

March 10, 2015

Submitted via email to kkbi@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess Pumping Plant and Keechelus-to-Kachess Conveyance DEIS**

Dear Ms. McKinley:

The following are Sierra Club comments on the NEPA and SEPA Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) Draft Environmental Impact Statement (DEIS), dated January 9, 2015. These comments are submitted under both NEPA and SEPA.

Overall, we remain disappointed that Yakima Plan project EISs continue to rely on a faulty and inadequate Yakima Plan Final Programmatic EIS that failed to provide a range of alternatives. We also object to the lack of alternatives, including water conservation, water efficiency, and water marketing presented in this DEIS.

Executive Summary – page ES-viii

The following statement is repeated at various points: “Reclamation would use the pumping plant during drought years and could possibly use it in following years...” [emphasis added] (p. ES-viii). It appears this statement is at variance with the authorized purpose of the KDRPP/KKC projects, which is to initiate pumping only when proratable water supplies fall below 70%. What authority exists for using the pumping plant outside the 70% criteria? Please cite the statutory and/or regulatory authority for such an action. If such action is contemplated, what is the maximum frequency and amount of such pumping?

Table ES-1 – page ES-xix

This table states that for both KDRPP alternatives (Alt. 2A and 2B) and Alt. 4 (combined KDRPP and KKC), Kachess Reservoir will “...take 2 to 5 years following a drought year to refill.” Please provide information on the frequency with which drought refill will require 2, 3, 4 and 5 years to refill, and the evidence for such projections.

Table ES-1 – page ES-xix

According to this table, under the no-action alternative, “Bull trout will be adversely affected [in Keechelus tributaries] for approximately 115 days in 81 percent of years” when Keechelus Reservoir level falls below elevation 2,466. Enhancement efforts in Keechelus Reservoir tributaries are described, but in order for Environmental Species Act criteria to be met there must be no net loss of population. Please quantify the net loss of bull trout population in the Keechelus Reservoir under each alternative, based upon the enhancement efforts under consideration. Under both KDRPP alternatives (Alts. 2A and 2B) bull trout access to Keechelus Reservoir tributaries would be “at the same frequency as the No Action, but for a longer duration.” Under Alt.4

(combined KDRPP and KKC), Keechelus Reservoir “would fall below elevation 2,466 approximately 130 days in 74 percent of years.” How would bull trout recovery be carried out under these alternatives if the Keechelus reservoir elevation will be lower for a longer duration?

Table ES-1 page ES-xxi

Under both KDPRR alternatives (Alts. 2A and 2B) this table states for fish, “available prey would be reduced in both reservoirs,” but the extent of reduction is not quantified. Please provide a quantified analysis for these reductions. Under Alt. 4 (combined KDRPP and KKC) it states that “Available prey would be reduced in Kachess Reservoir but only “available zooplankton prey would be reduced within Keechelus Reservoir.” Please quantify the amount of zooplankton prey reduction in Keechelus Reservoir. Please explain why available prey would be reduced in Kachess Reservoir under both KDPRR alternatives, but not under Alt 4. Please provide quantitative estimates of the reduction in food prey, including type of food (including fresh water mussels/clams in Little Kachess), with citation of evidence, and conduct an analysis of the effect of habitat degradation on Osprey.

Sec. 1.7 Next Steps in implementation, page 1-12

Additional steps in implementation include “Reclamation’s Planning Report feasibility analysis, including benefit-cost analysis and other environmental analysis” (p. 1-12). In view of the Water Research Center report on benefit-cost analysis of the Yakima Plan and its findings that KDRPP has a negative 0.46 (benefit/cost) and KKC has a negative 0.20 (benefit/cost) ratio, please indicate the criteria that will be used to determine an acceptable vs. unacceptable benefit/cost outcome as part of the Bureau’s feasibility studies. Please also append to the EIS the Water Research Center report on benefit-cost analysis of the Yakima Plan.

Sec. 3.2.3 Kachess Reservoir Area, pages 3-7 to 3-9

Drawdown of Kachess Reservoir will expose areas with steep slopes and the DEIS indicates landslides may occur on slopes of 15% or less (p. 3-9). Slopes along Kachess Reservoir will be exposed at grades of 20 – 60% with unknown vulnerability to slides (p. 3-7). No information is provided on the extent, severity, specific locations, or outcomes of instability likely to occur in Kachess Reservoir. Please provide this information including the reference evidence for such estimates. Please provide more detailed information on slide risk due to the KDRPP and KKC projects, both from historical data derived from similar geologic conditions, or from scientifically valid predictions.

Sec. 3.3.4.1 Box Canyon Creek, page 3-26

The DEIS states fish passage between Box Canyon Creek and Kachess Reservoir is impaired when Kachess Reservoir is drawn down during drought years. Doesn’t this occur whenever Kachess Reservoir is drawn down, not just during drought years?

Sec. 3.3.1.5 Prorating, pages 3-19 to 3-20

According to the DEIS, prorating occurred about once every 4 years in the last 20 years (p. 3-20). In five of those years, prorating fell below the 70% threshold and met the criteria for the KCRPP project to be activated. The KCRPP project would allow a drawdown of 82.75 additional feet below the current lowest allowable level due to gravity flow over Kachess Dam spillway. Is it possible that drawdown of Kachess Reservoir could exceed 82.75 ft.? If so, under what conditions could that occur?

Sec. 4.3.6.2 Operation of KKC, pages 4-33 to 4-34

Regarding water supply, the DEIS states “Alternative 3A – KKC North Tunnel Alignment would provide a very small (less than 1 percent) improvement in water supply for proratable water users during drought years. ... Water supply would remain well below the 70 percent of entitlement goal. Therefore, KKC would not have a

significant benefit to water supply. ... Kachess Reservoir levels would remain within current operating ranges and no significant effect on water resources would occur." Please explain why hundreds of millions of dollars should be spent on the KKC for no significant benefit to water supply.

Sec. 4.25.3.4 Cumulative Impacts of KDRPP and KKC, page 4-348

Drawdown of Kachess Reservoir would "cause significant impacts on recreation...cause recreationists to seek similar opportunities at other reservoirs [with] increased use and crowding. . .prevent use of boat launches, decrease fishing opportunities. . .and reduce the aesthetic quality of the reservoir." "These impacts are considered significant and would likely cause recreationalists to avoid the area." (p.4-348). Please identify the extent of these impacts to the Okanogan-Wenatchee National Forest.

Sec. 4.26 Unavoidable Adverse Impacts, pages 4-350 to 4-351

The DEIS states the KDRPP project would result in the unavoidable removal of 75 acres of forest habitat and the KKC project would result in the removal of 13 acres of forest habitat that supports northern spotted owls. How does the loss of this habitat support the recovery plan for northern spotted owls? How many of these acres are on Okanogan-Wenatchee National Forest? What additional approval must the Okanogan-Wenatchee National Forest provide for loss of endangered species habitat on national forest lands?

Because both the NEPA and SEPA process must be followed, we request that the BuRec and Ecology each provide separate responses to the above comments.

Please send us a copy of the Final EIS and Record of Decision.

Thank you for considering these comments.

Sincerely,



Margie Van Cleve
Washington State Chapter Chair
Sierra Club