



Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2011 Work Group – Draft Integrated Package, March 9, 2011

The Sierra Club resubmits the following statements to the Work Group.

*** The Sierra Club reasserts its support of water conservation measures and opposition to new storage projects as set out in our January 15, 2009, comments on the Yakima River Basin Integrated Water Resource Management Alternative Supplemental Draft Environmental Impact Statement:**

“We oppose any new storage projects on the Yakima River and its tributaries, including the Bumping Dam Enlargement (Large or Small Option), Wymer Dam (on Lmuma Creek), and Black Rock Dam. DOE and Bureau of Reclamation (BuRec) identified numerous possible measures for improved water conservation, including measures in the No Action Alternative and the Enhanced Water Conservation Alternative of the January 2008 *Yakima River Basin Water Storage Feasibility Study Draft Planning Report/Environmental Impact* (Draft Report). The conservation measures of these alternatives should be implemented before there is any further study or action on new storage projects.”

“Sierra Club is committed to water supply solutions that involve common-sense water management. We believe that in the face of climate change, aggressive water conservation, adoption of water efficiency standards and metering, water markets, low-impact storage projects (e.g., aquifer storage and recovery), forest and flood-plain restoration, and other strategies to promote natural storage are much more cost-effective than new dams, and could vastly improve the efficiency of water use in Washington State. The historic, massive hydrologic re-engineering of Washington’s rivers using dams and irrigation projects has caused historic environmental damage. We strongly urge you to focus on future water projects that fix existing problems, not cause new ones.”

*** Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2009 Work Group – July 15, 2009**, in which the Sierra Club raised concerns that the membership established by the BuRec and Ecology does not meet basic requirements for public participation and that nothing to date has demonstrated that additional dams in the Yakima River Basin are either-cost-effective or environmentally acceptable.

*** Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2009 Work Group – Discussion Draft Integrated Package, November 9, 2009**, in which the Sierra Club reaffirms its opposition to an expanded Bumping Lake Dam and support of water conservation measures.

*** Statement of the Sierra Club to the Yakima River Basin Water Enhancement Project Work Group – July 28, 2010**, in which the Sierra Club supports conserving land in the Teanaway River watershed, but not as mitigation for an expanded Bumping Lake Dam or Wymer Dam.

*** Comments of the Sierra Club on the Work Group Agreement to Support Final Integrated Water Resource Management Plan, December 17, 2010**, in which the Sierra Club raised specific concerns about the “Integrated Plan” and the Work Group planning process.

Tristin Brown
Sierra Club, Washington State Chapter Conservation Chair

Although the Department of Ecology and the Bureau of Reclamation did not request public comment on its "Workgroup Agreement to Support Final Integrated Water Resource Management Plan", please distribute the following comments from the Water & Salmon Committee of the Sierra Club, Cascade Chapter, to the Workgroup prior to its next meeting on December 17, 2010.

General Comments on the Workgroup Process

- * The membership of the Workgroup raises the following concerns:
 - The City of Yakima is a member while the Cities of Ellensburg and Cle Elum are not.
 - The Washington Department of Fish & Wildlife is a Workgroup member but the Meeting Notes for October 21, 2010, list two voting members from that Department (John Easterbrooks; Jeff Tayer).
 - Federal Resources agencies with permitting authority (e.g., USF&WS, NOAA Fisheries Service) are members, while the U.S. Forest Service, which manages the public's land within the Wenatchee National Forest is not.
 - Only one environmental/conservation group is a member.
 - The two agencies (i.e., Ecology and Bureau of Reclamation) responsible for funding and hiring the Workgroup facilitator are also voting members.
- * The November 19, 2010, Workgroup meeting was held without posting of any material from the October 21, 2010, Workgroup meeting on the Bureau of Reclamation website.
- * At the November 19, 2010, Workgroup meeting, Workgroup members were asked to vote on their support of the "Draft Agreement to Support Final Integrated Water Resource Management Plan and Related Future Activities" before the public comment period scheduled on the agenda.
- * Ecology is holding meetings relevant to YRBWEP mitigation without public notice.

Specific Comments on the Workgroup Agreement

1.0 Action

This section states, "The Workgroup supports an Integrated Water Resource Management Plan for the Yakima basin."

Comment: This is not a management plan for the Yakima basin. It also proposes the construction of new or enlarged irrigation dams. The Workgroup should not mislead the public by portraying this as a "management" plan.

This section states that "By approving this decision document the Workgroup also supports Integrated Plan implementation." This includes support of the "National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) reviews, permitting and mitigation for actions in the Integrated Plan." In addition, Workgroup members commit to an Implementing Subcommittee "to seek authorization and funding."

Comment: We are opposed to Ecology and the BuRec requiring Workgroup members to commit to supporting permitting and lobbying for authorization and funding prior to the completion of any NEPA or SEPA EIS.¹

2.0 Background

This section states, “The Yakima River Basin Water Enhancement Project (YRBWEP) Workgroup has been working for nearly 18 months on a Yakima Basin Integrated Water Resource Management Plan (Integrated Plan) to restore fisheries and improve water supply in the Yakima basin.”

Comment: Again, this is not an accurate description. Ever since the BuRec concluded that a new Black Rock dam, and two variations of the Wymer dam would generate only 0.13 cents, 0.31 cents, and 0.07 cents for every dollar spent respectively, Ecology and the Workgroup have spent every Workgroup meeting reviewing multiple new or expanded dams in the Yakima basin. The Workgroup should not mislead the public by portraying this as merely an attempt to “improve” water supply.

This section states, “. . . seven elements were identified in the 2009 Ecology Final Environmental Impact Statement for the Yakima River Basin Integrated Water Resource Management Plan.”

Comment: This is incorrect. The “Integrated Plan” includes conducting a feasibility study for direct pumping from the Columbia River with Yakima Basin storage options (Sec. 3.3.4). The 2009 Ecology FEIS specifically states, “An alternative of pumping directly from the Columbia River to Roza canal without using a reservoir has not been fully considered, but seems infeasible at this time. Because of these considerations, Ecology has decided not to carry forward the direct pumping option at this time.” *Ecology, Final EIS, June 2009, page 2-70*. The Workgroup should not mislead the public by mischaracterizing elements as already a part of Ecology FEIS.

This section states, “More detailed information will be provided in the Integrated Plan.”

Comment: By this admission, the Workgroup is being asked to support a “Final Integrated Water Resource Management Plan” without adequate information. This is also confusing as it fails to specify whether more detailed information will be provided in a “draft” or a “final” Integrated Plan.

This section states, “Workgroup members will have the opportunity to review and comment on the draft Integrated Plan in early 2011.”

Comment: Again, the Workgroup has ignored any mention of public notice or opportunity to review and comment on the draft Integrated Plan.

This section includes key concepts for promoting the “Integrated Plan.”

¹ Prior to the establishment of the YRBWEP Workgroup, the Department of Ecology released a supplemental draft EIS in December 2008 on a “Yakima River Basin Integrated Water Resources Management Alternative,” and a final EIS in June 2009. As acknowledged by Ecology, this was a “programmatic” EIS. Because the BuRec’s April 2009, Yakima River Basin Water Storage Feasibility Study concluded that none of its action alternatives met federal criteria for an economically and environmentally sound water project, the BuRec did not participate in Ecology’s SEPA process.

Comment: P.L. 96-162 authorized the Department of Interior to conduct a feasibility study of the Yakima River Basin Enhancement Project, "which shall include an analysis by the United States Geological Survey of the water-supply data for the Yakima River Basin." The Workgroup has failed to incorporate such an analysis into its "Integrated Plan."

3.1 Fish Passage

This section states, "Restore anadromous salmonid access to habitat above the five existing large storage reservoirs and provide upstream and downstream passage for bull trout and other resident fish."

Comment: This section fails to disclose that the proposed Bumping Lake Enlargement would wipe out bull trout spawning habitat.

This section states, "There would be no changes to current operations (i.e., quantity and timing of flow releases), . . ."

Comment: This appears to be an unrealistic constraint if restoration of fisheries is a goal.

This section states, "Providing for unimpeded fish migration past the existing storage dams in the Yakima basin. . ."

Comment: "Unimpeded" appears to be an unfortunately choice of words. By their very nature, dams impede rivers. The Workgroup should not mislead the public that it can provide "unimpeded" fish migration past the existing storage dams in the Yakima basin.

Section 3.2 Structural and Operational Changes

Comment: The description of the structural and operational changes misleads the public by failing to mention any adverse impacts.

Section 3.2.5 Wapatox improvements

Comment: Why isn't this project included under Sec. 3.6.1, which also includes lining or piping existing canals or laterals?

Section 3.3.1 Wymer Dam

This section states, "Option 2 would be a 400 cfs pump station on the Yakima River just upstream of Lmuma Creek with water conveyance through a new water transmission main that would deliver water to Wymer."

Comment: The Workgroup should explain how this option is different from the Wymer option already rejected by BuRec because the costs of pumping water from the Yakima River upstream to the reservoir were considered too high. This section should disclose the loss of sage grouse habitat due to a Wymer Dam.

Section 3.3.3 Enlarged Bumping Reservoir

Comment: This section should disclose the loss of bull trout and spotted owl habitat due to an enlarged Bumping Reservoir.

Section 3.3.4 Columbia River Pump Exchange with Yakima Storage

This section states, "If the need for the Columbia River project is demonstrated and the project is feasible, then request project funding and schedule implementation."

Comment: This section fails to describe or quantify the "triggers" to implement the Columbia River and Roza Alternate Supply projects. As with the entire "Integrated Plan," Workgroup members are being asked to commit to implementation of a Columbia River project prior to the preparation of any environmental impact statement. As set out in NEPA, an EIS is to be prepared prior to decisionmaking, not as a post-hoc rationale for decisions already made.

Section 3.5 Fish Habitat Enhancement

This section states, "Implement an approximate \$470 million habitat enhancement program addressing reach-level floodplain restoration priorities and restoring access to key tributaries through flow restoration, removing fish barriers, and screening diversions."

Comment: In 1979, Congress authorized and provided funds for the Yakima River Basin Water Enhancement Project, P.L. 96-162, which as part of Phase I included installation of fish ladders and screens. The Workgroup should explain why after 30 years removing fish barriers and screening diversion projects still need to be carried out.

Section 3.6 Enhanced Water Conservation

This section states, "Implement an approximate \$423 million agricultural water conservation program designed to conserve up to 170,000 acre-feet of water in good water years. The agricultural water conservation program includes measures beyond those likely to be implemented in the existing YRBEP Phase II conservation program."

Comment: Congress authorized Phase II of the YRBEP in 1994, which resulted in a voluntary water conservation program and the establishment of target flows on the Yakima River. The Workgroup should explain why after over 25 years, such a large amount of water conservation remains to be implemented.

Water conservation plans for the Wapato Irrigation Project (WIP) remain inadequate. The WIP should become a national model for water conservation.

This section states, "Projects to be implemented would be selected through detailed feasibility studies and evaluation by the existing Conservation Advisory Group (CAG)."

Comment: There is no description of the CAG or its membership. Once again, there is no mention of any public notice or comment on the selection of projects.

Section 3.7 Market Reallocation

Comment: Based on the presentation at the November 19, 2010 Workgroup meeting, market reallocation is a non-structural alternative that could eliminate the need for structural storage alternatives with their significant adverse environmental impacts.

Unfortunately, the Market Reallocation presentation occurred barely an hour before the Workgroup was pressured into taking votes on the Workgroup Agreement to Support Final integrated Water Resources Management Plan. Additional work should be carried out to more fully categorize the opportunity for market reallocation.

Attachments

Comment: Because Attachments 1-5 are not referenced in the Workgroup "Agreement," we do not consider them part as part of the document.



Statement of the Sierra Club to the Yakima River Basin Water Enhancement Project Work Group – July 28, 2010

The Sierra Club re-affirms its statement to the Work Group of July 15, 2009 that:

- * The Work Group process and limited public Task Force membership established by the BuRec and Ecology does not meet basic requirements for public participation.
- * New dam construction and irrigation water storage projects are national issues, because new dams have significant adverse economic and environmental impacts.

The Sierra Club re-affirms its statement to the Work Group of November 9, 2009 that:

- * The Sierra Club reasserts its support of fish passage measures and water supply solutions that involve common-sense water management. We believe that in the face of climate change, aggressive water conservation, adoption of water efficiency standards and metering, water markets, low-impact storage projects (e.g., aquifer storage and recovery), forest and flood-plain restoration, and other strategies to promote natural storage are much more cost-effective than new dams, and could vastly improve the efficiency of water use in Washington State.
- * The Sierra Club remains opposed to new storage projects on the Yakima River and its tributaries, including the Bumping Dam Enlargement, Wymer Dam (on Lmurna Creek), and Black Rock Dam.
- * The Sierra Club remains opposed to the Bumping Lake Dam small option as set out in the Discussion Draft Integrated Package because it would still flood late-successional and old-growth forest land that includes threatened spotted owl and bull trout habitat; a National Forest inventoried roadless area that should be added to the William O. Douglas Wilderness Area.

The Sierra Club supports conserving land in the Teanaway River watershed. However, we find that such conservation should not serve as “mitigation” for the permanent loss of bull trout habitat and old growth national forest lands surrounding the existing Bumping Lake or shrub-steppe land flooded by a Wymer Dam because such mitigation would be off-site in another Yakima sub-basin and out-of-kind, not replacing the same threatened fish/wildlife habitat.

Elaine Packard, Chair, Water and Salmon Committee
Mark Lawyer, Chair, National Forests Committee
Cascade Chapter
Sierra Club



**Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2009
Work Group – Discussion Draft Integrated Package, November 9, 2009**

The Sierra Club remains opposed to the Bumping Lake Dam small option as set out in the Discussion Draft Integrated Package because it has similar and unacceptable significant adverse impacts to endangered spotted owl and bull trout habitat as the large option. The smaller option would still flood old growth forests, a National Forest inventoried roadless area, trails and campgrounds. In addition, the Bureau of Reclamation did not include any Bumping Lake Dam project in its Yakima River Basin storage project benefit/cost analysis. It is time to put in place water conservation measures that have been identified over the past 30 years.

The Sierra Club also reasserts its support of water conservation measures and opposition to new storage projects as set out in our January 15, 2009, comments on the Yakima River Basin Integrated Water Resource Management Alternative Supplemental Draft Environmental Impact Statement:

“We oppose any new storage projects on the Yakima River and its tributaries, including the Bumping Dam Enlargement (Large or Small Option), Wymer Dam (on Lmuma Creek), and Black Rock Dam. DOE and Bureau of Reclamation (BuRec) identified numerous possible measures for improved water conservation, including measures in the No Action Alternative and the Enhanced Water Conservation Alternative of the January 2008 *Yakima River Basin Water Storage Feasibility Study Draft Planning Report/Environmental Impact* (Draft Report). The conservation measures of these alternatives should be implemented before there is any further study or action on new storage projects.”

“Sierra Club is committed to water supply solutions that involve common-sense water management. We believe that in the face of climate change, aggressive water conservation, adoption of water efficiency standards and metering, water markets, low-impact storage projects (e.g., aquifer storage and recovery), forest and flood-plain restoration, and other strategies to promote natural storage are much more cost-effective than new dams, and could vastly improve the efficiency of water use in Washington State. The historic, massive hydrologic re-engineering of Washington’s rivers using dams and irrigation projects has caused historic environmental damage. We strongly urge you to focus on future water projects that fix existing problems, not cause new ones.”

Elaine Packard
Chair, Water and Salmon Committee
Cascade Chapter
Sierra Club



Statement of the Sierra Club on the Yakima River Basin Water Enhancement Project 2009 Work Group – July 15, 2009

The process and Task Force membership established by the BuRec and Ecology does not meet basic requirements for public participation.

New dam construction and irrigation water storage projects are national issues, because new dams have significant adverse economic and environmental impacts.

Economic

The final report and EIS issued by the BuRec in December 2008 confirmed the economic reality that Black Rock Dam would only return 13 cents for every taxpayer dollar spent, and that the Wymer Dam and Pump Storage options would only return between 31 cents and 7 cents for every taxpayer dollar spent.

In the BuRec report, the Bumping Lake Enlargement did not even make the first cut for an economic analysis.

In this time of economic hardship across the nation, there is increasing scrutiny by Congress, taxpayers, and the press on wasteful government spending.

Environmental

Efforts to construct Black Rock have raised national concerns regarding groundwater impacts to the Hanford Nuclear Reservation. Perennial efforts to construct a Bumping Lake Enlargement continue to raise national concerns about loss of old-growth forests, roadless areas, recreational opportunities, and impacts to the William O. Douglas Wilderness Area.

Water Conservation

Any of the other irrigation dam project proposals will also draw national attention to the Yakima Basin regarding:

- * Water and energy subsidies provided to irrigation districts that are not available to dry land farming
- * Repayment of the costs of the existing BuRec Yakima River Basin Project
- * Extent to which irrigation district water conservation plans have or have not been implemented
- * A review of crop selection and water spreading

In conclusion, nothing to date has demonstrated that additional dams in the Yakima River Basin are either cost-effective or environmentally acceptable.