



February 16, 2010

The Honorable Christine Gregoire  
Office of the Governor  
P.O. Box 40002  
Olympia, WA 98504-0002

Dear Governor Gregoire,

Our organizations are writing you to express our opposition to the “Conservation Operation and Maintenance (O&M)” proposal from the Columbia-Snake River Irrigators Association (CSRIA). While we strongly support agricultural conservation and efficiency, we cannot support a proposal like this one that would result in reduced flows in the Columbia and Snake rivers.

As you know, and as documented in a 2004 report by the National Academy of Sciences, flows in the Columbia and Snake are regularly below the flow targets laid out in the Federal Columbia River Power System Biological Opinion in both spring and summer. In dry/low snowpack years, as 2010 is shaping up to be, this problem is especially acute. It would not be surprising this year if flow targets are met only for a few weeks at the very beginning of the salmon migration season in March and early April. Meeting these flow targets is essential if we are to protect 13 salmon and steelhead stocks listed under the Endangered Species Act. The current federal salmon management strategy, which seeks to avoid making significant changes to the operation and configuration of the federal hydrosystem, relies in large measure on achieving flow targets to meet its biological objectives. (Higher flows help mitigate for the effects of the dams and reservoirs.)

The principal problem with the CSRIA proposal is that it would allow water that has not been used for years – in some cases since the 1980s – to be pumped from the Columbia and Snake and applied to new irrigated acreage.<sup>1</sup> This would reduce flows during the irrigation season, which is also when target fish flows are often already missed by significant amounts.

It makes more sense to pursue a policy that encourages future O&M conservation. This was the intent of a “Draft Conservation Program” proposed by Department of

---

<sup>1</sup> The O&M conservation that has taken place to date has been implemented because it reduces pumping and fertilizer costs for farmers – it was not generally undertaken based on the assumption that the saved water would be spread to new land, or for the benefit of the river ecosystem.

Ecology staff and discussed at the Columbia Water Program Policy Advisory Group (PAG) meeting last November. While even the Ecology proposal may reduce return flows to the Columbia and Snake at certain times of the year, it proposes to mitigate for this by connecting the amount of prospective mainstem O&M conservation water allowed for spreading to the amount of water protected through separate, state-funded projects to enhance flows in water-short Columbia and Snake river tributaries. Questions remain about how to ensure that the Ecology proposal does not create a "slippery slope" that trades mainstem river health for tributary benefits. Nonetheless, the Ecology proposal represents the kind of creative thinking that we believe can lead to a policy that meets the goals of all the stakeholders on the PAG and benefits our state's economy and ecological health. The same clearly cannot be said for the CSRIA proposal.

We have other concerns about the CSRIA proposal as well. Any policy or legislation that provides a new policy basis or funding for water spreading must be accompanied by a strategy to protect eastern Washington's threatened shrub steppe habitat, and mitigate for shrub steppe that would otherwise remain intact. No such protection and mitigation policy has been developed or proposed by CSRIA. Further, water spreading was not a goal of the Columbia River program; the goal was to meet the well-documented needs of interruptible irrigators, Odessa groundwater irrigators, existing applicants for water rights (including municipalities and industries), and improve river flows for salmon, steelhead and the struggling fishing communities that depend on them. Agricultural water conservation can and must play a key role in meeting these goals, but spreading conserved water to new land rather than leaving it in the river or using it to address more pressing needs makes little sense from an economic or sound water management perspective. Policy makers should ensure that any economic gains from water spreading do not come at the expense of other farmers and communities in eastern Washington or the commercial or recreational fishing industries.

Thank you for your consideration of our comments, and we look forward to working with you, Ecology, and all the members of the Columbia PAG to formulate smart water conservation policies that meet the needs of Washington's communities and economy, and that help carry out the vision and purpose of the 2006 Columbia River legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Garrity". The signature is stylized and written in cursive.

Michael Garrity  
Washington Conservation Director  
American Rivers

\s\  
Lisa Pelly  
Director, Washington Water Project  
Trout Unlimited

\s\  
Mo McBroom  
Policy Director  
Washington Environmental Council

Cc: Jay Manning  
Ted Sturdevant  
Derek Sandison  
Sen. Lisa Brown  
Sen. Phil Rockefeller  
Sen. Craig Pridemore  
Rep. Frank Chopp  
Rep. Brian Blake  
Rep. Timm Ormsby