

**Alpine Lakes Protection Society * El Sendero Backcountry Ski and Snowshoe Club
Endangered Species Coalition * Friends of Bumping Lake
Kittitas Audubon Society * Middle Fork Outdoor Recreation Coalition (MidFORC)
North Cascades Conservation Council * Olympic Forest Coalition
Western Watersheds Project * Western Lands Project**

January 22, 2014

Nancy Sutley, Chair
Council on Environmental Quality
722 Jackson Pl NW
Washington, DC 20503

Dear Ms. Sutley:

We request that CEQ review the Bureau of Reclamation's NEPA process in preparing the environmental impact statement on the controversial Yakima "Integrated" Plan (77 FR 12076; Feb. 28, 2012), for the following reasons:

- * The Bureau of Reclamation issued a Final Programmatic Environmental Impact Statement (FPEIS) that did not provide a range of alternatives (other than the required no-action alternative).
- * The Bureau of Reclamation added a proposal for two National Recreation Areas within the Okanogan-Wenatchee National Forest, which included 46,000 acres for backcountry motorized recreation (motorcycles, ATVs and 4x4s on trails, and snowmobiles cross-country), the day after the close of comments on the Draft Programmatic EIS.
- * The Bureau of Reclamation prepared the Yakima Plan using a Workgroup of their own selection and of which they were a member and co-chair, in violation of the Federal Advisory Committee Act.

In addition, we strongly urge that the President's FY 2014 and FY2015 budgets not provide funds for the Bureau of Reclamation's controversial Yakima "Integrated" Plan water storage projects for the following reasons:

- * The Bureau of Reclamation is in the process of scoping the Cle Elem Pool Raise, K-to-K conveyance, and Kachess Inactive Storage elements of the plan. Draft EISs will not be released until Summer of 2014. The President's budget should not fund a plan while EISs have not been completed.
- * In 2013, the Washington State Legislature passed ESSB 5035, which includes Sec. 5035 requiring a benefit-cost analysis of the individual elements of Yakima Plan. This analysis is to be completed by December 15, 2014. The President's budget should not fund a plan while benefit-cost analysis information has not been provided.

* The Yakima Plan includes proposals for two new massive irrigation storage dams, a new dam on the Bumping River that would destroy ancient forests and endangered species Critical Habitat designated by the U.S. Fish and Wildlife Service on lands of the Okanogan-Wenatchee National Forest, and a Wymer Dam between Ellensburg and Yakima that the Bureau of Reclamation found in 2008 would have a benefit/cost ratio of 0.31 and flood greater sage-grouse habitat.

See:

http://washington.sierraclub.org/uppercol/ucr/yakima/media/Entries/2013/2/15_The_Other_Side_of_the_Story__Yakima_Water_Plan_1.html

Thank you.

Sincerely,

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