

Columbia-Snake River Irrigators Association Policy Memorandum

DATE: November 8, 2006

TO: Mr. Gerry O'Keefe, Columbia River Water Management Coordinator
Mr. Derek Sandison, WADOE Central Regional Office Manager

FROM: Darryll Olsen, Ph.D., CSRIA Board Rep.

SUBJECT: Summary Comments on the Proposed Voluntary Regional Agreement (VRA) Under the Columbia River Water Management Programmatic EIS; and Water Supply and Demand Inventories Review.

Although not a direct commenting agency under the formal consultation process for the Columbia-Snake River Irrigators Association (CSRIA) and WADOE Voluntary Regional Agreement (VRA)—for the development of new water rights under the Columbia River Water Management Program—the CSRIA does provide WADOE with the following summary comments for consideration relative to the Programmatic EIS, and the related water conservation and demand (inventories) reviews.

The CSRIA anticipates comment discussion and review with WADOE at the November 8th briefing/comment meeting, as well as more technical discussions surrounding the implementation of the VRA, and its relationship to conservation and water management projects.

In Summary:

The CSRIA supports the proposal/proposed action for implementing the Columbia River Water Management Program and the early implementation actions, including the Ecology-CSRIA Voluntary Regional Agreement (VRA), a Lake Roosevelt drawdown (re-regulation), and a supplemental feed route for the Potholes Reservoir.

As co-developer of the proposed Voluntary Regional Agreement (VRA), the CSRIA firmly supports an immediate implementation of the CSRIA-Ecology VRA.

The VRA is an important implementation action that fulfills a dominant piece of the 2006 Columbia River Water Management legislation. The Columbia River legislation directs the state and water users to embrace collaboratively new water efficiency and management approaches, and to protect current water rights and secure new supplies for our communities.

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WADOE should move expediently forward with the consultation process for the VRA, and it should be signed by CSRIA and Ecology, as soon as statutory and procedural time lines allow. Under the VRA, some new water rights should be issued by July 2007. As we proceed with VRA implementation, the CSRIA has some specific recommendations for water right processing, requiring more elaborate discussion in the months ahead.

30-2 The Programmatic EIS does offer a satisfactory level of information to assess adequately the significant or non-significant impacts affecting the proposed actions. The technical information within the EIS is adequate to complete the consultation process and to proceed with the VRA. We also note that each new water right is subject to site-specific SEPA review, and this full and complete environmental review.

As we proceed, the CSRIA requests an ability to review jointly with WADOE the consultation comments received and to make collaborative modifications, if needed, to the final VRA.

Under the new Columbia River Water Management legislation, the CSRIA supports state authorization and funding for projects like the new Kennewick Irrigation District (KID) water right (and others), that can be implemented immediately via the VRA process, and convey significant economic-environmental benefits.

The proposed KID water right permit should be authorized; and its associated water transfer infrastructure, appears to be eligible for funding under Section 7(2) of the 2006 Columbia River Water Management legislation—encouraging projects for water exchanges in the Yakima River.

30-3 Further this permit, and its associated benefits, is consistent with the flow regime objectives stated under the Yakima River Basin formation plan process, to meet Yakima River target flows.

The CSRIA will work to identify other water rights that can be moved forward rapidly under the new VRA approach. We include within these candidate water rights opportunities to consolidate multiple rights, and to use existing water rights for water spreading under RCW 90.03.380, with the issuance of new superseding permits/certificates conditioned under the new VRA and Columbia River water right legislation.

30-4 The CSRIA supports the proposed action for implementing a Lake Roosevelt drawdown (re-regulation); but there needs to be better assurances that this is a realistic, near-term option, and the support and "mitigation conditions" for this option should be more transparent. The CSRIA perceives this option as providing drought permits for existing interruptible water rights, as well as new water rights for the Wells Pool management zone.

For legislators and the principal economic stakeholders, the CSRIA suggests that WADOE make clear the real status of this option relative to federal agency consent (BPA and USBR) and the willingness of key parties (Tribes, County governments, irrigation districts, utilities, and others) to support this option. Our discussions with federal agency officials suggest that they view the proposed operation as minor within their current operating regimes—not recognizable under physical operation conditions, but capable of scenario impacts within spreadsheet analyses. The perspectives, and demands, of others are far less clear.

30-4 Specifically, if the Tribes, or others, seek funds to “mitigate” for reservoir operations, then this funding request should be made transparent by the WADOE. It appears to CSRIA that this issue is a “give me money” issue (a buy-out for cooperation). Are current Columbia River Account funding levels adequate to “mitigate” the Tribal/other demands, or is it necessary to request additional funds from the legislature in 2007? The legislature should be informed of this buy-out situation.

The CSRIA does support the state’s objectives for the Lake Roosevelt drawdown, and would further seek to explore use of such water for new, long-term water rights accessible from the Wells Pool area; as well as for the state’s stated purpose to use a portion of the water for a new Quad-Cities water right, partial relief for the Odessa Sub-Area, and drought permits for existing mainstem interruptible water rights.

In the programmatic EIS, the CSRIA believes it is appropriate that the observations and recommendations of the National Academy of Sciences (NAS) report are not overstated, as the report contains serious gaps in adequately evaluating available empirical data/studies pertinent to impacts related to new Columbia River water right withdrawals.

The Programmatic EIS includes limited information regarding the efficacy of the NAS study; and prudently, the EIS authors do not attempt to overstate the study’s findings and conclusions relative to the state’s actions under a new Columbia River Water Management Program.

30-5 To the extent that the state is able to provide expeditiously new water supplies to the key economic stakeholders, the need is rendered moot to re-address the gross technical deficiencies, qualitative speculation, and deliberate misinterpretation surrounding the NAS study—and particularly its relevance to empirical data supporting real-world water management.

The above comment aside, it appears unlikely that the state will be able to sustain over time any water resources management program that turns a blind eye toward the fundamental empirical data, that does not lend support toward that program. As the direct and indirect economic costs of sustaining the program increase, so too will increase the need to empirically justify the program’s existence.

Although identified by pending applications, water demand for developing agricultural irrigation is neither well “acknowledged” (appreciated) within the programmatic EIS, nor within the related water demand forecast review. Nevertheless, the CSRIA perceives that the coverage of the irrigated agriculture economic impacts within the programmatic EIS is more realistically served by the University of Washington (UW) review—as it better relates to incremental additions of irrigated acreage—than the obligatory references to the American Rivers-funded commentary.

The real-world conditions of Columbia River agriculture—and within our irrigation service area—do not conform to that suggested by American Rivers; nor does some of the demand forecast work “express well” current market conditions for irrigated agriculture along the mainstem Snake-Columbia River.

The American Rivers commentary—as well as some aspects of the WSU forecast review—exhibits several key problems/issues, summarized as follows:

- The actual amounts of added irrigated acres for new water rights, outside of the Columbia Basin Project area, are relatively small, over time. It is highly questionable whether this acreage would actually affect the global and regional production markets in the manner prescribed by American Rivers. Also, the near-term, conceivable allocations of new surface water for the Columbia Basin Project area will focus on relief of existing groundwater acreage (already in production), not new acreages.
- There will be some shifts in production agricultural from the tributary areas to the mainstem Columbia-Snake River corridors, with or without the allocation of new water rights. To suggest that this shift would be solely due to new water rights is wrong. The corridors account for prime production areas in the state, with significant production optimization potential, and not affected by other types of market, land, and production efficiency impacts.
- The American Rivers review did not consider export markets or multiplier (processing) effects of those markets. Over half of agricultural production in Washington State is exported, included high-value irrigation products.
- The review does not appear to account for increases in population (food demand) over the next 20 years, which will likely expand some demand for products grown in the Pacific Northwest and Columbia River Basin. Particularly high quality products that cannot be matched by foreign producers.
- It is assumed that new water would be put on marginal crops such as wheat, some types of hay, and other low-value crops. The water will be primarily used for high value crops—to assume otherwise is naïve.
- The review failed to acknowledge or address the concept of spreading fixed capital resources (tractors, pump stations, and other equipment) already purchased

over new land brought into production, and that only the variable costs of production on the new lands would increase (pesticides, power for pumps, etc.).

- The review failed to address the fact that new varieties of crops are being grown. This is particularly true in the orchard and vineyard business and the recent, expanding trend in the growth of bio-fuels. The newer variety crops—and crop needs—typically command a higher price in the market, thereby increasing direct net revenues to the agricultural sector.
- To some extent, the review fails to recognize continuing technological changes in irrigation practices that will take place over time and that would potentially off-set the effects of any new water withdrawals from the Columbia mainstem.
- The American Rivers review (and the WSU work) does not match well the developing land, water, and crop production conditions along the Horse Heaven Hills river corridor; the result of changing local, regional, and national market conditions. Actual market conditions suggest a demand for new agricultural products from this area, with stable-to-increasing price conditions.

30-6

Relative to the demand for new irrigated farmland in the Horse Heaven Hills and Eastern Oregon, and within the McNary-John Day Pools area¹, we observe further that:

- The current prices for most irrigated crops that are, and would be, grown in the Columbia River corridor suggest stable to moderately increasing price structures.
- New or previously grown crop types are becoming available for production with the siting of bio-fuels plants in the Boardman, Oregon, and Plymouth, Washington, areas (2007 and 2008 operation starts at announced plants).
- Recent land sales, rentals, and market inquiries for Columbia River irrigated lands suggest higher range values—approximately \$3,500-4,200 per acre; land demand is an indicator of demand for new water rights.
- Requests for new water rights from existing/new land owners in the Columbia-Snake River region, as well as several recent/active water right transfers for water spreading and processing needs, provide further demand indicators for new water rights.

¹ Based on survey data prepared for the Benton County Commission, Washington; personal communications with members of the Columbia-Snake River Irrigators Association (CSRIA); real estate information received from Clark-Jennings and Associates, Pasco, WA; and information received from the Benton County Water Conservancy Board, Kennewick, Washington, and IRZ Consulting; all information received September-October 2006.

Water rights demand should be met on a real-time basis, thus reducing speculation on the need for additional, large-scale water storage or management projects.

The market is dictating, and will dictate in the future, new water demand needs; the WADOE should focus on meeting immediately real-time demand for new water rights, and then re-assess whether demand calls for major supply projects to be actually developed. Failure to meet existing demand needs breeds speculation on large-scale projects; and large-scale project focus distracts from meeting current demand needs. Is this really the water management model WADOE seeks to follow? Is this effective natural resources management?

30-7

If WADOE meets current water right demands, then it will bring more clearly into focus the actual need for long-term water supply projects. Future needs will be best interpreted by present-day actions.

Realistic demand needs suggest marginal increments in new water supply—to meet existing and new water rights—and they can be met through relatively small reservoir supply projects used in combination with new conservation and water management strategies. With these needs met, the “demand” for large scale projects will be reduced.

We suggest that the CSRIA Yakima River Basin Plan Formulation recommendation, to Ecology and the USBR, is indicative of this management approach.

As completed to date, the CSRIA generally finds the water supply inventory prepared by the WADOE to be useful and a good initial benchmark; as the WADOE acknowledges, the agency needs to use this inventory as a baseline for clarification and refined project selection.

30-8

The key focus on water conservation or management projects should be on consumption relative to in-stream flow impacts, where any conservation or water management project is evaluated relative to reducing tributary or mainstem withdrawals during a critical water-year July-August period (per the actual NAS definitions and conclusions); and including a shifting net withdrawals—via water management strategies—away from the July-August period. The environmental objective of water conservation/management under the new Columbia River water management legislation is critical period flow stability or improvement—with reduced water withdrawals tied to specific measures and actions. This principal objective should not be belabored, redefined, or misconstrued.

The CSRIA will be providing WADOE and legislators with additional information on conservation and water management projects relative to continued review of the Conservation District prepared data and other projects recently identified by the irrigation districts and private sector. This will be an on-going process.

30-9

Finally, the CSRIA does recognize the considerable progress that is being made by WADOE to implement the new Columbia River Water Management legislation. We strongly encourage WADOE to retain its current pace for completing action items, with the realistic goal of issuing some new water rights by June 2007. The state needs to deliver tangible, near-term success to water users, or else the fundamental state approach and objectives will be questioned.

Comment Letter No. 30 – Columbia-Snake River Irrigators Association

- 30-1. Your comments in support of the Management Program are noted.
- 30-2. Comment noted. At the time of printing of this Final EIS, Ecology had completed the consultation process required under RCW 90.90.030.
- 30-3. Your support of the Kennewick Irrigation District application is noted.
- 30-4. Comment noted. Ecology will be preparing a Supplemental EIS on the Lake Roosevelt drawdowns that will address some of the issues you raise.
- 30-5. Comment noted.
- 30-6. Comment noted.
- 30-7. Comment noted.
- 30-8. Comment noted.
- 30-9. Comment noted.

Llewellyn Matthews
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November 20 2006

Derek Sandison
 Department of Ecology CRO
 15 W. Yakima Ave. Suite 200
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RE: Columbia River Draft EIS Comments

This letter constitutes the comments of the Northwest Pulp and Paper Association (NWPPA) on the Columbia River Water Management Program Draft programmatic Environmental Impact Statement (EIS).

NWPPA represents pulp and paper manufacturers in Washington Oregon and Idaho. NWPPA has member facilities located on the Columbia River in all three states: Potlatch in Lewiston; Boise at Wallula WA and St Helens OR; Georgia-Pacific at Camas WA and Wauna OR; Weyerhaeuser at Longview WA; and Longview Fibre also in Longview.

Our industry follows the Columbia River Management Program with interest and shares concerns of other river users for maintaining a full and viable use of the river for water resources and transportation while maintaining a healthy environment. We look forward to your evolving progress and realize the EIS is just the first of many steps.

NWPPA has several concerns regarding the EIS discussion of water quality. This section is does not accurately reflect the temperature water quality regime and also does not adequately position the potential temperature impacts for the purposes of broad policy making.

1. Effect of off-channel storage systems on the temperature regime of the Columbia is not addressed by the EIS

Any project alternative evaluating the feasibility of large off-channel storage systems in the Columbia Basin must evaluate the potential impacts of solar

heating on these reservoirs and what warmer waters will mean for the Columbia River. The EIS is curiously silent on this entire topic.

Nevertheless it is well known that the existence of impoundments behind the dams on the Columbia River creates a situation where a greater water surface area is exposed to solar heating and as a consequence dams have the potential to raise the temperature of the river several degrees over the natural system potential. The effect is not only greater warming of the river but there is also a shift in the temperature regime seasonally and this has implications for migrating anadromous fish. The EIS needs to evaluate the impact of additional impoundments on temperature of the river relative to return flows.

2. The EIS mis-characterizes the impact of point sources such as pulp and paper mills on heat loading this should be corrected.

Affected Environment Section 3.4.2 of Chapter 3.0 contains a description of surface water quality relative to temperature issues. The section references the effort by EPA the three Northwest States and Tribes to develop a TMDL report for temperature on the Columbia and Snake Rivers (P 3-24). The EIS then goes on to mis-characterize information in this draft version of this report by stating that

Water temperature can be elevated above natural background conditions by a number of human activities. Point sources such as municipal waste treatment plants or pulp and paper mills discharge thermal energy directly to the river.

It is true that these point sources discharge warm treated effluent; however it is incorrect to imply that this causes a significant impact on water temperatures. The impact is insignificant and while modeling can be performed to a tenth or hundredth of a degree the effects are shown by field studies to be not measurable.

The work performed so far in the draft TMDL report indicates:

The effect of point sources on water temperature is very small and in and of themselves the point sources do not lead to exceedances of water quality standards when averaged in with the total flow of the river (p. 26 of draft report). The point sources can cause temperature plumes in the near-field but they do not result in measurable increases to the cross-sectional average temperature of the main stems. The dams do however alter the cross-sectional average of the mainstem. They increase the cross-section average temperature by as much as 5° C at John Day Dam in late summer and fall and they extend the periods of time during which the water temperature exceeds numeric temperature criteria (p. 28 of draft report).

These facilities cumulatively do not increase water temperature by more than 0.14°C (p. 37 of draft report).

In response to Ecology Industrial Section concerns that pulp and paper verify the preliminary results of the Columbia River temperature TMDL modeling the mills were requested to perform a two-year field study of water temperature upriver and down river of the mills. Parametrix conducted this effort in the summers of 2002 and 2003. Essentially the two-year monitoring study shows that there is virtually no discernable difference in water temperature of the receiving water upstream and downstream of the facilities.

The final report is available through a number of sources. Ecology's Industrial Section has the report on file. Also the information was submitted to Ecology as part of the 303(d) data call for the most recent listing of impaired waters. Conclusions of the report are cited in the interactive tool for the list of impaired waters. Lastly the report is available through NWPPA by request.

In sum the body of work performed to better understand temperature water quality issues for the Columbia indicates that impoundments such as dams contribute significantly to elevated temperatures; however point sources cumulative do not. This further underscore the first point in this letter that is important to evaluate the effects of new proposed impoundments on river temperatures to better inform policy decisions.

Thank you for your consideration of these comments.

Sincerely,

Llewellyn Matthews
Executive Director

11/20/2006 8:19:00 AM

31-3

Comment Letter No. 31 – Northwest Pulp and Paper Association

31-1. Comment noted.

31-2. The effects of new on and off channel storage systems on water temperature in the Columbia River will be assessed on a project specific basis. See the Master Response regarding future review of off-channel reservoirs.

31-3. Information has been added to Section 3.4.2 to clarify the relative contribution of point sources and dams to temperature increases in the mainstem.



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November 20, 2006

To: Dereck Sandison
Department of Ecology
15 West Yakima Ave., Suite 200
Yakima, WA 98902-3452

From: Wesley L. McCart
Stevens County Farm Bureau - President
4979 Lyons Hill Rd
Springdale, WA 99173

Subject: Draft Programmatic EIS for the Columbia River Water Management Program

I, Wesley L. McCart, state the following for the record on behalf of Wesley L. McCart and the Stevens County Farm Bureau:

Stevens County Farm Bureau represents nearly 300 farm, ranch, and small forest landowner families in Stevens, Ferry, and Pend Oreille Counties.

32-1 Under State and local permits, licenses, and approvals, please add consultation with approved WRIA Plans. RCW 90.82 allows for the local input of the citizens in water management. The Department has agreed with these approved plans, and to shared governance concerning issues of these watersheds. It seems prudent that Ecology stands by their commitment and consults with all approved and ongoing WRIA planning processes before proceeding with projects or decisions. Please add this to your lists on pages two and three.

32-2 On page S-5, Section S.3.1.1 Storage Component / Fish, Wildlife, and Plants, please add the positive environmental impacts. Even though it is nice to note all the detrimental aspects of a project, I believe the SEPA process is to allow for all aspects of environmental impacts to be addressed, both positive and negative. There are many positive environmental impacts with regards to storage, such as new habitat and fisheries benefits. The people within the State deserve a well round EIS showing the positive as well as the negative impacts to the environment.

32-3 Many times throughout the draft EIS regarding the early action of drawdown of Lake Roosevelt it is stated that Reclamations proposals are predicated on agreement being reached with the Confederated Tribes of the Colville Reservation. This is only part of the picture. Please correct all of these references. There is a five party agreement between the State of Washington, Bureau of Reclamation, National Park Service, Spokane Tribes, and the Confederated Tribes of Colville for the management of Lake Roosevelt. It is my understanding that any changes in management to Lake Roosevelt must pass through ALL parties within this agreement. It is incorrect to assume that only two parties can form an

32-3 agreement. There is no reference to the National Park Service, and the Spokane Tribes are hardly mentioned. I believe these are important components of a successful process.

32-4 Also, in regards to the drawdown of Lake Roosevelt, consultation with the surrounding Counties should be a must. Recreation and other economic considerations are a huge deal to these counties, and the private owners around and adjacent to the Lake. To disregard these is wrong. It is stated in section 3.12.3.1 that there are no effects due to the loss of recreation. Several citizens at the hearing in Colville in regards to the CRI testified that there are impacts and that these are largely negative and need to be addressed. This has not changed. It is further stated in section 5.1.1.11 that there would be the need to make modifications to the docks, boat ramps, and other structures to accommodate lower lake levels. These have economic and environmental impacts, on the Counties, private citizens who own these facilities, the NPS, and on the people who recreate. Please recognize these impacts and address them. Mitigation concerning these impacts could be made with the County Commissioners of the affected Counties.

32-5 Another concern is section 3.4.2 Surface Water Quality / Nutrients. It is stated that high concentrations of phosphorus from run off of fertilizers is a concern. What are not mentioned are the high concentrations of phosphorus that occur naturally in many areas of the Okanogan Highlands. This information needs to be added to portray an accurate picture. If more information is needed in this regard, please contact the Conservation District of Stevens County for their water quality studies in their area.

I would like to incorporate by reference the oral and written comments of all other Farm Bureau members.

Thank you for allowing me to comment on this matter.

Respectfully submitted,

Wesley L. McCart
Stevens County Farm Bureau - President
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Comment Letter No. 32 – Stevens County Farm Bureau

- 32-1. Ecology acknowledges the importance of coordinating with WRIA managers regarding approved WRIA plans, and will continue to coordinate closely with watershed managers in support of WRIA efforts. There is no formal approval process required, although Ecology will continue to consult with WRIA managers.
- 32-2. Comment noted. Additional information on impacts, both positive and negative, are included in the main body of the EIS, Chapters 4, 5, and 6. Section S is a summary.
- 32-3. See the response to Comment 7-6.
- 32-4. Ecology has determined that additional environmental review of the Lake Roosevelt drawdowns is required and will be preparing a Supplemental EIS. As part of this process, Ecology will coordinate with a wide range of stakeholders, including surrounding jurisdictions, agencies, and individuals. The Final EIS includes additional discussion of impacts to recreation, and the Supplemental EIS will include additional information on impacts to recreational facilities.
- 32-5. The discussion of nutrients was clarified in Section 3.4.2 to include the contribution of nutrients from natural sources.

Wellner, Joanne (ECY)

From: Laura Ackerman/Larry Hampson [simahafarm@ieway.com]
Sent: Monday, November 20, 2006 4:18 PM
To: Sandison, Derek
Subject: PEIS Draft Comments

Nov. 20, 2006

Mr. Sandison,

Please accept these comments into the official record regarding the Columbia River Water Management Program PEIS. We are against more dams in the Columbia Basin. Having spent time at Hawk Creek and Lower Crab Creek on several occasions we know what wild life is there and the damage more dams will do in eastern Washington, especially for the sagebrush- steppe. We desperately need to keep sagebrush-steppe. It's disappearing with development pressures and once dams are built, it will be gone forever. The Columbia Basin has the most species of reptiles, for example, in the state and they are increasingly on the decline due to loss of habitat. Salmon certainly don't need anymore dams. They need free-flowing water. I (Laura) have seen salmon runs so thick in Alaska that you could literally walk across them. That used to be true in Washington, but of course not anymore and dams are the major reason why.

The state needs to take the lead in helping to preserve our natural heritage for future generations. It's not enough to simply rely on private land trust groups to preserve the sagebrush-steppe. Our natural resources belong to everyone, not just the few farmers who would benefit from increased irrigation water. Having grown up in the Columbia Basin, I have seen dozens of times, first hand, the great waste of water the Columbia Basin Federal Irrigation System has produced. I am not anti-farmer, but water conservation just doesn't seem to be a concern to many of them. Sustainability is the only way we are going to have enough water for everyone and wildlife in the future. Dams will just take water away from the rest of the citizens of Washington, including other farmers. It's a cliché, but water is a precious resource that shouldn't be wasted and it is disappearing. These dams just benefit the few and not the many. We don't need water wars in this state. We also don't need to be in the business of subsidizing certain farmers. The VRA is a bad idea, it just subsidizes corporate agriculture. It doesn't take into consideration the public needs and we would get no public benefits.

It's important ecology take the high road, and have adequate public input, look at the science (which doesn't favor dams) and decided that the best course is the one which will benefit the most people.

Sincerely,

Laura Ackerman and Larry Hampson
3118 S. Windsor Rd.
Spokane, WA 99224
509 624-1832
simahafarm@ieway.com

11/27/2006

Comment Letter No. 33 – Ackerman, Laura and Larry Hampson

33-1. Comment noted. See the Master Response regarding Opposition to Dams and Reservoirs.

Sandison, Derek (ECY)

From: calbright@peoplepc.com
It: Sunday, November 19, 2006 12:44 PM
To: Sandison, Derek
Subject: Public Comment--Proposed Sand Hollow Reservoir Site

November 19, 2006

The Proposed Sand Hollow Reservoir Site

34-1 [This area was designed to be productive irrigation land by the Bureau of Reclamation. We object that the land and its purpose be changed for any reason.

Nancy Albright
Albright Farms

11/25/2006

Comment Letter No. 34 – Albright, Nancy

34-1. Comment noted. See the Master Response regarding Future Studies for Off Channel Reservoir Proposals.



Comment Form

Draft Programmatic Environmental Impact Statement (EIS)

Open House

Please provide us with your comments on the Draft Programmatic EIS for The Columbia River Water Management Program. You can complete this form and leave it in the box provided or mail to the address on the back. In addition, you can email your comments to dsan461@ecy.wa.gov.

Comments on the Draft EIS must be received by 5 p.m. November 20, 2006.

35-1

I am very much against the building of dams on any of these four creek tributaries to the Columbia River. The impact on wildlife and people would be devastating. To complete the storage plans formulated when Grand Coulee Dam was built makes no sense.

Lois J. Aldrich

Department of Ecology
Attn: Derek Sandison
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Yakima, Washington 98902

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Follow progress on the EIS at our website <http://www.ecy.wa.gov/programs/wr/cwp/crwmp.html>. Provide your contact information- you will be added to the CRWMP e-mail list and receive automatic updates on the Program.

Name: LOIS J. ALDRICH
Address: 33917 HAWK CREEK RANCH ROAD N.
City, State, Zip: DAVENPORT WA 99122
E-mail: _____

Comments must be received by 5 p.m. November 20, 2006.
Please return this comment form tonight or mail to the address above.

Comment Letter No. 35 – Aldrich, Lois

35-1. Comment noted. See the Master Response regarding Opposition to Dams and Reservoirs.

“Comment on Programmatic Environmental Impact Statement (EIS)”

I have been a long term resident of the Hawk Creek area (almost 33 years) that would be directly impacted if this project were to go forward. Not only did my wife Jan and I raise three sons in this location, we also handcrafted our home and developed 18 acres of land into a small farm, through a continuum of our love, ingenuity, and labor during this period of time. We are located approximately at the 1650 foot elevation level, so according to your projections of water to the 2000 foot elevation, our “home” would lie under 350 feet of water should this project ever be realized.

36-1 I know there are many facts and figures that compute into the logistical analysis around such an endeavor and I am not an expert in regard to any of them. What I do know is that it is a serious undertaking to potentially disrupt the lives and destroy the homes of folks who have labored to create a space on this planet that is dear to them. From the perspective of maps and aerial photos this may seem like a relatively isolated area, but to those who reside here it represents their lives, and in our case at least, it has been the focus of our creative energy. To this regard, I would ask that you maintain this awareness throughout your “feasibility study”.

36-2 In addition, I would like to state that the general impression from our perspective has been that information regarding this project and the meetings that have been scheduled so far have been purposely designed to “fly under the radar” and not invite public participation. The information is very difficult to find on your website and the meetings have been located a substantial distance away during a timeframe that most working folks would have difficulty attending.

36-3 Although I am extremely opposed to this project, I am also realistic in knowing that we are only a small voice in the path of an ever-increasing demand for precious resources. As a result, it is often easier to view the earth through the eyes of how we can manipulate it to meet our demand rather than contemplate alternatives that would both conserve our use and preserve the environment that we are so dependent upon. As decisions such as these can quickly undo the natural habitat that has evolved over a great expanse of time, they should be evaluated in a holistic manner.

Sincerely,

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Comment Letter No. 36 – Bowdish, Barney

- 36-1. Comment noted. Additional environmental review will be conducted on the proposed reservoir sites. See the Master Response regarding Future Studies for Off Channel Reservoir Proposals.
- 36-2. Ecology welcomes public input on the Management Program and has attempted to provide timely information on the process and meetings. There is a link to the Columbia River Water Management Program on Ecology’s home page with extension information on the components of the Program. Meetings were scheduled in four locations in eastern Washington—Moses Lake, Colville, Kennewick, and Wenatchee.

The Columbia River Mainstem Off-Channel Storage Study is considered part of the storage component of the Columbia River Water Management Program and is briefly described in Section 2.1.2.1 of this Programmatic Environmental Impact Statement (EIS). However, this EIS is intended to address the Columbia River Water Management Program (Management Program) as a whole, and is not intended to provide detailed information or analysis regarding potential new storage sites. Such information would be provided in future project-level EISs specifically addressing the storage sites, which would be prepared if the study proceeds beyond an appraisal level of evaluation to a feasibility study.

Ecology chose to conduct four open houses on both the scoping process for the EIS regarding the Management Program and for the public comment process regarding the Draft EIS. There is no requirement in the State Environmental Policy Act (SEPA) or the SEPA Rules for Ecology to hold such open houses, but such events are viewed by Ecology as important vehicles for public outreach regarding the Management Program. The locations of those open houses were selected by the SEPA Responsible Official based primarily two criteria. The first criterion is their proximity to the first projects that are likely to be implemented as part of Management Program, identified in the EIS as “Early Actions.” Those actions are the Supplemental Feed Route Project, Lake Roosevelt Drawdown Project, and the Columbia-Snake River Irrigators Voluntary Regional Agreement. The second criterion was to attempt to provide broad geographic coverage within the Columbia River watershed in Washington State.

Should Congressional authorization be provided to perform a feasibility study on potential storages sites, a National Environmental Policy Act (NEPA) EIS would be prepared and a SEPA EIS would either be prepared jointly with the NEPA document, or subsequent to the completion of the NEPA EIS. As part of the EIS process, it is anticipated that public meetings would be held in locations near any sites under active consideration.

- 36-3. Comment noted.

Sandison, Derek (ECY)

From: mjadireccion@gmail.com on behalf of Paul Bryant [Paul@EveKennedy.com]
sent: Wednesday, November 15, 2006 11:51 AM
To: Sandison, Derek
Subject: Columbia River Draft EIS Comments

Dear Mr. Sandison,

As a resident and farm property owner in Washington state I want to make clear my position on several projects being reviewed by your department.

I am STRONGLY against any addition dams being built to store water along the Columbia river and its tributaries. Our water systems are already severely compromised and I believe additional dams will hurt, not help, the ecosystem already under extreme stress.

I also STRONGLY OPPOSE the construction of additional canals in the Columbia Basin. Current canals are terribly inefficient (eastern Washington is a desert after all) and more wasted water is not a wise idea. As a farm owner I know the terrible effects of our current agricultural policies and adding more heavily subsidized crops to the market will only make life harder, not better for farmers.

It would be far better, both in cost and benefits, to get your department and everyone else to focus and support water conservation and diversified farming. Drip irrigation, dry land farming, and improved tilling methods would save money and the environment, and be more profitable for us farmers as well.

We live in the 21st century, lets stop thinking in ways befitting the last 200 years and think about the next 200 instead.

Thanks you for listening.

Paul Bryant
property owner in Spokane and King county.

37-1

Comment Letter No. 37 – Bryant, Paul

37-1. Comment noted. The Management Program does include a substantial conservation component. See the Master Response regarding Future Studies for Off Channel Reservoir Proposals.

Sandison, Derek (ECY)

From: Bernie Buday [bbbrn@harbornet.com]
Sent: Wednesday, November 15, 2006 3:42 PM
To: Sandison, Derek
Subject: Columbia River Management Program

Attachments: couver letter15.doc; public hearing25.doc



couver letter15.doc
(30 KB)



public hearing25.doc (31 KB)

Please note attachments. We on the west side of the state, also, in some areas, have a shortage of water supplies as called out in water shed and ground water plans. For these identified reasons we need to under go a similar posses as afforded Eastern Washington under RCW 90-90. In addition because there may be some future administrative or other changes occurring in our State's water laws. We should should be part of the on going public hearing process associated with RCW 90-90.

38-1

11/2/06

Western Washington Water Issue. Part I

Within the last several years major changes have occurred in our State's policies concerning water and how we will use it and how much of it can be put to beneficial use.

A number of issues have arisen which have caused this to occur. Primarily these are Indian fishing rights and the associated rights of fisheries to instream flows large enough to sustain their existence. The need to solve the water issues arising between quantities need for fisheries and the amount of water needed for production of food, energy and other beneficial uses have recently brought this to a head in the Columbia River basin.

At the present time, because of the existing water laws of the State, fisheries have the primary right to instream flows. This means that in stream water levels cannot be lowered for irrigation or other activities below a defined amount. The Washington Administrative Codes (WAC 173-510-030) defines the in stream water assessing process and the amounts that are to be maintained.

38-2 To solve this problem the State has acted RCW 90-90, which will provide a methodology and funds for obtaining additional new water supplies for both of these needs. RCW 90-90 was written exclusively for the Columbia River Basin - Water Supply (contained within USA)

The new water is expected to be divided 1/3rd for fisheries and 2/3rds for food or other needs. The new water is expected to be made available through conservation and by capturing excess in stream flows (seasonal excess runoff) and placing them in storage facilities; a water harvesting approach to solving the problem.

For reasons outlined in the attached paper the west side of the State has a need to obtain new harvested water also. This will be for different activities but for the same basic need to put limited water supplies to maximum beneficial use.

The West Side of the State contains 76% of this state's population (2005 DOT data) or 4,824,727 persons.

BB Buday
 Olalla WA.
bbbrn@harbornet.com
 253-857-2978

A Western Washington Water Issue.

11/2/06

From October 15th to November 7th Public hearings were scheduled exclusively in Eastern Washington on an Environmental Impact Statement concerning the recently passed RCW 90-90 legislation. This addresses the need for acquiring additional water supplies to satisfy the growing water needs of the Towns, the production of food and for maintaining fisheries, in the Columbia River basin.

RCW 90-90 identifies the process around which this is to occur. The public hearings are intended to get feed back on the pros and cons of this effort. The hearings will end on the 7th of Nov. 06. Public comment will be taken until the 20th of Nov, 06.

What may be the result of this effort are changes in legislation (RCWs), or changes in the WAC codes or internal administrative water policies, which may impact the West side of the State, good or bad. The west side harbors many urban and semi urban areas which also need water and which must also accommodate fisheries. While we don't grow a lot of food we do have a population which continues to expand and we need water for purposes other than food. We should not be excluded from efforts which will likely provide us with additional water supplies derived from and needed in our urban and semi urban environment and water sheds were applicable.

38-3 The West side of the State has a grate deal of rain fall and it appears that we do not have a shortage of water. This is an elusion. We cannot use the shallow groundwater that is in hydraulic continuity with stream flows, or in stream flows, in quantities that will jeopardize fisheries. This is limiting the amount that is available. As a result we are becoming more and more dependent on ground water contained in aquifers which are well below the stream beds and which are not in direct hydraulic continuity with them. An example of the amount contained in the deep aquifers, located on the Kitsap peninsula, the WRIA 15 water shed, was estimated to be 19% of the rainfall it receives each year. This amounts to 10 inches of rain fall out of an estimate 50 inch average. (In general the deeper aquifers recharge rates are small and will vary from location to location) In addition the amount of water that can be taken from the deep aquifers is farther limited to the aquifer's safe sustaining yield (SSY). This is a quantity that can be safely taken from the aquifer which will not deplete it. For planning purposes, this is estimate to be about 1/3 rd of the aquifer's capacity. In terms of our 10 inches example, this is a little in excess of 3 inches. While we do not exactly have the same sort of water problems the East Side has, there are similarities in that the quantities available for beneficial use are small; as a result we are close to being in the same boat as far as future water needs are concerned. The need to increase water supplies for public benefit and to accommodate fisheries is basically the same, and for that reason we should hold public hearings on this side of the State also.

Contact Derek Sandison, DOE, for information on RCW 90-90 and the on going public comment process @ 1-509-454-7673.

BB Buday
Olalla Wa.
bbbm@harbormet.com
253-857-2978

Comment Letter No. 38 – Buday, Bernie

- 38-1. Comment noted. The Washington Legislature created the Columbia River Water Management Program specifically to address water issues in the Columbia River Basin. Chapter 90.90 RCW applies to the portion of the Columbia River Basin in the state of Washington from the Canadian border to Bonneville Dam. It is intended to address ongoing problems in that area. The Management Program does not apply to other portions of the state. Ecology has other programs, including the Watershed Planning process, to address water issues in other parts of the state.
- 38-2. Comment noted. The public meetings were scheduled in eastern Washington, the area to which the Columbia River Water Management Act applies.
- 38-3. See the response to your comment 38-1 regarding applicability of the Columbia River Management Program to eastern Washington.



November 20, 2006

To: Derek I. Sandison
 Re: EIS for Columbia River Water Management Program
 From: Peter S. Burgoon, PhD., PE

These comments will focus primarily on the Supplemental Feed Routes - Section S2.2.2 and Affected Environment Section 3.4.2 Surface Water Quality.

In general all these comments talk around the premise that additional flows to Moses Lake will have beneficial impacts to the trophic status of Moses Lake. A Washington State Department of Ecology (WA DOE) TMDL phosphorus assessment (Carroll 2006) has highlighted the need for reducing phosphorus loads to Moses Lake. Additional flows will dilute lake concentrations and may have similar net impacts as would actual phosphorus load reductions. Consideration and selection of feed routes and time of delivery to the Potholes Reservoir should be required to provide maximum benefit to the trophic status of Moses Lake.

Comment: A Rocky Ford Feed Route should be evaluated. If it is not considered an alternative to Crab Creek it should be included as part of the Crab Creek Alternative.

Reasons are:

1. A significant portion of the flow for the Crab Creek Alternative will flow into Rocky Ford Creek. This has already appears to be occurring during early action flow tests.
2. An earthen dike of unknown structural integrity located in Adrian, Washington could be removed and the flow would go toward Rocky Ford instead of Crab Creek.
3. The route from Adrian to Rocky Ford Creek is underlain by highly permeable sand and gravel and may provide a subsurface transport route to Rocky Ford. This would reduce water loss by evaporation and erosion of unstable channels.
4. Rocky Ford 90th percentile flow is 94 cfs (WA DOE - Carroll 2006). Supplemental flow may significantly reduce the elevated concentrations of phosphorus in groundwater that enters Rocky Ford Creek. Carroll (2006) reported a mean TP of 103 ug/L from Rocky Ford Source Springs. Dilution of Rocky Ford Spring flow may improve the trophic status of Moses Lake.
5. Dilution is currently used to reduce phosphorus concentrations and improve the trophic status of Moses Lake. This dilution water enters the lake from Rocky Coulee on Crab Creek.
6. Moses Lake is on the 303(d) list for phosphorus and a TMDL assessment has been completed (Carroll 2006). This TMDL assessment should be referenced and discussed in the EIS.
7. If additional dilution water entered Rocky Ford Creek the trophic status of the main arm of Moses Lake (that is fed by Rocky Ford Creek) may improve.

Comments regarding Section 3.4.2.2 Supplemental Feed Route -- Water Quantity

8. A significant portion of the flow for the Crab Creek Alternative will flow into Rocky Ford Creek.
9. Potential impacts to flows in Rocky Ford Creek may need to be discussed or evaluated.
10. The route from Adrian, Washington to Rocky Ford Creek is underlain by highly permeable sand and gravel and may provide a subsurface transport route to Rocky Ford.
11. A real time flow station should be installed on Rocky Ford Creek to record flows and changes in Rocky Ford Creek.

103 Palouse Street, Suite 2
 Wenatchee, Washington 98801
 509-663-1303 Fax: 509-663-9449

Comment Letter No. 39 – Burgoon, Peter

- 39-1. Comment noted. Reclamation is performing the evaluation of the Supplemental Feed Routes and the routes you suggest were not selected for study

- 39-2. The potential impacts to Rocky Ford Creek from the Crab Creek Alternative are discussed in Section 5.2.1.3 and 5.2.1.4. Those sections address the water that would flow from Crab Creek to Rocky Ford Creek, the impacts to flows in Rocky Ford Creek from the Crab Creek Alternative, and the highly permeable sand and gravel near Adrian that could provide a subsurface transport route from Crab Creek to Rocky Ford Creek. Reclamation will determine if it is appropriate to install a real time flow station on Rocky Ford Creek if that route is selected.

Wellner, Joanne (ECY)

From: WMDaehlin@aol.com
Sent: Wednesday, November 15, 2006 11:13 AM
To: Sandison, Derek
Subject: Columbia River dams

40-1

My husband and I wish to convey our strong opposition to any further dams on the Columbia River, which would mean the destruction of thousands of acres of prime wildlife habitat.

Wanda Daehlin
1608 S Ash St
Spokane, WA 99203
509.922.0212

11/27/2006

Comment Letter No. 40 – Daehlin, Wanda

40-1. Comment noted. See the Master Response regarding Opposition to Dams and Reservoirs.

Mr. Derek Sandison
Department of Ecology
15 W. Yakima Av, Ste 200
Yakima, WA. 98902-3452

Columbia River Water Management Program

A key concept being omitted with this proposal has to do with public investments needing public benefits, not state subsidies noted thru the VRA process.

41-1 Thank-you for the opportunity to comment on the PEIS. Most of my outdoor experience within Eastern Washington has been related to canoeing with friends and some excursions with the Spokane Canoe and Kayak Club. Overall, it appears that public funding will benefit private corporate agricultural entities, without considerable consideration to degradation of fish, already threatened with extinction due to existing dams. Even if the Columbia Plateau water supply were siphoned from Hawk Creek, Foster Creek, Sand Hollow Creek, and Lower Crab Creek, water supplies after damming could not meet ever growing demands for irrigation. Other creative options and technologies need further exploration.

41-2 I'm concerned that impacts in the PEIS do not reflect unintended year round consequences. With expanding the Columbia Basin Project eastward existing funded conservation projects will be negatively impacted from sustained increase in water temperatures and sediment accumulation. Proposed mitigations do not come close to matching negative year round impacts projected.

41-3 Do not issue uninterruptible new water rights for advancement of irrigation, while promoting degradation to fish habitat and decreasing water flows necessary.

41-4 Please reevaluate the proposed policy to see the Columbia-Snake River irrigators, Yakima Basin, and Odessa Subarea demands for more dam building are excessive. Year round mitigations that are overlooked, without sustaining habitat and wildlife ecosystems attributable to dam building suggest public policy readdress the proposal for another dam. Key issues for sustainable alternatives that balance public needs should be further considered.

Thanks, *Julie Dalsano*
Julie Dalsano
P.O. Box 5053
Coeur d'Alene, ID 83814

Comment Letter No. 41 – Dalsaso, Julie

41-1. Comment noted.

41-2. The projects that you mention will undergo additional environmental review. See the Master Response regarding Future Studies for Off Channel Reservoir Proposals. Expanding the Columbia Basin Project eastward is not a part of the Management Program and will undergo separate environmental review by Reclamation and Ecology. See Section 2.1.2.1 and Section S.4 of the EIS.

41-3. Comment noted.

41-4. Comment noted. See the response to your Comment 41-2 regarding additional environmental review.

Ann Root

From: Wellner, Joanne (ECY) [JWEL461@ECY.WA.GOV]
Sent: Tuesday, December 05, 2006 12:34 PM
To: Ann Root
Subject: Susan Droz: Columbia Water Plan

Joanne R. Wellner, Dept. of Ecology-CRO
15 W. Yakima Avenue, Suite 200
509/575-2680 509/575-2809 fax
jwel461@ecy.wa.gov

From: Susan Droz [mailto:sdroz@verizon.net]
Sent: Thursday, October 12, 2006 10:49 AM
To: Sandison, Derek
Cc: Paul F. Marker
Subject: Columbia Water Plan

October 12, 2006

To: The Department of Ecology
Attn: Derek Sandison

In regards to the Columbia River water management shed, I would like to express my disappointment in eliminating the Palisades Moses Coulee area for a reservoir.

The terrain seems so appropriate to accommodate a massive water supply that would have the potential to benefit the entire state in many ways, such as:

- * a water supply for increased farm land
- * the potential for a magnificent recreational area, which we need more of, due to the increased population growth. Our existing recreational areas are beginning to become overcrowded
- * a contribution to salmon recovery with the possibility of restoring salmon behind Grand Coulee Dam into Lake Roosevelt
- * creating good paying jobs that would come with the construction and maintenance of the project

Yes, it would be very expensive but when you look at all of the benefits it would serve, it would be worth it. With global warming a reality, we need to conserve our natural resources as much as possible at any expense.

Why specifically, was the Palisades Moses Coulee area eliminated from consideration?

Thank you for your consideration of my views on this matter.

Sincerely,

12/5/2006

Paul Marker
711-14th NE
East Wenatchee, WA 98802
509-884-6763

You may reply to this e-mail sent on my behalf by sdroz@verizon.net

12/5/2006

Comment Letter No. 42 – Droz, Susan

42-1. The off-channel storage proposals are being evaluated under a separate process from the Management Program. See the Master Response regarding Future Studies for Off Channel Reservoir Proposals. The Moses Coulee site was eliminated from further consideration because it did not meet the review criteria for feasibility.

Jason Duba
 Faith & Enviro. Network
 2612 W. Gardner
 Spokane WA 99201 (509) 325-3071
jasonduba@gmail.com

I am writing to you as a Christian young man who feels strongly about the need for sound conservation policy. I am concerned about some plans for use of the Columbia River.

I urge you not to build new dams at Foster Creek in Douglas County Sand Hollow and Lower Crab Creek in Grant County and especially Hawk Creek in Lincoln County.

I am concerned that construction of these dams would lead to the loss of thousands of acres of prime wetlands and shrub-steppe habitat. These habitats are critical for several endangered species including the pigmy rabbit sage grouse and spotted leopard frog.

I am also concerned about claims that water stored behind these dams would be available for salmon augmentation flows and would ultimately help in salmon recovery efforts. However water stored in these reservoirs could actually cause more problems with high water temperatures and sedimentation issues due to constant filling and emptying of the reservoirs.

I am concerned that water stored through the construction of these dams would be allocated on a 1/3 to 2/3 basis. Only 1/3 of stored water would be made available for salmon recovery efforts. The remaining 2/3 would be used for out-of-stream uses such as industrial development community water supply agriculture irrigation and changing interruptible water rights to uninterruptible water rights. I think this could lead to problems in dry years and for downstream users.

Additionally expanding the scope of the Columbia Basin Irrigation Project poses some problems. Instead of additional canal construction and water diversion please focus on conversion of irrigated crops to dryland farming. Please work on strict water conservation programs. Currently canals within the Columbia Basin are unlined and uncovered. This results in water being lost to evaporation and seepage of water into the ground. If these canals were lined and covered around 90% of the water would reach its intended destination. Currently only 40% to 60% reaches its destination. Another conservation strategy would be to move from flood irrigation to drip irrigation.

Finally I would like to caution against further draw downs on Lake Roosevelt. An additional 2 foot draw down could expose heavy metal laden sediment to people that recreate on the lake. This draw down would also expose the sediment to

winds that could pick up the heavy metal laden sediment and deposit it in other locations. Another major problem would be the exposure of cultural sites along the banks of Lake Roosevelt which are currently flooded to looters.

Additional water withdrawals from the Columbia River CANNOT CONTINUE. Water from the Columbia River has already been over allocated. Hydroelectric power production irrigation industry and communities all take water from the Columbia River. If additional water is taken from the river there will be continued degradation to the river.

If the current pending water rights are granted through this program it is very possible that we will be in the same situation further down the road. There will always be a demand for water from the Columbia River and dam construction is not the way to supply that demand. We must move towards a sustainable economy that doesn't rely on Columbia River water for all of our water demands.

11/19/2006 1:04:00 PM

Comment Letter No. 43 – Duba, Jason

- 43-1. Comment noted. The off-channel reservoir sites are being evaluated under a separate process from the Management Program. See the Master Response regarding Future Studies for Off Channel Reservoir Proposals.
- 43-2. See the response to your Comment 43-1.
- 43-3. The one-third/two-third allocation would apply to the portion of water resulting from state funding of a storage project (RCW 90.90.010). The allocation was established by the legislation.
- 43-4. See the response to Comment 41-2.
- 43-5. Ecology has determined that additional review of the Lake Roosevelt drawdowns is required and will be preparing a Supplemental EIS. The Supplemental EIS will consider contaminated sediments and exposure of cultural sites. The exposure of archaeological sites along the shore of Lake Roosevelt is addressed in Section 5.1.1.9 of the Final EIS.
- 43-6. Comment noted.
- 43-7. Comment noted.

Frans Eykel
N/A
199 Ostervold Road
Cathlamet WA 98612 (360) 849-4254
franseykel@juno.com

Dear Derek

As you are probably aware of several proposed Liquefied Natural Gas (LNG) facilities on the Lower Columbia River Estuary with the Bradwood OR facility leading the application process may I hereby submit my concerns related to water conservation management.

These facilities when under construction or in operation will use a tremendous amount of water and will effect the water quality of the estuary. Following are amounts of water use from the NorthernStar EIS draft reports;

Ship ballast water 14mg/ship X 125 ships/yr = 1 750mg

Ship cooling water (18hrs at dockside) 1 800mg

Fire Suppression 4400gpmX60minutesXweekly = 13.7mg

Wellwater during construction (3years) 13.4mg

Hydrostatic testing of storage tanks 60.0mg

Wellwater for irrigation/sanitation 1.0mg

They also will add 84.0mg of treated vaporizers condensation water which has 10X the salinity of the water at this location. (0.04)

I have voiced my concern also in a letter to Brian Baird our US senators and our Governor.

Thank you for the opportunity to voice my concerns.

Frans Eykel

10/10/2006 11:46:00 AM

44-1

Comment Letter No. 44 – Eykel, Frans

44-1. The liquefied natural gas facility in Bradwood, Oregon is outside the scope of the Management program. The facility is being evaluated separately by the Federal Energy Regulatory Commission and the state of Oregon.



Comment Form

Draft Programmatic Environmental Impact Statement (EIS)

@ Colville WA Open House

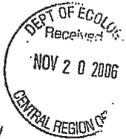
Please provide us with your comments on the Draft Programmatic EIS for The Columbia River Water Management Program. You can complete this form and leave it in the box provided or mail to the address on the back. In addition, you can email your comments to dsan461@ecy.wa.gov.

Comments on the Draft EIS must be received by 5 p.m. November 20, 2006.

See letter. Building these storage dams will not solve your problem. Sometimes we need to say no to progress - get to basics. We don't need more housing in an area that can't support it. Why don't we look at nuclear which would reduce the need for hydro power - may ↑ the water that could be used ~~for~~ different use. There are too many projects that continue to encroach on habitat. We need to figure out something else. Why should we build these when pretty much only private citizens will benefit - Not the whole society. LET'S work together to figure out something else.

I own property in Indian Creek.

Sincerely,
 Yvonne Eyles
 10411 E 24th Ave
 Spokane VLY, WA
 99206



Stopping the Dams ...

I received the Spokesman Review paper on October 2, 2006 and read with a sickening feeling in my stomach about the proposed dams being considered on Hawk Creek, Foster Creek, Sand Hollow and Crab Creek. I contacted the author of the article, James Hagengruber, and he sent me the email address where all of the information can be found. From that email address, there are links to other pieces of information. The email address is http://www.ecy.wa.gov/programs/wr/cwp/crwp_info.html (between "crwmp" and "info" are 2 underscores). There are documents of many pages and like all government agencies, you will be awash in information that you need to plow through.

As best as I can tell, House Bill 2860 which was sponsored by Representatives Grant, Newhouse, Hankins, Hafer, Walsh and McCune and was proposed to figure out a water management plan of the Columbia River Basin "to meet the economic and community development needs of people and the instream flow of fish". In early 2006, Governor Gregoire signed the bill into law. With this came an aggressive program to figure out how best to meet the water needs for irrigation, fish and development through new "dams" and conservation. This legislation does not require building new "dams" i.e. storage facilities but it is part of the plan.

45-2 From this web site, I found out there were 4 public meetings being conducted. The open houses will be held from 4 to 7 p.m. at these locations:
 Oct. 24 - Moses Lake: Big Bend Community College, Advanced Technologies Education Center (ATEC), 7662 Chanute Street N.E.
 Oct. 25 - Colville: Agricultural Trade Center, 317 W. Astor
 Nov. 1 - Kennewick: Three Rivers Convention Center, Meeting Rooms E & F, 7016 W. Grandridge Blvd.
 Nov. 7 - Wenatchee: Wenatchee Convention Center (The Coast Wenatchee Center Hotel), Fuji Room, 201 N. Wenatchee Ave.

Since the proposal of the dam in Hawk Creek affected my father, Wayne Geissler who lives in Indian Creek and the rest of my family, my husband and I decided to attend the meeting in Colville. On the way up to Colville from Spokane, we chatted back and forth as to why the meeting was in Colville and not in Davenport or Odessa, etc.

When we came to the meeting, it was an informal affair with different stations with information about the water and the ideas they had come up with. Our first encounter was with Brian Watkins who is with the Lands Council in Spokane and we told him right away we are against all 4 dams being proposed. We thought he was part of the group of people who set up this meeting but he was not. We told him we were going to fight this. He said the Lands Council was aware of the proposals and already were planning to become involved to stop them. He also mentioned there were other groups that did not want the dams built. There were only about 8-10 people that attended the meeting when we left at 6 p.m.

45-3 I asked many questions to the people who put on the meeting... such as "why the meeting here in Colville?". Tim Hill, who is with the department of Ecology, could not answer that. I asked why there was not any notice in the Davenport Times, Odessa Record, etc. He did not have an answer for that either. They also did not put any notice of the meetings in the Spokesman Review. They did put notices in the Yakima, Wenatchee and the Colville papers none of which reached all of the people that could be impacted. We explained to Tim Hill that the perception is reality and we were very concerned that the people impacted by these dam proposals were not being given sufficient notice to attend the meetings. Our trust in government agencies is not running very high these days.

45-4 As of now there are 450 pending water right applications that have not been approved. I understand we need water, need to help the salmon and need irrigation. I understand we need some development but maybe an answer to some of the development is NO. If there is not enough water to support your development, maybe it should not be built. After all, Eastern Washington is a desert.

45-5

What I don't understand is why they want to cover acres of wild life habitat and peoples houses to gain what they need? There are other sources of renewable energy, which needs to be considered. This would generate energy that would not have to be from hydropower. This would take away the demand for hydropower and would enable water to be there for the fish if this is 33% of their concern as they stated. (I do have some suggestions for the salmon recovery). To build storage dams, taking water from the river and using it to generate electricity...which was not mention in the press releases...yes, generate electricity and to build another dam to correct the problems created by building a dam in the first place doesn't seem to me to be the best solution. I also understand dams serve many purposes.

45-6

I was told there were about 60 people at the 1st meeting and one person with the Ecology group told us that Odessa people were against the dam. I do not know if this is accurate or not and would like to hear from anyone who attended that 1st meeting.

45-7

I am against all 4 dams being put in. There were storage plans made when they build Grand Coulee that have not been completed. The plans are already in place if this is what they decide to do. My husband and I are going to continue to fight this. Our lands will be taken by eminent domain and paid "fair market price" determine by the government. There will not be any "lake front property as the water behind the dam at Hawk Creek will ebb and flow...It will be drawn down in the summer time....Prqbably will only have 100 to 200 feet behind the dam in summer and be filled in the spring. In the dry years there may be little water behind this storage dam.

In my opinion, we as a community, have a lot to lose if this dam is built...whether it is here or anywhere else. We need to get the message to the people who are in place to make a decision regarding this. There is form you can fill out and state your opinion about these proposed dams or the entire Programmatic Environmental Impact Statement for the Columbia River Water Management Program. You can obtain a form on-line at the email address above or from Jan Bowdish in Davenport @509.725.6731 or I can fax or email you a copy. Call me...509.990.8759 & leave a message or email me yeyler@comcast.net. OR you can write directly to Department of Ecology; Attn: Derek Sandison; 15 West Yakima Avenue, Suite 200; Yakima WA 98902 and note this is for "Comment on Programmatic Environmental Impact Statement (EIS)". This needs to be sent by November 20th, 2006. As always, you can write your legislator regarding your opinion about this.

I will continue to write articles on this subject as long as it is a threat to our way of life and plans for our future. Yvonne Eyler

Comment Letter No. 45 – Eyler, Yvonne (Letter)

45-1. Comment noted. See the Master Responses regarding Future Studies for Off Channel Reservoir Proposals and Opposition to Dams and Reservoirs.

45-2. Comment noted.

45-3. See the response to Comment 36-2 regarding meeting locations.

45-4. Comment noted.

45-5. See the response to your Comment 45-1.

45-6. There were approximately 60 people in attendance at the Moses Lake meeting.

45-7. Comment noted.