



## KLICKITAT COUNTY PLANNING DEPARTMENT

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Derek Sandison, Regional Director  
Central Regional Offices  
Washington Department of Ecology  
15 West Yakima Avenue, Suite 200  
Yakima, WA 98902-3452

RE: Klickitat County Comments: Proposed Columbia Snake River Irrigators Association (CSRIA)  
Voluntary Regional Agreement (VRA) Consultation

Dear Mr. Sandison,

Please consider the following comments on the proposed CSRIA VAR, which I am submitting on behalf of Klickitat County.

RCW 90.90.030(2)(c) states that voluntary regional agreements shall ensure that efforts are made to harmonize such agreements with watershed plans developed under authority of chapter 90.82 RCW that are applicable to the area covered by the agreement. Additionally, RCW 90.42.040(1) states that to the extent practicable trust water rights acquired in an area with an approved watershed plan developed under chapter 90.82 RCW shall be consistent with that plan if the plan calls for acquisition. We appreciate that these statutes prevent state operated programs from redistributing water rights from one part of a watershed to another or from one beneficial use to another in a manner that is inconsistent with a watershed plan developed under chapter 90.82 RCW. We also appreciate that these statutes reinforce the role of watershed planning.

A watershed plan developed under chapter 90.82 RCW addresses the management of water resources to meet both instream and out of stream water needs within the area subject to the plan. Watershed plans and planning units are the appropriate resources for identifying and prioritizing conservation and other mitigation projects. However, approved watershed plans will be amended from time to time. A one-time review of the watershed plans existing at the time the VRA is executed would likely not achieve harmonization.

The proposed CSRIA VRA does not address RCW 90.90.030(2)(c) or RCW 90.42.040(1). We recommend the following changes to the VRA to help ensure conformance with RCW 90.90.030(2)(c) and RCW 90.42.040(1).

- Include a provision in the Ecology commitment section of the VRA stating that Ecology will ensure conformance with RCW 90.90.030(2)(c) and RCW 90.42.040(1).

- Include a provision in the VRA stating that applicable watershed plans and their associated detailed implementation plans will be utilized to aid in the identification of candidate conservation projects and other mitigation actions. The watershed plan that would be applicable to a given water right is the one that is applicable to the WRIA in which the water right is located. If a conservation or mitigation project is under consideration that is located in a WRIA other than the one in which water right is located, then the watershed plan for that WRIA would be relevant too.
- Include a provision in the Ecology commitment section of the VRA stating that Ecology shall work with the applicable WRIA planning unit(s) to identify and prioritize conservation and mitigation projects. It might be appropriate for Ecology to identify the applicable WRIA(s) and which planning units want to participate in the effort to harmonize the VRA to the watershed plan. It might also be appropriate for Ecology to develop and memorandum of agreement with the interested WRIA planning unit(s) regarding the process and timelessness of the process.
- There is a provision in the CSRIA commitment section of the VRA regarding CSRIA working with Ecology to identify projects. Perhaps this provision should also mention working with interested WRIA planning units to identify projects.

With the inclusion of appropriate provisions to address RCW 90.90.030(2)(c) and RCW 90.42.040(1), as outlined above, Klickitat County supports approval of the CSRIA VRA.

Thank you for considering Klickitat County's comments which are submitted for consideration under the consultation process provided for in RCW 90.90.030(4)(a).

On behalf of Klickitat County,



David McClure  
Watershed Planning Coordinator