



**Klickitat County**  
WASHINGTON



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# Scoping Responsiveness Summary Report

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## Switzler Reservoir Project

### Co-Leads for State Environmental Policy Act (SEPA) Review:

Office of Columbia River  
Washington State Department of Ecology  
Union Gap, Washington

Klickitat County  
Goldendale, Washington

Benton County  
Prosser, Washington

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<https://www.klickitatcounty.org/1045/Switzler-Reservoir-Water-Storage-Project>

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## Project Summary

Washington State Department of Ecology (Ecology) Office of the Columbia River (OCR) has Lead Agency responsibilities, in coordination with co-leads Klickitat County and Benton County under the State Environmental Policy Act (SEPA, Chapter 43.21C Revised Code of Washington (RCW)) to conduct environmental review for design, construction, permitting, operations, and mitigation associated with the proposed Switzler Reservoir Water Storage Project. The project is located within the Horse Heaven Hills area (Horse Heaven) and will provide a new surface water supply that could mitigate for interruptible water rights during drought years, mitigate for new water rights, and improve instream flows.

The proposed new off-channel storage reservoir would have a maximum storage capacity of 44,000 acre-feet impounded by a concrete-faced rockfill dam located approximately 1.1 miles upstream of the confluence of Switzler Canyon and the Columbia River. Water would be diverted from the Columbia River mainstem during periods when water is available (when Chapter 173-563 Washington Administrative Code (WAC) regulatory instream flow minimums are met), stored in the reservoir, and released back to the Columbia River. Released water could mitigate for diversions from the McNary Pool, John Day Pool, or any downstream reach of the mainstem.

The proposed Switzler Reservoir Water Storage Project is the result of watershed planning and various evaluations of options for new surface water storage and mitigated water supply to meet existing and new water demands within Water Resource Inventory Area 31 (WRIA 31). WRIA 31—the Rock-Glade Watershed—encompasses portions of Benton, Klickitat, and Yakima counties in southeast Washington. The proposed project is located within WRIA 31 and is the agricultural and economic center of the watershed. The Horse Heaven encompasses approximately 1,200 square miles bounded by the crest of the Horse Heaven Hills on the north and east, the Columbia River on the south, and the Rock Creek watershed on the west.

The Columbia River basin is subject to myriad water resource management challenges and regulations that limit the availability of water for agriculture, economic development, and ensuring sufficient stream flows for fish. Ecology has a mandate to develop water supplies for the Columbia River basin to meet the economic and community development needs of people and the instream flow needs of fish (RCW 90.90.020).

## Alternatives and SEPA Scoping Process

The Switzler Reservoir EIS will consider a Preferred Alternative (Switzler Canyon site) and a No-action Alternative. One structural alternative (Alder Reservoir) and a Non-structural alternative were considered, but not carried forward for consideration in the EIS. The Alder Reservoir was found to be “fatally flawed” because of potential landslide hazards and the Non-structural alternative was eliminated because it would not meet current regulations and statutes in support of the project’s purpose and need.

The project’s SEPA scoping open house was held September 19 and 20, 2018 to present the proposed Switzler Reservoir Water Storage Project details and solicit comments from stakeholders and other interested parties. In response, 18 formal comment letters were received, catalogued, and incorporated into this Responsiveness Summary. These comments will help to inform the EIS content and analyses.

## Scoping Responsiveness Summary Table

Comment No.	Commenter	Comment Type	Comment Summary	Response
01-01	Confederated Tribes of the Umatilla Reservation (CTUIR)	Cultural Resources	Include an analysis of impacts to tribal cultural resources as well as treaty rights and resources in the scope of the EIS.	The EIS will include a cultural resources assessment and will analyze the potential for impacts. Impacts to treaty rights and resources will also be analyzed.
01-02	Confederated Tribes of the Umatilla Reservation (CTUIR)	Cultural Resources / Consultation	<p>CTUIR requests additional research on cultural resources and coordination with their Cultural Resources Protection Program. Specific concerns listed:</p> <ul style="list-style-type: none"> <li>- Impacts to archaeological sites, historic properties of religious and cultural significance, and other historic properties within the project footprint;</li> <li>- Impacts to integrity of feeling, setting, and association for historic properties, particularly those of religious and cultural significance;</li> <li>- Impacts and effects to a cultural resource's viewshed;</li> <li>- Defining cultural resources and the Area of Potential Effect to adequately evaluate and address potential project impacts, noting that the National Historic Preservation Act (NHPA) definition of historic properties is inadequate; and</li> <li>- Identifying the impact area to include direct, indirect, and cumulative effects, and describing where the water will be used and impacts from its use.</li> </ul>	<p>The co-leads will consult with CTUIR's Cultural Resources Protection Program on the specific issues listed in the comment letter. An informational meeting will be scheduled and formal agency consultation will occur concurrent with the public release of the draft EIS.</p> <p>Based on early coordination with the U.S. Army Corps of Engineers (USACE) as the federal lead entity, an archaeological survey will be completed per Section 106 of the NHPA during project permitting. At that time, DAHP (Robert Whitlam) also informed USACE that DAHP will take direction from USACE. Ecology may elect to undergo additional surveys for the SEPA EIS in conformance with Executive Order 21-02.</p>
01-03	Confederated Tribes of the Umatilla Reservation (CTUIR)	Cultural Resources / Consultation	Concerns about impacts to First Foods (water, fish, big game, roots, and berries), and ability to exercise treaty reserved rights associated with First Foods. Requests the scope of the EIS include analysis of these potential impacts and coordination. Suggests coordination with other tribes as well.	The co-leads will consult with CTUIR and other local tribes on issues of direct and indirect First Food impacts that would result from implementation of the proposal. Impacts to treaty rights and resources will also be analyzed.
01-04	Confederated Tribes of the Umatilla Reservation (CTUIR)	Fish/Habitat	Concerns regarding impacts to fish and ecosystem function from altering flows: Near-term withdrawal impacts to high flows vital to juvenile salmon outmigration and ecosystem functions; maintaining minimum flows, as prescribed in Chapter 173-563 WAC, does not guarantee there will be no impacts and does not fulfill the requirement to consider impacts; Long-term withdrawal impacts to flexibility within the system to accommodate future instream and out-of-stream demands, climate change impacts, and efforts to restore a more natural flow regime and related ecosystem functions; and impacts to fisheries/ecosystem functions from the construction, operation, and maintenance of the diversion structure.	<p>Impacts to near-term and long-term tributary and Columbia River stream flow and fish, including out-migration of juvenile salmonids, will be analyzed in the EIS. Impacts to ecosystem functions will be analyzed in the EIS. A mitigation framework for any likely significant adverse impacts that would result from the proposal will also be described in the EIS.</p> <p>Current and future water supply demands will be addressed as reasonably foreseeable future actions in cumulative effects.</p>

Comment No.	Commenter	Comment Type	Comment Summary	Response
01-05	Confederated Tribes of the Umatilla Reservation (CTUIR)	Water Quality	<p>Concerns about discharging water to the Columbia River:            How the project will address expected violations of existing temperature water quality standards and potential impacts from sediment and dissolved oxygen;            Impacts to salmon migration from releasing up to 280 cfs, an amount larger than that from many tributaries that may at times be warmer than the Columbia River receiving waters; Potential release of methane due to the yearly growth and decomposition of organic matter, or any other methane-generating effects, from Project operation; opportunities to address habitat, water quality, and ecosystem function concerns with actions within lower Switzler Canyon; and impacts from the expected uses enabled by the creation of new water supplies and their periodic discharges into the Columbia River.</p> <p>Support for proposed modeling but would like additional modeling and more detail on circumstances that may lead to temperature impacts and detail on how to resolve any potential issues.</p>	Water quality impacts (and associated potential effects on fish and wildlife, or indirect effects that may occur to land use and other elements of the environment), as well as a mitigation framework for any likely significant adverse impacts that would result from implementation of the proposal will be described in the EIS.
01-06	Confederated Tribes of the Umatilla Reservation (CTUIR)	Instream Flows	Concern that out-of-stream allocations will impact instream flow reliability with growing demands in a changing climate. Request that analysis include direct, indirect, and cumulative impacts, including impacts from the uses enabled by new water supply.	All new water rights issued from the Columbia River are junior to the instream flow rule. This will be the case for any new water rights that would result from implementing this proposal, including any mitigated from Switzler Reservoir. This will be described in the EIS along with any potential indirect or cumulative impacts of this proposal to instream flows.
01-07	Confederated Tribes of the Umatilla Reservation (CTUIR)	Shorelines/ Habitat	Concern about impacts of increased water levels and reservoir operations on jurisdictional shoreline area and terrestrial habitat, shrub-steppe and wetlands habitat, and cultural resources	Potential impacts to cultural resources and terrestrial and wetland habitat from reservoir operations will be analyzed in the EIS.
01-08	Confederated Tribes of the Umatilla Reservation (CTUIR)	Instream Flows	Concern that applying the 1/3 requirement relative to OCR's financial contribution to the overall project may undermine the intent of the requirement and unjustifiably short-change instream benefits and the need to enhance them.	OCR will meet the legislatively mandated two-thirds, one-third ratio for out-of-stream and instream water development in accordance with RCW 90.90.020. This requires one-third of water developed with funding from the Columbia River Basin Water Supply Development Account to go toward instream flow. It is OCR's interpretation that this ratio relates to total OCR expenditures from the account, so OCR will put one-third of water supply funded by the account toward instream flow.

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02-01	Yakama Nation	Cultural Resources / Consultation	Request a full archaeological survey and consultation regarding Yakama Traditional Cultural Properties.	<p>The co-leads will consult with the Yakama Nation’s Cultural Resources Program on the specific issues listed in the comment letter. An informational meeting will be scheduled and formal agency consultation will occur concurrent the public release of the draft EIS.</p> <p>A Cultural Resources Assessment was performed to inform the EIS and provide recommendations on areas of focus for future survey. An archaeological survey, with USACE as the lead entity, will be completed per Section 106 of the NHPA during project permitting and in conformance with Executive Order 21-02.</p>
02-02	Yakama Nation	Fish	Requests analysis of impacts to aquatic species, which are resources protected by Treaty.	The EIS will include analysis of impacts to aquatic species and Treaty Reserved Rights.
02-03	Yakama Nation	Indirect Impacts	Include in the EIS an assessment of impacts associated with the development of surrounding lands resulting from new water supplies, which have additional indirect effects on Yakama resources.	A discussion of indirect impacts of new and expanded land use and potential development will be included in the EIS.
03-01	Confederated Tribes of the Warm Springs Reservation of Oregon	Cultural Resources / Consultation	Concern about potential impacts to historic properties and cultural resources within the Project Area and a request for consultation.	<p>The co-leads will consult with CTWSRO’s Cultural Resources Program on the specific issues listed in the comment letter. An informational meeting will be scheduled and formal agency consultation will occur prior to the public release of the EIS.</p> <p>An archaeological survey, with USACE as the lead entity, will be completed per Section 106 of the NHPA during project permitting. The survey will be completed in conformance with Executive Order 21-02.</p>
04-01	U.S. Army Corps of Engineers (USACE)	NEPA Integration / Consultation	Concerns about coordination and NEPA integration.	The co-leads participated in several meetings with USACE during the scoping process. Environmental review under National Environmental Policy Act (NEPA) will occur following the submittal of federal permit applications, and will be informed by the SEPA EIS evaluations. It is the intent of the co-leads to meet with the USACE following release of the draft EIS.
04-02	U.S. Army Corps of Engineers (USACE)	Water Quality	Section 404 permitting.	The co-leads will work with USACE on Section 404 permitting as well as other review and permitting requirements under Endangered Species Act (ESA), National Historic Preservation Act (NHPA), and NEPA following submittal of federal permit applications.

Comment No.	Commenter	Comment Type	Comment Summary	Response
05-01	U.S. Fish and Wildlife Service (USFWS)	Fish/ Habitat	The project should include a plan to avoid, minimize, and compensate for impacts to fish and wildlife resources resulting from project construction, operation, and maintenance. More studies are necessary to evaluate current conditions and impacts to aquatic species, and alternatives to protect, mitigate damages, and enhance fish and wildlife and their habitats. Specific concerns include effects on geomorphology, substrate, sediment transport, woody debris transport, streamflow regimes, flow release timing, flow fluctuation, water quality (including water temperature and nutrients), and fish passage in the study area. Include information on seasonal timing of filling and releasing.	The EIS will include a mitigation framework for any likely significant adverse impacts. Wildlife, aquatic, and terrestrial habitat assessments have been completed and will be incorporated into the EIS. Sediment analysis, water quality modeling and a description of proposed filling and release scenarios will be included.
05-02	U.S. Fish and Wildlife Service (USFWS)	Instream flows	Request more analysis on stream flow including seasonal timing of filling and releases, impacts upstream and downstream of the diversion point and discharge structure. Requests implementation of Instream Flow Incremental Methodology (IFIM) to determine an appropriate instream flow regime. Also review of the effect of the project on timing, quantity, quality, and effectiveness of downstream flow releases from the proposed Switzler Reservoir.	Effects of project construction, operation and maintenance on streamflow will be analyzed and discussed in the EIS and further analyzed and considered during design. Impacts to water resources and water quality will be included in the EIS. IFIM analysis is not planned during the EIS process based on the intended scale and timing of withdrawals conforming to Columbia River instream flow requirements.
05-03	U.S. Fish and Wildlife Service (USFWS)	Water Quality	Diverted flows could affect dissolved oxygen, pH, salinity, turbidity and other chemical constituents. A study to characterize water quality at different flow levels should be conducted. Potential changes to water temperature should be evaluated to determine effects on aquatic organisms.	Water quality and temperature changes will be evaluated for both Switzler Canyon and the Columbia River as part of the impact analysis in the EIS.
05-04	U.S. Fish and Wildlife Service (USFWS)	Cumulative Impacts	Cumulative effects of the project should be addressed. This should include key interactions between this project and any other projects or factors not considered in this application that could have a cumulative effect on water quality, quantity, fisheries, and aquatic species, and related water resources management issues in the region.	A discussion of cumulative impacts with other past, present, future, or reasonably foreseeable projects will be included in the EIS.
05-05	U.S. Fish and Wildlife Service (USFWS)	Wildlife	Wildlife survey and appropriate avoidance and mitigation measures should be proposed. USFWS has specific concerns regarding bats, sage grouse, and migratory birds, including waterfowl.	Wildlife and terrestrial habitat assessments have been completed and will be incorporated into the EIS. The EIS will include a mitigation framework for any likely significant adverse impacts. The species of concern are noted.
05-06	U.S. Fish and Wildlife Service (USFWS)	Terrestrial Habitat / Geomorphology	Evaluate the impacts of downstream flow releases on riparian vegetation. Include erosion potential and control measures.	Impacts to downstream vegetation and erosion will be analyzed in the EIS. This will include a mitigation framework for any likely significant adverse impacts.
05-07	U.S. Fish and Wildlife Service (USFWS)	Wildlife	Potential for drawing migratory birds to the HHH Wild Energy Area. Additionally, review bird presence information and impacts on those species: golden eagle and loggerhead shrike (federally protected), and merlin, sage thrasher, and vesper sparrow (state species of concern).	The potential for attracting migratory birds is acknowledged and will be discussed in the EIS. Specific species of interest are noted.
05-08	U.S. Fish and Wildlife Service	Wildlife	Impacts of loss of bird habitat and forage areas, and proximity to nesting locations.	Impacts to wildlife and habitat, including bird habitat, will be analyzed in the EIS.



Comment No.	Commenter	Comment Type	Comment Summary	Response
05-09	U.S. Fish and Wildlife Service (USFWS)	Wildlife / Consultation	Develop an Avian Protection Plan in coordination with USFWS. Obtain raptor monitoring reports associated with adjacent wind development areas and associated raptor use to assess whether the proposed Project is compatible with migratory birds in the surrounding landscape.	The requests for consultation and consideration of surrounding raptor use monitoring reports are noted. The development of an Avian Protection Plan may be proposed as a mitigation measure in the EIS. The co-leads appreciate the USFWS's ability to provide technical assistance in project design.
05-10	U.S. Fish and Wildlife Service (USFWS)	Wildlife	Obtain an eagle permit.	A list of potential permits will be included in the EIS.
05-11	U.S. Fish and Wildlife Service (USFWS)	General	Recommend against development in the proposed area.	Your concern regarding this specific site is noted.
05-12	U.S. Fish and Wildlife Service (USFWS)	Fish	Request for more information about proposed pump station design, collective operation of proposed pump station and existing pump stations and fish exclusion devices.	A description of the proposed pump station, existing infrastructure and operations will be included in the EIS. Fish exclusion devices will be incorporated into the design in accordance with state and federal criteria. Impacts to resources from these facilities will also be described in the EIS.
05-13	U.S. Fish and Wildlife Service (USFWS)	Fish	Avoiding entrainment of juvenile non-native fish species is important because of potential introduction to the reservoir and re-release to the Columbia River.	The importance of avoiding non-native fish entrainment into the proposed reservoir is acknowledged. Impacts to fish will be analyzed in the EIS and a mitigation framework for any likely significant adverse impacts will be included. Fish exclusion devices will be incorporated into final project design in accordance with state and federal criteria.
05-14	U.S. Fish and Wildlife Service (USFWS)	Fish	Conduct hydraulic operation modeling and fish entrainment study to determine zone of passage. To minimize impacts on passage, USFWS recommends the intake be built flush with the shoreline and provides additional design recommendations and references.	The recommendations and references are noted and appreciated. Impacts to fish will be analyzed in the EIS and a mitigation framework for any likely significant adverse impacts will be included. Fish exclusion devices will be incorporated into final project design in accordance with state and federal criteria.
06-01	Department of Archaeology & Historic Preservation (DAHP)	Cultural Resources / Consultation	Recommend full archaeological survey and consultation with concerned Tribes and USACE.	Under Section 106 of the NHPA, a cultural resources work plan will be prepared and provided for review to consulting parties. The work plan will describe cultural resources survey activities to be completed in advance of permitting. A description of these required surveys will be included in the EIS. A cultural resources survey with USACE as the lead entity will be completed per Section 106 of the NHPA during project permitting. The survey will be completed in conformance with Executive Order 21-02.
06-02	Department of Archaeology & Historic Preservation (DAHP)	Cultural Resources	Section 106 of the NHPA must be followed if there are federal funds or permitting associated with the project.	If implemented, the proposal would require federal permits, and NHPA requirements will be met.

Comment No.	Commenter	Comment Type	Comment Summary	Response
06-03	Department of Archaeology & Historic Preservation (DAHP)	Cultural Resources	DAHP would like to receive any correspondence or comments from concerned tribes or other parties concerning cultural resources.	The co-leads are making comments publicly available for review and will consult with DAHP on specific cultural resource comments.
07-01	Washington Department of Fish and Wildlife (WDFW)	Terrestrial Habitat	Proposed reservoir footprint will result in direct loss of over 400 acres of terrestrial habitat, including shrub-steppe habitat and wetlands, which are WDFW Priority Habitats.	Impacts to terrestrial habitat, including a discussion of Priority Habitats and a mitigation framework for any likely significant adverse impacts, will be analyzed and discussed in the EIS.
07-02	Washington Department of Fish and Wildlife (WDFW)	Indirect Impacts	The reservoir has potential storage capacity to irrigate ~7,000-10,000 acres (assuming one-third is reserved for instream flow benefits). The EIS should identify the potential “place of use” footprint for the “new” water and identify how impacts to terrestrial habitats and wildlife is mitigated consistent with state, regional and county land use codes and programs.	The potential uses of water made available by the project, including mitigation for existing interruptible water rights and areas of depleting groundwater supply, will be identified. The EIS will discuss the indirect impacts associated with potential end uses of available water.
07-03	Washington Department of Fish and Wildlife (WDFW)	Indirect Impacts	Include where and how new water will promote increased agricultural viability while protecting critical areas and PHS and other sensitive habitats in both Benton and Klickitat Counties.	Any new development, including agricultural, would need to comply with local governmental zoning rule and critical area ordinances. More detail on these issues will be provided in the EIS.
07-04	Washington Department of Fish and Wildlife (WDFW)	Habitat	Mitigation strategies should be consistent with WDFW Wind Power Guidelines to ensure appropriate mitigation and ratios are applied to shrub-steppe and other identified habitats. Suggest applying new, stored water to already converted lands or dryland agriculture to avoid conversion of priority habitats, consistent with WDFW’s mitigation policy. Current information does not provide a clear picture of the potential locations that new irrigated agricultural lands will occur. Without this information, terrestrial impacts of the project cannot be fully assessed. Recommend developing a method for accounting for new irrigated acres. Part of the accounting should document the habitat type or land use prior to irrigation.	The comments relating to assessing indirect impacts and developing mitigation strategies are noted.
07-05	Washington Department of Fish and Wildlife (WDFW)	Alternatives / Instream Flow	Encourage co-leads to consider additional restoration benefits beyond mandated instream flow contributions. Pumping should occur based on optimal flow targets, not just instream flow rule. Project should be adaptively managed to maximize environmental benefit. EIS should include design flexibility to accommodate various pumping and discharge alternatives.	The purpose and need statement will provide rationale for the proposal and clearly define the proposal objectives. In reviewing the proposal, the co-leads will rely on regulatory requirements, such as the targets set in Chapter 173-563 WAC, and current Columbia River Management protocols, such as Biological Opinion (BiOp) targets. Additional resources may be reviewed as well. The Switzler Reservoir alternative anticipates pumping and releases will be adaptively managed based on flow conditions and best available science.

Comment No.	Commenter	Comment Type	Comment Summary	Response
07-06	Washington Department of Fish and Wildlife (WDFW)	Instream Flows	A robust system for metering, monitoring, and enforcing additional water withdrawals from new diversion works and wells within hydraulic continuity, is worthy of incorporating into any water supply proposal. Concerned with how the project will account for new Columbia River withdrawals and corresponding mitigation releases to ensure instream flow mitigation occurs. Accordingly, the EIS should outline how the new storage project will provide a clear and enforceable accounting of withdrawals, consumptive use, and return flow assumptions.	The EIS will not prescribe specific policy or regulatory decisions to the Department of Ecology, rather, it will review the likely environmental consequences of the proposal. EIS analysis will assume current measuring and reporting requirements established in Chapter 173-173 WAC will be required for any new water use authorization.
07-07	Washington Department of Fish and Wildlife (WDFW)	Water Quality	Given the ephemeral and relatively lower-flow level currently within the outlet of Switzler Canyon there are likely to be siltation contributions to the Columbia River during mitigation releases if a discharge pipe or lined flume is not constructed. How will the outlet works be designed to avoid sediment discharge or near-shore water quality changes? In addition, depending on the lake temperature strata and location of the outlet works there may be warm and deoxygenated input to the Columbia River at a time of year when these conditions are easily exacerbated. This can result in near-shore thermal or anoxic migration barriers to fish life. The EIS should identify how to avoid these potential impacts.	Water quality and sediment transport analysis will be performed to inform impact analysis in the EIS.
07-08	Washington Department of Fish and Wildlife (WDFW)	Land Use/Habitat	How is this project consistent with Voluntary Stewardship Program (VSP)? Specifically, how will critical areas identified in the VSP be protected as "new" water promotes agricultural viability?	Any new development, including agricultural, would need to comply with local governmental zoning rules and critical area ordinances. The EIS will discuss the indirect impacts associated with the potential end uses of available water.
07-09	Washington Department of Fish and Wildlife (WDFW)	Instream Flows	How will the new withdrawals be metered, monitored, and enforced?	EIS analysis will assume current measuring, reporting, and enforcement requirements established in Chapter 173-173 WAC.
07-10	Washington Department of Fish and Wildlife (WDFW)	Instream Flows	How will withdrawal rates and associated return-flow be managed both in terms mitigating for consumptive use, and timing of return flows?	Water budget and impacts on surface water resources will be analyzed in the EIS.
07-11	Washington Department of Fish and Wildlife (WDFW)	Water Budget/ Water Quantity	How was the (current and future) demand determined and what is the level of certainty for prospective future demand?	Demand was determined by the WRIA 31 Planning and Advisory Committee through economic analysis and stakeholder outreach. Additional detail on current and projected demand will be analyzed in the EIS.
07-12	Washington Department of Fish and Wildlife (WDFW)	Water Budget/ Water Quantity	How was reservoir seepage and evaporation calculated into the supply-side and mitigation assumptions?	Reservoir seepage and evaporative calculations have not been completed. Water budget and impacts on surface water resources will be analyzed in the EIS. Consumptive losses associated with reservoir storage will be considered in the water budget.

Comment No.	Commenter	Comment Type	Comment Summary	Response
07-13	Washington Department of Fish and Wildlife (WDFW)	Terrestrial Habitat	How will the project proposal mitigate for loss of ecological connectivity and migration/movement corridors within remaining shrub-steppe along the Columbia River?	Impacts to habitat and a mitigation framework for any likely significant adverse impacts will be analyzed and discussed in the EIS.
07-14	Washington Department of Fish and Wildlife (WDFW)	Fish	How to design and operate the pump station in winter conditions without risk of entraining salmonids?	Impacts to fish will be analyzed in the EIS and a mitigation framework for any likely significant adverse impacts will be included. Fish exclusion devices will be incorporated into final design in accordance with state and federal criteria.
07-15	Washington Department of Fish and Wildlife (WDFW)	Fish and Wildlife	How to design and operate the pump station to accommodate pool fluctuations of 10' - 15'to preserve predator control alternatives?	The EIS will not include specific design plans or criteria for the pump station, but rather, will analyze the impacts of construction and operation of the pump station.
08-01	American Rivers & Trout Unlimited	Purpose and Need	Purpose and need statement should include public interest and a thorough rationale and explanation of the new uses of water the project would provide, as well as the potential impacts of those new water uses.	The purpose and need statement in the EIS will provide rationale for the proposal and clearly define the proposal objectives.
08-02	American Rivers & Trout Unlimited	Impact Analysis	Include direct, indirect, and cumulative impacts.	Direct, indirect, and cumulative impacts of the proposal will be analyzed in the EIS.
08-03	American Rivers & Trout Unlimited	Fish / Instream Flows	Fully describe and consider impacts of seasonal filling on juvenile salmon and steelhead outmigration. EIS should also clearly describe when water for out-of-stream uses will be diverted and timing of water releases for instream flows.	Impacts to stream flow and fish, including timing relative to outmigration of juvenile salmonids, will be analyzed in the EIS.
08-04	American Rivers & Trout Unlimited	Instream Flows	The EIS should fully describe the operations of the reservoir to meet the mandate required by Department of Ecology's OCR to provide for 2/3:1/3ratio, for out-of-stream and instream, respectively.	OCR will meet the legislatively mandated two-thirds, one-third ratio for out-of-stream and instream water development in accordance with RCW 90.90.020. This requires one-third of water developed with funding from the Columbia River Basin Water Supply Development Account to go toward instream flow. It is OCR's interpretation that this ratio relates to total expenditures from the account, so OCR will put one-third of water supply paid for by the account toward instream flow. More detail regarding exact quantities and operations of the reservoir relative to timing of release will be provided once a project funding plan is finalized and the total expenditure from the account relative to overall project costs are determined.
08-05	American Rivers & Trout Unlimited	Water Quality	Impacts of operation on Columbia River and Switzler Creek water temperature.	Water quality modeling, including temperature, will be performed to inform impact analysis in the EIS.

Comment No.	Commenter	Comment Type	Comment Summary	Response
08-06	American Rivers & Trout Unlimited	Water Quality	Describe and analyze any non-point source pollution that may enter Switzler Reservoir. An action plan should be devised to control non-point pollution from entering the reservoir, and a management plan should be prepared dealing with potential pollutants that may exist in the reservoir.	Water quality impacts and a mitigation framework for any likely significant adverse impacts will be analyzed and described in the EIS.
08-07	American Rivers & Trout Unlimited	Water Quality	Describe and analyze timing and quality of sediments that will enter the reservoir from the slopes. Determine the rate in which the reservoir will fill with sediment, and a sediment management plan.	A preliminary evaluation of geologic hazards and slope stability of surrounding slopes was completed in the appraisal level studies. Analysis of potential sediment loading will occur during the project design phase. An analysis of the potential sediment budget and transport will be included in the EIS.
08-08	American Rivers & Trout Unlimited	Fish / Wildlife	Surveys for aquatic and terrestrial species including but not limited to fish and amphibians should be conducted in Switzler Canyon to document presence, absence, and extent of use. Develop mitigation plans. Identify any federally or state-listed threatened and endangered species and consult with appropriate federal managing agencies as required.	Wildlife, aquatic, and terrestrial habitat assessments have been completed and will be incorporated into the EIS. A mitigation framework for any likely significant adverse impacts will be described in the EIS.
08-09	American Rivers & Trout Unlimited	Habitat / Mitigation	Mitigation for lost wetlands and shrub steppe should be identified.	Habitat impacts and a mitigation framework for any likely significant adverse impacts will be described in the EIS.
08-10	American Rivers & Trout Unlimited	Fish/Mitigation	Mitigation should include improving passage in Switzler Canyon. Also, could include off-channel rearing and spawning for Columbia River aquatic species.	The comment recommending specific mitigation measures is noted.
08-11	American Rivers & Trout Unlimited	Climate Change	Include climate change analyses and impacts using best available science to determine how climate change predictions will affect the proposed project.	A qualitative analysis of the effects of climate change on the proposed project will be included in the EIS.
08-12	American Rivers & Trout Unlimited	Climate Change/Cumulative Impacts	Impacts of Switzler reservoir should be considered under a range of climate conditions, as well as along with other anthropogenic changes on the landscape. When evaluating the impacts of the proposed dam and reservoir on aquatic and terrestrial resources, consideration of the cumulative impacts of the project in addition to change in upland land use practices and climate change.	A qualitative analysis of the effects of climate change on the proposed project will be included in the EIS. A discussion of cumulative impacts with other past, present, future, or reasonably foreseeable projects will be included in the EIS.
08-13	American Rivers & Trout Unlimited	Economics	Include an economic study that has a price point for when the dam is no longer feasible.	A discussion of economic considerations will be included in the EIS. A cost-benefit analysis is not required by SEPA, but may be incorporated by reference or appended to aid in evaluating environmental consequences (WAC 197-11-450).
08-14	American Rivers & Trout Unlimited	Economics	Specify out-of-stream uses. Include a robust local-user, cost-share program description. Users should help pay for the water-supply benefit of Switzler Dam with interest over a reasonable term, and without an "ability to pay" exception.	The comment suggesting a user-pay, cost-share program is noted. A qualitative discussion of economic considerations will be included in the EIS. A cost-benefit analysis is not required by SEPA, but may be incorporated by reference or appended to aid in evaluating environmental consequences (WAC 197-11-450).
09-01	Columbia Riverkeepers	Impact Analysis	Include direct, indirect, and cumulative impacts.	Direct, indirect and cumulative impacts of the proposal will be analyzed in the EIS.

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09-02	Columbia Riverkeepers	Alternatives	Include reasonable alternatives.	Reasonable alternatives will be evaluated as required by WAC 197-11-440.
09-03	Columbia Riverkeepers	Water Budget / Indirect Impacts	EIS should describe new water uses made available by this proposal.	The water developed through this proposal could be used for new agricultural, domestic, municipal, and instream flow uses. The EIS will include a description of potential end uses of available water and analyze indirect effects of that use.
09-04	Columbia Riverkeepers	Indirect Impacts	EIS must include indirect impacts of developments that result from new water, including CAFO-style mega-dairies.	In Washington State, stockwater is eligible for groundwater permit exemptions under RCW 90.44.050. The EIS will include a description of potential end uses of available water and analyze indirect effects of those uses .
09-05	Columbia Riverkeepers	Fish	Provide detailed description of when Columbia River withdrawals would occur and describe any potential impacts on juvenile salmonids outmigration (including cumulative impacts of other planned, similar storage projects).	Seasonal operations of the proposed reservoir will be described in the EIS. Impacts to stream flow and fish, including outmigration of juvenile salmonids, will be analyzed in the EIS. The effects of past, present, and reasonably foreseeable future projects will be assessed in the cumulative impacts analysis in the EIS.
09-06	Columbia Riverkeepers	Water Quality / Economics	Concern about meeting water quality standards for temperature in September and October and during steelhead and fall chinook migration through September, based on temperature simulations produced for Phase 1 appraisal studies for the current proposal. The EIS should explain how the proposal will be operated or altered to avoid violating Washington's water quality standards for temperature. If such operations or alterations would materially change the amount or timing of mitigation water available from the proposal (or the overall project cost), the EIS should explain how such changes would impact the utility of the proposal and the proposal's cost-benefit analysis.	Water quality impacts, including impacts to temperature in context of seasonal operations, will be analyzed and discussed in the EIS. A mitigation framework for any likely significant adverse impacts will be described. The concern about temperature violations and feasibility of the project are noted. Operation of the proposed project would be subject to Section 401 certification and all other permit requirements. A qualitative discussion of economic considerations will be included in the EIS. A cost-benefit analysis is not required by SEPA, but may be incorporated by reference or appended to aid in evaluating environmental consequences (WAC 197-11-450).
09-07	Columbia Riverkeepers	GHG Emissions	The EIS should explain the amount of methane that would be released as a result of the proposal (anaerobic decomposition of organic matter).	Potential methane impacts will be discussed qualitatively in the EIS.
09-08	Columbia Riverkeepers	Cost / GHG Emissions	The EIS should use the social cost of carbon tool developed by the U.S. Environmental Protection Agency and to inform discussion of the severity of the reservoir's methane emissions and the cost-benefit analysis for the project.	The recommendation is noted.
09-09	Columbia Riverkeepers	Consultation	Encourage the co-leads to engage in consultation with interested tribes.	The co-leads will engage and consult with interested tribes during the development of the DEIS.
10-01	Columbia Snake River Irrigators Association (CSRIA)	General	Opposition to further project development.	The comment regarding the proposal is noted.

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10-02	Columbia Snake River Irrigators Association (CSRIA)	Alternatives	<p>Include a Non-Structural Alternative to make changes to the existing Columbia River WACs, to meet the objective of allocating new water supplies from the McNary- John Day Pools Reservation (WAC 173-531A-040). These new allocations will be mitigated by a new water right permitting regime that adopts direct water right mitigation funding, paid by the water right recipients, with Office of Columbia River (OCR) review and with consultation with other stakeholders and affected parties. No state funds will be applied to the permit allocations.</p> <p>A fundamental part of the Non-Structural Alternative is steering committee review, that is concurrent with the EIS review/preparation process, to evaluate the above features and other related factors.</p>	A non-structural alternative will be described in the EIS and assessed along with other alternatives relative to meeting the intent and objectives of the Switzler Reservoir Water Storage Project. The non-structural alternative as well as the other alternatives considered but not carried forward for environmental review will be presented in the EIS. The comment for a user-funded approach is noted. This will be included in describing the non-structural alternative.
10-03	Columbia Snake River Irrigators Association (CSRIA)	Consultation	Request for co-lead consultation with CSRIA.	The co-leads encourage public participation and will solicit input during review of the draft EIS.
11-01	Gilbert Fruit	Roads and Infrastructure	New roads into orchards would be required. The proposed site would put irrigation pumps and mainline under water. Propose moving the pumps and mainline to high ground.	Impacts to roads and other infrastructure, and a mitigation framework for any likely significant adverse impacts will be analyzed and described in the EIS.
12-01	Benjamin Sprague	General	More water storage is good. If this project is successful, maybe others could be considered.	The comment supporting water storage is noted.
12-02	Benjamin Sprague	Alternative	Suggested alternative site at Locust Grove Road near Kennewick.	Alternative water storage sites were reviewed in the Water Storage Pre-Feasibility Assessment Report for WRIA 31 (Horse Heaven Area). These alternatives will be described in the other alternatives considered but not carried forward for environmental review. Switzler Canyon was determined to be the most feasible site for water storage within the Horse Heaven Area.
12-03	Benjamin Sprague	Alternative	Suggested a series of smaller reservoirs could work better than a large one.	Alternative water storage sites were reviewed in the Water Storage Pre-Feasibility Assessment Report for WRIA 31 (Horse Heaven Area). These alternatives will be described in the other alternatives considered but not carried forward for environmental review. Switzler Canyon was determined to be the most feasible site for water storage within the Horse Heaven Area.
13-01	Debbie Berkowitz	Terrestrial Habitat	Concerns about terrestrial habitat impacts from new water users. Specifically, the ecosystem impacts of converting habitat to irrigated agriculture.	Impacts to terrestrial habitat will be analyzed in the EIS, including indirect impacts.
13-02	Debbie Berkowitz	Wildlife	Concerns about impacts on ferruginous hawks and other state-listed threatened species, as well as other wildlife including birds, mammals, reptiles, amphibians, and insects.	Impacts to sensitive species, threatened and endangered species and other wildlife will be analyzed in the EIS.
13-03	Debbie Berkowitz	Terrestrial Habitat	Consider shrub-steppe habitat impacts and impacts on wildlife corridors, pinch points, and biodiversity in EIS.	Impacts to terrestrial habitat and wildlife will be analyzed in the EIS.

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13-04	Debbie Berkowitz	Wildlife	Recommends a bioblitz be done and, at a minimum, seasonal count of wildlife species to determine potential impacts.	Recommendations are noted. Wildlife, aquatic, and terrestrial habitat assessments have been completed and will be incorporated into the EIS. A mitigation framework for any likely significant adverse impacts will be described in the EIS.
13-05	Debbie Berkowitz	Habitat / Mitigation	Concerns about impacts to wetlands and intermittent flows in Switzler canyon, as well as uniqueness of the wetland type in the area and mitigation measures.	A wetland and terrestrial habitat assessment has been completed and will be incorporated into the EIS. A mitigation framework for any likely significant adverse impacts will be described in the EIS.
13-06	Debbie Berkowitz	Habitat	Consider benefits to habitat that would be gained by restoration efforts after the recent fire in Switzler Canyon area.	The EIS will include a description of baseline conditions and potential impacts to those baseline conditions should the proposal be implemented. A mitigation framework will also be included in the EIS.
13-07	Debbie Berkowitz	Habitat / Wildlife / Mitigation	Include habitat and wildlife avoidance, minimization, and mitigation in the EIS.	Impacts to wildlife and habitat and a mitigation framework for any likely significant adverse impacts will be included in the EIS.
13-08	Debbie Berkowitz	Cumulative Impacts	Consider the cumulative impacts of shrub-steppe habitat loss.	The EIS will include consideration of cumulative impacts on habitat.
13-09	Debbie Berkowitz	Water Budget/Cumulative Impacts	EIS should consider potential changes in river operations resulting from changes in the Columbia River Treaty, including how the proposal would be affected by potential changes, and impacts of the projects with those potential changes.	The Columbia River Treaty renegotiation and its nexus to the proposed project will be discussed in the EIS.
13-10	Debbie Berkowitz	Water Budget/Climate Change/Cumulative Impacts	What proportion of the “new” water would be used to meet existing demands, for instream demands, and for new water rights? Given the potential changes from climate change and from the Columbia River Treaty renegotiations, it is important to explain how this project could be affected by the amount of water that will be available in the future.	The EIS will discuss the indirect impacts associated with the end use of available water. All new water rights issued from the Columbia River are junior to the instream flow rule, which would be the case for any new water rights that would result from this project. The Columbia River Treaty renegotiation and its nexus to the proposed project will be discussed in the EIS. A qualitative analysis of the effects of climate change on the proposed project will be included in the EIS.
13-11	Debbie Berkowitz	Instream Flows	Consider the potential benefits to ecosystems by retaining more than minimal flows in the Columbia River as compared to withdrawing more water (in 'excess' of minimal flows) for the proposal. For example, what are optimal flows in the Columbia River for fish and wildlife? An additional consideration should be the impact of releases from the reservoir on water temperature/water quality in the near-shore Columbia.	Impacts to surface water and aquatic species will be analyzed in the EIS. This will include impacts of withdrawals and releases on aquatic species, water quality and stream flow within the Columbia River.



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13-12	Debbie Berkowitz	Instream Flows/Cost	Describe what instream flows would look like if there is no public funding.	<p>Diversion of Columbia River water into storage will need to comply with regulatory requirements, including minimum instream flows set in Chapter 173-563 WAC, and Columbia River Management protocols, such as BiOp targets, to avoid impacts to instream flows. There is no requirement for releases from storage of the pro-rata portion of the project that is privately funded to supplement instream flows.</p> <p>Depending on the funding source, the pro-rata portion of the project that is publicly funded may require releases from storage to supplement instream flows. OCR will meet the legislatively mandated two-thirds, one-third ratio for out-of-stream and instream water development in accordance with RCW 90.90.020 for the pro-rata portion of the project funded under the Columbia River Basin Water Supply Development Account. This requires one-third of water developed with money from the Columbia River Basin Water Supply Development Account to go toward instream flow. It is OCR's interpretation that this ratio relates to total OCR expenditures from the account, so OCR will put one-third of water supply paid for by the account towards instream flow. If OCR does not have any direct expenditures from the account related to this project, then no additional water would be put instream.</p> <p>More detail regarding exact quantities will be provided once a funding plan is finalized in the future.</p>
14-01	Devin Moon	Cost / Instream Flows	Alternate public funding source other than OCR so that 1/3 does not need to go to instream flows and instead can be used for irrigated agriculture.	Your interest in alternative public funding is noted.
14-02	Devin Moon	Alternative	Proposal should include a public pipeline or canal to make water more accessible to potential end users.	A public pipeline is not part of this proposal. As such, it will not be considered as part of this EIS.
15-01	Patricia Williford	Water Budget / Climate Change	Relying on dwindling water sources is short sighted. Enlarging the Irrigators Association Board would bring new ideas for solutions to water shortage issues.	The comment supporting enlarging the Irrigators Association Board is noted.
16-01	Randy Dutton	Climate Change	Lakes help sequester CO2 (references provided).	The comment and references are noted. A qualitative analysis of the effects of climate change on the proposed project will be included in the EIS.
16-02	Randy Dutton	Climate Change	Impacts (benefit) of water storage on sea level rise.	The comment is noted. A qualitative analysis of the effects of climate change on the proposed project will be included in the EIS.
17-01	Randy Routh	Cost	Who is paying for this?	The funding mechanism has not been determined and evaluating funding scenarios is not within the scope of the EIS.

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17-02	Randy Routh	Water Budget	Who is benefiting from this?	The water developed through this proposal could be used for new agricultural, domestic, municipal, and instream flow uses, as well as improved reliability for existing users with interruptible water rights.
17-03	Randy Routh		Rock-Glade watershed is listed in the info. Isn't there a draw area below McNary Dam?	The proposed project would be sited in Switzler Canyon, a tributary to the Columbia River approximately 9.5 miles upstream of McNary Dam. Both Rock Creek and Glade Creek are downstream of McNary Dam. Although this project would not be constructed in either Rock or Glade creeks, it is in an area known as the Rock-Glade Water Resource Inventory Area (WRIA 31), which is a state-designated management unit for water resources. Releases of water from the proposed Switzler Reservoir would be available to mitigate Columbia River diversions in WRIA 31.
17-04	Randy Routh	Communication	When and where is the next public comment meeting?	The next public meeting will be held after the draft EIS is published to provide an overview of the proposal, discuss impacts analyses, and provide opportunity for additional comments.
18-01	Ray H.	Land Use	Adamantly opposed to proposal if the land required for the reservoir is not purchased by those who would benefit from it.	The comment indicating preference for users to pay for the land required for this project is noted.