

COLUMBIA RIVER BASIN WATER MANAGEMENT PROGRAM

STATE ENVIRONMENTAL POLICY ACT (SEPA) ADDENDUM

The following addendum has been prepared pursuant to provisions of WAC 197-11-625.

Environmental document added to or modified by this addendum: The document for which additional information is being provided is the *Columbia River Water Management Program Final Programmatic Environmental Impact Statement* (EIS). This State Environmental Policy Act (SEPA) document was prepared by the Washington State Department of Ecology (Ecology) and released on February 15, 2007.

Proponent: Washington State Department of Ecology (Ecology)

Proposal: Chapter 90.90 RCW directs Ecology to aggressively pursue development of new water supplies for both instream and out-of-stream uses. Ecology is in the process of developing and implementing a Management Program to facilitate implementation of the RCW.

Description of proposal: The Management Program will potentially involve implementation of a variety of water supply development measures authorized by Chapter 90.90 RCW. Those may include: new or modified surface storage facilities, aquifer storage, municipal and industrial conservation, regional or irrigation district agricultural conservation, on-farm irrigation efficiency projects, conveyance system improvements, and pump exchanges.

Addendum: This addendum provides information that was not included in the *Columbia River Water Management Program Final Programmatic EIS* (February 2007). The addendum has been prepared in two sections:

Attachment 1 – A letter from the Save Our Wild Salmon organization and responses to comments contained within that letter, which were inadvertently omitted from the final programmatic EIS; and

Attachment 2 – An amendment to Appendix F of the EIS pertaining to storage projects identified within watershed plans that had been completed prior to the release of the EIS.

SEPA Lead Agency: Washington State Department of Ecology

Responsible official: Derek I. Sandison

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Date: September 7, 2007

Signature:



ATTACHMENT 1

Comments of
Save Our Wild Salmon
on the

Draft Programmatic Environmental Impact Statement for
the Columbia River Water Management Program

November 20, 2006

79-1 [Save Our Wild Salmon (SOS) is a nationwide coalition of conservation organizations, commercial and sport fishing associations, businesses, river groups, and taxpayer advocates – all joined in a commitment to restore Pacific Northwest wild salmon and the communities that depend on them. SOS offers these comments on the Washington Department of Ecology’s Draft Programmatic Environmental Impact Statement for the Columbia River Water Management Program (hereinafter referred to as “EIS”).

79-2 [As you know, Columbia Basin salmon and steelhead are severely affected by existing degraded habitat in the Columbia River system. Dams, water withdrawals, and water quality issues cause significant impacts to wild salmon and steelhead populations throughout the basin.

79-3 [Potential new storage projects and other water source developments, as well as expansion of existing water rights, may negatively impact habitat for native salmonids. While the Columbia River Management Program includes the important goal of providing additional stream flows for fish, Ecology should work with federal dam and water managers to help achieve federal flow targets in both the Snake and Columbia during the entire salmon migration season. Currently, those targets are often missed by wide margins, particularly in the lower Snake River, but also in the Columbia.

SOS urges the Washington Dept. of Ecology (“Ecology”) and other management agencies to consider more fully the following issues:

1. The EIS reflects an unwarranted emphasis on new storage projects.

79-4 [There is no comprehensive investigation of the range of alternatives that might satisfy both instream and out-of-stream needs, and the draft EIS assumes too readily that new water storage is necessary and in the public interest. The Columbia Water Management Act does not – contrary to the statements on page 6-2 of the draft EIS – direct Ecology to aggressively pursue storage options. Instead, it calls on Ecology to aggressively pursue new *water supplies* using a variety of tools. In light of this, Ecology should only consider new storage if further analysis with respect to other alternatives demonstrates that it is necessary to meet a water supply need that furthers the public interest, including the protection and recovery of salmon and steelhead, the health of recreational and commercial fishing industries, and other environmental and economic factors.

2. Existing information indicates that there is little if any need for additional irrigation water.

79-5 Ecology should be careful not to assume that there is a significant need for new out-of-stream water uses. For instance, Ecology's draft water supply and demand forecast projects that water demand from irrigated agriculture is likely to be stable or decline over the next 20 years (Draft Supply and Demand Forecast at ES-12-13). And the Williams and Capps study demonstrates that additional irrigation could actually hurt the agricultural economy by reducing the value of crops. Given this situation, there is no clear need for big storage projects; Ecology should ensure that its tools fit its needs and meet the public interest.

3. New storage projects may degrade water quality and fish habitat.

79-6 Ecology has touted the potential benefits to fish from "new water" collected in new storage reservoirs proposed in the Columbia Basin that will be released for instream water flows to benefit fish. However, the EIS rightly points out that water held back in new reservoirs may suffer from high water temperature and other water quality degradation. Additional water for fish must not exacerbate already unhealthy (and sometimes lethal) summer water temperatures in the lower Snake and Columbia rivers.

In addition, warm-water reservoirs may increase non-native and native predator fish. The EIS also points out impacts to downstream gravel recruitment and potential additional fish passage problems created for anadromous fish. Any proposed new storage reservoirs or alterations to existing storage reservoirs must avoid any additional impacts to salmon and steelhead populations.

4. The proposed Voluntary Regional Agreements (VRAs) may not adequately insure the protection of fish habitat.

79-7 Relaxing the process for issuing new water rights as proposed under the VRAs could put salmon and steelhead populations at greater risk. Of particular concern is that the "no net loss" requirement for instream flows only applies to July and August in the Columbia River, unlike in the Snake River, where it applies from April through August. While the federal flow targets for the Columbia are missed more frequently in the summer than in the spring, they are often missed in the spring as well. The federal government has an obligation to improve flows throughout the salmon migration season, and Ecology should help rather than hinder this effort. It is also unclear how these agreements would be implemented and enforced, and how they might comport with the requirements of the Clean Water Act.

5. The EIS must address the impact on salmon and steelhead of potential flow reductions in the Columbia River from April through June.

79-8 As stated above, SOS is concerned that the EIS only addresses the need to mitigate for Columbia River water withdrawals in July and August. Indeed, the EIS lacks an analysis of the impacts of granting new and expanded water rights on salmon and steelhead over

79-8 | the long term, particularly in terms of instream flows and temperature. The EIS should address the impacts of removing more water from the Columbia during April through June.

6. The “early activities” need fuller analysis.

79-9 | The proposed early activities described in the EIS, such as alternate feed routes to Potholes Reservoir and the Columbia-Snake River Irrigators Association’s VRA, need a more in-depth investigation before they are implemented. These complex proposals merit considerable scrutiny, both as part of the SEPA process and likely under NEPA and the ESA. Ecology must therefore not rush into them, but should engage in a much-expanded analysis of the impacts of these activities.

Thank you for the opportunity to comment on the EIS and we hope you will take our comments into consideration.

Sincerely,

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**ATTACHMENT 2
(MODIFICATIONS TO APPENDIX F)**

WRIA 43 (Upper Crab Creek Basin)

The WRIA 43 watershed plan calls for assessment and implementation of small scale storage opportunities along upper Crab Creek and its tributaries. Such small storage projects would include construction of infiltration trenches and ponds as well as implementation of stream channel, stream bank, floodplain and wetland restoration/enhancement efforts intended to delay flows during peak runoff periods and to enhance creek flows in the summer months. The plan also calls for identifying opportunities for recharge of shallow unconfined aquifers and the Wampum basalt interbeds to augment groundwater available for deep well irrigators and to enhance flows in Crab Creek and its tributaries. Aquifer recharge strategies will be developed in order to assist with recharge to local aquifers for the agricultural users, and for long term recharge to the downstream water users in the Odessa subarea and/or the Potholes Reservoir, in addition to enhancing baseflow back to Crab Creek and its tributaries during the low flow periods. The WRIA 43 Plan calls for Columbia River Basalt rehydration projects to be coordinated with opportunities and efforts ongoing in the Columbia River Basin Water Resource Management Program (ESSHB 2860)