



## Washington State Chapter

180 Nickerson Street, Suite 202  
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March 28, 2012

Attention: Derek Sandison  
Director, Office of Columbia River  
Department of Ecology  
15 W. Yakima Ave, Suite 200  
Yakima, WA 98902-3452 Via Email to: [dsan461@ecy.wa.gov](mailto:dsan461@ecy.wa.gov)

Attention: Candace McKinley  
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Environmental Program Manager  
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RE: Supplemental comments on the Yakima “Integrated Plan” FPEIS

On behalf of the Sierra Club’s 25,000 members in Washington State, I would like to provide supplemental written comments on the Final Programmatic Environmental Impact Statement for the “Integrated Water Resource Management Plan, Yakima River Basin Water Enhancement Project, Benton, Kittitas, Klickitat, and Yakima Counties, Washington” (FPEIS), published on March 2, 2012. This letter supplements the comment letter on the FPEIS that we have joined with other organizations.

We are very concerned with the lack of a full range of viable alternatives prepared in the FPEIS. The Bureau and Ecology could have prepared additional alternatives to provide the range of alternatives that is required under NEPA. For example, to address the public’s concerns with irreparable harm to the environment that would be caused by expansion of Bumping Lake and a new reservoir at Wymer, the FPEIS should have considered and analyzed one or more alternatives that provide comparable quantities of irrigation water and instream flows without the Bumping Lake or Wymer elements. Such additional alternatives could have considered enhanced conservation measures, strong water marketing, and conversion to less water-intensive crops. But because the FPEIS has only *one* action alternative, the public has been denied a full presentation

and comparison of valid alternatives. Why have the agencies failed to provide a full range of alternatives?

Furthermore, the plan's provision to guarantee water to 70 percent of the junior water rights holders in drought years was not analyzed in the EIS process: the 70 percent is instead set up at the outset in the Purpose and Need (pp. i-ii) and was not subject to further analysis. Because the agencies had only one action alternative, this 70 percent requirement, combined with inadequate consideration of conservation, efficiencies, and water marketing, drove the agencies to require additional water storage in the action alternative. We question the validity of this 70 percent requirement, which has been such a strong driver of the outcome of this EIS process.

This 70 percent figure could be lowered if junior water rights holders were encouraged to change to less water-intensive crops, yet such a possibility was not considered. Additional alternatives could have been constructed and analyzed in the EIS process that offer a smaller quantity of water to the junior water rights holders during drought years, and impacts to them could have been mitigated by incorporating new, highly efficient irrigation systems such as are used in desert areas. Or alternatives could have been developed that provide for sharing of water from non-proratable irrigators in severe drought years. Or the FPEIS could have compared the cost of crop insurance to cover junior water rights holders to the cost of additional storage. Any number of options could have been considered to assist junior water rights holders during drought years short of the contemplated large-scale storage dams (and potentially at less taxpayer expense), but the FPEIS fails to consider such options.

Unfortunately, because the FPEIS failed to analyze any other alternatives with lower levels of prorationing, the agencies have failed to disclose a full range of viable alternatives to the public.

We appreciate your consideration of our concerns and will appreciate your written response.

Yours sincerely,



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