enhancement* to improve habitat for fish, and protect and improve riparian corridors. Protection of headwater streams is important for the ecological health of watersheds and fisheries resources.

4. Create improved spawning, incubation, rearing, and migration conditions for all salmonid species and resident fish residing in the Yakima Basin. The Service supports early implementation of Element 5– *Habitat Protection and Enhancement* of the Integrated Plan for this purpose. The Service recommends that Reclamation coordinate with the Service, the Yakama Nation, NOAA, WDFW, and the Yakima Basin Fish and Wildlife Recovery Board to implement habitat restoration projects aligned with on-going planning efforts and fish management priorities within the basin.

5. Modify existing irrigation diversions to provide adequate functional screening to prevent fish mortality due to water diversion infrastructure throughout the basin. The Service recommends that Reclamation continue to coordinate with the Service, the Yakama Nation, NOAA, WDFW, and the Yakima Basin Fish and

Wildlife Recovery Board to inventory, prioritize, and address irrigation diversions in need of screen installation and/or maintenance activities.

6. Coordinate activities with the Yakima Klickitat Fisheries Project (YKFP) to monitor and evaluate changes to fish populations, assemblages, and habitats at the project planning stage. The YKFP implements and monitors fish supplementation activities with the basin as a means to maintain or increase natural production of salmonids.

Terrestrial Resources

1. Protect shrub-steppe habitat for its use by a unique assemblage of species, such as black tailed jackrabbit and Townsend's ground squirrel. The Service supports early implementation of Element 5– *Habitat Protection and Enhancement* of the Integrated Plan as a means to acquire lands that protects shrub-steppe habitats. The Service will evaluate direct impacts to shrub-steppe habitat from the construction of Wymer Reservoir, as well as other construction projects as they are planned at the project level.

2. Protect large, contiguous wildlife habitats. The Service supports early implementation of Element 5 – *Habitat Protection and Enhancement* of the Integrated Plan to provide refuge for wildlife species anticipated to be displaced by the proposed action. The Service recommends that Reclamation continue to work with the Lands Subcommittee and the Service to identify and acquire lands that provide benefits to wildlife and support our mutual conservation strategies and partnerships.

General Provisions

1. The Service recommends that Reclamation work with the Service to develop Best Management Practices that avoid or reduce impacts to fish, wildlife and their habitats at the project planning stage, as subsequent actions are proposed and fully planned.

2. The Service recommends that Reclamation continue to work with the Service to develop an ESA consultation schedule for current project operations and maintenance activities within the Yakima River Basin prior to consulting on Integrated Plan elements.

3. The Service recommends that Reclamation work with the Service to develop an ESA consultation schedule for Integrated Plan elements likely to move into the project planning stage.

Appendix G

CORRESPONDENCE BETWEEN RECLAMATION AND THE NATIONAL MARINE FISHERIES SERVICE AND U.S. FISH AND WILDLIFE SERVICE

Record of Correspondence between Reclamation and the U.S. Fish and Wildlife Service and National Marine Fisheries Service Regarding Endangered Species Act Compliance on the Integrated Plan

November 18, 2011 – Letter sent from Candace McKinley, Environmental Program Manager, Bureau of Reclamation to Ken Berg, WWFWO Manager, U.S. Fish and Wildlife Service. (This letter is attached.)

November 18, 2011 – Letter sent from Candace McKinley, Environmental Program Manager, Bureau of Reclamation to Dale Bambrick, National Marine Fisheries Service. (This letter is attached.)

January 10, 2012 – Email acknowledging November 18, 2011 letter sent from Dale Bambrick, Eastern Washington Branch Chief, National Marine Fisheries Service to Candace McKinley, Environmental Program Manager, Bureau of Reclamation. Mr. Bambrick agreed with the approach to consult on actions as they are carried forward. (Not attached.)

February 1, 2012 – Email acknowledging November 18, 2011 letter sent from Jessica L. Gonzalez, Assistant Project Leader, U.S. Fish and Wildlife Service to Candace McKinley, Environmental Program Manager, Bureau of Reclamation. Ms. Gonzalez stated she understands consultation under Section 7 of the Endangered Species Act may be necessary for subsequent planned projects, but is not requested at this time for the Integrated Plan. (Not attached.)

United States Department of the Interior
BUREAU OF RECLAMATION
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:
CCA-1600
PRJ-3.00

NOV 18 2011

Ken Berg
WWFWO Manager
510 Desmond Drive SE, Suite 102
Lacey, WA 98503

Subject: Request for Response – Section 7 of the Endangered Species Act Biological Evaluation – Yakima River Basin Water Enhancement Project Integrated Water Resource Management Plan (Integrated Plan) Programmatic Environmental Impact Statement (PEIS)

Dear Mr. Berg:

The Bureau of Reclamation appreciates your participation and involvement in formulating the Integrated Plan over the past 2 years. As part of the environmental compliance process, we are sending you this letter with our determination that the development of the PEIS and identification of a preferred alternative will have no effect on threatened and endangered species or critical habitat.

This PEIS is an umbrella document which analyzes diverse issues in broad terms with respect to individual and cumulative environmental effects of the seven Integrated Plan elements. The PEIS process will help identify which elements will be considered for further review. The PEIS does not provide sufficient environmental analysis to implement any particular project or element within the preferred alternative. In the future when projects are initiated, site-specific environmental compliance including, Section 7 of the ESA will be conducted.

We are submitting this for informational purposes and any thoughts or information you have about our determination would be appreciated.

Should you require additional information, please contact Candace McKinley, Environmental Program Manager, at 509-575-5848, extension 232.

Sincerely,

Candace McKinley
Environmental Program Manager

United States Department of the Interior
BUREAU OF RECLAMATION
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, Washington 98901-2058

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NOV 18 2011

Mr. Dale Bambrick
National Marine Fisheries Service
304 S. Water Street, #201
Ellensburg WA 98926

Subject: Request for Response – Section 7 of the Endangered Species Act Biological Evaluation – Yakima River Basin Water Enhancement Project Integrated Water Resource Management Plan (Integrated Plan) Programmatic Environmental Impact Statement (PEIS)

Dear Mr. Bambrick:

The Bureau of Reclamation appreciates your participation and involvement in formulating the Integrated Plan over the past 2 years. As part of the environmental compliance process, we are sending you this letter with our determination that the development of the PEIS and identification of a preferred alternative will have no effect on threatened and endangered species or critical habitat.

This PEIS is an umbrella document which analyzes diverse issues in broad terms with respect to individual and cumulative environmental effects of the seven Integrated Plan elements. The PEIS process will help identify which elements will be considered for further review. The PEIS does not provide sufficient environmental analysis to implement any particular project or element within the preferred alternative. In the future when projects are initiated, site-specific environmental compliance including, Section 7 of the ESA will be conducted.

We are submitting this for informational purposes and any thoughts or information you have about our determination would be appreciated. Should you require additional information, please contact Candace McKinley, Environmental Program Manager, at 509-575-5848, extension 232.

Sincerely,

Candace McKinley
Environmental Program Manager