WASHINGTON ENVIRONMENTAL COUNCIL

PROTECTING OUR LAND, AIR AND WATER

BRINGING RIVERS TO LIFE

American Rivers

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American Rivers / Washington Environmental Council Goals and Principles for the Columbia Water Partnership

Goals: To improve instream flow in the main stems of the Columbia and lower Snake rivers to levels sufficient to sustain healthy fish and wildlife populations and meet water quality standards, and to provide water for consumptive use to meet the needs of communities along the rivers.

Principles:

- **Increasing flows in the Columbia during the critical months -- not just maintaining current depleted flow levels -- is essential to protecting salmon and steelhead.** As clearly documented by both the National Academy of Sciences and the Independent Scientific Advisory Board, there is a flow-survival relationship for salmon and steelhead, which is particularly strong for summer migrating stocks. Presently, instream flow objectives in the Columbia are rarely met in the summer months, which reduces survival of both ESA-listed and non-listed (i.e., Hanford Reach fall Chinook) salmon and steelhead. Accordingly, any new water management program should improve instream flow conditions throughout the salmon and steelhead migration period by requiring mitigation water in excess of the quantity allowed to be withdrawn.

- **Mitigation for new withdrawals should only be in the form of water added at or above the point of diversion in the reach of the Columbia or Snake affected by the withdrawal.** The instream flow deficit in the mainstem Columbia and lower Snake cannot be remedied by instream flow improvements in other river basins. The way to remedy the summer flow deficits in the Columbia and Snake rivers is by preventing further flow reductions and putting water back in those rivers at a rate exceeding withdrawals (i.e., 3 "buckets" of mitigation water for every two "buckets" withdrawn).

- **Commitment to provide mitigation water should be firm and coextensive with water rights.** Mitigation water must be provided for as long as the water right is exercised. Accordingly, there must be some mechanism to reduce water withdrawals should the water bank be under-funded at some point in the future.

- **Mitigation water should be provided for the entire withdrawal, not just the portion alleged to be consumptively used.** There is often a significant lag time

before water that is withdrawn from the river returns to the river, and actual consumption is difficult to measure.

- **New water rights recipients should be required to pay a fair annual mitigation fee that is sufficient to cover the costs of acquiring water necessary to mitigate for new withdrawals.** Those who benefit from a right to use public water should be required to pay for mitigation water equivalent to the quantity of the withdrawal.

- **Water right holders and Ecology should be fully accountable.** Currently, Ecology has inadequate information on actual water use in the basin. Metering of existing and new water diversions must be a prerequisite to obtaining a new water right. Similarly, mechanisms must be put in place to verify the delivery of mitigation water.

- **New water rights should be conditioned on proof of efficient water use.** Some irrigators along the Columbia and lower Snake rivers are highly efficient, but there still remain many inefficient irrigation operations that are contributing to instream flow deficits. Washington water law requires efficient use of water. (RCW 90.03.005). Thus, applicants for new water rights must be required to demonstrate that they are using Best Management Practices to operate efficiently.

- **New water storage facilities should not be built if water management objectives can be met with conservation and efficiency measures and market mechanisms**. As the estimated $4 billion cost of the proposed Black Rock storage facility clearly shows, building large new water storage facilities is extremely expensive, and they can be environmentally destructive.

- **Ecology should set a year-round instream flow regime for the Hanford Reach**. The Hanford Reach has been designated a national monument and is the home of the Columbia River's only healthy population of wild salmon. A year-round instream flow regime should be set to protect this exceptional aquatic ecosystem from dewatering and destructive flow manipulation at hydroelectric dams.

- **Inchoate rights should be accounted for in any new water management program.** The State has issued 163 water rights that have not been perfected. Once put to use, these water rights will further deplete flows in the mainstem Columbia.

- **Comprehensive, accurate economic analysis should be completed prior to adopting a new water management program.** The economic analyses conducted for the Columbia River Initiative contained major flaws in both their methodology and assumptions, including: (1) the lack of an analysis of the economic effects of significantly increasing crop production in light of existing over-supply problems; (2) the failure to account for the infrastructure cost

associated with delivering water to farms; and (3) the lack of information on the value of recreational and commercial fishing impacted by Columbia flows. Such flaws must be rectified in any economic analysis of any new management proposal that emerges out of the Columbia Water Partnership.

- **The primary objective and beneficiaries of a new water management program should be accurately identified.** In the Columbia River Initiative process, Ecology inaccurately represented the proposal to allow the withdrawal of approximately 750,000 acre-feet of water as a way to provide water for "growing communities". In fact, irrigated agriculture would have received the vast majority of the water. Municipal and industrial use would have accounted for only 19% of the water; 75% would have been made available for new irrigated agriculture. Ecology should accurately identify the beneficiaries of any new water management program that emerges out of the Columbia Water Partnership to enable an informed public discussion.

- **All affected communities should be treated equitably.** Many communities (tribal and non-tribal) along the Columbia and Snake Rivers from the Pacific Ocean to central Idaho depend on the rivers for their livelihoods and community well being. These communities depend on the rivers in different ways (i.e., fishing and farming) and each must be treated equitably in any new water management program.