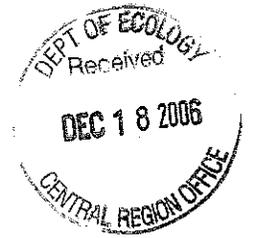


WALLA WALLA WATERSHED PLANNING UNIT

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December 15, 2006



Dan Haller, Columbia River Unit Manager
Water Resources Program
Department of Ecology, Central Region Office
Yakima, WA 98902-3452

RE: Comments on the Draft Voluntary Regional Agreement between Columbia-Snake River Irrigators Association and Ecology

Dear Mr. Haller:

The Walla Watershed Planning Unit for Water Resource Inventory Area (WRIA) 32 appreciates the Department of Ecology's consideration of our interests in reviewing and consulting on the Voluntary Regional Agreement (VRA) between the Columbia-Snake River Irrigators Association (CSRIA) and the Department of Ecology. A tremendous amount of time and energy has been spent by citizens, agencies, Tribes and interest groups over the last 5-years developing a water management plan for WRIA 32, including portions of Walla Walla County and Columbia County. This plan, WRIA 32 (Walla Walla) Watershed Management Plan was adopted in June, 2005 and sets forth the priority areas and actions for improvements to watershed health for current and future generations. The Plan addresses instream flow, water quantity, water quality and habitat and benefits greatly from commitments and support from those in our watershed. In addition, the Detailed Implementation Plan for WRIA 32 identifies the highest priority project in our basin to be the Flow Enhancement Feasibility Study with Pump Exchange sponsored by the Confederated Tribes of the Umatilla Indian Reservation and U.S. Army Corps of Engineers.

Our WRIA 32 Watershed Plan sets the direction and priorities for our watershed. However, management of water resources at the larger scale, i.e., the Columbia and Snake River basins, has been very inflexible and difficult for water users and water conservationists to navigate. To address these issues, we believe that performance based management strategies be developed as an approach that will allow water users and regulators the opportunity to manage water resources to the mutual benefit of instream and out of stream uses. We find that the Columbia River Water Resources Management Program and this Draft VRA are both headed in a direction that could help to address the larger-scale water management challenges. Further we believe that RCW 90.90.030 and the Department, by seeking voluntary agreements for the purposes of providing new water for out-of-stream use, streamlining the application process, and protecting instream flow is a substantive step forward so long as the program is performance based and consistent with the WRIA 32 Watershed Plan. However, we also have concerns that tributary systems such as the Walla Walla watershed streams may be called upon for provision of water for mainstem irrigators at the level needed to fulfill VRAs such as this.

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Therefore, we have the following comments for your consideration during the consultation period and welcome additional consultation on these comments:

1. Identifying conservation programs and to work with basin implementers to identify projects that could be funded with revenue under the VRA must not be solely the responsibility of DOE and the CSRIA but also include Watershed Planning Units and Salmon Recovery Boards.
2. For implementation of any future conservation projects in or affecting WRIA 32 such as water transfers, water trust transactions, etc., the Watershed Planning Unit strongly urges that DOE and the CSRIA likewise consider the recommendations embodied in our locally developed plans. Any such projects will be evaluated against the instream flow recommendations and pending rule set forth in the WRIA 32 Watershed Plan and incorporated by reference in the Snake River Salmon Recovery Plan.
3. The WRIA 32 Watershed Planning Unit will continue to engage in the Columbia River Water Management Program decision-making process with representatives attending meetings of the Ecology / Eastern Washington County Commissioners forum and the Ecology Policy Advisory Group to follow the progress of this CSRIA VRA and any future proposed VRA's.

We thank you for your consideration of these comments and we welcome additional consultation with Ecology staff at upcoming meetings of the WRIA 32 Watershed Planning Unit. We have tentatively identified January 22, 2007 as the next meeting date, with additional meeting information available at the Walla Walla County Watershed Planning website online at <http://www.wallawallawatershed.org/calendar.html>. Please contact Walla Walla County Watershed Planning Director Cathy Schaeffer at 509.524.2648 or by email at cschaeffer@co.walla-walla.wa.us. Thank you.

Sincerely,

WRIA 32 WALLA WALLA WATERSHED PLANNING UNIT

Cathy Schaeffer
on behalf of

Eric Myers, Co-Chair
WRIA 32 Planning Unit

Hal Thomas, Co-Chair
WRIA 32 Planning Unit

cc: Snake River Salmon Recovery Board