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STATEMENT TO THE YAKIMA WORKGROUP – Dec. 16, 2015

The Sierra Club supports the proposal made by former Representative Sid Morrison, on behalf of the Yakima Basin Storage Alliance, at the September 9, 2015, Yakima Workgroup meeting that a new dam at Bumping Lake should be dropped from the Yakima Plan. We note that members of the public were not allowed to comment on the Workgroup's Roundtable Discussion when this proposal was made. However, the proposal to drop a new Bumping Lake dam is in keeping with the Naches Ranger District letters to Department of Ecology, dated July 31, 2008, and November 20, 2009, which noted that the proposal to enlarge "the dam and reservoir has several potentially adverse effects on National Forest resources and facilities." The Bureau of Reclamation itself recognized the environmental values and low likelihood of constructing a new Bumping Lake dam when it dropped this project from its *Yakima River Basin Water Storage Feasibility Draft Planning Report/EIS* in 2008.

The Sierra Club continues to support sustainable populations of wild fish in the Yakima Basin. We remain concerned that the Yakima Plan continues to rely on a faulty four-accounts analysis that vastly overestimates the number of returning salmon, especially given the experience of sockeye salmon die-offs due to high temperatures in the Columbia River and low flows and high temperatures in the Lower Yakima River.

The Sierra Club continues to support the Federal Advisory Committee Act. We note that while the Yakima Basin Conservation Advisory Group established by the 1994 Phase II act is FACA compliant, this Yakima Workgroup is not. FACA's legislative history is especially instructive:

One of the great dangers in the unregulated use of advisory committees is that special interest groups may use their membership on such bodies to promote their private concerns." (page 3496).

<http://www.gsa.gov/graphics/ogp/FACALegislationHistory1972.pdf>

Finally, we continue to object to the Yakima Workgroup portraying the Yakima Plan as the product of diverse interest groups when the Workgroup remains unresponsive to comments and concerns from those not at the table and the Workgroup's Implementation Committee continues to be closed to the public. We also object to references to the Workgroup as a model for national water policy planning unless significant changes to the Yakima Plan are made.

Joshua Osborne-Klein

Conservation Chair

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