

**Endangered Species Coalition – Federation of Western Outdoor Clubs  
Kittitas Audubon Society - Lower Columbia Basin Audubon Society  
The Mazamas - The Mountaineers - Seattle Audubon Society  
Sierra Club Washington State Chapter - Western Lands Project  
Western Watersheds Project - Wild Fish Conservancy**

November 23, 2011

Karl E. Wirkus  
Regional Director, Pacific Northwest Region  
Bureau of Reclamation  
1150 North Curtis Road, Suite 100  
Boise, Idaho 83706

Dear Mr. Wirkus:

The Council on Environmental Quality's implementing regulations for the National Environmental Policy Act (NEPA) (42 U.S.C. Sec. 4371 et seq.) state that an environmental impact statement shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. *40 CFR 1502.1.*

You signed a Notice of Availability and public meetings on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Integrated Water Resources Management Plan, Yakima River Basin Water Enhancement Project, which appeared in the Federal Register on November 16, 2011, with a 45 day comment period.

We request that you extend the time for comments until March 3, 2012, for the following reasons:

1. The Notice of Availability does not provide adequate time for public participation at the "public meetings." The Ellensburg, Cle Elum, and Yakima, Washington "public meetings" are set for 1:30 to 3:30 PM and 5:00 to 7:00 PM on work days. This does not allow for the working public to participate in a meaningful way given that it can take several hours of driving to these cities from other parts of the Northwest during winter weather when Snoqualmie Pass is likely to be closed. The Notice of Availability must be reissued to extend the comment time to 9:00 PM at these meetings.
2. As with the scoping process, the Notice of Availability does not provide adequate locations for public participation. While no cost figures or benefit/cost analysis is provided for in the PDESI, the projected cost of the "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. A comment period longer than 45 days is needed to include PDEIS comment meetings in Seattle and Spokane, WA.
3. The Notice of Availability does not provide adequate time for public comment. As noted above, the projected cost of the "Integrated Plan" is over \$5 billion. It contains an extremely wide number of elements from massive new dams, to fish passage at existing dams, to groundwater storage, to water conservation, to water marketing. In addition,

environmental impacts of the “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 species listed under the Endangered Species Act, including spotted owl, bull trout, and sage grouse habitat.

Any one of these elements require extensive detailed review by the public to ensure that specific comments can be submitted as required under 40 CFR Sec. 1503.3.

4. The proposed 45-day comment period covers the Thanksgiving, Christmas and New Year’s holidays. This means the non-holiday time to review such a complex PDEIS is much less than 45 days.

Please extend the comment period on the PDEIS until March 3, 2012.

Signed:

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