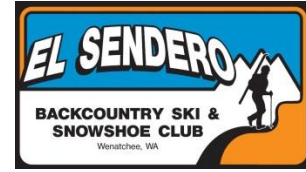




ALPINE LAKES
protection society



TESTIMONY OF
ALPINE LAKES PROTECTION SOCIETY; EL SENDERO BACKCOUNTRY SKI &
SNOWSHOE CLUB; AND NORTH CASCADES CONSERVATION COUNCIL
to the Energy and Natural Resources Committee
U.S. Senate
Washington D.C.

July 7, 2015

on S. 1694

Sen. Murkowski (Chair) and members of the Committee, thank you for the opportunity to provide comments on S. 1694.

As introduced, S. 1694, proposed Section 1214 (a)(1) states, “It is the intent of Congress that the Management Plan shall be implemented in its entirety.” Amended Section 1202 new subsection (8) defines the “Management Plan” as the plan described in the 2012 Final Programmatic EIS and Integrated Water Resource Management Plan for the Yakima River Basin (Benton, Kittitas, Klickitat, and Yakima Counties, WA). This 2012 Plan is also known as the Yakima River Basin Integrated Plan, or the Yakima Plan.

The 2012 Yakima Plan is:

Bad national water policy

A 2014 analysis by the Water Resource Center found that “When implemented together as part of the Integrated Plan, the major water storage projects as a group do not pass a B-C [benefit-cost] test.” The 2012 Yakima Plan violates both past water projects principles and standards and recently adopted CEQ principles, standards and regulations.

The 2012 Yakima Plan is a prototype of the BuRec’s Watersmart Program to support the BuRec’s goal of constructing over 100 new water storage projects throughout the west to respond to climate change.

The 2012 Yakima Plan includes studies to pump water from the Columbia River to the Yakima River Basin.

Bad National Forest policy

The 2012 Yakima Plan would flood 1,000 acres of ancient forest roadless area that should be added to the adjacent William O. Douglas Wilderness area.

Bad national recreation policy

The 2012 Yakima Plan would designate two new National Recreation Areas within the Okanogan-Wenatchee National Forest with 41,000 acres dedicated to off-road vehicle use.

Bad national Endangered Species Act (ESA) policy

The 2012 Yakima Plan would flood critical habitat for ESA-listed bull trout and Northern spotted owls, as well as sage-steppe habitat for greater sage grouse.

Bad National Environmental Policy Act (NEPA) policy

The Yakima Plan's 2012 Final Programmatic EIS included only the BuRec's preferred alternative and the required no-action alternative. The BuRec failed to consider a range of alternatives as required by NEPA.

Bad public participation policy

The 2012 Yakima Plan was developed by a Yakima Workgroup, handpicked by the BuRec and the Washington State Department of Ecology. Meetings of the Implementation Committee of the Workgroup remain closed to the public.

Although the Yakima River Basin Conservation Advisory Group was authorized in 1994 by Congress and established under the Federal Advisory Committee Act (FACA), the Yakima Workgroup is specifically exempted from FACA under this bill (modified section 1202, new subsection (16)(C)).

For more information, please see the attached article from the February 13, 2103 issue of *The Water Report*.

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