

**Endangered Species Coalition – Kittitas Audubon Society  
Lower Columbia Basin Audubon Society - North Cascades Conservation Council  
Seattle Audubon Society - Sierra Club Washington State Chapter  
The Mountaineers - Washington Wilderness Coalition – Western Lands Project  
Western Watersheds Project - Wild Fish Conservancy**

April 22, 2011

Steven L. Brawley  
Acting Regional Director, Pacific Northwest Region.  
Bureau of Reclamation  
1150 North Curtis Road, Suite 100  
Boise, Idaho 83706

Dear Mr. Brawley:

The Council on Environmental Quality’s implementing regulations for the National Environmental Policy Act (NEPA) (42 U.S.C. Sec. 4371 et seq.) require Federal agencies to carry out “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” *40 CFR Sec. 150.1.7.*

You signed a Notice of Intent to prepare a combined planning report and programmatic environmental impact statement, and notice of scoping meetings for an “Integrated Water Resource Management Plan” for the Yakima River Basin that appeared in the Federal Register April 5, 2011 (76 FR 18780) (Scoping Notice).

We request that you re-issue the Scoping Notice and extend the time for comments for the following reasons:

1. The Scoping Notice does not include the full scope of the draft “Integrated Plan.” Section 3.1.5 of the draft “Integrated Water Resource Management Plan” includes, “the potential for an inter-basin transfer from the Columbia River.” However, pumping water from the Columbia River to the Yakima River Basin was not mentioned in the Scoping Notice. As a result, many citizens in the Northwest will not be aware that the draft “Integrated Plan,” has the potential for significant adverse environmental impacts on the Columbia River, not just within the Yakima River Basin. The Scoping Notice must be reissued to properly alert the public to the full scope of the draft “Integrated Plan.”
2. The Scoping Notice does not provide adequate time for public participation at the “scoping meetings.” Both the Ellensburg and Yakima, Washington, “scoping meetings” are set for 1:30 to 3:30 PM and 5:00 to 7:00 PM during the work day. This does not allow for the working public to participate in a meaningful way given that it can take several hours of driving to either Ellensburg or Yakima from other parts of the Northwest. The Scoping Notice must be reissued to extend the scoping meeting to 9:00 PM at both hearings.

3. The Scoping Notice does not provide adequate locations for public participation. The projected cost of the draft “Integrated Plan” is over \$5 billion. Significant adverse impacts to the environment include the loss of protected species habitat under the Endangered Species Act that would occur from flooding Okanogan-Wenatchee National Forest land for a new dam on the Bumping River. These are issues of regional and national concern. The Scoping Notice must be reissued to include scoping meetings in Seattle and Spokane, WA.

4. The Scoping Notice does not provide adequate time for public comment. As noted above, the projected cost of the draft “Integrated Plan” is over \$5 billion. It contains an extremely wide number of elements from massive new dams, to pumping from the Columbia River, to fish passage at existing dams, to groundwater storage, to water conservation, to water marketing. In addition, environmental impacts of the draft “Integrated Plan” include the flooding of significant amounts of Okanogan-Wenatchee National Forest roadless area containing ancient forest habitat. Impacts also include flooding impacts to Endangered Species Act spotted owl, bull trout, and sage grouse habitat.

Any one of these elements require extensive detailed review by the public to ensure that scoping is carried out pursuant to 40 CFR. Sec. 1501.7(a).

Please reissue the Scoping Notice as set out above, with a comment period of 60 days from the date of publication in the Federal Register, so that the Bureau of Reclamation can carry out its affirmative duty to carry out an early and open scoping process. *40 CFR Sec. 1501.7.*

Signed:

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