

**Friends of Lake Kachess * Kachess Community Association * Friends Of Bumping Lake
Kittitas County Fire District #8 * North Cascades Conservation Council
Alpine Lakes Protection Society * Friends of the Clearwater
Kootenai Environmental Alliance * Wise Use Movement
Federation of Western Outdoor Clubs * Great Old Broads for Wilderness
Kachess Ridge Maintenance Association**

December 7, 2015

Ms. Lorri Lee
Regional Director, Pacific Northwest Region.
Bureau of Reclamation
1150 North Curtis Road, Suite 100
Boise, Idaho 83706
Email: Llee@usbr.gov

RE: Proposed Roza Kachess Emergency Temporary Floating Pumping Plant Project NEPA Scoping

Dear Ms. Lee:

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. 1501.7*.

Our review shows no NEPA scoping notice in the period between November 9 and December 4 in the *Federal Register* regarding the Kachess Emergency Temporary Floating Pumping Plant project as required by 40 CFR Sec. 1501.7 and 1506.6(b)(2). The Yakima Field Office issued a News Release dated November 23, 2015, immediately before the Thanksgiving holidays, announcing public scoping workshops for the Kachess Emergency Temporary Floating Pumping Plant Project with a comment deadline of Dec. 18, 2015. Not counting the intervening holidays, this is barely a three-week comment period.

Therefore, we request that the Bureau of Reclamation issue a *Federal Register* Scoping Notice and allow for a 60 day time period for comments for the following reasons:

1. This project is not part of the 2012 Yakima "Integrated Plan." Furthermore, the Bureau's release fails to reference the Yakima Plan, but the location of the project is located right in the middle of a Yakima Plan component, Kachess Lake. Therefore, there is little information available on this project, except for a hastily prepared memo from the Roza Irrigation District dated October 15, 2015, on a non-governmental website at www.roza.org. More time is

required to understand the Roza's "emergency" proposal and allow for review by the public to ensure that scoping is carried out pursuant to 40 CFR. Sec. 1501.7(a).

2. The Scoping Notice does not provide adequate time for public participation at the "scoping workshops." The Ellensburg, Cle Elum, and Sunnyside, Washington, "scoping workshops are set for 4:00 PM 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 these locations from other parts of the Northwest. A Scoping Notice must be issued to extend the scoping meeting to 9:00 PM.

3. The Bureau's Scoping "release" does not provide adequate locations for public participation. Significant adverse impacts to the environment include impacts to ESA protected bull trout by lowering water levels in Kachess Lake below the current outflow levels and increasing fish passage problems between the upper and lower Kachess basins. This is a proposed action with effects of national concern . *40 CFR 1506.6(b)(2)*. A Scoping Notice must be issued to include scoping meetings in Seattle and Spokane, WA.

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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