

LOWER COLUMBIA BASIN AUDUBON SOCIETY
9016 Sunset Trail
Pasco, Washington 99301

May 19, 2011

Bureau of Reclamation
Columbia-Cascades Area Office
Attention: Candace McKinley
Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901

Via Email to: yrbwep@usbr.gov

Dear Ms. McKinley,

We are writing to comment on (PEIS) Federal Register scoping notice for the “Integrated Water Resource Management Plan, Yakima River Basin Water the Federal Register Programmatic Environmental Impact Statement Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington. *76 FR 18780 (April 5, 2011)*.

We are deeply concerned that water conservation has not been fully addressed. Water conservation is the most economical and environmentally benign means of providing additional water. Water conservation should be exhaustively studied and implemented before public funds are expended on billion dollar storage projects.

The expansion and creation of wetlands along the Yakima River by diversion of peak spring runoff should be considered. The wetlands would create valuable fish and wildlife habitat, provide outdoor recreation and recharge the basin’s ground water providing large underground water storage at a very low cost.

The Bureau of Reclamation and Washington Department of Ecology have squandered millions of dollars over the past ten years studying large storage projects such as the Black Rock and Lower Crab Creek reservoirs. These have all proven to have cost benefit ratios that could not justify construction. It is highly unlikely that the Wymer Dam or Bumping Lake large storage projects will be found to be economically justifiable. New studies should focus on conservation. All proposed large storage projects should be subjected to an intense cost/benefit review by an independent third party such as a blue ribbon team of economist and scientist not associated with the Bureau of Reclamation or Department of Ecology. This review should be conducted as early as possible – and by all means prior to the issuance of a draft EIS. One of the objects of the review would be to weed out projects that will not be justifiable as early as possible and save the taxpayers millions.

The country has been struggling to deal with one of the most severe recessions in its history. Government budgets at all levels, federal, state and local are insufficient to meet our basic needs. It is unconscionable to squander funds on questionable water projects when our citizens are suffering cuts in education, social security, and health care. Our highway transportation system is on the point of collapse. We simply cannot spend scarce funds on studying projects which hold little promise of being viable.

The Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project should fully disclose and analyze the cost of electricity to operate the project, the utility rates for

computing the cost of power should be fully disclosed, the dollar value of lost power production by storage of water and diversion of water to crop use, and how much will those benefitting from the water storage pay to construct, operate and mitigate the projects. The cost and economic benefits of water conservation must be fully documented.

We absolutely oppose enlarging Bumping Lake. Our chapter has fought for thirty years to protect old growth timber in Washington. We were among the original petitioner's to list the spotted owl as an endangered species. It makes no sense to flood the old growth timber adjacent to Bumping Lake.

Enlarging Bumping Lake would inundate approximately ten 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.

We recommend dropping enlargement of Bumping Lake from further consideration.

Comment periods are entirely too short. The public needs at least 90 days to read and analyze the complex Environmental Impact Statements and scoping documents which will be issued as this plan evolves.

Please send the Lower Columbia Basin Audubon Society a copy of the draft Programmatic EIS when it becomes available.

Finally, from my reviews of recent EIS's for Black Rock and Lower Crab Creek reservoirs, I have found the quality and comprehensiveness of these studies to be lacking. I am also concerned that the Bureau of Reclamation and Department of Ecology pay little attention to public input and comment. I hope that you will value and heed the comments of the public – remember they are the taxpayers who foot the bill and suffer the consequences of your decisions. All public comments should be recorded, specific concerns addressed and responded to in a report published in print and posted to the internet for further public review.

I request the Bureau of Reclamation provide a response directly to the Lower Columbia Audubon Society addressing the concerns we have raised.

Thank you!

Sincerely,

Richard J. Leumont
Chairperson
Conservation Committee