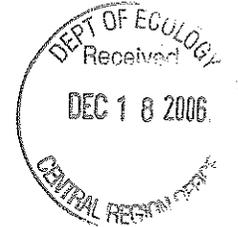


## KLICKITAT COUNTY PLANNING DEPARTMENT

228 W. Main St., MS: CH-17, Goldendale, Washington 98620  
VOICE: 509 773-5703 or 1 800 765-7239  
FAX: 509 773-6206

December 15, 2006



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

RE: Proposed Columbia Snake River Irrigators Association (CSRIA) Voluntary Regional Agreement (VRA) Consultation, WRIA 30 Planning Unit

Dear Mr. Sandison,

We appreciate Bob Barwin meeting with the Water Resource Inventory Area (WRIA) 30 Planning Unit and presenting information on the proposed CSRIA VRA. Please consider the following comments on the proposed CSRIA VAR, which I am submitting on behalf of the WRIA 30 Planning Unit.

Watershed Plans 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. However, the proposed VRA does not address RCW 90.90.030(2)(c) or RCW 90.42.040(1).

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 may not achieve harmonization.

The following would help ensure that adequate efforts are made to harmonize the VRA with watershed plans developed under authority of chapter 90.82 RCW.

- 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).

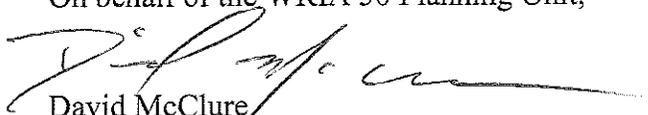
- Include a provision in the VRA stating that applicable watershed plans and their associated detailed implementation plans will be utilized to aid in the identification of candidate conservation projects and other mitigation actions. The watershed plan that would be applicable to a given water right 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.

Public Interest Under RCW 90.82.130(4), Ecology is to use an approved watershed plan as the framework for making water resource management decisions in the planed watershed and as a primary consideration in determining the public interest in such decisions. For these purposes, we refer the department to Chapter 5.1 of the *Klickitat River Basin Watershed Management Plan (01-FinalWRIA30ManagementPlan-05032005.pdf)*, which specifies that a high priority goal for water resource management is to ensure adequate water supply to meet the current and future needs of the citizens of WRIA 30. Particularly relevant sections of the watershed plan include section 5.1.3 in which “the planning unit urges the implementation of voluntary and positive incentive-based approaches to addressing issues associated with meeting water demand” (such as voluntary regional agreements like the one proposed by CSRIA) and subsection 5.1.3.3, which outlines strategies for meeting water demand including water conservation projects and use of water banking and the water trust program (like are proposed in the CSRIA VRA).

With the inclusion of appropriate provisions to address RCW 90.90.030(2)(c) and RCW 90.42.040(1), as outlined above, the WRIA 30 Planning Unit supports approval of the CSRIA VRA. To the extent that the Planning Unit may be enabled under chapter 90.82 RCW, other applicable statute(s), or departmental policy to provide Ecology with input regarding public interest in water resource decisions within WRIA 30, the Planning Unit recommends that expeditious approval of the CSRIA VRA and issuance of water rights there under is in the public interest.

Thank you for considering the WRIA 30 Planning Unit’s comments which are submitted for consideration under the consultation process provided for in RCW 90.90.030(4)(a).

On behalf of the WRIA 30 Planning Unit,

  
 David McClure  
 WRIA 30 Watershed Planning Coordinator