Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance

FINAL Environmental Impact Statement

KITTITAS and YAKIMA COUNTIES, WASHINGTON

Volume III of III

March 2019

Comments and Responses from the Supplemental Draft Environmental Impact Statement Released in April 2018 – File 2 of 2

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess project

1 message

Sharon Chabal <sharonchabal100@gmail.com> Wed, Apr 25, 2018 at 11:46 PM
To: kkbt@usbr.gov

We emphatically vote for alternative one -no action 1

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Don't drain Lake Kachess

1 message

Hannah Cooley <hkcooley11@yahoo.com> Sun, May 20, 2018 at 3:35 PM
Reply-To: "hkcooley11@yahoo.com" <hkcooley11@yahoo.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Hannah Cooley

Sent from Yahoo Mail on Android

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/KCC - STRONGL Y OPPOSED

1 message

Sarah Dunkel <casesarah@gmail.com> Fri, May 18, 2018 at 10:17 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Sarah Dunkel

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Question about SDEIS

1 message

Jean/Tim Fountain <kachess385@gmail.com> Sat, Apr 28, 2018 at 3:30 PM
To: kkbt@usbr.gov

I have questions about the THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT for the proposed KACHESS DROUGHT RELIEF PUMPING PLANT.

1. Why do you refer to LAKE KACHESS as Kachess Reservoir ???

2. How much is this project going to cost the small farmers???

3. Are the small farmers willing to spend their hard earned money on this project when know one knows if it is going to work???

4. What is the lake level that a fire truck can get water safely out to fight a fire???

5. Lake Keechelus does not have any private property owners, does not have a state park, is not used by the public like Lake Kachess. Why is it not being considered as an option???

Thank you

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2
3
4

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Supplemental DEIS

1 message

Ann Lewis <roniaspamonia@gmail.com>
To: kkbt@usbr.gov

Thu, Apr 19, 2018 at 2:13 PM

Hi Candace,

I have a simple question: Does the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental DRAFT Environmental Impact Statement contain everything or do we need to have the original 2015 DEIS as well? i.e. is the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental DRAFT Environmental Impact Statement complete by itself? 1

Thanks,

Ann Lewis

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] My opposition to KDRPP/KCC

1 message

Lisa Morrison <lmorr11@comcast.net> Sat, May 19, 2018 at 1:49 AM
To: kkbt@usbr.gov

Dear Ms. McKinley,
I am writing to express my opposition to the KDRPP/KCC project. I am a Washington resident from Vancouver and I believe that this proposed plan does NOT serve the majority of Washington residents and their interests. The proposed plan risks Bull Run trout habitat for spawning and draining Lake Kachess will irreparably damage current wells. I am also concerned that draining the lake will eliminate recreation ON the lake, but also create a huge mud hole along which many Washington access high alpine wilderness through accessible trails; I would no longer use these trails if I needed to pass along a dirty, smelly and insect laden mud hole!! Finally, it appears that this proposed project will cost Washington taxpayers a huge sum of money; this expensive project serves a small number of farmers, not the global interests of state citizens.
Thank you for considering my thoughts as you deliberate on this proposal.
Sincerely,
Lisa Morrison, MD
Vancouver, WA

Sent from my iPhone

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/kcc

1 message

alyxandra hazard <alyxhazard11@gmail.com> Fri, May 18, 2018 at 9:48 AM
To: kkbt@usbr.gov

Ms McKinley,

. I am a resident of WA and have owned a cabin on. Lake Kachess for 29 years . By email , I am saying how STRONGLY opposed I am to this . 1

. Alyxandra hazard

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/KCC - STRONGL Y OPPOSED

1 message

Emily Hazard <ecooley2@gmail.com> Fri, May 18, 2018 at 9:30 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Emily Hazard

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/KCC - STRONGL Y OPPOSED

1 message

Kiefer Hazard <kieferhazard@gmail.com> Fri, May 18, 2018 at 9:59 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Kiefer Hazard, DVM

Sent from my iPad

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/KCC - STRONGL Y OPPOSED

1 message

Morgan W inden <morgan.winden@gmail.com> Fri, May 18, 2018 at 10:02 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,
Morgan Hazard

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposition of the KDRPP/KKC

1 message

Nick Hazard <nhazard11@gmail.com> Fri, May 18, 2018 at 6:57 PM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP / KCC - STRONGL Y OPPOSED

1 message

Alec Hendren <alec.hendren@icloud.com> Sat, May 19, 2018 at 10:23 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Alec Hendren

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Fwd: KDRPP/KCC - STRONGL Y OPPOSED

1 message

Josie Johnson <josiecjohnson85@gmail.com> Fri, May 18, 2018 at 11:20 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Josie Johnson
NICU nurse

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/KCC - STRONGL Y OPPOSED

1 message

Maggie Halpin <bennett.mag@gmail.com> Fri, May 18, 2018 at 3:45 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess. I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. I am concerned about the endangered bull trout population, as well as the cost vs. benefit of this plan. 1

Thank you,
Maggie Halpin

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Supplemental Draft Environment Impact Statement - Questions

1 message

J P Owens <jpowens99@yahoo.com> Thu, May 3, 2018 at 6:13 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Supplemental Draft Environment Impact Statement (SDEIS) for the proposed Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) project released for public comment. I have several questions I have several questions I would like answered.:

Why is Lake Keechelus not an Alternative? Lake Keechelus is very shallow at the westerly end of the lakebed. It would be much easier and cost effective to excavate the lakebed to increase the water storage capacity and achieve the additional 200,000 acre feet of water. 1

What has been done to hold the water that comes from Lake Keechelus? At one of the meetings that I attended it was stated the canals that take water from Lake Keechelus had many leaks have they been fixed? 2

Has a water market and/or a water bank been created to improve water supply in the Yakima River Basin? 3

Has anything been done to improve Surface Water Storage? 4
Build a surface storage facility at Wymer on Lmuma Creek?
Construct a new dam at Bumping Reservoir to increase capacity?
Projects to transfer water from the Columbia River to the Yakima Basin?

What has been done about groundwater Storage? 5

Have the farmers or Water Districts created any new reservoirs to hold the water that they do receive? 6

What are the farmers doing to conserve water? 7

Are ALL the farmers using drip systems now for ALL crops?

Kachess Community has Senior Water rights how is this project effecting our Senior Water Rights? 8

What is being done to offset the negative impacts on private property? 9

Who is paying for this project? 10

Please answer my questions, Thank J P Owens

jpowens99@yahoo.com
253-750-4731

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP/KCC - STRONGL Y OPPOSED

1 message

Kaylin Rostron <kaylinrostron@gmail.com> Fri, May 18, 2018 at 1:51 PM
To: kkbt@usbr.gov

Ms. McKinley,

I am a Washington State resident and frequent user of Lake Kachess, by way of email I am strongly opposed to the KDRPP/KKC plans and support the no action alternative as outlined in the current SDEIS. 1

Thank you,

Kaylin Rostron
Weisman Design Group
971.285.7870

Johnson, Nancy and Joel
K projects Comment via voicemail – 11 a.m., May 30, 2018
Transcribed by KDera, - message at Extension 603.

"Hello. My name is Nancy Johnson and my husband is Joel Johnson. We have a home over in the Easton Area, a cabin home. And, I'm calling to complain about Reclamation taking down Kachess Dam, as far as the water. I grew up in a farm area in the Skaggit Valley, and I know how you can take care of your water system in more of a drip way vs. the massive amount of water their doing over in Eastern Washington.

"I'm totally against anything of ruining the Kachess Dam. We would also lose the use of the home that we built over there. There are several families in that area that are going to be devastated. There is no excuse of this, absolutely none. I want to leave my name, Nancy Johnson, date of birth, 5/22/61, and we live in Auburn, Washington. We also have a home over in Easton. 1

"I want my voice heard. You can call me back if you like at (253) 332-6348. Thank you very much."

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Fw: public comment on federal register rights of birds and wildie to have access to water to drink - taking that all away to kill them?

1 message

Jean Public <jeanpublic1@yahoo.com> Fri, Apr 13, 2018 at 10:15 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: Humanelines <humanelines@hsus.org>, PETA <info@peta.org>, idausa <info@idausa.org>, Cok Info <info@cok.net>, Lohv Info <info@lohv.org>, NYCLASS <info@nyclass.org>, "madraven@gmail.com" <madraven@gmail.com>, Godscreaturesministry Info <info@godscreaturesministry.org>, "AMERICANVOICES@MAIL.HOUSE.GOV" <americanvoices@mail.house.gov>, Pew Trusts <info@pewtrusts.org>, earthjustice <info@earthjustice.org>, SIERRA SIERRA CLUB <information@sierraclub.org>, "scoops@huffpost.com" <scoops@huffpost.com>, "jean.harrison@gmail.com" <jean.harrison@gmail.com>, The Center for Biological Diversity <center@biologicaldiversity.org>, Aplnj Info <info@aplnj.org>

any plans for water alwayshave to make sure that wildlife, birds, reptiles have access to water too. you cannot make this project only for humans. this comment is for the public record. please receipt. j ean upbliee jeanpublic1@yahoo.com

1

Subject: rights of birds and wildie to have access to water to drink - taking that all away to kill them?

Federal Register, Volume 83 Issue 72 (Friday, April 13, 2018)

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Federal Register Volume 83, Number 72 (Friday, April 13, 2018)]
[Notices]
[Pages 16126-16127]
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[FR Doc No: 2018-07737]



[[Page 16126]]

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DEPARTMENT OF THE INTERIOR

Bureau of Reclamation

[RR01113000, XXXR0680R1, RR.R0336A1R.7WRMP0032]
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To: Ms. Candace McKinley, Environmental Program Manager
Bureau of Reclamation, Columbia-Cascades Area Office
1917 Marsh Road, Yakima, WA 98901 -2 058

From: James E. Rowe, 14429 SE 260th St., Kent, WA 98042

Reference: Environmental Impact Statement (SDEIS) for the purposed Kachess Drought Relief Pumping (KDRPP) and Keechelus Reservoir to Kachess Reservoir Conveyance (KKC) projects. These projects are components of the Yakima River Basin Integrated Water Resource Management Plan (Integrated Plan). The SDEIS has been prepared jointly by the Bureau of Reclamation and the Washington State Department of (Ecology), Office of Columbia River.

My opinion: We (My family) have close friends who have owned property in Kachess Village for many years. As a result my daughter and her husband built a house there. My wife and daughter are serious naturalists and members of the Audubon Society. I love the peace and quiet as well as the beauty the outdoors offers. We have been "often visitors" to the Lake and its surroundings. It is my opinion that the "No action: alternative one" should be adopted. The possible irreversible negative results of the six action alternatives considered outweigh the benefits and the statistics back up the issues of concern. I feel it is grossly irresponsible to adopt the "rob Peter to pay Paul" solution to resolve the water management issues. As I see it, there are two salient issues here. One is the natural issue of a finite availability of water at any given time and two is an inconsiderate use of the water available. I agree that the issues voiced for the Yakima River Basin are important but they should not overshadow the importance of the problems that could or would be generated by the adoption of any of the six action alternatives considered. In addition there is serious concern for the community's ability to have an adequate supply of water for wells and to support firefighting demands. 1 2

I would like to restate the importance of the fact the greatest possible problems is the possibility that the degree of drawdown in the Reservoirs considered would NEVER be recovered and the statistics back up this concern. The general ecology surrounding the Reservoirs would suffer as a result of the slow recovery. The negative results on recreation and its economy is to be considered. The economic impact on real estate in the area would take a hit. A very important consideration is the quality of life for the people in the area of the Reservoirs. It is as important for them as it is for those people in the Yakima River Basin.

I ask that you also consider cost of the engineering, construction and maintenance of the six action alternatives as well as the ongoing noise of the pumps. Perhaps it is time to "return to the drawing board" on this one.

Thank you for your consideration.

James E Rowe

Sincerely, James E. (Jim) Rowe

Ms Candance McKinley
Bureau of Reclamation

21 May 2018

Comments on; Kachess Drought Relief Pumping Plant and Kachelus Reservoir-to Kachess Reservoir Conveyance (KDRPP/KKC) Projects Supplesmental Draft Environmental Impact Statement, Kittitas and Yakima Counties, Washington

Dear Ms McKinley

Attached are my comments on this supplemental draft. Please assure me that they will be provided to approopriate staffs. How will I be informed of their responses/explanations?

Sincerely,

Larry Wilson
11701 NE 145th St
Kirkland, WA 98034
425-488-8855

Comments on Supplemental Draft EIS

1) Overall premiSe throughout Supplemental draft is that periodically a draught year will necessitate implementation of conveyance of water from lake to lake, running pumps, etc. It does not address successive draught years (once Kachess is pumped down and subsequent partial refill). a)What are socioeconomic impacts on downstream irrigators? What is recovery plan by year and multiple years? b) In this scenario what is impact on fish along total course of Yakima river? c) per plan it is projected that drawdown will replenish in 2 to 5 years following a single draught year.. Plan does not address replenishment after multiple draught years. What is impact after successive draught years? What is ultimate management recovery plan and duration? 1

2) page ES-ki "...measures wells...coordinate appropriate mitigation..." a)Specifically what agency does dry well owner appeal to? b)What will be their reaction timing and when will dry well be operational (drilled deeper, or other action)? Is there a firm commitment for resolution? c) Has funding been allocated for drilling deeper well or alternative connections? If so, who controls these funds? The owner of a performing well cannot exist without water, particularaly as a victum of action over which he has no control. 2

3) page ES kiii It is planned for pumps to be electrically powered. a) What is dB from pumps and ventilation fans (p 4-268)
themselves, assuming motors are relatively silent? b) Auxillary power is supplied by diesel engines. When in operation what is dB of these engines? c) Will these run 24 hours a day until grid power is restored? 3

4) page ES xv Overall plan addresses key issues during construction. These same issues are not addressed once system is operational? Why were these factors omitted? 4

5) page ES x "...deliver up to 200,00 acre feet..." page 1-1 "active capactiry of 239,000 acre feet..." Stated another way, it means that the project will remove 84% of water in Lake Kachess or reducing the lake to 1/6th its present size.. This greatly reduces the size of the lake. That 1/6 has a significant psychological effect. What is overall impact on Kachess basin, wildlife, underground water in close proximity of lake and river? 5 During wildfires the lake was been used as resource for dipping water by aerial fire bombers. Such drawdown will prohibit this option. What is alternative water source during fire season? 6

6) The overall plan seems to be extremely expensive for the benefit derived. a) What other options have been explored and consequently rejected? What criterion was used? Other possible options could include injection wells, dredging Kachelus to increase holding capacity and minor dams, as reservoirs, 7

on tributary streams, drawing irrigation from Columbia, etc. .

7) The plan places estensive interest on fish recoveryfor migratory fish as well as resident fish. For an integrated/comprehensive plan to succeed what is plans for seals gluttonly feeding at base of Bonneville Dam. What other agencies are you working with to achieve an all encompassing plan? Yes, the overall fish population needs to be enhanced but with seals having a smorgsboard on migrating fish what good does it do to have a great home to live and breed if at the same time the seals are descimaating the returning adults. Given enough time we will have a great place for them to live but none will be getting there. (refer to newspaper article attached) Has this big picture been addressed? What action is planned? What other agencies are integrated into this plan? 8

8) Reference Sibleys's Guide to North American Birds, pages 358 to 365 The "Pacific Flyway" straddles Easton and Lake Kachess. Humming birds are plentiful every May on migration north at time of year nectar is abundant. During southern migration the lake level is low and vegetation has dried along shoreline due to moisture absence so insects are not prevalent. This will be aggravated by extensive shoreline enlargemnt and water level significantly lower. How are birds to obtain nourishment? Humming birds do eat insects by foraging on forest floor but when vegetation is crisp there is an absence of "bugs". When food is absent birds do not exist. Is it anticipated that birds will merely move to other, more nourishing routes? Page 4-125 What is plan for restoring vegetation on 56 acres when construction is completed? Page 4-157 and 175 acknowledge reduction of wetlands and shift in existing wetlands and increased anthropogenic noise both effecting bird habitat. 9

9) page 4-128 "...furure restoration scenarios." Is this effort funded? What is schedule? What are these restoration scenariios? 10

10) page 4-129 "...loss of zooplanakkton" and ...negataively affected..." What is planned mitigation? Schedule? Funding allocated? 11

11) page 4-131 "Short term exceedance of state surface water quality..." How is this justified? Can state sue for non-compliance? 12

12) page 4-131 "Most small fish...not occur in deep water..." Study admits to larval stage of some species pass through screen but seldom found at depth when reservoir is full. But when reservoir is drawn down and not fully recharged the following year the larval are no longer 123.75 feet below former sruface. This statement exhibits faulty logic. Provide a full explanation of this reasoning. 13

13) page 4-137 Trout Passage Improvements When upper and lower lake are connected will passage improvements impact boats transiting between lakes? 14

14) page 4-145 In previous EIS it was stated PCB's are present in Lake Kachellus but not in Lake Kachess. This supplemental EIS acknowledges PCB's in both lakes. What statement is accurate? Regarding transfer of diseases and exotic species what is plan for minimizing this eventuality and potential negative impact if conditions are ignored? 15

15) page 4-277 "...access...at many other sites on east shore." This statement 16

needs to be limited in its conclusion. There are no other boat launch sites, and access would only be by cross country trekking on foot, in some cases across private land. This is simply a feel good statement. This needs correction in EIS.

16) Page 4-284 "....would not increase the amount of irrigated land....." This is contrary to presentation given during public meetings previously where increases in agricultural business were a wonderful situation for Washington state where agricultue generates X revenue already. What constraints exist to curtail additional new land brought under irrigation and consequently requiring more water? Will this additional water be economically affordable to the agricultural community? Otherwise this whole concept, as expensive as it is, is coming to fruition to benefit adventurous land speculators primarily.

17) Pages 4-320, 4-326 and 327 "...engaged an appraiser to study....land value impacts..." It is apparent the study did not observe land value impacts from other areas of lake front properties. For instance, in cases where lake front disappeared or compare lake front to non-lake front in same local, compare values in upstate New York, Minnesota, Michigan and even more closely to Lake Washington. Once lake front property reverts to so called mud flat or steep and inaccessable rocky slopes the value invariably decreases. The reported analysis smacks of seeking an answer that supports a preconceived opinion. This situation needs a more thorough study and perhaps by more than one appraiser. When will it be completed?

CIRCULATES IN THE HEART OF THE SCENIC COLUMBIA GORGE

The Skamania County Pioneer

Volume One Hundred-Twenty-Six Number Sixteen Wednesday, April 18, 2018 Single Copy 75 Cents Publication No. 497720 Stevenson, Washingt

Salmon runs may be losing the battle with sea lions

By Philip Watness
The Pioneer

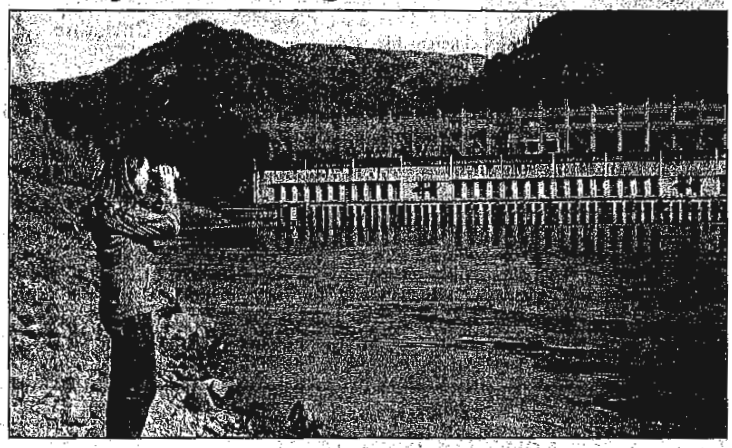
The lowest spring Chinook run in 13 years has fisheries managers looking at better tools to manage sea lion predation of the once abundant species.

Joe Hymer, a fish biologist with the Washington State Department of Fish and Wildlife, reported that only 101 adult Chinook had been counted at Bonneville Dam through Tuesday, April 10. The last time fisheries workers had seen that low of a run was back in 2005 when just 120 Chinook passed the dam.

That tracks with what they've seen this year. Just 26 Chinook had been counted through Sunday, April 1, the third lowest on record since at least 1938. The lowest ever recorded were just 11 fish through April 1, 1949. Last year, the 17 fish that passed the dam comprised the second lowest count through that date.

While all salmon runs fluctuate from year to year, the decline in the Chinook runs can be attributed, in part, to the burgeoning population of California and Stellar sea lions below the dam.

In 2002, sea lions ate an estimated 0.4 percent of salmon and steelhead below Bonneville Dam. Thirty sea lions feasted on 1,010 salmon that



U.S. Rep. Jaime Herrera Beutler spots sea lions below Bonneville Dam during a media presentation regarding sea lion predation on Wednesday, April 4. ***Photo by Philip L. Watness***

year. In 2017, the sea lion population had more than tripled and had eaten 5,384 salmon or 4.7 percent of the runs.

The number of salmon being taken by sea lions has increased while the overall runs have diminished. When the runs are high, as they were in 2015, the number of salmon taken by sea lions also rises. Of the 239,326 salmon/steelhead counted three years ago, sea lions took 10,859 of them.

Another issue is that more Stellar sea lions are also coming upriver to Bonneville Dam. Their numbers were below a dozen each year through 2007 but then 39 showed up to join 82 California sea lions in 2008 – and they keep coming back in numbers ranging from 89 in 2011 to 63 last year.

Fisheries managers have also ramped up efforts to lethally remove more sea lions over the past few years. In 2012, 24 sea lions were trapped with 19 being euthanized. In 2016, 54 sea lions were trapped and destroyed. Over the past decade, 199 sea lions have been removed with 175 euthanized, 15 placed in zoos and aquariums, and nine dying from accidental injuries. Fisheries managers estimate that removal of the animals saved between 15,000 and 20,000 spring Chinook.

Fisheries workers also shoot or drop explosive charges at the marauding sea lions throughout the spring Chinook run to scare them away from the areas where the salmon congregate below the dam.

A white paper published by the U.S. Army Corps of Engineers on March 5, 2017, states that more and more sea lions are feasting on salmon regardless of the size of the runs. Some are also not leaving the area when the runs end. Regarding hazing, the authors state "... our data calls into question the effectiveness of these treatments."

Fisheries managers say their efforts to remove problem sea lions is hampered by the process currently being used to identify and remove the pinnipeds. To remove a California sea lion under the current rules, each animal must be individually identified by trapping, marking and releasing the subject animal; observed at Bonneville Dam for five days; been previously observed eating salmon at the dam; and subjected to non-lethal hazing while at the dam.

If those criteria are met, managers then must request approval to euthanize an identified sea lion from the National Oceanic and Atmospheric Administration. Once approved, the specific sea lion must be trapped again before it can be killed.

"They have to be here for at least five days and they have to be observed eating a salmon," said Steve Jeffries. "We've actually marked hundreds of animals here. We started working here in 2005, 2006. Before 2000, very few sea lions had ever been seen up here. There was a big smelt run in the river in 2000 and I think that drew a lot of California sea lions upriver. When the smelt left, a bunch of animals were still looking for food and they came up here and discovered the spring Chinook."

Fisheries agencies have

Continued on p. 10

Salmon runs...continued from p.1

asked U.S. Rep. Jaime Herrera Beutler to back legislation making it easier to identify and remove problem sea lions. On April 8, 2017, the congresswoman introduced the Endangered Salmon and Fisheries Predation Act to amend the Marine Mammal Protection Act of 1972 (MMPA) to streamline the process to remove and euthanize sea lions.

House Resolution 2083 would "authorize the National Oceanic and Atmospheric Administration (NOAA) to issue one-year permits allowing (the states of) Washington, Oregon, Idaho, the Nez Perce Tribe, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes and Bands of the Yakama Nation, the Columbia River Inter-Tribal Fish Commission, and the Cowlitz Indian Tribe to kill sea lions in a portion of the Columbia River or certain tributaries in order to protect fish from sea lion predation."

The agencies would be allowed to kill up to 100 sea lions per year. The legislation would also require NOAA to issue or deny a permit within 30 days of application, much faster than the current process.

While the bill was approved by the House Committee on Natural Resources (21 ayes, 14 no's) and sent to the full House of Representatives on July 26, 2017.

Rep. Herrera Beutler hosted a media tour on Wednesday, April 4, to put pressure on lawmakers to consider the bill in the House with the hope that passage would prompt the Senate to also approve the legislation. The legislation has garnered the support of the governors of Oregon, Washington and Idaho, the Columbia River Intertribal Fish Commission, state and federal fisheries agencies, and others.

Standing on the shore of Bradford Island below Bonneville Dam, the congresswoman told TV and print journalists that the fisheries managers needed the new tool to address the increasing sea lion predation of salmon runs and the spring Chinook run, in particular.

Shotgun blasts and explosive charges echoed around the members of the media as Herrera Beutler talked about her bill. Sea lions lazily swam a few feet offshore as she spoke, adding a visual footnote to her comments.

Herrera Beutler said some salmon runs face extinction if the sea lion predation isn't curbed – and quickly.

She said opponents to her legislation remain fixed on removing hydroelectric dams as the ultimate solution to protecting and enhancing salmon runs.

"The main argument I've heard is that if you really want to protect the runs, you need to rip out the dams," Herrera Beutler said. "At this point, we mitigate like putting in fish ladders. We do a lot and we should but the next step is dam removal and there are proposals out there to do that which I don't support."

She said she supports the manifold approach to managing the sea lion population and supporting the salmon runs.

"It's not just one thing," she said.

The workers who haze the sea lions get up before dawn to catch the animals before they disperse from their overnight slumber.

Steven Jeffries, fish biologist for Washington State, said hazing works best on new arrivals to the dam.

"It's effective on naïve animals, those that haven't been here very long," he said. "The animals that are habitual here – probably not so much. They recognize the boat. It's a constant battle to outsmart them."

Workers spot sea lions from the roadway which crosses in front of the dam and direct the hazing boat to them. They monitor the three tail races (where water is pouring through the dam) to identify sea lions munching on spring Chinook. A worker with a shotgun shoots at the animals from the dam while boats navigate the waters below.

Three traps are set around the area in front of the dam. Sea lions are individually identified and tagged. Workers remove and euthanize the ones previously identified for removal.

"Some of them have previously been marked so we hot-brand them," Jeffries said. "Some of them have natural marks that are identifiable but the most reliable mark is the hot-brand so they get an individual number. Observers are watching those animals and then identifying them."

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP

1 message

Bonnie Aguilar <BONAGI@msn.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Thu, May 31, 2018 at 2:40 PM

To take this great recreation area from the hundreds of people using this area every year is a crime. This plan is only to put more money in the pockets of farmers to grow more produce. The big farmers are running the little farmers out of business because the small farmer cannot keep up.

I have a house on the lake in the Lake Kachess Community Assoc. Many of the trees are already dying because of the lake of water since the lake is low. Lake Kachess should not be lowered any more. The pumping plant would take so much water out, it would take the lake years to recover. 1

And what good would it do the farmers in the following years, when the lake is already so low.

The State park at the end of the lake is very popular and filled every weekend in the summer. It would be severly effected for many years. Even when they lowered the lake to install a boat ramp, it took many years to recover from that.

Please reconsider this proposed Kachess Drought Relief pumping plant, it is an obsurd idea.

Thank you, Bonnie Aguilar, Lake Kachess Community Assoc.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Attn: Candace McKinley

1 message

Robert Aigner <roba@harsch.com> Thu, May 31,
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Hello;

I am writing, again, to express my disapproval of the proposed Kachess Drought Relief Pumping Plant.

I simply feel that not all constituencies have been assessed nor do I believe that an accurate cost-benefit analysis has been provided.

1

For the dollars that are considered being expended and for the corresponding benefit, it just does not make sound financial sense.

Nor, have all of the potential ramifications of the proposed been evaluated.

Thank you.

Rob Aigner | SVP & Regional Manager | Harsch Investment Properties
13228 NE 20th Street, Suite 300 | Bellevue, WA 98005
O: 425.974.3200 C: 206.948.0607| roba@harsch.com
www.harsch.com |

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Drought Puming Plant

1 message

Mike <mcanans@q.com>
To: kkbt@usbr.gov

Tue, May 29, 2018 at 4:14 PM

Your plan to pump water from Lake Kachess is foolish… and a huge waste of tax payers money.

How about this…….

Every spring season millions of acres of water are allowed to run down the Yakima River from the snow melt..!!

1

Instead why not form another reservoir somewhere near Yakima and capture this water to be used later for irrigation…

Also demand that water users conserve and prove it or they won't get water..

Mike Canan

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Re: Proposed KDRPP and KKC Projects

1 message

Sarah Kitchell <sckitchell@gmail.com> Tue, May 29, 2018 at 9:21 PM
To: Save Lake Kachess <contact@savelakekachess.org>
Cc: bocc@co.kittitas.wa.us, kkbt@usbr.gov

Hello,

My family has owned property on Lake Kachess for over 25 years. My greatest memories growing up are of time spent on Lake Kachess. Polar bear jumps in the early spring, kayaking/racing across the great expanse to explore the other side, and basking in the summer sun. This plan to drain Lake Kachess will not only devastate the local ecosystem and drain our natural Lake to historic lows from which it will never recover, but it will also steal the place that has been so meaningful to me and my family, as well as the many other families who live at Lake Kachess. 1

A couple of additional points I would urge you to consider that have been keeping us up at night for the past couple of years:
- There is no current plan in place to ensure that all residents of Lake Kachess maintain a working well or source of running water. As you are well aware, water is critical to survival and draining Lake Kachess will put our water source at high risk of failing without the ability to recover. I challenge you to consider the extreme, and in many cases impossible financial burden this will put on all residents of Lake Kachess, forcing many to find a new home. 2
- Every year we face a fire ban due to the areas extreme heat and dry spring-fall. This plan removes our fire department's readily accessible resources to ensure effective fire prevention and spread in our community. This could have truly epic consequences as we've seen more frequently across our beautiful state in recent years. 3

We must be able to come up with an alternate solution. Without a LONG TERM plan for supporting the farming industry of eastern Washington while global warming is only intensifying droughts, we really have found no solution at all. I plead with you to reconsider this decision, to keep our beautiful natural lake and continue discussing plausible long term options that we could implement in support of everyone's best interests. 4

I want to reiterate my petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 5

Please feel free to reach out if you have any additional questions.

Best,

--
Ms Sarah Kitchell
sckitchell@gmail.com

May 30, 2018

Ms. Candace McKinley

Environmental Program Manager

Columbia-Cascades Area Office

Bureau of Reclamation

1917 Marsh Road

Yakima, Washington 98901-2058

RE: Comments on Supplemental Draft Environmental Impact Statement (SDEIS) for the Kachess Drought Relief Pumping Plant (KDRPP)

I have reviewed the SDEIS for the KDRPP. My comments are:

1. The SDEIS was – as these things go – "a pleasure to read." The writers organized it well and drafted it using active and plain language. Refreshing! Compliments to all who worked on it.
2. The public involvement process for the project was satisfactory. I consider the Upper Kittitas Valley my second home and I had no difficulty following along the proposed project as it has evolved over the years even though I live on the west side. Anyone paying attention to the world around them should have had no difficulty following along and weighing in at appropriate opportunities. People unhappy with the substantive conclusions of the environmental review documents *always* attack the public involvement process. In this case, there is no merit for doing so. 1
3. The SDEIS appears essentially complete in terms of examining the various environmental, economic, and social factors that reasonably can be evaluated for a project of this type. I imagine others may fill in minor gaps but I'd be surprised if there were any significant omissions based on the thoroughness of the SDEIS.
4. The 2015 drought was a wake-up call and a "trial run" for the hotter, lower-snow-pack future in store for us due to global warming ("climate change" in the – ahem – "dry" language of the SDEIS). If implemented, the KDRPP will help the Yakima basin and thus Washington State adapt to this future. 2
5. Based on the analysis of the SDEIS, I strongly support Alternative 4 and the corollary Alternative 5C that includes the Keechelus Reservoir-to-Kachess Reservoir Conveyance. These projects have both the least environmental impacts among the "action alternatives" while also having the lowest lifetime costs.
6. The only concern I have after reading the SDEIS is the ambiguity regarding who will pay for the project. The SDEIS discusses the degree to which Reclamation can assign costs to the proratable entities but there also is reference to Ecology (that is, we Washington taxpayers) paying for a substantial portion of the project. While the proposed project is impressive in that it has the 3

potential for increasing the water available for irrigation *and* water for threatened & endangered fish species in a few reaches of the Yakima watershed, the *primary* purpose of KDRPP is irrigation. There is nothing wrong with that. But the principal beneficiaries – the proratable entities – should pay the lion's share of the costs. In a well-regulated free market, they can and should pass those costs on to us consumers. I acknowledge that cost are "to be determined" but I express my preference for an outcome in which the primary beneficiaries pay.

Thank you for your consideration.

Sincerely,

Dennis Clark

Dennis Clark

PO Box 1381

Anacortes, WA 98221

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Mark Klebanoff <klebanoff@comcast.net> Wed, May 30, 2018 at 7:33 PM
To: kkbt@usbr.gov

I would like to register my objections to the KDRPP and KKC projects. We all need to figure out how to manage our water resources in a shared way that is fair to all stakeholders and is economically rational. Spending $500m to pump water from Lake Kachess so that a handful of large farms can irrigate more water intensive crops is not a good solution. We can manage our water needs in a more rational way – by for example shifting to less water intensive crops and investing in water conservation generally. 1

I admit I am a Lake Kachess property owner so I have concerns specifically about the impact on Lake Kachess, but I am also a tax payer and an environmentalist have those more general concerns as well.

Mark Klebanoff

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus SDEIS

1 message

Michael Berline <mberline@gmail.com> Fri, Jun 1, 2018 at 8:09 AM
To: kkbt@usbr.gov

Hello, I am writing this in response to the comment period for the Kachess and Keechelus projects. As a lifelong resident of Easton I oppose any actions that would change the level of the lakes. There is no reason to drop them below the historical levels. I support no action proposition 1. 1

Michael Berline

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Dont Drain Lake Kachess

1 message

Lucia Fox <lmarie@sprynet.com> Sun, Jun 3, 2018 at 10:45 AM
To: kkbt@usbr.gov

It does make good sense to drain the lake...please quit wasting precious natural resources for the almighty dollar...ugh! 1

Sent from my Verizon, Samsung Galaxy smartphone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Sue Grinius-Hill <suehi@live.com> Sun, Jun 3, 2018 at 6:25 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

The proposed pump will not realize the supposed goal, but will drain the lake, have negative impacts on wildlife and small farmers, and ruin natural beauty. I dont support the plan to install a pump in Lake Kachess. Please stop this action. 1

Thank you, Sue Grinius-Hill
Sammamish, WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus projects

1 message

Henry Halvorson <halvmobile@gmail.com> Thu, Jun 7, 2018 at 11:34 PM
To: kkbt@usbr.gov

Hello,

I am writing to express concern about this project regarding changes to water in Lake Kachelus. This has been a beautiful and fun lake for recreation for many years to the full time and part time residents of Snoqualmie Pass. I am slightly confused with the intentions of the project as a whole, and what the expected results will be. Could you help clarify what the goal of the project is, and what steps could be taken to achieve this goal? Thanks! 1

-Henry (Resident of Snoqualmie Pass)

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] #SaveLakeKachess

1 message

MSN Service <kmulqueeney@msn.com> Fri, Jun 1, 2018 at 4:06 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: Shawn Mulqueeney <shawn.mulqueeney@becu.org>

Please save Lake Kachess!

We are new residents to the area and are deeply concerned about our property - particularly our well and the reason we bought on Lake Kachess, to enjoy the LAKE!

Beyond draining the lake, the KDRPP has the potential to:

De-water many of the wells surrounding Lake Kachess and in upper Kittitas County

Limit (eliminate) recreational activities on the lake

Compromise the efforts of local fire districts to suppress forest fires

And makes NO mention of any financial restitution for property values which will plummet in our community

Cost tax payers an estimated $400 Million Dollars for a project that will ultimately fail

We are a small community but we will not sit by and watch our quality of life be of detriment.
Please consider other options and #SaveLakeKachess

Kara/Shawn Mulqueeney
111 Winter Park Ln
Easton, WA

Thank you

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess irrigation - comments

1 message

Baraka Poulin <bpoulin1@gmail.com> Mon, Jun 4, 2018 at 4:18 PM
To: kkbt@usbr.gov
Cc: Bruce Poulin <brucepoulin3@yahoo.com>

Hi,

I reviewed the Kachess Drought Relief Pumping Plant Supplemental Draft Environmental impact statement dated April 2018 and would like to offer the following questions and observations.

Observations:

- Power cost looks like an order of magnitude to low. 260kW average? Are there backup calculations I could review? 1
- Both the construction and operating CO2 emissions are incredibly large. The EPA's social cost of carbon should be applied to this lifetime value (8000 tons/yr * $50/ton) as part of the life cycle cost. Although below significance thresholds, this is NOT in-line with state goals. 2
- $450M is an tremendously expensive burden for taxpayers to bear with the benefit going to only a select few individuals during infrequent drought years. This study needs to show the estimated cost per gallon, the number of people directly impacted, and the alternative cost (ie not planting year)- I suspect it may be less expensive to leave the field fallow and pay a distribution to the farmer. 3
- With lake drawdown decreasing rim stability – what is the estimated cost if implementing the proposed erosion control measures (what are these measures?) 4

My general concern is lack of cost/benefit quantification and analysis.

I look forward to your feedback.

Thanks.

Baraka Poulin

WA State Professional Engineer #51231

206.445.2037

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Amy Shirley <woodinvilleshirleys@yahoo.com> Fri, Jun 1, 2018 at 1:20 PM
To: kkbt@usbr.gov

Please don't drain/lower lake Kachess. It's an amazing, quiet lake where you can go for vacation. It's peaceful and beautiful. So many people have invested in the economy and have homes on the lake. Their value will be drastically affected by this action.
Thousands of people visit the area every summer, this also is going to affect money coming in as the government will loose those funds from summer campers. 1

Please find another way.

Sincerely,
Amy Shirley

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Lake

1 message

Gary Brill <garyalanbrill@gmail.com> Mon, Jun 11, 2018 at 4:42 PM
To: kkbt@usbr.gov

On the proposed Lake Kachess drought pumping proposal I favor the alternative of “no action”. My concerns are for homeowners, recreationists, fire management, in an area where in the life of the project fire will be increasingly a concern, and environmental concerns. 1

Gary Brill

Seattle 98133

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Attention - Candace McKinley - Environmental Program Manager

1 message

Paul Cook <pcookemail@yahoo.com> Mon, Jun 11, 2018 at 8:10 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Lake Kachess -

Why would we drain this lake? I don't understand the reasoning for doing something so unsustainable. Is this so that we can continue to plant crops that consume too much water for the terrain? This is the opposite of conservation, this is the opposite of what any reasonable person would do.

This benefits a few wealthy farmers at the cost of a natural resource, taxpayer dollars and common sense. Please - find the courage to do the right thing here. You know what it is. Lead, don't follow. 1

Best,

Paul T. Cook

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake kachess

1 message

Steve Villa <stevebv1@yahoo.com> Wed, Jun 13, 2018 at 3:26 PM
To: kkbt@usbr.gov

I was more than shocked to hear of the plan to drain Lake Kachess. One of the most beautiful and unspoiled lakes in Washington. I was lucky enough to spend my younger years growing up on the lake in summer and can not believe this treasure would be destroyed by needs of a few. It was my hope that many generations could continue to enjoy the beauty of the lake. There surely are other options for this. Like perhaps water conservation instead of waste.
Sent from my iPad

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Keechelus Reservoir to Kacheess Reservoir Conveyance project.

1 message

Kevin W olcott <Kevin.Wolcott@workspaceinteriorsod.com> Mon, Jun 11, 2018 at 6:51 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Attn Candace Mckinley

Regarding the Keechelus Reservoir to Kacheess Reservoir Conveyance project.

Dumb idea.

God put in rivers to drain water, please leave our lake alone as it is part of the wild & scenic properties that must be preserved as part of our state. 1

As my favorite T shirt says "Strip mine the earth we'll do the other planets later". Stealing natural resources from our community can not be allowed.

Kevin W olcott
Snoqualmie Pass resident

Tel: 206.399.2450 |

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Malcolm MacLeod <mrmacleod3@yahoo.com> Wed, Jun 13, 2018 at 3:53 PM
To: kkbt@usbr.gov

I am saddened to learn about more detailed plans to pump out more water from Lake Kachess. This is absolutely unacceptable, and it represents a dubious solution for irrigation practices that are irresponsible and unsustainable in the first place. The proposed solution to drain lake water is financially and environmentally costly and greatly exceed any benefit, except that for big farming industry stakeholders who fail to recognize the true value of natural resources and assume it is theirs for the taking. 1

Please use your influence and expertise to stop this pump plant and lake draining from proceeding further.

Thank you for your support.

Malcolm MacLeod
847.722.5720

Malcolm MacLeod
Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Maggie Batson <batsonmaggie@gmail.com> Sat, Jun 16, 2018 at 6:25 AM
To: kkbt@usbr.gov

No, no, no, no!!!! This area of upper Kittitas county is a beautiful, natural resource for visitors and locals. Its resources are not to be ruined by special interest groups who have no connection to our beautiful area. For years and years, lake Kechelus has been drawn down to nothing for the irrigation of eastern Washington farmers, now they want to ruin lake Kachess? Please please do what you can to stop this horrible plan. The upper Kittitas area is a beautiful area, please lets not it be taken apart piece by piece by greed and careless people. 1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP Questions - EIS comment period

1 message

Phil Day <philday813@gmail.com>
To: kkbt@usbr.gov

Fri, Jun 15, 2018 at 9:07 AM

June 15, 2018

Hello,

I am a resident at Kachess Village, adjacent to Kachess Lake in Kittitas County, Washington. Last night I attended a meeting in Issaquah regarding the proposed Kachess Drought Relief Pumping Plant. I would like you to know that I am extremely concerned about the facts based in this project.

Lake Kachess is a gem. It is a place of incredible natural beauty, and it is home to many (including my husband and me). It is used extensively as a recreational lake, by people from all over, thanks to the beautiful campground located on the north end of the lake. It also provides drinking water and fire safety. 1

Destroying a priceless natural resource which many enjoy in order to irrigate low value crops (such as hay) is cruel. The entire effect of homes and environment in upper Kittitas County around Lake Kachess and Keechelus due to lack of water in an area prone to fires is unimaginable. The overall effect of properties being red tagged in one area of Kittitas county so other areas can prosper is crazy.

I have some questions I would like answered:

1. Who will pay for this project, which is estimated to be in the $300 million range, but easily run up to $500 million? 2

2. Wildfires are increasingly common in the area. How will drawing down the lake, and hence the water table, help with firefighting efforts? 3

3. If the water table lowers it is not unreasonable to believe that wells will dry up and increase wildfires, wells will run dry and make our homes uninhabitable. That is a tremendous financial and environmental burden for local residents, and taxpayers in general. Has an accurate cost/value analysis been done which compares realistic losses to Kittitas County in exchange for crop irrigation downstream? 4

4. Kachess is home to the endangered bulltrout. How will these and other fish be saved? Trucking them to another location does not seem like a reasonable solution to this issue. 5

5. You are proposing a floating pump on the lake. What will be the noise pollution and how far can residents hear the pumps? 6

6. One neighbor has not been able to get insurance on his home due to wildfire hazard. How many other areas will be affected by this new problem which would only get ,larger if you pump water out of the lake? 7

7. The lakes are full in spring or late spring. What are you doing with the runoff water coming down into lower Kittitas County now? What could be done in the future? 8

8. Are all farms in the Yakima valley which your report targets rigged with efficient water use irrigation systems? What conservation measures will be put in place (piped systems, additional storage, etc.). 9

Please count me as being vehemently opposed to this boondoggle project, which will pump down and ruin the lake and environs where I live, and which I love. As proposed this expensive project will wreak havoc on Kachess and Keecheluss Lakes, and all of those who benefit from them. 10

Phil Day

2331 Via Kachess

Easton, WA 98925-0184

Keechelus-kachess pumping proposal

My name isEdward A. Giaudrone, 71 years old, born and raised in Kittitas County all ofmy life. Your ecurrent proposal to install a pipe from Keechelus toKachess for the purpose to keep Kachess full during ea draught period is unwarranted. Also installing a pumping station oneLake Kachess will totally ruin and edestroy the lake for recreation purposes and aqua levels forsurrounding homes on the lake, as well as useproperty owners East of the lakes that depend on our wells for our homes and irrigation. 1

I have lived here all ofmy life, and there h s never been e problem with smartly supplying water to the elower valley, even in the toughest of times. Now that more wineries andthe like have started up in the edesert areas, there becomes a great shortage for water to operate. Rather than mismanage our water, eand totally destroy our lakes and recreational livelihoods why not drill your own wells in the lower valley eso that you can supply your own water. 2

I have fished these lakes with my parents and grandparents almost all of my life, and there is noepossible eway that once you pump Lake Kachess down as proposed, it will NEVER be able to return to it's natural state, destroying everything around it, including water to fight our own forest fires.

The Bureau of Indians have begun reintroducing salmon to our lakes and the destruction of our lakes ewill also impact those upeand coming projects.

My opinion therefor isthat if the desert does not have it's own water for the projects proposed, then estop stealing water from the Upper County and drill your own.

Start managing the flow from our existing lakes better, and let them fill up sooner einstead of turning it edown the rivers too early for no benefit. 3

You eannot tell methat you cannot let water out from the lakes faster than snow melts into them; and I ehave no college education. They have been fine for years past.

LEAVE OUR LAKES ALONE AND QUIT TRYING TOeDESTROY THEM FOR THE BENEFIT OF THEeLOWER VALLEY. e

DISGUSTED e

eEdward A. Giaudrone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess dam

1 message

Adam Gorski <hyakski06@yahoo.com> Mon, Jun 18, 2018 at 7:18 PM
To: kkbt@usbr.gov

I have been a resident of Snoqualmie Pass since 2003. Also I have a bachelor's degree in landscape architecture from Cornell university a own a multimillion dollar company in the landscape and irrigation industry. I know water isn't being used effectively and the farmers could be using modern technology decreasing usage. I deem this project a waste of money and and have detrimental effects to the established environment 1

Adam Gorski
425-766-8605

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Oppose KDRPP/KCC

1 message

Lisa Morrison <lmorr11@comcast.net> Sun, Jun 17, 2018 at 10:23 AM
Reply-To: Lisa Morrison <lmorr11@comcast.net>
To: kkbt@usbr.gov

Dear Ms McKinley,
I am writing to express my opposition to the KDRPP/KCC project. I am a Washington State resident from Vancouver and I believe that this project does not serve the majority of Washington residents and interests. The proposed plan risks Bull Run habitat for trout spawning and draining Lake Kachess will damage current wells and result in a lake that cannot be used for recreational purposes for all Washington residents. This project will cost Washington tax payers a huge sum of money and I do not believe that it serves us well.
Please carefully consider my opinion as you make this important decision. 1

Sincerely,
Lisa Morrison, MD
Vancouver, WA

Sent from my iPad

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Re: #SaveLakeKachess

1 message

Kara Mulqueeney <kmulqueeney@msn.com> Mon, Jun 18, 2018 at 4:39 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

We were not notified of the potential to install a floating pump, is someone notifying those of us that pay taxes on Lake Kachess? 1
Will someone be issuing a notice to residents about the security of water to our wells/fire pumping trucks to protect our property?
Please let us know if this project will actually be enough water for farmers in need during drought years and if it's not then why spend the money and damage an alpine lake taking away recreation, environmental impacts and negatively affecting not only our property values but possibly deeming our houses uninhabitable. 2

Kara/Shawn Mulqueeney
111 Winter Park Ln
Easton, WA

From: MSN Service <kmulqueeney@msn.com>
Sent: Friday, June 1, 2018 4:06 PM
To: kkbt@usbr.gov
Cc: Shawn Mulqueeney
Subject: #SaveLakeKachess

Please save Lake Kachess!

We are new residents to the area and are deeply concerned about our property - particularly our well and the reason we bought on Lake Kachess, to enjoy the LAKE!

Beyond draining the lake, the KDRPP has the potential to:

De-water many of the wells surrounding Lake Kachess and in upper Kittitas County

Limit (eliminate) recreational activities on the lake

Compromise the efforts of local fire districts to suppress forest fires

And makes NO mention of any financial restitution for property values which will plummet in our community

Cost tax payers an estimated $400 Million Dollars for a project that will ultimately fail

We are a small community but we will not sit by and watch our quality of life be of detriment.
Please consider other options and #SaveLakeKachess

Kara/Shawn Mulqueeney
111 Winter Park Ln
Easton, WA

Thank you

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Questions

1 message

Rick North <ricknorth@comcast.net>
Reply-To: Rick North <ricknorth@comcast.net>
To: kkbt@usbr.gov

Fri, Jun 15, 2018 at 6:31 AM

6/15/18

Hello,

I am a resident up at Lake Kachess and I went to a meeting in Issaquah last night in regards to the proposed Kachess Drought Relief Pumping Plant. I would like you to know, I am extremely concerned about the facts based in this project, cannot even believe it is being proposed and am vehemently opposed to the project. Spending money on crops (hay) that don't make money is ludicrous. Destroying a natural resource which many enjoy is cruel. The entire effect of homes and environment in upper Kittitas County around Lake Kachess and Keechelus due to lack of water in an area prone to fires is unimaginable. The overall effect of properties being red tagged in one area of Kittitas county so other areas can prosper is crazy. 1

I do have some questions I would like answered.

1. You are proposing a floating pump on the lake. What will be the noise pollution and how far can residents hear the pumps? 2

2. One neighbor has not been able to get insurance on his home due to wildfire hazard. How many other areas will be affected by this new problem which would only get ,larger if you pump water out of the lake? 3

3. The lakes are full in spring or late spring. What are you doing with the runoff water coming down into lower Kittitas County now? What could be done in the 4

future?

4. Are all farms in the Yakima valley which your report targets rigged with efficient water use irrigation systems? 5

Rick North

2331 Via Kachess

Easton, WA 98925

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save LAKE Kachess

1 message

C C Owens <ccowens385@gmail.com> Wed, Jun 20, 2018 at 8:55 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

Please send me a detailed account of what you have spent (and wasted) of the Washington tax payers money so far on this project. 3

Who is paying for this project going forward? 4
The Washington Tax payers?

Why do you want to turn a beautiful LAKE into dried up dirt? 5

This is BIG Corporate welfare at its worst.

Please respond,
Cliff Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

C C Owens <ccowens7@gmail.com> Mon, Jun 18, 2018 at 9:03 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

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I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

Who is paying for this project? 3

Why not dig out LAKE Keechelus and take your extra water from there? 4

With your plan how does this benefit the LAKE Kachess property owners? 5

Please respond, C C Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

J P Owens <plsjpowens@gmail.com> Thu, Jun 21, 2018 at 12:42 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

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I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

What benefits to KDRPP stay in Kitttitas county? 3

What is your plan when private wells in upper Kittitas county are de-watered? 4

How many Yaikma Farmers are Really backing KDRPP? 5

I would like to know the count of the family farms vs the corporate farms.

Please respond, J Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

J P Owens <epxkachess@gmail.com> Wed, Jun 20, 2018 at 3:42 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

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I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

Who is funding this project? 3

When LAKE Kachess is at an unusable water level, what is being done to meditate needed water for a wild fire? 4

When LAKE Kachess is at an unusable water level, what is being done to meditate the loss of wells for LAKE Kachess residents? 5

Please respond, J Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE Kachess

1 message

J P Owens <kachess99@gmail.com> Mon, Jun 18, 2018 at 6:12 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

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I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

What is being done when the lake has been drained for water to fight Forest Fires? 3

Who is paying for this project? 4

What are the Yakima farmers doing to conserve water? 5

Please Respond, Jo Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

R B Owens <epxdudmarketing@gmail.com> Tue, Jun 19, 2018 at 9:25 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

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I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

With lowering LAKE Kachess water level so the lake is unusable how much water do you plan on bringing over from LAKE Keechelus? 3

Do you plan on putting in a filter to filter out all of the sand and salt that is thrown into LAKE Keechelus from the snow removal along I90.? 4

Who is paying for this project? 5

Please Respond, Rachel Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

stephanie owens <owens.stephanie206@gmail.com> Tue, Jun 19, 2018 at 8:38 AM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

Has an Environmental Study been done? 3

If so what were the results?

Who is paying for this project? 4

Who does this project benefit? 5

Please Respond, Stephanie Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] W ashington State Concerned Citizen Questions. SDEIS Kachess Drought Relief Pumping Plant and the Keechelus to Kachess Conveyance Project.

1 message

Dan Ryno <rynoman222@gmail.com> Sat, Jun 16, 2018 at 3:21 AM
To: kkbt@usbr.gov
Cc: Dan Ryynanen <rynoman222@gmail.com>, Sonshinefarm <rfarm2@msn.com>

Please address the following questions:

1. If the Kachess Pumping Plant is installed in Lake Kachess, what compensation will be provided to Homeowners around the lake to offset a resulting drop in property values? 1
2. Have studies been done on both Lake Kachess and Keechelus to help assess the risk of landslides or land movement as a result of lowering the level of both lakes? 2
3. With global warming occurring, what impact will a warmer climate have on Lake Kachess in conjuction with a max drawdown from a floating pump? Will this impact the fish and clams in the lake? 3
4. The Bull Trout populations in Lake Kachess and Lake Keechelus is relatively low. If the populations in both lakes decline as a result of lake level drawdown below natural levels, what penalties will be paid and who will pay them? As a fisherman I have to pay a fine if I harvest a single bull trout. 4
5. What type of water rights were/will be granted allowing drawdown of Lake Kachess and Keechelus, both natural glacier made lakes? What department authorized/will authorize this? 5
6. Where will Roza Irrigation District come up with the money to pay for a floating pump on Lake Kachess and other related expenses, and if they rely on government bonds, how will we be sure they don't default, burdening taxpayers? Who will pay for the Bull Trout Volitional Channel, boat launch, reduced property values, dewatered wells, and any other related costs? 6
7. From what depth would the floating pump draw water from Lake Kachess? The reason I ask is if the pump draws from the cold deep water the impact to lake temperature would be much greater, potentially impacting the Bull Trout population. 7

A concerned citizen,

Dan Ryynanen

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Comments regarding SDEIS

1 message

Junichi T suneoka <stbnsdbn@gmail.com> Tue, Jun 19, 2018 at 1:31 PM
To: kkbt@usbr.gov

Dear Ms. Candace McKinley,

I have reviewed KachessDroughtReliefPumpingPlantandKeechelusReservoir-to-Kachess Reservoir Conveyance (KDRPP/KKC) Projects Supplemental Draft Environmental Impact Statement, Kittitas and Yakima Counties, Washington. As an owner of property on Kachess lake, I have many concerns and questions. I have quoted the sections and add my comments specific to the each quotes below. Please review my comments.

- All the wells on the East side will be dewatered according to DOE's own study (p2-68). But the DEIS notes only that they will continue to be "monitored and … coordinate appropriate mitigation if needed" (p ES-xi)."
    - o If one has senior water rights for his/her well, According to the SDEIS, their well will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater my well which has senior water rights? The SDEIS notes the wells on the East side of Lake Kachess will be dewatered. There is no money for mitigation. Exactly what is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry? 1 2

- Bull trout: the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS."
    - o What fraction of the resident endangered Bull Trout population in Lake Kachess will be killed under the proposed alternative? 3

- Time pumps could be used: "Project proponents would use the pumping plant during drought years and could possibly use it in following years as the reservoir refills to a level above the existing gravity outlet." (p2-6)
    - o Does this mean the definition of when the pumps could be used has changed from the prior definition of drought (less than 70% of prorated water expected to be available)? Why would the pump be used in following years 4

"as the reservoir refills to a level above the existing gravity outlet?" would that not prevent or delay refill?

- Page 1-4 notes that the integrated plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation).
    - Please define the number of kAf saved by water conservation and market reallocation. 5

- Only the preferred alternative has pumps at lake level, exposed to the environment (all others have pumps at the bottom of a shaft). P2-75 notes the maximum permissible environmental noise is 55 dBA.
    - How is the noise expected to change as a function of distance away from the pumps? Will the pumps be running 24/7 once they start running? For how long? 6

- Table 1-2 on p 1-20 notes that ecology will "issue water rights as necessary." We've been told over and over that no new rights will be generated from this plan.
    - What is the legal mechanism by which new water rights be issued? To whom? 7

- The description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff). Can we raise the issue of how this will be done (what happens to the excess water, the "flip-flop," etc) to delay the plan?
    - The SDEIS notes the lake would need to be drained for construction. How will this affect flows for fish passage and the "flip-flop"? 8

- 115,000 cubic yards of KKC tunnel muck comes out on Kachess Lake Road with no mention of where it will be trucked to or the impact of over 5000 truckloads of material being hauled off.
    - Where will the 115,000 cubic yards of KKC tunnel muck be deposited? 9

- P2-68 notes all action alternatives will result in localized short term exceedance of turbidity standard.
    - Please provide a definition of the degree of turbidity exceedance and the effect it will have on native fish populations. 10

- P2-71 notes permanent habitat loss with the preferred alternative
    - Please Define the effect of permanent habitat loss on the spotted own, bull trout, and other endangered / listed species. 11

- P2-73 notes decreased recreation desirability
    - Please quantify the economic impact of the decreased recreation desirability. 12

- P2-76 notes that the parcels north of the existing beach road on the East side are indeed private and may need to be purchased from their current owners for the boat ramp and parking lot.
    - There is no money in the SDEIS for property purchase. How many lots and at what expected price will be purchased? 13

- P3-29, 3-45: both Keechelus and Kachess are now listed as "category 5" water impairment because of PCB contamination.
    - In the 2015 DEIS, only Keechelus was noted to have PCB contamination. Please release the report which also indicates that Kachess has a similar contamination. Would dredging and construction activities not stir up sediment containing PCBs? What increase of PCB levels is expected on the basis of the proposed alternative construction activities? 14

- P3-172 notes indian sites on kachess.
    - Please describe what happens with indian artifacts unearthed during construction. 15

Thank you for your time.

Best Regards,
Junichi

Junichi T suneoka
phone_206.407.4546
9407 21st Ave SW
Seattle WA. 98106

Bureau of Reclamation
Columbia Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

6/20/2018

Attention: Candace McKinley – Environmental Program Manager

Dear Candace,

We are writing this written comment regarding the KDRPP & KKC SCEIS project.

We are **strongly opposed** to this project.

We have the following questions that require a response:

1. How will the lake be refilled when the SDEIS (released 4/13/18) says it will take 5 years for the lake to return to pre-drawn down levels, when there is analysis of the KDRPP data that says the lake will never recover because the water shed above the lake does not produce enough excess water? How does the Bureau plan to refill this lake if the water shed does not have enough excess to refill the lake as proposed? 1
2. Has the research been completely finished regarding the FULL environmental impact when 400,000+ acre feed from Lake Kachess is drained? What are the long term effects? 2
3. What will happen to the bull trout when they cannot reach their spawning grounds? 3
4. How will the noise and pollution be addressed when the pump continues to run even after the lake has been drawn down? 4
5. What is the plan when there is a fire and there is no water in the lake to assist in fire fighting efforts? This is a major concern and must be addressed. 5
6. Why are none of the benefits of this water staying in Kittitas County? Why are none of the farmers in Kittitas County receiving ANY of this water? 6
7. There is the very real threat of the wells going dry for land owners around the lake and perhaps beyond. How will this be mitigated when that happens? What are the plans to replenish the wells? How will the landowners be compensated when their wells go dry and the homes are now inhabitable? 7
8. What happens to the small farmer who cannot afford the KDRPP water rates? How will those farmers be compensated and how will assurances be made that these farms will NOT be forced to sell to larger farmers? Many of these small farms have been in families for years. 8
9. How do you plan to justify this to the many visitors that enjoy Lake Kachess every summer and will no longer be able to? How will you explain this to the news media when a beautiful pristine lake has been drained to benefit only a few farmers in Yakima County? 9
10. How will it be addressed when Lake Kachess isn't enough for unsustainable agricultural practices? What pristine lake will you drain next? 10
11. What alternatives have been researched in place of this project and how do those costs compare to this project? 11
12. What happens when the bonds cannot be repaid by Rosa Water district? Will the taxpayers be stuck paying for this dead-end project even after all the water is gone? 12
13. How do you plan on "undoing" the damage caused by this project? 13
14. What is each farmer paying to cover the cost of the $444M+? 14

15. What is the cost/income ratio for the crops vs paying for this project? 15
16. Has anyone looked into raising the price of the crops during a drought year due to a lower supply instead vs the cost of this project and the potential damage it can cause? 16
17. KDRPP is built on faulty science and faulty economics. Is there a new study being done that is more accurate? 17
18. Can water be drawn from the Columbia River instead? Has a study been done for this alternative? 18
19. What are the names of the farmers who will be the major benefactors of this water? Do they realize this is NOT a long term solution? 19
20. What will happen to any salmon that are currently in this lake and any future salmon that are legally being released into Kachess to increase the salmon population? 20

Thank you for looking into this further.

Again, we strongly oppose this project. It is NOT in the best interest of ALL the people and stands to benefit only a few farmers. It's too risky and expensive for such a small gain.

Respectfully,

Dan & Carol Ferguson

Dan and Carol Ferguson
5834 Kachess Dam Road
Easton, WA 98925

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL]

1 message

Raylan Thompson <raylanabe@gmail.com> Thu, Jun 28, 2018 at 6:26 AM
To: kkbt@usbr.gov

To whom it may concern,

Do not go forward with this project. It is detrimental to habitat of water creatures, and local Flora and fauna.
If you go forward, it will be proof positive that you, our government, is saying F you, we do what we want and you do as you're told.
As a General contractor, I could never do any of the work you propose as it is environmentally protected.
I am a life long Washington State resident and am tired of the double standard. Start making developers responsible for water usage and putting in Wells and infrastructure to supply water for the structures they are building.
I own land I had subdivided, then my subdivide was withdrawn due to water restrictions. I'm not DR Horton or some mega builder, so I got the big F you from my State and local government.
This is a bad plan on so many levels. Leave that water up there alone.
Sincerely,
Raylan Thompson

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Kathryn Bernhardt <kathryn.l.bernhardt@gmail.com> Mon, Jun 25, 2018 at 12:43 PM
To: kkbt@usbr.gov

Please do not install a pumping plant to drain Lake Kachess. This lake is a glacier formed natural lake which only a small portion has been converted for a reservoir. The draining of this lake will have devastating impact on local wildlife, bull trout, fires, recreation, and homes.

I am trying to understand how this is the only answer? I am trying to understand why the larger hop farmers are seemingly the only ones who will benefit? The small farmers have been very vocal that they cannot afford the cost of this water and it could cause their farms to go under. This is not fair nor is it right to cause so much damage for the benefit of a few. 1

We are also hearing that information is being shared by proponents is that Kachess will refill in 1 year. This is not accurate information and the public should be given, and is entitled to accurate transparent information. Kachess when drained beyond the natural waterline could take 2-3 years or more to regain its level. The facts being offered are only in a perfect case scenario. I have personally seen this lake lowered in time of a drought and the subsequent year we had another drought. It took Kachess 3 years to recover and it was not drained anywhere near what is being proposed. (I have pictures that substantiate what I am saying.). Rethink this. There are other options that are much less damaging to our environment. 2

Thank you,
Kathryn Bernhardt

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Nikki Fountain <nikkifd17@gmail.com> Wed, Jun 27, 2018 at 10:59 AM
To: kkbt@usbr.gov

Don't let special interest groups drain Lake Kachess! Adding a pumping facility to Lake Kachess is bad for farms, fish, wildlife, recreation, and local businesses. 1

Thanks,
Nikki Fountain

#SaveLakeKachess

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Draining the lake.

1 message

Jelo Family <jelofamily11@gmail.com> Wed, Jun 27, 2018 at 10:55 AM
To: kkbt@usbr.gov

To whom it may concern,
I would like to vocalize that I am whole heartedly against the draining of the lake. Special interest groups do not out weigh the needs of our Washington state citizens to enjoy the serine beauty of this natural lake. What a gift you would be distroying.
Sincerely,
Joslynn Jelovich

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] commenting on Lake Kachess

1 message

Loralee L <medieval.woman@gmail.com> Fri, Jun 22, 2018 at 4:11 PM
To: kkbt@usbr.gov

I read in the Kirkland Reporter about the plans to add a pumping station at Lake Kachess which would "drop the level of Kachess Lake by an additional 80 feet" (Kirkland Reporter, "Kachess Lake Plan Raises Concerns," June 1.)

My family is very worried about this plan. We often come up to Lake Kachess for day trips to go kayaking, and minor variations in the level of the lake really affect the activity. A few years ago, when we had that drought, we came up to Lake Kachess late in the summer. To our surprise, there were absolutely no campers, and when we drove to our favorite beach, we could see why: mud flats everywhere. I'm not sure how much the lake dropped--maybe 12 feet--but it made the site totally unusable. We had to haul our kayaks a long distance over thick deep mud to even get to the lake. When we got there, we could see dead clams, as well as the tracks of freshwater clams that had all been forced to retreat to the center of the lake, and could only imagine what devastation was happening to the lake wildlife. 1

We want you to know that even a small drop in lake level makes the lake almost impossible to use for recreation.

Sincerely,

Loralee Leavitt
12425 NE 73rd Street
Kirkland, WA 98033

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

J P Owens <laketapps99@gmail.com> Mon, Jun 25, 2018 at 8:09 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

Say NO to KDRPP because

KDRPP is built on faulty science and faulty economics

Once drawn-down water levels may never fully recover 3

Once KDRPP damage is done, it can't be undone

What's next when Lake Kachess isn't enough for unsustainable agricultural practices?

How Much will it Cost…
and who will pay for it? 4

Please respond, J R Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

R B <laketapps333@gmail.com> Thu, Jun 28, 2018 at 1:27 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

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I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

If the LAKE gets drawn down to the lowest level what happens if it NEVER recovers?

What are the environmental impacts if the LAKE NEVER recovers?

What's next when LAKE Kachess isn't enough for unsustainable agricultural practices?

What happens if there is no water in LAKE Kachess for the thousand of people each year who fish, swim and go boating? 3

What happens to the bull trout in LAKE Kachess?

What happens if we are not givien HONEST and TRUEFULL answers to all the questions being sent about this project?

Please Respond, R B Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

C C Owens <laketapps77@gmail.com> Tue, Jun 26, 2018 at 6:46 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

What benefits to KDRPP stay in Kittitas County? 3
What benefits will the Kittitas farmer receive? 4
What will be done when private wells in upper Kittitas County run dry? 5
Which Yakima farmers can afford the high cost of water? 6
Why do you want to take away a rare accessible alpine lake?
What will be done about the environmental impacts?

Please respond, Charles C Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

C C Owens <epxccowens@gmail.com> Sat, Jun 23, 2018 at 8:54 AM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

LAKE Kachess iis a LAKE NOT a reservoir. Calling it a reservoir does not make it a reservoir. This is an LAKE enjoyed by several thousand of people each year. This lake should not be taken away from us for a group of special interest Yakima farmers. This group ignores and misrepresents the cost, overstates the benefits and excludes affected citizens from being part of the process.

The Yakima Basin Integrated Plan (YBIP) proposal for a Kachess Drought Relief Floating Plant (KDRPP) is an attack on a natural glacier-built lake. It has nothing to do with a reservoir, every drop of water will be taken from a natural LAKE. 3

The truth is the water in LAKE Kachess is divided into both a lake and a reservoir the original glacier created water (about 80% of the total water) is a natural lake and the top 20% is a man made regulated reservoir. So only 20% of the water should ever be taken out of LAKE Kachess.

Why would you want to ruin a beautiful LAKE for a special interest group? 4
Why should the tax payers of Washington pay for a special interest group? 5
What are the benefits for Kittitas county? 6
What have the Yakima farmers done to conserve the water that they already get from LAKE Keechelus and LAKE Kachess? 7
Why don't they use the water in Yakima and leave our water alone?

Please respond, Cliff Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save LAKE Kachess

1 message

J P Owens <kachess99@gmail.com> Sun, Jun 24, 2018 at 9:16 PM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

The Proposed SDEIS Action: ¬

A Floating Pumping Plant in Lake Kachess

How Much will it Cost…

and who will pay for it?

Two simple questions…questions that should have ready answers: How much will it cost, and who will pay for it ? But the special interests promoting YBIP have engaged in a “shifting sands” strategy , apparently designed to obfuscate and deceive the public. Their approach seems to be, “if you don’t like the answer this week, stick around and we’ll come up with a different answer next week.” 3

In 2012 the Bureau of Reclamation "Four Accounts Analysis" calculated the cost of a Lake Kachess pumping plant to be $195.8 mil.

- By January , 2015 the cost had risen to $509.4 mil.
- Then, it jumped another $135 million, to $645.4.
- That number omitted mitigation obligations that could easily add another $100 mil.
- In three years a $195.8 mil. project became a $750 mil. project… and climbing.
- But while the costs skyrocketed, the benefits stayed the same, or went down.
- The prestigious Water Research Center at WSU calculated the benefits at approximately $165 mil…meaning it would LOSE 80 cents of every dollar invested.
- After trying desperately to get federal taxpayer dollars for this boondoggle, it became DOA…Dead on Arrival.

Then there was the ill-fated "Emergency Floating Pumping Plant" proposed by Roza Board of Directors in 2015. It would cost $85 mil., provide 50,000 acre/ft. of water , and be "totally paid for" by the farmers of Roza Irrigation District. But somebody forgot to tell the farmers, and they calculated the costs per acre of irrigated land. Their conclusion? In a full-page ad in the Yakima herald, here is what they said:

3

"for the opportunity to add 8-acre inches of water to your farm…the additional cost in drought years would be $92/acre, and in drought years…the cost would be $141.92/acre…The potential for lawsuits to hold up this project is HUGE…the increase in water delivered to you… would not be significant. The proposed plan would in ef fect have smaller operations, which benefit less from the plan, subsidizing the largest land owners for 10 years. It is not right.

The farmers were smarter than the bureaucrats; they knew they couldn't pay for it, and that ended the project.

Now we are starting the process again, with a new project… the KDRPP Floating Pump proposed by Roza Irrigation District. Table 2-5 (p. 2-59) shows the cost of the project to be $282 mil. However, it further states the project must anticipate a 50% increase in cost, which would bring the project cost to $423 mil. But this does not include cost of the Bull Trout Volitional Channel project, shown to cost $23 mil. (but mysteriously missing from the budget). It does not include any mitigation costs such as:

- Negative impact on private property values (previously shown by BoR contracted study with Potter LLC to be at least 5-10% of affected property values).
- Mitigation cost of "dewatered" private and community wells
- Mitigation costs of Fire District increased exposure to wildland fires
- Increased costs of Fire Districts for emergency medical services
- Costs of U.S..Forest Service improvement of USFS Lake Kachess Campground
- Litigation costs
- Costs of building new boat launch and other services
- …and at least a dozen other items

Given past history, and the items omitted from cost calculations, it is clear the cost of this project will be well in advance of $500 mil.

Scott Revell, General Manager of the Roza Irrigation Districted, has stated publicly that "Roza will pay 100% of the costs of this Project." This seems to be confirmed by Table 1.1, page 1-4 that states the Role and Responsibility of Roza Irrigation District is to "Fund, design, construct, operate, maintain [the project]. However, the refusal of Roza farmers to pay for an $85 mil. project in 2015, brings into question whether they would pay $500 mil. for a project in 2018.

3

If Roza doesn't pay for the project, that can only mean taxpayers will be asked to foot the bill. For a project that returns pennies on the dollar? That destroys local environments? That has ignored the concerns of citizens and denied their participation and representation? That has been shown by independent analysis to fall short of delivering the amount of water promised (Schwartz)?

How much will it cost, and who will pay for it?
We are still waiting for the answer….

3

Please respond, J R Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

J P Owens <uwtjpowens@gmail.com> Fri, Jun 22, 2018 at 8:36 AM
To: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

What is the plan for LAKE Keechelus how much water do you plan on taking out of it? 3

LAKE Kachess and LAKE Keechelus belong to all of the residents of Washington how is it that you think a Special Interest group of Yakima Farmers can ruin the usage of these 2 lakes? 4

Who is paying for this project?

Please respond, J R Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO for KKC Proposal

1 message

imap.aol.com <lonetreemeghan@aol.com>
To: kkbt@usbr.gov

Sat, Jun 30, 2018 at 7:05 AM

Keechelus-to-Kachess Conveyance Project not comprehensively planned.

1 The gist of this proposal is that the KKC would divert water from the Yakima River immediately downstream from the Keechelus Dam and convey it through a new tunnel to the Kachess Reservoir and the purposes this would achieve would be to reduce high flows below the dam for fish and accelerate refilling of the Kachess Reservoir for drought relief.

Nowhere in the description of this text is there any acknowledgment of climate change as an exacerbating force in drought or water issues. Yet we know Ecology is aware based on this quote from an article June 18, 2018 in The Daily Record: “Dry weather will mean less water for irrigators” is the headline. In this article Ecology is quoted: “The Department of Ecology attributes the drop in water supply to climate changes, which are increasing temperatures and causing snow to melt faster, which results in problems maintaining water supply throughout the year.”

2 Climate forecasts and science need to be included in the analysis of water in our area in all aspects: how we get it, how we use it and how we manage it.

Kittitas County has recently enacted ’No Solar on our Farm Lands’ proclamation and yet here we are destroying property rights along the lake in question and diverting water to said farmers.

Special interests again are forcing this poorly collaborated plan in the upper county. Ecology needs to get its science in order and make sure the proposals and planning work in accordance with the greater good in a comprehensive analysis.

Kittitas County needs to reassess its stance on solar in the county if it’s going to be asking to force water from other areas in an effort to help farmers more. Farmers need to support Initiative 1631, the climate initiative, which specifically exempts farm diesel from the carbon tax in deference to the special interest of farmer needs, if they are going to get ANY support for more water.

Special interest groups can’t have whatever they want, whenever they want it in the form of ‘no solar and more water’.

Comprehensive, collaborative planning on the County and State level is not happening in the Keechelus water project. Until it does, please stop the current KKC proposal.

Sincerely,
Meghan Anderson
6083 Secret Canyon Rd
Ellensburg, WA 98926

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess

1 message

Alice B. <gravellust@hotmail.com> Sat, Jun 30, 2018 at 11:59 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

1 Commandeering a public asset as vital as water to benefit only a handful of private businesses is WRONG!!! SAVE and PROTECT LAKE KACHESS.
Sincerely,
Alice M. Bickford

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Requests for additional information on KDRPP andKKC 2018 SDEIS

1 message

gordon brandt LAST_NAME <gcbrandt@comcast.net> Thu, Jul 5, 2018 at 7:10 PM
Reply-To: gordon brandt LAST_NAME <gcbrandt@comcast.net>
To: kkbt@usbr.gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

1 I request additional information to be added to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018.

- 2 Wells on the East side of Lake Kachess will be dewatered according to DOE's own study (p2-68). But the DEIS notes only that they will continue to be "monitored and … coordinate appropriate mitigation if needed" (p ES-xi)."
  - 3 Residents on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. Under what law is it allowed that prorated junior water rights holders of the Roza irrigation district can dewater wells which have senior water rights? Please cite sections of Washington state or Federal law.
  - 4 The SDEIS notes my well on the East side of Lake Kachess will be dewatered. There is no money for mitigation. The EIS or ROD must detail exactly what is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry. This question was asked in comments to the 2015 DEIS and was not answered.
  - 5 The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells below the lake? Will wells in Easton also run dry?
- 6 Bull trout: the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS."

cont

- What fraction of the resident endangered Bull Trout population in Lake Kachess will be killed under the proposed alternative? Under what law is extirpation of one population allowed by augmentation of a disparate population? This question was asked in comments to the 2015 DEIS and was not answered.

7

- P 2-6 notes: "Project proponents would use the pumping plant during drought years and could possibly use it in following years as the reservoir refills to a level above the existing gravity outlet."
  - Does this mean the definition of when the pumps could be used has changed from the prior definition of drought (less than 70% of prorated water expected to be available)?
  - Why would the pump be used in following years "as the reservoir refills to a level above the existing gravity outlet?" would that not prevent or delay refill?

8

- Page 1-4 notes that the integrated plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation).
  - Define the number of kAf saved by water conservation and market reallocation.
  - Why are these alternatives not included in the SDEIS?

9

- Only the preferred alternative has pumps at lake level, exposed to the environment (all others have pumps at the bottom of a shaft). P2-75 notes the maximum permissible environmental noise is 55 dBA.
  - What is the expected noise level in dBA at 100 feet from the pumps? At 1000 feet?
  - Will the pumps be running 24/7 once they start running?

10

- Table 1-2 on p 1-20 notes that ecology will "issue water rights as necessary." We've been told over and over that no new rights will be generated from this plan.
  - How will new water rights be issued? To whom? Under what authority? Please site Federal or Washington state law.

11

- 115,000 cubic yards of KKC tunnel muck comes out on Kachess Lake Road with no mention of where it will be trucked to or the impact of over 5000 truckloads of material being hauled off.
  - Where will the 115,000 cubic yards of KKC tunnel muck be deposited?

12

- P2-68 notes all action alternatives will result in localized short term exceedance of turbidity standard.
  - Define the degree of turbidity exceedance and the effect it will have on native fish populations

13

- P2-71 notes permanent habitat loss with the preferred alternative
  - Define the effect of permanent habitat loss on the spotted own, bull trout, and other endangered / listed species

14

- P2-73 notes decreased recreation desirability and conflict with "established SIL/VOQ"
  - Quantify the economic impact of the decreased recreation desirability
  - Under what authority are established SIL/VOQ permitted to be violated?

15

- P2-76 notes that the parcels north of the existing beach road on the East side are indeed private and may need to be purchased from their current owners for the boat ramp and parking lot.
  - There is no money in the SDEIS for property purchase. How many lots and at what expected price will be purchased.

16

- P3-29, 3-45: both Keechelus and Kachess are listed as "category 5" water impairment because of PCB contamination.
  - In the 2015 DEIS, only Keechelus was noted to have PCB contamination. Please release the report which also indicates that Kachess has a similar contamination.
  - Would dredging and construction activities not stir up sediment containing PCBs? What increase of PCB levels is expected on the basis of the proposed alternative construction activities?

17

- P3-172 notes indian sites on kachess.
  - Describe what happens with indian artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level.

cont

- The description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff).
    - Describe the mechanics of draining the lake to allow construction. What happens to the excess water, and how is the “flip-flop” flow pattern maintained if the lake is drained early in the season? What is the effect on the Easton reach of the Yakima river spawning?

18

- Under what legal authority can a natural lake (below the level of the reservoir) be drained for the benefit of a private entity (Roza Irrigation District)?

19

- Under what legal authority can a public resource Lake Kachess be drained for the benefit of a private entity Roza Irrigation District?

Thank you, Gordon Brandt

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] RE: Kachess and Keechelus Environmental Impact Report

1 message

Tom Carmody <tom.carmody.issaquah@gmail.com> Tue, Jul 3, 2018 at 1:23 PM
To: "K2KConvey, BOR UCA" <sha-uca-k2kconvey@usbr.gov>, "realityjap@aol.com" <realityjap@aol.com>, "chevans@amazon.com" <chevans@amazon.com>, "Dingdong_1959@yahoo.com" <Dingdong_1959@yahoo.com>, "gorchelskay@gmail.com" <gorchelskay@gmail.com>, "res0zp6j@hotmail.com" <res0zp6j@hotmail.com>, "Campbell, William H" <bill_campbell@unc.edu>, "myangel582011@gmail.com" <myangel582011@gmail.com>, "Millsk1@msn.com" <Millsk1@msn.com>, "s.trantina@gmail.com" <s.trantina@gmail.com>, "Jmwoerner@gmail.com" <Jmwoerner@gmail.com>

When did we change the name of Lake Kachess to Kachess Reservoir? Oh yeah, when a few people decided that taking more water (that can't be replenished in a year or two with average snowpack and rainfall) from a pre-historic glacier-carved alpine lake was a good idea! 1

From: K2KConvey, BOR UCA
Sent: Tuesday, July 3, 2018 8:44 AM
To: realityjap@aol.com; chevans@amazon.com; tom.carmody.issaquah@gmail.com; Dingdong_1959@yahoo.com; gorchelskay@gmail.com; res0zp6j@hotmail.com; Campbell, William H; myangel582011@gmail.com; Millsk1@msn.com; s.trantina@gmail.com; Jmwoerner@gmail.com
Subject: Kachess and Keechelus Environmental Impact Report

Thank you for your comments and questions on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Supplemental Environmental Impact Statement (SDEIS).

Your comments and questions have been recorded for consideration and attention. We will be collecting comments throughout the 90-day comment period (April 13 through July 11, 2018). After July 11, all comments and questions will be categorized, considered, and responded to in the Final Environmental Impact Statement.

Many of your questions and concerns may already be addressed in the SDEIS. You can access this document at

https://www .usbr .gov/pn/programs/eis/kkc/kprojectsdeis2018.pdf

We appreciate your participation in the comment period. We have recorded your email address, and you will be notified when the Final Environmental Impact Statement is released.

Thank you

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Drain Kachess Open Comments

1 message

Kevin Curd <kcurd@live.com> Tue, Jul 3, 2018 at 5:34 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

I think water conservation needs to be the priority. The amount of wasteful water practices I see around Kittitas valley is mind boggling. Let's practice good water practices. Lets cover our culverts. Lets stop watering the lawn all day and night, lets not water in the middle of the day. How about we stop continually creeping further up the valley walls. Do we really need grapes growing in what was once desert? Against lowering the lake so some tech millionaires can build a winery. Against wasting tax money to destroy summer lake recreation.
Thanks,
Kevin Curd
Hyak
Upper county resident for twenty years

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

Jean/Tim Fountain <kachess385@gmail.com> Sun, Jul 1, 2018 at 12:27 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

Ms Candance Mckinley,

I am writing to you about my concerns of the KDRPP proposal 1

How much is this project going to cost us tax payers?? 2

This seems like a waste of tax payers money for only one water district with no. senior water rights to get the water. 1

How are you going to replace the lost of boating, swimming, picnicking, and general enjoyment of the lake as our water disappears?? 3

There are only a few alpine lakes that people can come to and enjoy all these outdoor activities. Why do you want to take this away when you have no idea if or when LAKE Kachess will refill when it drained another 80 vertical feet. Please respond to my concerns. 1

PLEASE DON'T DRAIN LAKE KACHESS

Thank you,

Jean Fountain

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

chris gorchels <gorchelsc@msn.com> Sun, Jul 1, 2018 at 3:47 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

I have no idea why you are trying to call Lake Kachess a reservoir. It is not. It is a natural alpine lake that has been in existence for eons. It would be criminal to drain this lake, just so some eastern wa farmers would have more water. You would ruin a wonderful campground, and greatly affect the value of the cabins around the lake. The colombia river has been extremely high all spring. I suggest you find a way to use that water. 1

Chris Gorchels
3180 Willow pointe Dr
Richland, WA 99354

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP

1 message

kay gorchels <gorchelskay@gmail.com> Mon, Jul 2, 2018 at 3:50 PM
To: kkbt@usbr.gov

Dear Sirs,

I appreciate the opportunity to express my feelings and opinions concerning the proposed KDRPP project. I live in Richland WA and have been enjoying visiting Lake Kachess for several years. My husband and I have camped at the campground and now are happy "cabin owners" . This lake is special to us because of its beauty, accessibility and memories formed from our many visits. It is truly a place we love and cherish. It is always startling to see how far down the level of the lake is at the end of each summer. But each spring, we happily see the lake back up to its high level. I have learned that this big fluctuation of the water level has been taking place for over 100 years without adverse consequences. When the Kachess dam was constructed, creating the current reservoir, the amount of water drained from the lake for irrigation purposes was calculated to match the amount of snow pack available each winter to replenish the lake. And thus, I have learned that even when the lake is so very low in September, it will be back to its full potential each spring. The folks that constructed the dam all those years ago knew what they were doing! After the initial creation of the reservoir, along came the campground and cabins that surround the lake. Think of how many thousands of people have enjoyed this lake for all those years!!! 1

Recently we have been hearing about a plan to increase the amount of water drained from the lake to create more irrigation opportunities in the Yakima Valley. The addition of a floating pump, to drastically increase the amount of water drained from the lake, raises many questions. What will happen to the water sources for the campground and cabins? Right now, the water levels in the lake adequately supply the needs for both. But what happens when the water level is reduced another 80 vertical feet? Will those water sources that currently supply water, still be functional? Also, will the expected, typical snow pack that currently replenishes the water level in the lake each year, be enough to replenish a lake that has been drained way beyond the amount of the original design? And if Lake Kachess is not able to recover its high water level in the spring because the snow pack available does not match with the amount of water drained, what happens to the folks in the Yakima Valley who have become dependent on this new, additional irrigation water that no longer is available? 2

There are more objections that I have about the proposed floating pump, but these questions are of the upmost importance to me. I have not heard any satisfactory answers to these questions. The idea of moving forward without knowing the answers is not using wisdom. The installation of the floating pump, for the sole purpose of creating unnecessary additional irrigation, that may very well be unsustainable due to the inability of Lake Kachess to rise to the necessary water levels, is unthinkable. Please consider the consequences of your decision carefully, thoughtfully and rationally. Is all this uncertainty worth the destruction of one of the prettiest places in our state? I say NO!!! 3

Kay Gorchels

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

C C Owens <epxccowens@gmail.com> Thu, Jul 5, 2018 at 7:44 PM
To: laura.osiadacz@co.kittitas.wa.us, oble.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County. 2

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100. 3

Taking a public asset as vital as water to benefit a single water district with no senior water rights is wrong. 4

LAKE Kachess is one of the most popular campgrounds in the state with over 23,000 visitors and 11,000 boat launches per year. 5

Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices? 6

Say NO TO KDRPP and KKC.

Thanks, C C Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

J R Owens <laketapps242@gmail.com> Thu, Jul 5, 2018 at 8:31 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100. 1

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Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices? 4

Say NO TO KDRPP and KKC.

Thank You Jaxon Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Fwd: SA VE LAKE KEECHELUS AND LAKE KACHESS

1 message

J P Owens <kachess99@gmail.com> Thu, Jul 5, 2018 at 12:09 PM
To: kkbt@usbr.gov

Additional Comments

---------- Forwarded message ----------
From: J P Owens <kachess99@gmail.com>
Date: Tue, Jul 3, 2018 at 8:26 PM
Subject: SAVE LAKE KEECHELUS AND LAKE KACHESS
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100. 1

Taking a public asset as vital as water to benefit a single water district with no senior water rights is wrong. 2

LAKE Kachess is one of the most popular campgrounds in the state with over 23,000 visitors and 11,000 boat launches per year. 3

Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices? 4

Say NO TO KDRPP and KKC.

Thank You, J P Owens

[EXTERNAL] NO to KDRPP

1 message

J P Owens <epxkachess@gmail.com> Thu, Jul 5, 2018 at 8:02 PM
To: obie.obrien@co.kittitas.wa.us, laura.osiadacz@co.kittitas.wa.us
Cc: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County. 2

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100. 3

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Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears. 5

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices? 6

Say NO TO KDRPP and KKC.

Thank You, J R Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO to KDRPP

1 message

S L Owens <laketapps23@gmail.com> Thu, Jul 5, 2018 at 8:18 PM
To: obie.obrien@co.kittitas.wa.us, laura.osiadacz@co.kittitas.wa.us
Cc: kkbt@usbr.gov

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100. 1

Taking a public asset as vital as water to benefit a single water district with no senior water rights is wrong. 2

LAKE Kachess is one of the most popular campgrounds in the state with over 23,000 visitors and 11,000 boat launches per year. 3

Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices? 4

Say NO TO KDRPP and KKC.

Stephanie Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

tina reeves <tinareeves63@gmail.com> Mon, Jul 2, 2018 at 9:14 PM
To: "bocc@co.kittitas.wa.us" <bocc@co.kittitas.wa.us>, "kkbt@usbr.gov" <kkbt@usbr.gov>

I understand that you have been contacted regarding the draining of Lake Kachess for severe drought. Many people are concerned of destroying the beauty, going beyond the man-made dam and draining into the natural levels of the glacier and the loss of recreation, not to mention home owners losing property value. In addition to this I want to point out the environmental effects. I hear people plan to relocate the bullhead trout. First of all, I do not know how that will happen successfully but I am certain there are other fish at risk as well and many fresh water clams. Then there are the larger animals that go to the lake for water. If the lake is drained as low as they intend to drain it, all that will be left is clay and silt which will cause the animals to get stuck. I saw a picture of the purposes plan and even if the animals were to make it to the water, there would be no way for them to get out. The effects would be devistating. The firefighters use this water to fight wild fires. I understand that it would take 7 years to replenish the lake, so the money made from the water temporary. The money is not worth all the negative this will cause. Please do not drain Lake Kachess. There are so many other water options. 1 2 3 4

Thank you for your consideration,
Christine Reeves
--

Tina

"it would also be mistaken to view other living beings as mere objects subjected to arbitrary human domination." - Pope Francis #PopeUS

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposition to Floating Pumping Plant for Lake Kachess

1 message

Avery Aresu <averyaresu@gmail.com>
To: Kkbt@usbr.gov

Wed, Jul 11, 2018 at 6:25 PM

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

Dear Ms. McKinley,

The following are comments on the draft supplemental EIS on the Caches Drought Relief Pumping Plant and Keechedlus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be build. Instead, spend funding on promoting water conservation, water efficiencies and water markets during drought years instead of more uneconomical and environmentally damaging water projects in the Yakima River Basin. 2

This proposal for a floating pumping plant is a travesty and completely a misuse of public funds which those that are promoting it will regret when the worst comes to fruition. Those of us who do care about fiscal responsibility and the environment will be sure to publicize our opposition and grow louder in our voice in the days ahead. 3

Sincerely,
Avery M. Aresu
20207 Island Parkway E
Lake Tapps, WA 98391

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

Chris Baker <baker477@mail.com> Wed, Jul 11, 2018 at 5:55 PM
To: kkbt@usbr.gov

FROM CHRIS BAKER 430 BAKER LANE LAKE KACHESS i WOULD LIKE TO EXPRESS MY THOUGHS ABOUT THE LAKE I OWN CABINS ON THE LAKE THAT HAVE BEEN IN MY FAMILY FOR ABOUT A HUNDRED YEARS HOW WILL I MAKE A LIVING IF THERE IS NO LAKE WHEN NOBODY WANTS TO COME HERE I JUST WONDER HOW I WILL PAY THE BILLS 1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant

1 message

Sarah Buri <sburi2@aol.com>
To: kkbt@usbr.gov

Wed, Jul 11, 2018 at 4:24 PM

Via email to: Kkbt@usbr.gov
Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 2

Thank you.
Sarah Buri
Kent WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Oppose KDRPP

1 message

Joe Dill <joedill2@gmail.com>
To: Kkbt@usbr.gov

Wed, Jul 11, 2018 at 8:49 PM

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 1 2

Thank you.

Joseph Dill
4917 Wallingford Ave N
Seattle, WA 98103

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Additional Questions & Concerns

1 message

Jean/Tim Fountain <kachess385@gmail.com> Mon, Jul 9, 2018 at 8:42 AM
To: kkbt@usbr.gov

Greetings,

A notice was sent out from the Dept of Ecology "Reminder--KDRPP & KKC SDEIS 90 day Comment Period Ends July 11, 2018". On April 13, 2018 our 90 days started, but the post card was not sent out until May 25th. Why was it not sent out until May 25th? I did not received it until May 28th giving us only 45 days to make our comments. 1

Also, what provisions are being made for the devaluation of our property value after the lake gets drained and is never that same beautiful lake it was before?. 2

I am opposed to any of the Kachess SDEIS alternatives. The only one is NO ACTION that is acceptable. Please send me a response to my questions and concerns. 3

PLEASE SAVE OUR LAKE

Thank you.

Jean Fountain

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Jean Fountain <sundance385@gmail.com> Fri, Jul 6, 2018 at 4:29 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

Greetings,

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

--
Ms J Fountain
sundance385@gmail.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess DEIS

1 message

Lonnie Gienger <lonnie@wilkinsoncorporation.com> Wed, Jul 11, 2018 at 5:08 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

RE: Kachess DEIS

Dear Candace,

I am writing to you to express my strong opposition to any of the Kachess SDEIS active alternatives (2-5); any type of pumping plant and/or pipeline at Lake Kachess. I own an apple orchard in the Yakima Valley and I own property on Via Kachess road. So I have some personal understanding of the farmer's need for water and of the Lake Kachess and Kittitas County resident concerns. Following are some of my specific concerns and questions that I would like answers to. 1

1) Impact on my private wells The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." I own two wells on lake front property which serve two residences valued at nearly three million dollars. It is unacceptable to tell me that my water will likely disappear, and then offer a vague statement that you'll "monitor and mitigate." A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. I ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD. Please describe exactly how I can be assured that I will not lose water needed for my properties. How much will I be paid for drilling new or deeper wells? How much will I be compensated if there is a loss of property value because of this? 2

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria, will these effects be calculated? 3

-

2) Impact to my private property . The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected, but a better description would be "substantial numbers of private residences…etc." Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This easily number 300 homesites, far more than would be inferred from the term "several." The systematic bias against representing impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. I ask for an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline.

4

3) Impact to my property value I have one of my properties on Lake Kachess for sale and one of the first questions that potential buyers ask my realtor is how much property values will be reduced if this initiative to lower the level of Lake Kachess is passed. We have had to drop the price of our home on Lake Kachess by over 15% and are still getting the same question and objection with no one even wanting to make an offer because it is lakefront property that would drastically be impacted both in view, usage and well water if this initiative is passed. BoR commissioned a study by Dean Potter LLC, a real estate appraisal firm, to determine the negative impact on private properties resulting from the pumping drawdown. This study showed a negative impact of 5-10%, but even this was an under-estimate. The Potter study imposed a primary screening criterion that the only value a lake had, was the view it provided to a homesite. This eliminated 85% of the homesites in the immediate area of the lake, even though the residents had chosen their homes because of access to the lake. The Potter LLC study claimed that even though the lake could become inaccessible for years at a time, people who lived there to enjoy boating, fishing, hiking, picnicking, and other water-related activities, wouldn't notice the lake had disappeared. The only ones who would be adversely affected would be those people with a view…but not just any view, an "unfiltered view" (no description of what this might mean). Even this was perverted, to say only people with unfiltered views within 0.1 mile of the lake would be affected. The study actually claimed that a view of a full lake within 0.1 miles, and a view of the drawn down lake more than 0.1 miles away, would be equivalent. There is no precedent for such exclusionary criteria, and there is no justification using standard methods of appraisal. The entire exercise is a transparent effort to minimize any negative impact. Even so, a 5-10% negative on impacted properties was reported.

5

Even though the BoR commissioned this study, and even though the study went to extraordinary lengths to minimize impact, the BoR declared in the SDEIS there was "no way to reliably assign or assess impacts…" The only analysis reported was that conducted by Dean Potter LLC, it used flawed methods that were biased to under-reporting of negative impacts on private property values, but it still reported significant (5-10%) negative impacts. Yet strangely, even these were rejected, without providing any data to support the rejection.

Lake Kachess homeowners have repeatedly requested to be involved in designing a valid and reliable study of the negative impacts on property values of proposed alternatives. BoR has ignored and rejected all requests, and instead contracted for a study that (although flawed by its obvious intent to minimize findings of damage) still showed significant damage to private

property caused by the 80 ft. drawdown. Despite overwhelming evidence to the contrary…and their own analysis…BoR now claims the study they just completed, in fact can't be done!

The implications of negative impact on private property values go beyond the affected citizens. A reduction in property values affects the tax base of the county and fire departments, and will reduce available resources to provide essential services. This is acknowledged in SDEIS Page 4-326 as follows: "while effects on property values would most directly affect property owners, the wider community would also experience effects." In other words, private property owners, fire departments, city and county governments, and others would also be negatively impacted.

It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. I request that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued. Please let me know exactly how I will be compensated for the loss of property value if this initiative goes through.

4) Impact on W ater Rights How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? I request further studies about this and communication to those senior water rights holders of possible impacts to them by the SDEIS active alternatives. Then another public comment period be opened for their comments. I also have senior water rights on water that comes from this same source in the orchard I own in Yakima. My land is in Yakima County and I paid more than three times the amount per acre for my land as what the average prices for farm land are in the Rosa district. Part of this difference in land price comes from the fact that I have senior water rights and the farmers in Rosa district pay less for their land because they have junior rights. If this project goes through, over time, it will definitely increase the value of the Rosa farmer's land and possibly decrease the value of my farm land. Please tell me exactly how I will be compensated for this loss in value of my farm land in Yakima.

6

5) Water Conservation and Market Reallocation Page 1-4 notes that the Yakima Basin Integrated Plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation). Define the number of acre-feet saved by water conservation and market reallocation in the whole Yakima watershed. Please let me know exactly what other measures are being pursued to conserve water and which other measures are in the works. And please let me know what the cost benefit analysis looks like for those conservation measures. My guess is that they look better than this highly costly solution being proposed which is a one time fix to drain a lake in a drought year which may never fill up to previous historic levels and therefore is not a sustainable solution.

7

6) Financial Impact The statement of budget (Page 2-59) for KDRPP-FPP is clearly incomplete and under-valued. It appears that the budget should presented as a $423,000,000 base. And all the mitigation costs must be included. For example, the required Bull Trout Volitional Passage is stated in the text (Page 2-60) to cost $23,000,000 (preliminary estimate) but is not included. That would bring the cost even higher. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for the KDRPP-FPP.

8

The budget presentation seems inadequate, misleading, incomplete, and systematically biased to undervaluation. I request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

Economics – Simply put, there is no meaningful economic analysis in the SDEIS. It assumes broad econometric analysis is the same as substantial Benefit-Cost or ROI analysis. And it specifically fails to address the question of how much the water will cost and how and where it will be used in a rational economic return on investment approach.

Given the likely negative Benefit-Cost for a majority of Yakima Basin crops, how can the overall economics of the KDRPP provide any positive economic return? How can the water be used only on crops with a positive Benefit-Cost? How can you enable only those irrigators with a positive Benefit-Cost to pay for and use the water from KDRPP?

Some additional specific questions that I want answered are:

- How much will the water cost and explain how this a good economic decision? 9
- How much water will this project actually deliver and what are is the factual basis for these assumptions? 10
- What is the life-time cost per Acre Foot of water for the KDRPP project? 11
- What is the incremental profit of an acre-foot of water per crop type in the Yakima Basin? 12
- Which crops have a positive Benefit-Cost vs a negative Benefit-Cost? 13
- For crops with a negative Benefit-Cost, how can the using KDRPP water be justified as a private or public good? 14

As you can see, there are many valid concerns regarding this proposal and many unanswered questions that must be answered.

Thank you so much for your prompt attention to this. And thanks in advance for answering my questions.

15

Because both the NEPA and SEPA process must be followed, we request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments.

Please send me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

Lonnie Gienger

Mailing Address:
PO Box 625
Easton, WA 98925

Physical Address:
950 Via Kachess Rd
Easton, WA 98925

2018 SDEIS Comments and Questions from Lonnie Gienger .pdf
238K

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS Comment

1 message

Laura Hamilton <4hamiltons@gmail.com> Wed, Jul 11, 2018 at 4:29 PM
To: kkbt@usbr.gov

The SDEIS makes very clear statements about the devastating impact of this pumping project and the recommendation of the bureau shows that they are not being open to data or facts that go against their foregone conclusion that draining Lake Kachess is the way to solve future droughts.

There are sustainable alternatives that have not been explored in favor of this “easy” answer of putting a straw into a pristine glacial lake.
We need to work harder and commit to economically viable and ecologically responsible approaches with ALL stakeholders. The impacts described are severe and irreversible.

1

Thank you,

Laura Lottman Hamilton
631-335-3284

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess SDEIS public comment

1 message

Kirk Harris <kirkaharris@gmail.com> Wed, Jul 11, 2018 at 4:26 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

To whom it may concern,

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 1

I am very opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative.

It certainly appears that other measures should be taken to AKA "fixing the ditch" in an effort to minimize and/or eliminate loss of water that is currently conveyed via aging and defective irrigation canals from reservoirs such as Lake Kachess. This "fixing the ditch" should be done before any efforts are made to draw these lakes/reservoirs down below the levels they were before they were first dammed. To not fix the current problem of leaking irrigation canals prior to engaging in any other efforts (such as pumping down Lake Kachess) seems irresponsible on the part of the State. In addition to being a safeguard of the environment, I fully expect the State to be a good steward of our public funds and "fixing the ditch" seems to be a good way to be fiscally prudent in this regard. 2

Finally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County. 3

Sincerely,

- Kirk

Kirk Harris
4921 370th CT SE
Fall City, WA 98024
kirkaharris@gmail.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Lake

1 message

Mark Hoover <mark.hoover@att.net> Wed, Jul 11, 2018 at 7:13 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

Hi

I travel for work so I just heard about this plan to drain Kachess to send water toward Yakima. This has to be the dumbest idea I've heard of in quite some time. I'm not exactly a tree hugger but come on. If you farm in the desert you might have dry years. Leave the lake where it is to serve the communities that are more local to it. Yakima has no right to the lake. 1

Mark Hoover

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

larisa larisa <llavrentyev@yahoo.com>
To: kkbt@usbr.gov

Tue, Jul 10, 2018 at 11:21 PM

I am opposed to any of the Kachess
active alternatives (2-5);
a pumping plant and/or pipeline at the Lake Kachess. Alternative #1,
NO Action is the only acceptable alternative.

Larisa Lavrentyev

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL]

1 message

Max lavrentyev <maxim.lavrent@icloud.com> Tue, Jul 10, 2018 at 11:29 PM
To: kkbt@usbr.gov

I am opposed to any of the Kachess
active alternatives (2-5);
a pumping plant and/or pipeline at the Lake Kachess. Alternative #1,
NO Action is the only acceptable alternative.

1

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Sergey Lavrentyev <sergeylavrentyev1969@icloud.com> Tue, Jul 10, 2018 at 11:24 PM
To: kkbt@usbr.gov
Cc: la.sergey@yahoo.com

I am opposed to any of the Kachess
active alternatives (2-5);
a pumping plant and/or pipeline at the Lake Kachess. Alternative #1,
NO Action is the only acceptable alternative.

Sergey L

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] OPPOSED: Kachess and Keechelus Drought Relief Plans

1 message

Nancy Lawton <nelawton1@gmail.com> Wed, Jul 11, 2018 at 3:20 PM
To: kkbt@usbr.gov

I am another long time user of Lake Kachess and oppose the plans for the Kachess Drought Relief Pumping Plant and the Keechelus Reservoir to Kachess Reservoir conveyance. In simple terms the enormous expense to Washington taxpayers and immense environmental degradation to our beautiful Snoqualmie Pass and surrounding lakes benefits too few at too great a cost. I don't minimize the reality of climate change and the probability of dryer, warmer winters that could decrease available water and increase risks of wildfire. I don't dispute that a long term plan must be developed that preserves our natural resources but shares both the benefit and their costs across the state. This plan costs everyone too much, damages ecosystems and benefits too few for their high water-utilization, high profit crops. I attach photos of current water usage that this proposal would support. How can this be fair to all state residents, to destroy our lakes, some peoples water supplies, and wonderful recreational resources for the economic profit of so few? The photos below are from Prosser, but they could be from any of the agricultural areas in eastern Kittitas County, where we watch water sprayed into the air all day long to keep private lawns green. 1

Please do not promote this boondoggle. Let's find better ways to conserve water and maintain resources fairly for all Washington State residents.

Nancy Lawton, MN, ARNP, FNP-BC, FAANP
Adjunct Clinical Faculty, WSU School of Nursing
Adjunct Clinical Faculty, UW School of Nursing
nelawton1@gmail.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Comments on KDRPP/KKC SDEIS

1 message

Katie Lewis <katri.lewis@gmail.com> Wed, Jul 11, 2018 at 4:23 PM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Columbia-Cascades Area Office
1917 Marsh Road Yakima, Washington 98901-2058
Phone: 509-575-5848, ext. 603 Fax: 509-454-5650
Email: kkbt@usbr.gov

Thank you for being the recipient for comments and questions on the KDRPP/KKC SDEIS. My family owns property near Lake Kachess so as you can imagine I care deeply about the impacts this project may have on Kachess lake, the environment surrounding it, and properties in the area. 1

Below are my questions:

What's the difference in toxins present in Keechelus versus in Kachess? If Keechelus has higher levels of toxins (Keechelus is in a watershed with I-90 and Kachess isn't) are there plans to filter out such chemicals prior to putting Keechelus water into Kachess? Would there be any health impacts to folk swimming in Kachess or on the fish in Kachess due to any chemicals present in water piped from Keechelus to Kachess? 2

What alternatives to pumping Kachess could be considered and how do they compare to the options considered in the report? The current report considers four alternatives of pumping Kachess and one alternative of do nothing but does not consider any water management options besides pumping Kachess lake. To really understand our alternatives it seems like it would make sense to also consider other forms of water storage and conservation. How does this plan compare to water market strategies, water conservation methods, crop mix management, and use of technology? 3

For which parts of the shoreline of Kachess lake would the pumping station be audible for each of the different pump alternatives? 4

Would the "Volitional Bull Trout Passage Improvements" be completed and operational before the pump is used to lower the lake? 5

What is the process by which property impact mitigations would be determined? Who will pay any mitigation if there is a cost associated? What time frame will be involved in the mitigation process? 6

What mitigation would be provided if any wells are impacted when Kachess lake water levels are lowered an additional 80 feet? 7

What mitigation would be provided if property values are impacted? 8

If the increase in fire danger from this makes fire insurance harder or more expensive to maintain? 9

Since Kachess lake is part of firefighting strategy and may be more difficult to use when it is lower, what mitigations will be in place to enable fire departments to continue to effectively handle fires? 10

Will there be impacts on when Kachess campground is open? 11

Who will pay for this project? 12

If there is more than one year of drought in a row. Would Kachess lake be allowed to return to a certain minimum level before being drawn down again or could it be kept below it's current minimum lake level for multiple years in a row? 13

What protections are in place to limit the amount the lake is drawn down if it is causing negative impacts on fish, wildlife, ecosystems, properties, or recreation? 14

Please let me know by email if any additional SDEIS, FEIS, Record of Decision or other updates are released. 15

Thank you,

Katie Lewis

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA Y NO TO KDRPP & KKC

1 message

J P Owens <epxcanyon@gmail.com> Sun, Jul 8, 2018 at 3:23 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

Save LAKE Kachess. A group of special interest and large irrigators want to drain the natural glacial lake.
The new plan will pump water from the natural lake below the existing dam outlet. This is not sustainable because the watershed cannot replace the extra water taken. It will turn the lake into a deep pool of water surrounded mostly by canyon walls. The lake may never recover, and it will cost tax payers hundreds of millions of dollars to do this! 1

Pumping out extra water and lowering the lake will:
Severely limit access and recreation opportunities by campers and boaters

A rare accessible alpine lake will be lost

Cost Taxpayers hundreds of millions for a project that will ultimately fail

Make the cost of irrigation water unaffordable for most farmers

Compromise the efforts of local fire districts to suppress forest fires

The water will only benefit a few private irrigators in single water district Roza Irrigation district a district with no senior water rights

Waste of Taxpayer's money for one water district

There are NO benefits to Kittitas County

LAKE Kachess is a LAKE **NOT** a reservoir

Please **Do NOT** support the KDRPP or KKC projects.

Thank you, Cliff Owens

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO T O KDRPP and KKC

1 message

J P Owens <epxcanyon@gmail.com>
To: kkbt@usbr.gov

Tue, Jul 10, 2018 at 9:36 AM

Additional Comments and Questions

There is a group of special interest farmers who has been planning for a decade to take water from Upper Kittitas for their use the Yakima Basin Integrated Plan (YBIP). Operating in secrecy and denying every request for representation and involvement from Upper County citizens. 1

This is exactly the type of process that most Americans are fed up with government today. Backroom deals in the dark of night, without public input or proper consideration of viable alternatives. Then when discovered, the name of the organization is changed to protect the violators.

LAKE Kachess is a natural lake not a reservoir as the proponents would like the public to think.

Why are you trying to confuse and mislead the public and call LAKE Kachess a reservoir?

What water saving techniques have been developed by the Yakima farmers?

What new watering technologies have been implemented by the Yakima Farmers? 2

What have the Yakima Farmers done to conserve on water?

Why are the Yakima Farmers still planting "Too-Thirsty" crops?

NO TO KDRPP and KKC

Please respond, Cliff Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposing the pump! Save Lake Kachees

1 message

Patricia Phillips <mytkdnews@comcast.net> Wed, Jul 11, 2018 at 4:55 PM
Reply-To: Patricia Phillips <mytkdnews@comcast.net>
To: kkbt@usbr.gov

Dear Ms Mkkinley,

I am writing you in opposition to the plans on installing a diesel pump on Lake Kachees and ruining this beautiful lake. It would be tragic to have anything ruin this beautiful place that so many of us in this region love and count on! Please take note the Yakima Valley needs to do their work fix their ditches before ruining this natural resource.

Sincerely, Master Patty Phillips

Phillips Taekwondo Center LLC

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Do not drain our lake!

1 message

Jenna Richter <richterj@thorpschools.org> Tue, Jul 10, 2018 at 7:41 PM
To: Kkbt@usbr.gov

Via email to: Kkbt@usbr.gov
Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 2

Thank you.

Jenna Richter
Sent from my iPad

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO T O KDRPP and KKC

1 message

J R Owens <laketapps242@gmail.com>
To: kkbt@usbr.gov

Tue, Jul 10, 2018 at 11:34 AM

Additional Comments and Questions

There is a group of special interest farmers who has been planning for a decade to take water from Upper Kittitas for their use the Yakima Basin Integrated Plan (YBIP). Operating in secrecy and denying every request for representation and involvement from Upper County citizens.

This is exactly the type of process that most Americans are fed up with government today. Backroom deals in the dark of night, without public input or proper consideration of viable alternatives. Then when discovered, the name of the organization is changed to protect the violators. 1

LAKE Kachess is a natural lake not a reservoir as the proponents would like the public to think.

Have the Yakima farmers purchased land with Senior Water Rights?

Have they purchased water on the Free Market from Senior Water Right Holders?

Have they purchased crop insurance to protect against losses due to drought? 2

Have they invested in water sparing technology?

What have the Yakima Farmers done to help themselves?

How many Family Farms are there in the Roza Water District? How many Corporate Farms in the Roza Water District?

How many of the Family Farmers will be able to afford the water?

3

How many Family owned farms to the Corporate Farms plan on forcing them to sell because they can't afford the water?

NO TO KDRPP and KKC

Please Respond, Jaxon Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO T O KDRPP and KKC

1 message

J P Owens <jpowens99@yahoo.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Tue, Jul 10, 2018 at 9:19 PM

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years.

1

There is a group of special interest farmers who has been planning for a decade to take water from Upper Kittitas for their use the Yakima Basin Integrated Plan (YBIP). Operating in secrecy and denying every request for representation and involvement from Upper County citizens.
This is exactly the type of process that most Americans are fed up with government today. Backroom deals in the dark of night, without public input or proper consideration of viable alternatives. Then when discovered, the name of the organization is changed to protect the violators.

LAKE Kachess is a natural lake not a reservoir as the proponents would like the public to think.

What plan has been addressed when our property value is effected when there is no water in the lake?

2

What mitigation has been done for the private wells in the LAKE Kachess area?

3

In Kachess Village we have Senior water rights there is no way that you should be allowed to drain our wells when Roza only has Junior Water rights.

4

What mitigation has been done for fires in the Upper Kittitas area when you have drained all the water from LAKE Kachess and we have no water in our wells?

5

If there is a fire and there is no water do you plan on paying for all the damage done?

How many lawsuits do you think you can cover? Do you have enough insurance to cover all the litigation that will be brought against the Roza Water District?

6

Why do you want to ruin a beautiful Alpine LAKE?

7

NO TO KDRPP and KKC

Please respond, Joann Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

J P Owens <kachess99@gmail.com> Mon, Jul 9, 2018 at 8:04 PM
To: kkbt@usbr.gov

Additional Comments and Questions

There is a group of special interest farmers who has been planning for a decade to take water from Upper Kittitas for their use the Yakima Basin Integrated Plan (YBIP). Operating in secrecy and denying every request for representation and involvement from Upper County citizens. 1

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LAKE Kachess is a natural lake not a reservoir as the proponents would like the public to think.

What mitigation has been put in place if our property value is negatively impacted if LAKE Kachess is drained? 2

Has an audit been done on the Ecology Office of Columbia River (OCR) to determine what has happened to the $200 million dollars given to the ORC? 3

I would like to see a detailed report on where this money was spent.

NO TO KDRPP and KKC

Thank You. J P Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

J P Owens <epxkachess@gmail.com> Sun, Jul 8, 2018 at 1:50 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

Save LAKE Kachess. A group of special interest and large irrigators want to drain the natural glacial lake.
The new plan will pump water from the natural lake below the existing dam outlet. This is not sustainable because the watershed cannot replace the extra water taken. It will turn the lake into a deep pool of water surrounded mostly by canyon walls. The lake may never recover, and it will cost tax payers hundreds of millions of dollars to do this!

Pumping out extra water and lowering the lake will:
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Waste of Taxpayer's money for one water district

There are NO benefits to Kittitas County

LAKE Kachess is a LAKE **NOT** a reservoir

Please **Do NOT** support the KDRPP or KKC projects.

Thank you, J R Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO T O KDRPP and KKC

1 message

R B <laketapps333@gmail.com> Tue, Jul 10, 2018 at 8:07 PM
To: kkbt@usbr.gov

Additional Comments and Questions

There is a group of special interest farmers who has been planning for a decade to take water from Upper Kittitas for their use the Yakima Basin Integrated Plan (YBIP). Operating in secrecy and denying every request for representation and involvement from Upper County citizens. 1

This is exactly the type of process that most Americans are fed up with government today. Backroom deals in the dark of night, without public input or proper consideration of viable alternatives. Then when discovered, the name of the organization is changed to protect the violators.

LAKE Kachess is a natural lake not a reservoir as the proponents would like the public to think.

Have you communicated with the campers and boaters who use the LAKE Kachess camp grounds of your plans to drain this Alpine LAKE? 2

What mitigation has been done for the private wells in the LAKE Kachess area? 3

Why do you call LAKE Kachess a reservoir? 4

NO TO KDRPP and KKC

Please Respond, Rachel Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save LAKE Kachess

1 message

R B Owens <epxdudmarketing@gmail.com> Fri, Jul 6, 2018 at 4:03 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

1

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100.

Taking a public asset as vital as water to benefit a single water district with no senior water rights is wrong.

LAKE Kachess is one of the most popular campgrounds in the state with over 23,000 visitors and 11,000 boat launches per year.

Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices?

Say NO TO KDRPP and KKC.

Thank You, R L Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA Y NO TO KDRPP AND KKC

1 message

R B Owens <epxdudmarketing@gmail.com> Sun, Jul 8, 2018 at 4:58 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

Save LAKE Kachess. A group of special interest and large irrigators want to drain the natural glacial lake.
The new plan will pump water from the natural lake below the existing dam outlet. This is not sustainable because the watershed cannot replace the extra water taken. It will turn the lake into a deep pool of water surrounded mostly by canyon walls. The lake may never recover, and it will cost tax payers hundreds of millions of dollars to do this!

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There are NO benefits to Kittitas County

LAKE Kachess is a LAKE NOT a reservoir

Please Do NOT support the KDRPP or KKC projects.

Thank you, R L Owens

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] NO T O KDRPP and KKC

1 message

S L Owens <laketapps23@gmail.com>
To: kkbt@usbr.gov

Tue, Jul 10, 2018 at 7:27 PM

Additional Comments and Questions

There is a group of special interest farmers who has been planning for a decade to take water from Upper Kittitas for their use the Yakima Basin Integrated Plan (YBIP). Operating in secrecy and denying every request for representation and involvement from Upper County citizens. 1

This is exactly the type of process that most Americans are fed up with government today. Backroom deals in the dark of night, without public input or proper consideration of viable alternatives. Then when discovered, the name of the organization is changed to protect the violators.

LAKE Kachess is a natural lake not a reservoir as the proponents would like the public to think.

Why is your only alternative to drain LAKE Kachess or not drain LAKE Kachess? 2

Has modification been made to the Kittitas Reclamation District Canals to provide efficiency savings? 3

Have efficiency improvements to the Waptox canal been done? 4

What water conservation plans have been put in place to conserve water? 5

Has a fund to promote water use efficiency basin-wide been put in place? 6

Has a surface storage facility at Wymer on Lmuma Creek been done? 7

What about transferring water from the Columbia River to the Yakima Basin? 8

Why didn't the Yakima Basin Farmers buy Senior Water Rights? 9

Has Lake Cle Elum been raised to add to water storage? 10

NO TO KDRPP and KKC 11

Please Respond, Stephanie Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SA VE LAKE KACHESS

1 message

stephanie owens <owens.stephanie206@gmail.com> Fri, Jul 6, 2018 at 4:13 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

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What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices?

Say NO TO KDRPP and KKC.

Thank You S L Owens

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachees opposition

1 message

JOHN PHILLIPS <jphillips280@comcast.net> Wed, Jul 11, 2018 at 5:09 PM
Reply-To: JOHN PHILLIPS <jphillips280@comcast.net>
To: kkbt@usbr.gov

Hello Candace, I became aware of the plan to drain lake Kachees and wanted to voice my strong opposition. this lake is one of the most beautiful places I have visited in Washington state. I have been taking my family here for the past 26 years. It is a true shame that the draining of this lake is even being considered for the gain of what, special interest groups who stand to make money. Shame on everyone who allowed this project to get this far. 1

Thank you for taking the time to read my email.

John

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Do not drain Lake Kachess

1 message

Rachel Smith <rachel_stew@hotmail.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Tue, Jul 10, 2018 at 5:19 PM

Please take the time to read the following document and take no action to drain Lake Kachess. 1

-Rachel Smith

KDRPP-public-comments.pages
865K

Rachel Smith
24269 SE 44th Place
Issaquah, WA 98029

July 10, 2018

Bureau of Reclamation, Columbia-Cascades Area Office
Attention: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058
kkbt@usbr.gov

Dear Ms. McKinley,

The Kachess Drought Relief Pumping Plant (KDRPP) is not a public benefit and must not be enacted, either by the Bureau of Reclamation and Department of Ecology, or by the Proratable Entities interested in implementing it. It is inconsistent with adopted plans, the analysis is based on missing data and questionable assumptions, proposed mitigation is lacking, groundwater impacts could be detrimental to property owners and public recreationists, there are insignificant agricultural impacts given the negative recreation and environmental impacts, lake habitat for fish is negatively impacted, and it could potentially increase the fire susceptibility of the area while decreasing the ability of emergency responders to fight fires. It also radically changes the use of the Yakima Project, which has been managed for over 100 years as a system for all users and instead essentially earmarks one reservoir for one irrigation district. 2

Inconsistency with Mission and Adopted Plans

Comprehensive planning within the State of Washington requires that all plans and projects be consistent with adopted policies; KDRPP does not appear to meet that test in several regards, including contrasting with the mission of the proposing agencies.

The opening page of the DSEIS cites the missions of the US Department of the Interior, the Bureau of Reclamation, and the state Department of Ecology. While all agencies have mission facets that can compete with one another, making mission-project consistency a balancing act, this project does not fit with the adopted missions more than it does.

- Though the US Department of the Interior is directed to "supply the energy to power our future," this part of the mission is tertiary to protecting natural resources, which KDRPP does not do. Instead, it denigrates a natural environment in order to provide economic benefit to a small group. 3
- Reclamation is directed to "manage, develop and protect water" and clearly KDRPP fits within that purview. However, Reclamation must also do this work "in an environmentally and economically sound manner," which is not descriptive of the proposed project.
- This project is most inconsistent with the state Department of Ecology's mission to "protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations." Undertaking KDRPP has significant negative environmental and recreational impacts which are not consistent with Ecology's mission.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SDEIS

1 message

Bonnie Aguilar <BONAGI@msn.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Wed, Jul 11, 2018 at 3:06 PM

It is absolutely ridiculous that you would want to get more water out of Lake Kachess, when you have hundreds of people with homes around the lake, and thousands who use the State park for camping and boating.

If you really think about it, this action would cost millions, and only help a few people for the first year, then it will take many years to recuperate. 1

In the mean time, the fish habitat will suffer, animals of all kinds live in these hills and depend on this water. And most of all, the trees become weak and are attacked by bark beetles, ants and other diseases, causing devastation and extreme fire danger.

We depend on this water to fight forest fires, too.

Thank you, for listening
Bonnie Aguilar
Property Owner
Kachess Community Assoc.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess Drought Relief Pumping Plant

1 message

Michael Aiken <michael.aiken@hotmail.com> Wed, Jul 11, 2018 at 1:15 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS.
The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 1

2 How do you plan on saving the Bull Trout that will not be able to spawn? 3 How will you compensate the many houses in the area? 4 Where will the thousands of people that use this beautiful natural lake go to camp, boat and enjoy the area? 5 What will you do to mitigate the wells that will run dry? 6 Why haven't you considered other options like conservation and rebuilding the ditch which looses hundreds of thousands of gallons of water? 7 How will you mitigate potential forest fire danger? 8 This natural lake should never be drawn down further then it's natural level, it will likely never fill up again. 9 The farmers knew how much water they would get in drought years when they bought their land, why do they get more water now? At the price of thousands of others who enjoy this natural beautiful lake. It makes no economic or common sense. Do not allow this lake to be destroyed to benefit a few, keep it for the thousands that use it. 10

Please answer each of my questions above

Thank you.

Michael Aiken
6809 Crestview Ave SE
Snoqualmie, Wa 98065

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP SDEIS

1 message

Michelle Albulet <malbulet@copiersnw.com> Wed, Jul 11, 2018 at 8:35 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Dear Ms. McKinley:

Please accept my comment regarding the KDRPP SDEIS:

Alternative 1 No Action: I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 1

Thank you,

Michelle Albulet

526 Yale Ave N #606 Seattle, WA 98109

Michelle Albulet

Human Resources Generalist

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K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposition to Floating Pumping Plant for Lake Kachess

1 message

Diana Aresu <dianaaresu@comcast.net>
To: Kkbt@usbr.gov

Wed, Jul 11, 2018 at 4:35 PM

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

Dear Ms. McKinley,

The following are comments on the draft supplemental EIS on the Caches Drought Relief Pumping Plant and Keechedlus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS.

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be build. Instead, spend funding on promoting water conservation, water efficiencies and water markets during drought years instead of more uneconomical and environmentally damaging water projects in the Yakima River Basin.

This proposal for a floating pumping plant is an travesty and completely a misuse of public funds which those that are promoting it will regret when the worst comes to fruition. Those of us who do care about fiscal responsibility and the environment will be sure to publicize our opposition and grow louder in our voice in the days ahead. 1

Sincerely,
Diana E. Aresu
20207 Island Parkway E
Lake Tapps, WA 98391

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposition to Floating Pumping Plant for Lake Kachess

1 message

Tony Aresu <tonyaresu@comcast.net> Wed, Jul 11, 2018 at 4:42 PM
Reply-To: Tony Aresu <tonyaresu@comcast.net>
To: Kkbt@usbr.gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation

Columbia- Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

Dear Ms. McKinley,

The following are comments on the draft supplemental EIS on the Caches Drought Relief Pumping Plant and Keechedlus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS.

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be build. Instead, spend funding on promoting water conservation, water efficiencies and water markets during drought years instead of more uneconomical and environmentally damaging water projects in the Yakima River Basin. 1

This proposal for a floating pumping plant is an travesty and completely a misuse of public funds which those that are promoting it will regret when the worst comes to fruition. Those of us who do care about fiscal responsibility and the

environment will be sure to publicize our opposition and grow louder in our voice in the days ahead.

Thank you,

Tony Aresu

20207 Island Parkway East

Lake Tapps, WA.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposed to draining of Lake Kachess

1 message

Inna Avdeyev <innaavdeyev@yahoo.com> Tue, Jul 10, 2018 at 11:14 PM
To: kkbt@usbr.gov

I am opposed to any of the Kachess SDEIS active alternatives (2-5) a pumping plant and/or pipeline at Lake Kachess. Alternative #1 no action is the only acceptable alternative 1

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Re: Kachess SDEIS

1 message

Gloria and Jeb Baldi <baldi@kvalley.com> Wed, Jul 11, 2018 at 12:13 PM
To: kkbt@usbr.gov

Thank you for considering the comments attached. 1

Gloria Baldi

Kachess SDEIS.docx
14K

July 11, 2018

To: Candace McKinley
Environmental Program Manager, B of R

Please consider the following comments part of the response to the SDEIS regarding the proposed Kachess Lake Pumping Plant and the pipeline proposal from Lake Keechelus to Lake Kachess. When we consider the effects of the proposed projects, the first alternative of **No Action** is the only acceptable action. The others (2-5) are definitely unacceptable. 2

The effects of water removal are always drastic. Lowering the storage pool at Lake Kachess up to 80 feet more during drought conditions, taking 2 to 5 years for the level of water to return, indicates there will be much less water in the reservoir for Bull Trout, other fish and animals. 3 With such a lowered water level, have the effects of a higher water temperature on fish been considered? 4 Have the effects of water into surrounding streams, or even access to those streams been researched? 5 Has the importance of the water table been taken into account for the surrounding forest and habitat, especially in drought years with heavy fire potential? 6 And it appears the public, both those who live near the lake or the public which recreates on Lake Kachess, have not been considered. 7

We are concerned about Swamp Lake, a very high quality wetland, with the possibility of a tunnel being drilled underneath to pipe water to Lake Kachess. Again, the water table needs to be a high consideration for the habitat of plants and animals that follow Swamp Creek under I-90 to the Yakima River. 8

There is no way to mitigate for such risky projects. With Climate Change factoring in agriculture production in the lower Yakima Valley, we do not even know if it will be possible if farmers will be able to produce the products grown at this time. **Conservation** should be the project considered rather than the risky and highly expensive taking of water from one area for the benefit of another. 9

We are adamantly opposed to the both the Kachess Drought Relief Pumping Plant and the proposed tunnel transferring water from one Lake to the other.

Thank you for the opportunity to comment.

Sincerely,
Gloria and Jeb Baldi
440 Riverbottom Road
Ellensburg, WA 98926

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL]

1 message

Rebecca Beaty <outlook_E8F1AA267DCB5E99@outlook.com> Wed, Jul 11, 2018 at 10:46 AM
To: "Kkbt@usbr.gov" <Kkbt@usbr.gov>
Cc: "beckybeaty@comcast.net" <beckybeaty@comcast.net>

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation

Columbia- Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS.

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 1

Thank you.

Rebecca M Beaty

Sent from Mail for Windows 10

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus DEIS

1 message

benediktl@aol.com <benediktl@aol.com> Wed, Jul 11, 2018 at 7:32 AM
To: kkbt@usbr.gov

Submitted via email to kkbt@usbr .gov and mailed, July 11, 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: Kachess and Keechelus DEIS

Dear Ms. McKinley:

The only alternative I can endorse is Alternative 1 No Action.

My objection to the other proposals reflects my financial and emotional commitment to preserving Lake Kachess, and my conviction that this proposal ignores stated legal requirements, will be ineffective and hugely expensive, and will degrade a natural resource of the kind that is becoming less and less available to future generations. 1

I have been concerned from the beginning about the limited participant, process and intention of the KDRPP and KKC. As I understand it, the NEPA guidelines specifically state that proposals should not be slanted to benefit any special interest group, yet it is clear that this SDEIS benefits some special interest groups at the expense of others. How do you intend to rectify this? Will you demand an unbiased, independent and thorough study as that satisfies the requirements of NEP A? 2

A new study should include alternatives other than “do nothing” or pump water from Lake Kachess one way or another . How will you rectify the failure to provide alternatives as required by NEP A? Surely there are other options; building a reservoir near Rosa to capture winter rain and snow, for example. 3

Why is there no detailed examination of methods of conservation? How will this omission be addressed? The response to a diminishing resource must be first, conservation, second, increased supply, not the other way around. If I were a farmer being asked to pony up money to build a portable or fixed pumping station on Lake Kachess so that I could get a larger share of my water allotment, I would welcome an alternative, or example, funds or tax breaks for installing water conservation irrigation. Take a drive through Kittitas and Yakima valleys and beyond. You’ll see open irrigation ditches, spray sprinklers, water running away, as well as “thirsty” crops expanding into increasingly dry land. Why spend money to build a temporary, inconsistent, and finally inadequate (given the trajectory of climate change) solution to a lack of water when it could much better be spent on methods of conservation!!! 4

Supply increases demand. The study says no new rights will be generated but then contradicts itself saying “it will issue water rights as necessary”? How will this contradiction be resolved? What are the specific restrictions and requirements on new applications for water rights? 5

As a senior water rights holder , what are the protections of my rights? Are they being violated in favor of lesser rights? And what will be the cost of remuneration for those lost rights? Will the Bureau redig my well, compensate me for lost property value? How much? To what extent? 6

What are the true losses and costs to the environment? Among those might be the repercussions from exposing a huge area of dust and silt. Surely the Bureau recognizes the danger of exposed shoreline to poor air quality, increased danger of fire, and vulnerability to disease of the surrounding trees and vegetation. What will be done to provide a complete, thorough, and accurate assessment of environmental impact? Have the concerns of the fire district been heard? What does the EP A say about damage to air and water quality if Lake Kachess were drawn down? 7

It’s hard to imagine that the small streams will actually make the journey to a lake that has been drawn down an additional 80 feet below its current level. Which means less water to refill the lake – all wasted – and an imperiled journey for Bull Trout from Box Canyon Creek, a major spawning stream. What proposal do you have for protecting the species that depend on travel to and from these streams into the lake? The tunnel or bypass between the lakes is inadequate and may not achieve its stated goals. 8

My family has owned a cabin on the east side of Lake Kachess since 1979, and it is our place for coming together with our children and grandchildren. The property is not just a piece of land but a piece of our heritage. Less so than to the Native Americans who came to Lake Kachess to set up camps, pick huckleberries, and hunt. The arrowheads we have found at the end of the lake attest to Kachess Lake’s long history as a place for preserving culture as well as resources and species. Have all the native American tribes that used this area been thoroughly consulted about these proposals? Have the campers and boaters and snow mobilers? What is the dollar amount of the loss to Native Americans, cabin owners, and the thousands of people who visit annually to swim and fish and enjoy the beauty of this lake? 9 10

My only option is to support, vehemently, Alternative 1, No Action. 11

Sincerely,
Lynn Benediktsson, Cabin Owner, East Lake Kachess

Lake Kachess response july 2018.docx
132K

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Pumping Plant Environmental Impact Statement

1 message

T Benediktsson <benediktssont@mail.montclair.edu> Wed, Jul 11, 2018 at 6:09 AM
To: kkbt@usbr.gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation/ Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

Dear Ms. McKinley:

As a cabin owner on the east side of Lake Kachess, I am writing to endorse **Alternative 1 No Action**, as the only acceptable alternative to the plan to install a pumping station on Lake Kachess. Below I offer a series of questions to indicate why I regard the plan to be flawed. 1

First and very importantly, the proposal lacks a range of alternatives. Why, for instance, is there no consideration to create another catchment area downstream to recover early spring runoff when Lakes Keecheless and Kachess are full? There is a considerable spring flow, and you project that with climate change there will be a greater one. Why can't it be captured? 2

Furthermore, why is there no proposal to encourage and fund water conservation technologies and techniques of crop management? I understand that quite sophisticated water-saving irrigation technologies exist. Wouldn't it be cheaper and better in the long run to fund them, rather than pumping more water downstream to be wasted ? I am supported in this speculation by a Washington State University study of the pumping project, which concluded that it is not only economically unfeasible, but also that water conservation will achieve the same benefits at a much lesser cost. Why has that study not led to a "conservation" alternative that we could endorse? 3

Another concern: I have not read exactly who will have financial responsibility for implementing, operating and maintaining the pumping station, and who will have responsibility for mitigation and litigation and other costs? Bureau of Reclamation estimates range to almost half a billion dollars, and that is just for construction. Who will pay? 4

The proposal implies that the pumping station will be deployed only under drought conditions. What if there are successive years of drought? With a relatively small inflow, will Lake Kachess actually refill? If not, then will the pumping station be deployed earlier and more often, and ultimately be ineffectual? If as well there is an economic expansion of agriculture in the Yakima River drainage beyond the capacity of the water supply, will "drought" be the new normal? And with congruent failures to capture spring water runoff or to implement water conservation technologies or to rotate to less "thirsty" crops, will the half billion dollars have been wasted? 5

As I am sure you are aware, the original Big Lake Kachess still exists under the dam water. Will pumping 80 feet below the dam actually be draining a natural lake? Is it legal to drain a natural lake? 6

I now move to more specific questions relating to our own local situation. There are more than 300 homesites around the lake. The proposal projects that our wells will run dry. What exactly will be done to mitigate that? Will the Bureau of Reclamation send someone to drill them 80 or more feet deeper and how long will that take? The document offers no details, only to acknowledge that wells will be "dewatered." On that note, several of us on the East Side have senior water rights. How do junior water rights holders downstream have the right to "dewater" us? 7

The Snoqualmie Pass Fire and Rescue Agency has raised concerns about increased area fire risk if the lake level is lowered. I have read that the Bureau of Reclamation refused to meet with them. I am shocked: why? What if they are right, and some of our homes burn down because the Fire and Rescue people can't access a lake that is well over a hundred feet below its high water mark? 8

On that note--what will be the new shoreline of the lake when it has been pumped to capacity? How much of the lakeside will become mud or silt? As the silt dries will those prevalent strong winds create blowing dust? I am asthmatic; I want to know. 9

I have so far neglected the obvious, because I'm not sure it matters to the Bureau of Reclamation. But I must speak. Like all of our neighbors, we are here because we love the lake. Our family has had a cabin here for forty-seven years, and our grandchildren are the fourth generation to enjoy it. We have strewn ashes here. The proposal presents an existential threat to the lives we lead on these shores. If the pumping station is built, Lake Kachess will be degraded into a noisy and polluted industrial site, a violation of what it is now-- not only an irrigation resource but also a homesite for hundreds of people, and for thousands a profoundly beautiful boating and camping experience-- a jewel of Washington State. 10

Ms. McKinley, please take note of the questions I have raised above, and add my voice to the others who endorsed **Alternative One.** I look forward to your response.

Sincerely,

Tom Benediktsson

benediktssont@montclair.edu

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Raya Bondarenko <raya@c21nhr.com> Wed, Jul 11, 2018 at 9:42 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative."

1

Get Outlook for iOS

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposition Comments to Lake Kachess (KDRPP) (KKC) - SEIDC

1 message

LYNN BREWER <lynn_brewer@msn.com> Wed, Jul 11, 2018 at 12:16 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Hi Candace,

Attached please find our letter in opposition to the proposed pumping of Lake Kachess along with the Geological Assessment that was done for our Well.

1

I have also sent the letter and assessment by fax as noted in the letter.

Kind regards,

Lynn Brewer
253.318.3188 (mobile)

Opposition Comments (Lake Kachess) (2018).pdf
1803K

LYNN & DOUGLAS BREWER
P.O. BOX 145
770 KACHESS RIVER ROAD
EASTON, WA 98925

July 11, 2018

Sent via email to: kkbt@usbr.gov
And by fax (509) 454-5650

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia – Cascades Area Office
1917 Marsh Road
Yakima, WA 90901-2058

Re: KDRPP & KKC SDEIS
Critical Area Assessment

Dear Ms. McKinley:

I am writing to you today to submit a critical area assessment for our property located at 770 Kachess River Road in Easton, which is located adjacent to Kachess River.

Enclosed please find the Geological Assessment from Migizi Group we had performed as it pertains to our well and the aquifer from which the nine wells in our sub-division draw water. As you will see in the "Conclusion," our subdivision has a high risk of potential groundwater contamination within the well system and that static water levels are approximately 15 feet below existing grades.

We are full-time residents in our sub-division and our well is our only source of potable water. The well serving our property sits approximately 100' from the Kachess River and is located within the designated flood zone of Kachess River. When we participated in these meetings a few years ago, I was informed by the U.S. Corp of Engineer representative, it is likely this project (as proposed at that time) could negatively impact our potable water and the downstream demand for water could cause insufficient water resources to keep the Kachess River flowing or could impact the available water source for our well. Can you provide us with what assurances you have this will not occur? We are deeply concerned about the impact the above-referenced project will have on our water source, as well as the noise pollution that will occur as a result of the proposed project and therefore are opposed to the proposed pumping of Lake Kachess.

Sincerely,

Lynn Brewer

MIGIZI GROUP, INC.

PO Box 44840
Tacoma, Washington 98448

PHONE (253) 537-9400
FAX (253) 537-9401

November 4, 2015

Richard T. Cole, P.S.
Attorney and Counselor at Law
P.O. Box 638
1206 North Dolarway Road, Suite 108
Ellensburg, WA 98926
(509) 925-1900

Subject: Geological Assessment
Brewer v. Lake Easton Estates HOA, et al
Cause of Action for Damages
Negligence for Failure to Manage Wellhead Protection Zones / Sanitary Control Areas

Dear Mr. Cole:

Migizi Group, Inc. (MGI) is pleased to submit this Geological Assessment as it pertains to the pending lawsuit Brewer v. Lake Easton Estates HOA, et al. The purpose of this assessment is to address the geologic conditions present underlying the Brewer property and the larger Lake Easton Estates. Specifically, how these geologic conditions could impact water quality within the estates.

Our scope of services is limited to the review of well logs, maps of the Lake Easton Estates Plat, environmental test results, and geologic research.

INTRODUCTION

Lake Easton Estates is a 52 lot subdivision located in Kittitas County on the west side of the Kachess River, between Kachess Lake (to the north) and Lake Easton (to the south), see Figure 1, Topographic and Location Map. Water is supplied to the occupants of Lake Easton Estates through nine Group B Wells (Figure 2), with each well serving four to six lots. Based on the well logs provided to us (attached), the original 5 wells for the estates were installed between August and September of 1990. A permit dated November 18, 1990 for an additional 4 wells was also provided to us, and can likely be attributed to the remaining wells servicing the community. No well logs are available for these additional wells. Based on information provided by the Washington State Department of Health, the system effective date for these secondary wells was December 19, 2002, with the implementation of these well systems likely being phased with the continued development of the site. Figure 2 shows the relative location of the wells in relation to the layout of Lake Easton Estates and the individual residential lots.

Of the 9 wells servicing the Lake Easton Estates, 8 have known encroachments within their 100 foot Sanitary Control Areas by either structures or septic systems, and all 9 of the well heads are within 100 feet of the major roadways servicing the community (Kachess River Rd and Evergreen Way). The green coloration within Figure 1 highlights the properties which contain structures within the Sanitary Control Areas for the given wells. Given the fact that all potable water within the estates is provided through this well system, if it were to become compromised, Brewer and the other occupants of the Lake Easton Estates could unknowingly suffer adverse health conditions. This would particularly be true if each well were drawing from the same aquifer, and could then potentially receive contaminants from the multitude of possible sources listed above.

GEOLOGIC SETTING

The Lake Easton Estates is located in what is generally considered the Yakima River Basin, shown in Figure 3; an area which includes almost all of Yakima County, more than 80 percent of Kittitas County, about 50 percent of Benton County and less than 1 percent of Klickitat County. The headwaters for the basin are located on the upper, humid east slope of the Cascade Range, with the basin terminating at the confluence of the Yakima and Columbia Rivers towards the southeast; encompassing approximately 6,200 mi^2 of central Washington. Eight major rivers and numerous smaller streams tributary to the Yakima River, with the largest of these being the Naches River.

4

The upper (western) Yakima River Basin, where the Lake Easton Estates is located, was the focus of a hydrogeologic study conducted by Gendazek and others (2014). Using subsurface information garnered from previous geologic maps developed by Dragovich and others (2002), Brown and Dragovich (2003), Cheney and Hayman (2007), and Haugerud and Tabor (2009), and additional lithostratigraphic information obtained from drillers' logs from 271 project wells located in the study area, 6 primary hydrogeologic units were identified within the larger aquifer system of the region. These hydrogeologic units are identified as unconsolidated sediment (UNC), basalt (BAS), volcanic rocks (VOLC), sedimentary rocks (SED), metamorphic rocks (META), and intrusive rocks (INT). The unconsolidated sediment unit occurs at land surface over about 27 percent of the study area, basalt 3 percent, volcanic rocks 27 percent, sedimentary rocks 34 percent, metamorphic rocks 4 percent, and intrusive rocks 5 percent.

The UNC hydrogeologic unit is composed of unconsolidated glacial and non-glacial deposits, including alluvium, talus, landslide deposits, alpine glacial deposits, recessional outwash, and outburst flood deposits; at depth, the unit also includes thick glaciolacustrine deposits beneath the broad valley floors. Though somewhat scattered throughout the study area, a large proponent of the UNC unit is concentrated within what is known as the Roslyn Basin, Figure 4. The Roslyn Basin is one of six identified structural basins within the greater Yakima River Basin (Roslyn, Kittitas, Selah, Yakima, Toppenish, and Benton Basins), and extends from the broad valley floors down valley from Kachess and Cle Elum Lakes toward the southeast, terminating near Teanaway. A structural basin is typically described as a geological depression formed by the tectonic warping of previously flat lying rock strata.

In a detailed analysis of the sedimentary deposits in the Roslyn Basin, Jones and others (2006) reported three subunits that make up the unconsolidated sediment unit comprising the Roslyn Basin. Jones and others (2006) described these as an upper coarse-grained (gravel and sand) aquifer with a median thickness of 80 feet, a middle fine-grained (silt and clay) and low productivity unit with a median thickness of 170 feet, and a lower coarse-grained (gravel) aquifer with a median thickness of 50 feet.

A review of the well logs provided to us for the Lake Easton Estates indicate that rapidly permeable gravelly outwash soils were encountered during the installation of Wells 1 through 4 from near surface elevations to the termination depth of each well; a depth from 80 to 100 feet below grade. Additionally, the National Cooperative Soil Survey for Kittitas County identifies subsurface soils in the vicinity of the Lake Easton Estates as 237, or Kladnick ashy sandy loam. This soil group is derived from glacial outwash, and ranges in composition from a gravelly sandy loam to an extremely gravelly sand.

Static water level based on the well logs is at approximately 15 feet below existing grades.

CONCLUSIONS

Given the relative location of the Lake Easton Estates, well log soils information, and geologic mapping of the region, it is our opinion that the Lake Easton Estates is located in what is known as the Roslyn Basin, and each well servicing the community draws from the same aquifer; the upper coarse-grained subunit of the larger unconsolidated sediment (UNC) hydrogeologic unit described by both Gendazek and others (2014) and Jones and others (2006). Additionally, given the high permeability of site soils, it is our opinion that the Lake Easton Estates contains a high risk of potential groundwater contamination within their well systems should contaminants be introduced from an above or below ground source.

5

REFERENCES CITED

Brown, E.H., and Dragovich, J.D., 2003, Tectonic Elements and Evolution of Northwest Washington: Washington State Department of Natural Resources Geologic Map GM-52; 1 sheet, scale 1:625,000; 1 pamphlet, 10p., accessed January 16, 2012, at http://www.dnr.wa.gov/researchscience/Pages/Publications.aspx.

Cheney, E.S., and Hayman, N.W., 2007, Regional Tertiary Sequence Stratigraphy and Structure on the Eastern Flank of the Central Cascade Range, Washington, *in* Stelling, P., and Tucker, D., eds., Floods, Faults, and Fire—Geological Field Trips in Washington State and Southwest British Columbia: Geological Society of America Field Guide 9, p. 179–208.

Dragovich, J.D., Logan, R.L., Schasse, H.W., Walsh, T.J., Lingley, W.S., Jr., Norman, D.K., Gerstel, W.J., Lapen, T.J., Schuster, J.E., and Meyers, K.D., 2002, Geologic map of Washington—Northwest quadrant: Washington State Department of Geology and Earth Resources Geologic Map GM-50, 1 sheet (scale 1:250,000) and two accompanying explanatory sheets (52 × 36 in. and 40 × 33 in.), with 72 p. text, accessed January 17, 2012, at http://www.dnr.wa.gov/Publications/ger_gm50_geol_map_nw_wa_250k.pdf.

Haugerud, R.A., and Tabor, R.W., 2009, Geologic Map of the North Cascade Range, Washington: U.S. Geological Survey Scientific Investigations Map 2940, 2 sheets, scale 1:200,000; 2 pamphlets, 29 p. and 23 p., accessed January 16, 2012, at http://pubs.er.usgs.gov/publication/sim2940.

Jones, M.A., Vaccaro, J.J., and Watkins, A.M., 2006, Hydrogeologic Framework of Sedimentary Deposits in Six Structural Basins, Yakima River Basin, Washington: U.S. Geological Survey Scientific Investigations Report 2006-5116, 24 p., 7 pls., accessed September 7, 2010, at http://pubs.water.usgs.gov/sir2006-5116.

Gendaszek, A.S., Ely, D.M., Hinkle, S.R., Kahle, S.C., and Welch, W.B., 2014, Hydrogeologic Framework and Groundwater/Surface-water Interactions of the Upper Yakima River Basin, Kittitas County, Central Washington: U.S. Geological Survey Scientific Investigations Report 2014–5119, 66 p., *http://dx.doi.org/10.3133/sir20145119*.

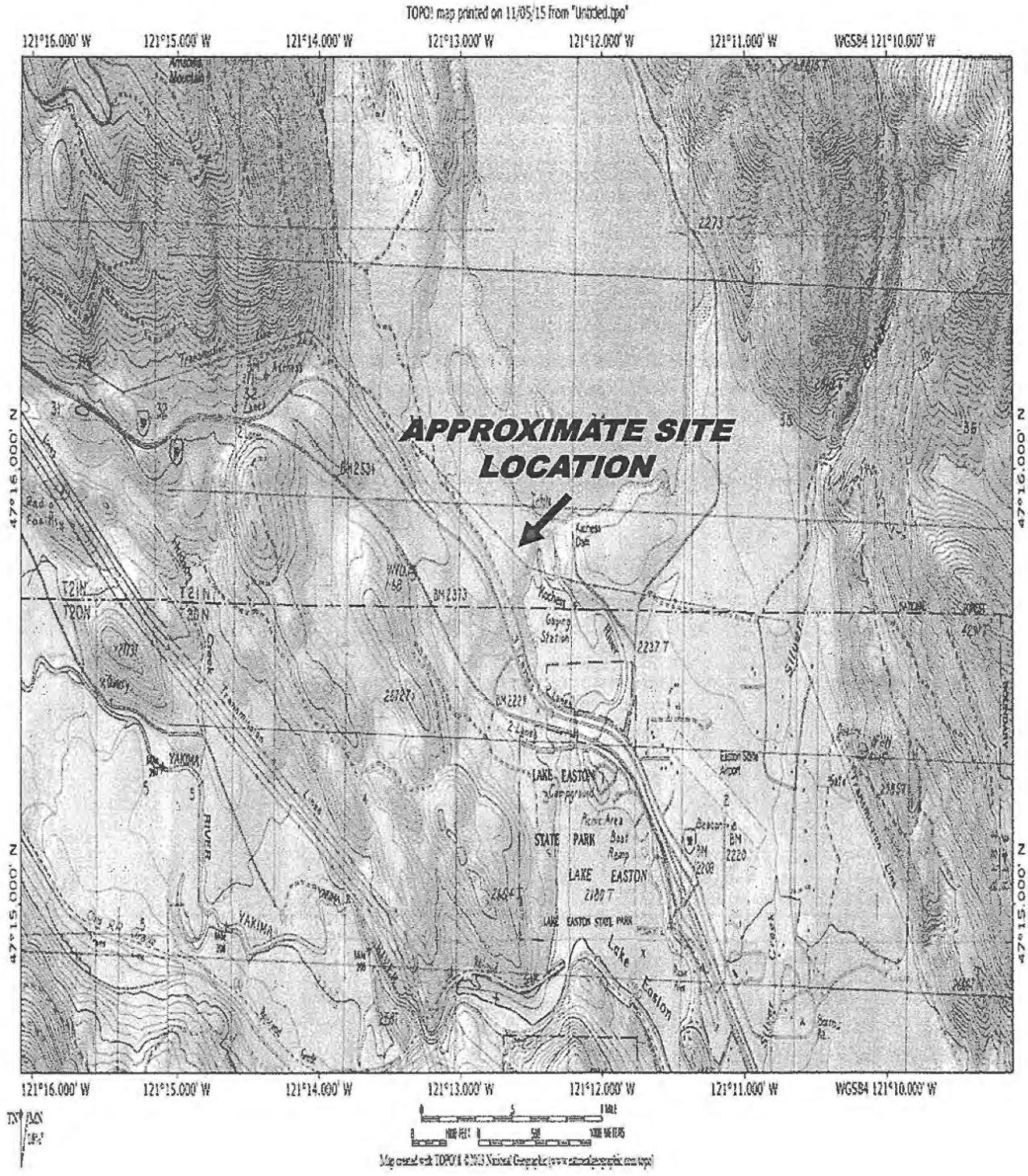
We appreciate the opportunity to be of service on this project. If you have any questions regarding this letter or any aspects of the project, please feel free to contact our office.

Respectfully submitted,

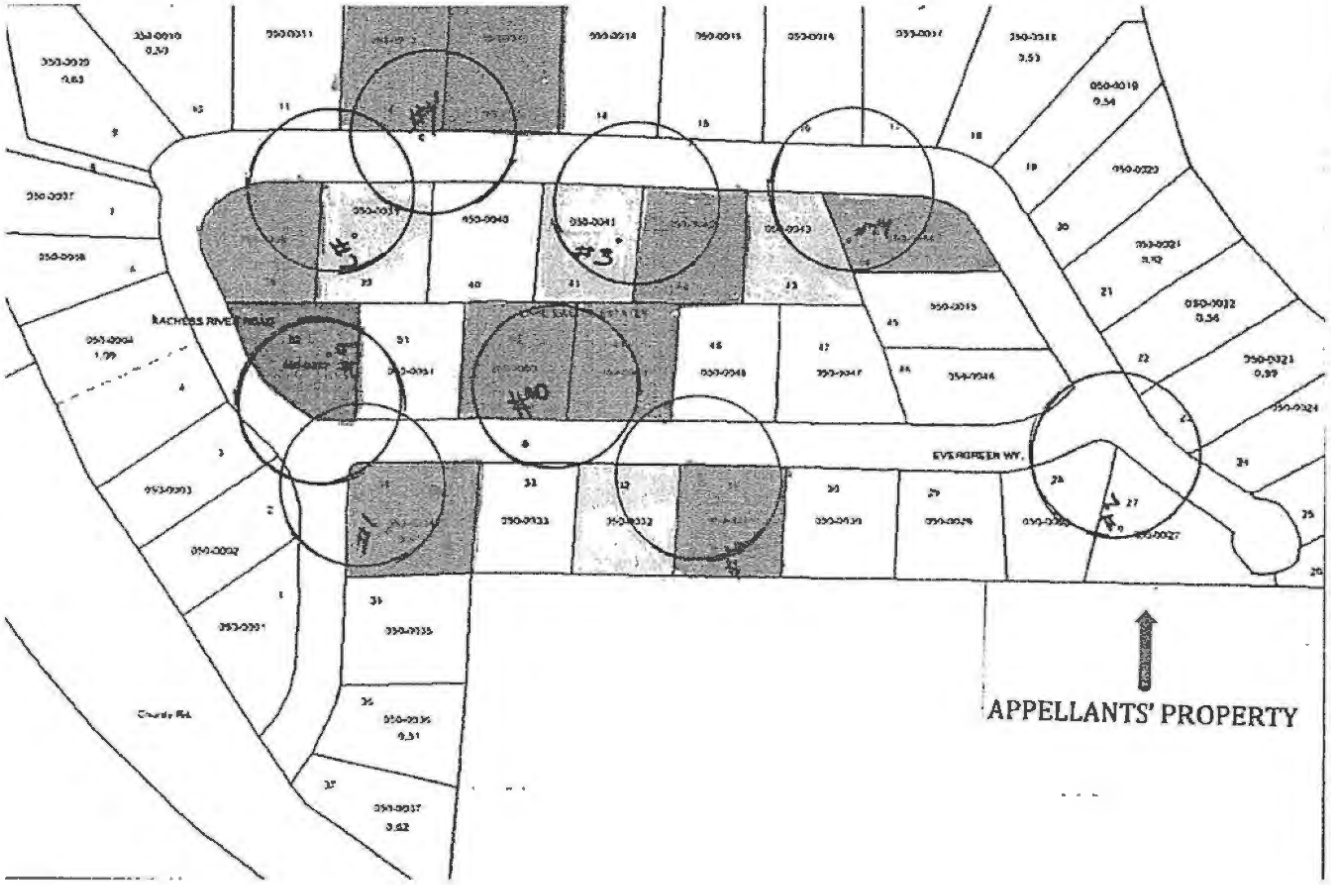
MIGIZI GROUP, INC.

Casey R. Lowe, P.E.
Principal Engineer

Attachments: *Figure 1. Topographic and Location Map*
Figure 2. Well Location Map
Figure 3. Yakima River Basin
Figure 4. Roslyn Basin
Well Log



Migizi Group, Inc. **P.O. Box 44840** **Tacoma, WA 98448**	Brewer v. Lake Easton Estates HOA, et al Cause of Action for Damages Topographic and Location Map	**FIGURE 1**



Migizi Group, Inc. **P.O. Box 44840** **Tacoma, WA 98448**	Brewer v. Lake Easton Estates HOA, et al Cause of Action for Damages Well Location Map	**FIGURE 2**

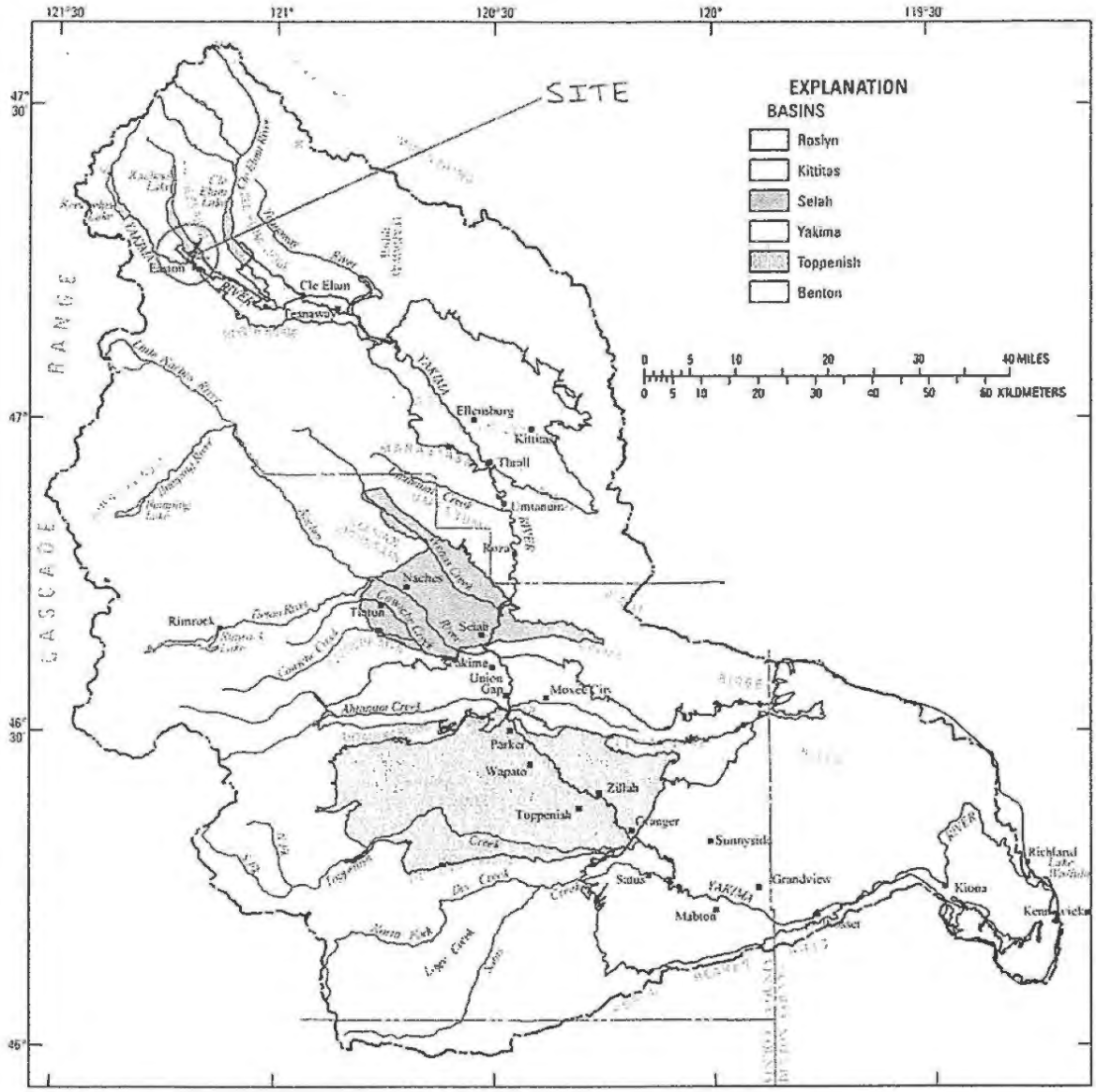


Figure 6. Location of six sedimentary basins, Yakima River Basin, Washington.

Migizi Group, Inc. **P.O. Box 44840** **Tacoma, WA 98448**	Brewer v. Lake Easton Estates HOA, et al Cause of Action for Damages Yakima River Basin	**FIGURE 3**

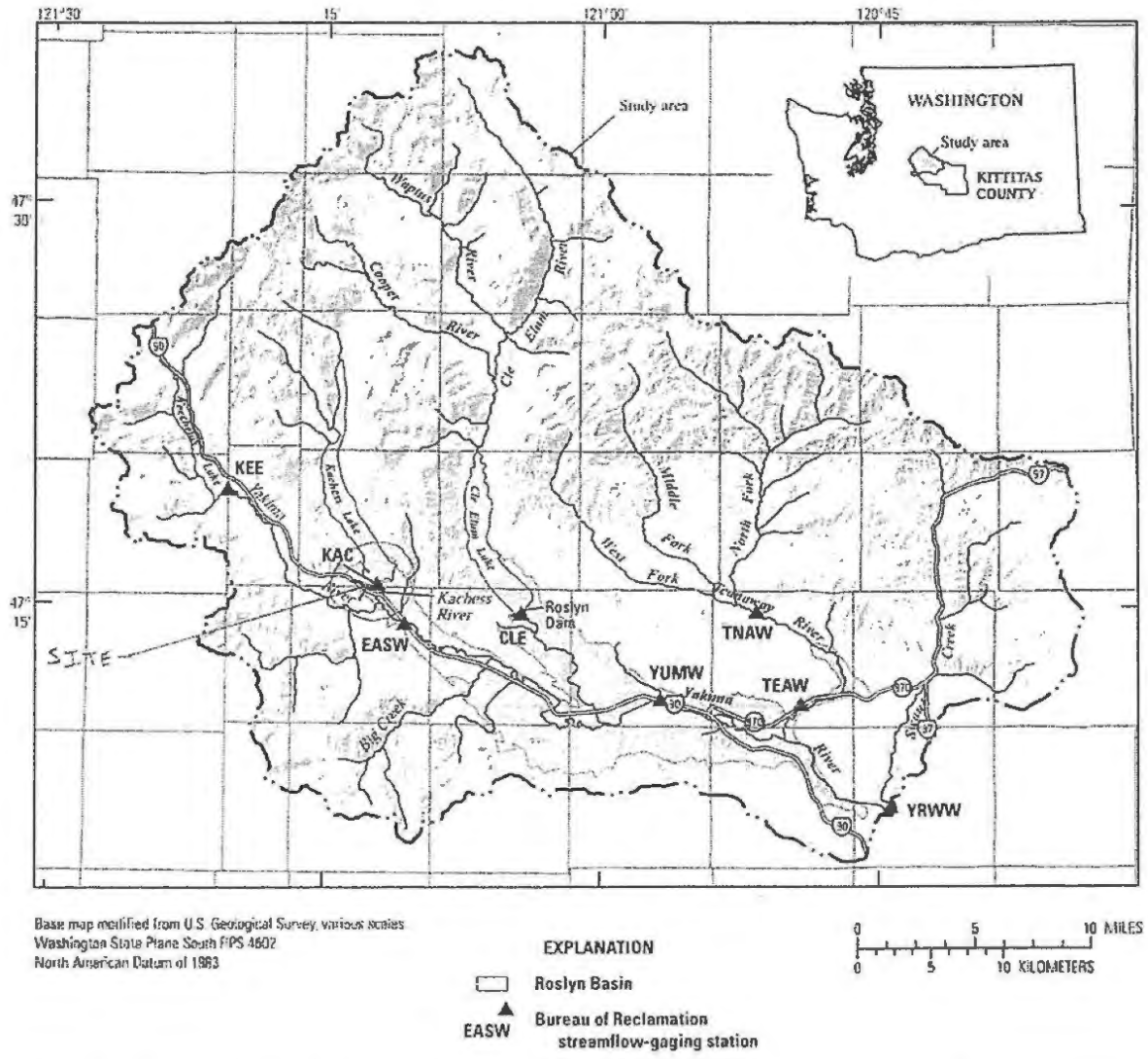


Figure 2. Upper Yakima River Basin, Kittitas County, central Washington. Abbreviations refer to streamflow-gaging stations as shown in table 1.

Migizi Group, Inc. **P.O. Box 44840** **Tacoma, WA 98448**	Brewer v. Lake Easton Estates HOA, et al Cause of Action for Damages Roslyn Basin	**FIGURE 4**

Report 2

The Department of Ecology does NOT warranty the Data and/or the Information on this

File Original and First Copy with Department of Ecology
Second Copy—Owner's Copy
Third Copy—Driller's Copy

WATER WELL REPORT

STATE OF WASHINGTON

3887 00714

Start Card No. 34137

Water Right Permit No. C

(1) OWNER: Name Hadley Hackney Address Spokane Wa

(2) LOCATION OF WELL: County Kittitas NE ¼ NW ¼ Sec 7 T 29 N., R 13 W.M.

(2a) STREET ADDDRESS OF WELL (or nearest address) Lake Easton Estates Lot 27

(3) PROPOSED USE: ☒ Domestic ☐ Industrial ☐ Municipal ☐ ☐ Irrigation ☐ Test Well ☐ Other ☐ ☐ DeWater

(4) TYPE OF WORK: Owner's number of well (if more than one) 2

Abandoned ☐ New well ☑ ☐ Method: Dug ☐ Bored ☐ Deepened ☐ Cable ☐ Driven ☐ Reconditioned ☐ Rotary ☒ Jetted ☐

(5) DIMENSIONS: Diameter of well 6 inches. Drilled 100 feet. Depth of completed well 100 ft.

(6) CONSTRUCTION DETAILS:

Casing installed: 6 " Diam. from +1 ft. to 100 ft.
Welded ☐ Liner installed ☐ Threaded ☐ " Diam. from ft. to ft.
" Diam. from ft. to ft.

Perforations: Yes ☐ No ☒
Type of perforator used
SIZE of perforations in. by in.
perforations from ft. to ft.
perforations from ft. to ft.
perforations from ft. to ft.

Screens: Yes ☐ No ☒
Manufacturer's Name
Type Model No.
Diam. Slot size from ft. to ft.
Diam. Slot size from ft. to ft.

Gravel packed: Yes ☐ No ☒ Size of gravel
Gravel placed from ft. to ft.

Surface seal: Yes ☒ No ☐ To what depth? 20 ft
Material used in seal Bentonite
Did any strata contain unusable water? Yes ☒ No ☐
Type of water? Silty Depth of strata 40'
Method of sealing strata off

(7) PUMP: Manufacturer's Name
Type: H.P.

(8) WATER LEVELS: Land-surface elevation above mean sea level ft.
Static level ft. below top of well Date
Artesian pressure lbs. per square inch Date
Artesian water is controlled by (Cap, valve, etc.)

(9) WELL TESTS: Drawdown is amount water level is lowered below static level
Was a pump test made? Yes ☐ No ☐ If yes, by whom?
Yield: gal./min. with ft. drawdown after hrs.

Recovery data (time taken as zero when pump turned off) (water level measured from well top to water level)

Time	Water Level	Time	Water Level	Time	Water Level

Date of test
Bailer test gal./min. with ft. drawdown after hrs.
Airtest 60 gal./min. with stem set at 80 ft. for hrs.
Artesian flow g.p.m Date
Temperature of water. Was a chemical analysis made? Yes ☐ No ☐

(10) WELL LOG or ABANDONMENT PROCEDURE DESCRIPTION

Formation: Describe by color, character, size of material and structure, and show thickness of aquifers and the kind and nature of the material in each stratum penetrated, with at least one entry for each change of information.

MATERIAL	FROM	TO
Over Burden	0	2
Gravel	2	100

RECEIVED
OCT 10 1990
DEPT OF ECOLOGY
CENTRAL REGION OFFICE

Work started 8-25 19 Completed 8-25 19 90

WELL CONSTRUCTOR CERTIFICATION:

I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

NAME American Drilling (PERSON, FIRM, OR CORPORATION) (TYPE OR PRINT)

Address PO Box 348 Cle Elum Wa 98922

(Signed) Richard Pool (WELL DRILLER) License No. 941

Contractor's Registration No. Amerid*121CW Date 8-7 19 90

(USE ADDITIONAL SHEETS IF NECESSARY)

ECY 050-1-20 (10/87) -1329- 3

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] YBSA COMMENTS KDRPP& KKC SDEIS

1 message

Charlie de La Chapelle <charliedela@gmail.com> Wed, Jul 11, 2018 at 5:45 AM
To: kkbt@usbr.gov
Cc: Sid Morrison <MrSidWMorrison@aol.com>, Chuck Klarich <klarichcj@charter.net>, tom@carpenterranches.com, Larry Vinsonhaler <larryvinsonhaler@msn.com>, Larry Johnson <ok_larry@msn.com>, Bob Hall <bhall@bobhallauto.com>, Bob Tuck <salmon1242@fairpoint.net>, Duane Unland <duane.unland@gmail.com>, Dan Martinez <martinezlivestock@wildblue.net>, Glenn Rice <algkrice@aol.com>, Natalie Martinkus <natb02@gmail.com>

Good morning
Thank you for the opportunity to provide questions on the KDRPP & KKC SDEIS
These are the written questions submitted on behalf of YBSA by Charlie de La Chapelle.
charliedela@gmail.com

1. Who pays how much and when.
We have seen the projection ranging from $150M to $450M when mitigation is included. A breakdown of capital costs, O&M, mitigation and interest. It should be divided by 72,000 acres to get per acre cost if Roza is to pay 100%. And would Roza be expected to pay 100% of K-to-K pipeline too?
This information needs to be quickly disseminated to their growers so decisions can be made and contracts signed ASAP.
Also, I don't see the estimated pumping cost in the event the dead storage is needed to fulfil the obligation to supply senior water contracts over the period of record. Are we further correct that should that event occur, Roza growers would receive no water from the project but would incur the full pumping bill? How can they be expected to pay if they receive no water to grow their crops? Lenders will want to know too.

2. Performance of the project.
Can we ask for an analysis of how well the project performs over the period of record with the UW assumption for climate change, relative to the 70% target goal?
We are especially interested in the back to back drought years.

3. Salmonid restoration.
Can we ask for a comparative analysis of the project on instream flows below Parker.
We are concerned about the impacts to flow volumes, temperatures, predation and survival of the Sockeye runs in the lower 100 miles. We also think some of the studies cited for survival are over 50 years old and need to be updated with more current data. The quick analysis comparing the Sockeye mortality of 2015 and 2017 need to be addressed!

4. Pumped storage.
As costs climb ever upward we need to investigate additional sources of revenue generation.
One of the possibilities of the K-to-K pipeline is to incorporate pumped storage to take advantage of the imbalance between power supplies and power demand to store solar and wind surpluses. Even if the possibilities are marginal or negative we should be learning what modifications can be made to offer values that other sectors will pay to have.

Can we ask for analysis of profit potential of a pumped storage project on the k-to-k pipeline, complete with limiting factor analysis.

5. Value

Initially three irrigation entities of the Yakima Project were identified as needing a supplemental water supply in drought years. However, if the costs are beyond their ability to pay how are these needs to be met? 6

Thanks for your attention.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Pumping

1 message

Harold Duncanson <haroldd@duncansonco.com> Wed, Jul 11, 2018 at 4:57 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Via Email

ATTN: Ms. Candace McKinley, Environmental Program Manager

Bureau of Reclamation

1917 Marsh Road, Yakima WA 98901-2058

Dear Ms. McKinley:

I am writing to present my observations, concerns and questions regarding the KDRPP 1

1. The inset photo on the cover of the SDEIS labeled Kachess Reservoir is not Kachess Reservoir. What is shown it Lake Kachess with most or all of the “reservoir” water drained down as evidenced by the visibility of the outlet channel to the dam. Other figures in the SDEIS also use the label “Kachess Reservoir”. It is misleading to refer to the subject water body as Kachess Reservoir. The pumps will not pump from Kachess Reservoir. They will pump from Lake Kachess. Other text throughout the SDEIS also consistently refer to Kachess Reservoir, when what is at stake is natural Lake Kachess, below the reservoir. The document needs to be revised to clarify to the public what is proposed. This is not pumping reservoir water that people are used to seeing fluctuate up and down. The KDRPP is proposing to more than double the furthest drawdown ever seen. 2
2. I respectfully request that you extend the comment period for another 60 days. I was in Easton last weekend and found a number of people, who still did not even know about this proposal. 3
3. If implemented, how specifically would the KDRPP be funded? What will be the State and Federal taxpayer obligations? 4
4. If implemented, how specifically will the recreation opportunities be mitigated? 5
5. Why was no alternative for conservation considered? 6

Thank you for your consideration. I look forward to your reply to my questions. 7

Harold Duncanson, PE
President
Duncanson Company Inc. | Civil Engineers--Surveyors
145 SW 155th Street, Suite 102
Seattle, Washington 98166

206-244-4141 phone
206-244-4455 fax
www.duncansonco.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SDEIS

1 message

James Elder <jimbarbelder@gmail.com> Tue, Jul 10, 2018 at 10:25 PM
To: kkbt@usbr.gov

Dear Sirs;
I am writing as a concerned resident of the Lake Kachess community regarding the SDEIS. My wife and I have been owners of a vacation home at Lake Kachess for 38 years. The floating barge or tunnel to Lake Keechelus would drain Lake Kachess to a level where recreation on the lake would be impossible. It would seriously affect property values of homeowners and be detrimental to the ecology of the area. In addition, it would impact the ability to provide water for fire protection in this fire prone area. It would make a wonderful state park less attractive with the lake dropping to a level where it would be inaccessible, thereby destroying a wonderful recreational opportunity for thousands of campers. In short this drainage plan will ruin a pristine recreational area not only for residents but all Washington residents. Would you please respond how all this issues would be mitigated if the plan is approved.

1

Sincerely,
James and Barbara Elder
3730 Rodesco Dr. SE
Puyallup, Wa 98374

jimbarbelder@gmail.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Re lake kachess

1 message

Brandon Erickson <brandonrerickson@gmail.com> Wed, Jul 11, 2018 at 1:06 PM
To: kkbt@usbr.gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

RE: Kachess and Keechelus SDEIS

Dear Ms. McKinley:

Please accept my comment regarding the KDRPP SDEIS:

Alternative 1 No Action: I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, “No Action” is acceptable. 1

Brandon Erickson

526 Yale Ave N #606

Seattle, WA 98109

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS Questions & Concerns

1 message

A P Fountain <kachess387@gmail.com> Wed, Jul 11, 2018 at 2:47 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

My question is why aren't there other choices beside draining a natural lake to benefit a small group of corporate farmers with no senior water rights? 1

Has the Roza Water District done repairs or made improvements to their trenches, reservoirs or added any water conservation programs?

How can you trust the SDEIS when they have tried to confuse, mislead and deceive the public. Like calling LAKE KACHESS a reservoir it is NOT a reservoir it is a LAKE. 2

I am opposed to any of the Kachess SDEIS alternatives. The only one is NO ACTION that is acceptable. Please send me a response to my questions and concerns.

AP Fountain

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDDRPP & KKC SDEIS Questions & Concerns

1 message

Tim Fountain <tnfountain@gmail.com> Wed, Jul 11, 2018 at 4:15 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

Greetings,

I have a residence in Kachess Village and I know if this project goes through our property value will go down.

Will mitigation be provided to owners whose property values are reduced by this project?

How will this lost in property value be calculated? 1

Who will pay for any mitigation?

The SDEIS does not address any mitigation for reductions in private property values. So, what assurances would private property owners have that mitigation would be available to us?

The SDEIS does not seem to have any reliable facts about how long if ever Lake Kachess will refill. No one can predict how much snow/rain we will get in any year. With the possibility of the KKC it was questionable if it would refill, without the KKC most likely it will take even more years. Then the only way it could refilled is that they don't take water for years out of Lake Kachess. So won't that make all the money spent on installing the floating pumping plant, a real waste of money? In the process, they will have ruined a beautiful Alpine Lake for years. 2

I am opposed to any of the Kachess SDEIS alternatives. The only one is NO ACTION that is acceptable. Please send me a response to my questions and concerns. 3

Thank you,

Tim Fountain
Kachess Village Residence

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant EIS Comment

1 message

Neil Garrison <neilegarrison@gmail.com> Wed, Jul 11, 2018 at 7:36 AM
To: kkbt@usbr.gov

To:

Bureau of Reclamation
Attn: Ms. Candace Mckinley

We would like to express support for the "no action" alternative proposed in the Kachess Drought Relief Pump Plant EIS. 1

We are diversified Roza irrigation district farmers. We raise a mix of permanent crops and row (forage) crops. 2

Our current management has been in place since 1979 and has witnessed many changes and many droughts on the Roza.

Our primary concern is the substantial cost of this project falling onto one irrigation district. The project, should it proceed, will substantially increase water rates for the two decades following its implementation. Rates would likely increase such (taking into account the current estimates and the likelihood that the project would go over budget) that anything other than high value permanent crops would be unprofitable. This would increase the current high percentage of water heavy permanent crops and make an already brittle irrigation district ever more reliant on extraordinary measures like the KDRPP and other continued outside subsidization. There is a reason that the Roza is the only district pursuing this part of the integrated plan, the water is simply too expensive. 3

Additionally we do not feel that the Roza board is doing an adequate job of communicating to it's stakeholders what is being proposed. We try and stay relatively well informed and we struggle to keep up with this project and just what it will mean if it is approved by all interested parties and pursued by the Roza board. We think there are many farmers within the Roza that do not understand the cost of what is being pursued by the Roza board here. 4

We hope that the Bureau of Reclamation will continue to work to improve the availability of water in the Yakima Basin, but in a way that will work for a majority of the users, not simply the largest growers with the loudest voices. 5

Respectfully,

Neil Garrison
Tom Garrison

Sunnyside WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Please Don't Lower Lake Kachess according to the SDEIS plan. Our Kittitas/Y akima County taxes will be severely affected with a domino effect federally . Read on!

1 message

Michelle Gienger <mgienger@me.com>
To: kkbt@usbr.gov

Wed, Jul 11, 2018 at 6:59 AM

Dear Candace,

Wow!! What a huge responsibility you have to sift through all these SDEIS comments letters. Thank you in advance for your service to our county and this country.

My name is Shelley Gienger. I am a registered nurse and health-coach business owner in Upper Kittitas County.

I grew up on, and am part owner, of a multigenerationally owned and operated, crop growing, 4000 acre-mostly dry land farming-cattle ranch in Indian Valley, Idaho. We have built several reservoirs over the years to help water crops and cattle.

My husband Lonnie and I currently have two properties in the Lake Kachess Ridge area and have owned the one for sale since 1991. We also have an apple orchard in Yakima West Valley area.

1

I state these facts only to establish credibility as I speak on behalf of many home/land owners in both counties as well as ranchers and farmers.

Even though we sympathize with the perceived need for more water in lower Yakima Valley and beyond; the property owners bought the land knowing it only had junior water rights and would grow only certain crops. As you know, property prices have always been adjusted lower based on this fact.

The solution to a perceived potential shortage of any resource with a limited supply, like water, is not to find ways to use more of that resource and take water from everyone else for private use.

So, I ask you this?

Why should people who paid less for their land be entitled to an expensive and unsustainable solution that increases their property values while all of our county land decreases? Kittitas County is left with the many downsides and messes of the decision-and they get all the benefit!

Knowing there are other solutions for capturing and conserving the water currently flowing past their farms, (like building reservoirs on their own property) we adamantly oppose the currently proposed SDEIS plan to pump out Lake Kachess in order to provide that extra water. There are many concerns, but most concerning is how there could be (will be and already is in some cases) reduced property values for people living on the lake and in Kittitas and Yakima Counties.

Lower property values will have a domino effect caused by less taxes being collected from property owners. That in turn could (will) cause, but not be limited to the following issues. 2

Less taxes collected could (would) lessen budget monies for county/federal projects, and decrease the effective running of our county/federal programs with budget cuts. Public school dollars will be affected. 3

The domino effect could (will) affect the ability to recruit and pay needed county employees the well deserved salaries they are accustomed to. We definitely want our local counties to be well run!! 4

This domino effect has already started from only the word getting out that the lake may be dramatically lowered an additional 80 vertical feet. The concern about the eventuality of wells drying up; actual affected wells that do dry up. The threat of damaged views from homes, campground recreation changes and no boating, (with less visitors the challenge on tourism and economy is another large subject of concern with county and federal tax dollars being affected) all these cause big hits on property values. 5

Also, people in all of KIttitas/Yakima counties could (will) feel the lowered property value results when they lack allotted water for senior water rights holders in year two and beyond after the drought year.

So, you see that it's a critical decision; a one time fix for junior water rights holders that affects all of Kittitas and Yakima counties. It's not just a Lake Kachess home owner challenge.

Are you, as a representative of the BofR prepared to live with and deal with the fallout challenges that will happen if you let this go through?

Just this week, a potential buyer from Seattle called about the house we have for sale in the Lake Kachess area. He asked our realtor, 'Is the draining of Lake Kachess a real threat?' And our realtor had to say, 'Yes' and look for other benefits to share about the property. The man wanted the beauty of a lake home and is now looking for a home in a different area. 6

This SDEIS proposal doesn't look good for the property values and long term prosperity balance in our county and federal government and beyond.

Let's find another solution or two for our farmers.

Sincerely,
Shelley Gienger RN
healthadvantagecoach.com

Sent from my iPhone

Raelene Gold
4028 NE 196th St.
Lake Forest Park, WA 98155
July 11, 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058
kkbt@usbr.gov

RE: Kachess and Keechelus SDEIS

Dear Ms. McKinley:

I am submitting comments on the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13, 2018.
All comments are submitted under both NEPA and SEPA. 1

Concerns:

I am a concerned citizen who has been attending YBIP Workgroup meetings throughout this process. I represent various groups, though these comments are my own. My main concern is that the YBIP mainly addresses only the issues of two stakeholders, irrigated agriculture in the basin and tribal fisheries. The YBIP attempts to solve their history of litigation and contention at the expense of other stakeholders who have much to lose with the current plan. The Workgroup as consistently not publicly alerted, included or listened to the other stakeholders, such as property owners, other environmental groups, taxpayers, most recreational organizations and individuals. As the word spread, impacted groups have showed up at the Workgroup meetings and over time have been allowed to speak and submit comments and documents. But the Workgroup, united and committed to the Plan, refuses to respond or enter into dialogue or consider their concerns or suggestions. There is a basic unfairness and inequality here that the interests of irrigated agriculture take precedent over other interests.The Workgroup also spends considerable money and time advocating for their Plan, and lobbying the State Legislature and Congress for support and financing for their Plan. 2

Comments:

1) I support Alternative 1 No Action, I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, “No Action” is acceptable.

The Yakima Plan programmatic FEIS failed to provide a range of alternatives. The only alternatives presented were the Yakima Basin Integrated Water Management Plan (YBIP) and No Action. This is a failure to comply with NEPA requirement for consideration of a range of alternatives. The National Environmental Protection Act (NEPA) requires consideration of a range of reasonable alternatives, which are not slanted to favor the interests of a particular party. The 2018 SDEIS’s alternatives only included a conveyance tunnel with two locations, and a pumping plant with three locations. Other alternatives need to be considered. The Water Research Center of Washington State University has shown that the purpose of the YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by 3

application of conservation and water market strategies. This report was ignored and denigrated by the Workgroup.
Water conservation could be carried out to save over 200,000 acre-feet of water instead of this expensive project. Other alternative solutions such as aquifer storage, water banks, water marketing, advanced water technology and crop management changes need to be considered.

2) The SDEIS inadequately accounts for the financial and "pursuit of happiness" impacts to the approximately 300 Lake Kachess area homeowners by the ongoing project construction and the 80 foot drawdown of Lake Kachess. This is a considerable number of people that were drawn here by shoreline homesites, views or access to Lake Kachess. That is a considerable component of their property's value and of their enjoyment of the many recreational opportunities Lake Kachess provides. The financial impacts to the property owners need to be accurately determined by an independent real estate appraisal firm. Also, please detail how property owners would be compensated. 4

In addition, the impact to property owners' wells of Lake Kachess drawdowns needs to be better determined and plans to "monitor and mitigate" described. Obviously not having available water is a major impact to homeowners that here is not here treated seriously. Please outline your plans to monitor and mitigate impacted homeowners wells? 5

3) The impact on the USFS Lake Kachess Campground during construction and drawdowns is not adequately or seriously considered. There are 23,00 annual visitors and 11,000 annual boaters here. This impacts a very large number of recreational users. How will this user be notified and what public meetings and opportunity to comment will be planned? Is there an assessment of the financial impact to the nearby communities to the loss of recreational dollars? 6

4) The environmental damage of these projects is not fully considered in the SDEIS. The federally listed Kachess bull trout pass from Lake Kachess by passage to Little Lake Kachess to their destination in Box Canyon, which when the Lake is lowered does not allow passage. (Others have submitted the photos shown of a drained Lake Kachess with totally inadequate plastic and bales of hay attempting to delineate a passage) What is the "temporary passage system" and how successful has it been shown to be? 7

Also, when Lake Kachess is drawn down, it is a mudflat that exposes and kills freshwater mussels, that are recently a species of concern. (See the photos that others have submitted.) Please detail what is your plan to protect these freshwater mussels? 8

Conclusion:

I support the No Action Alternative, as this SDEIS is inadequate because it is based on the 2012 Yakima Plan Final Programmatic EIS that failed to provide a range of alternatives. The 2018 SDEIS is also inadequate because it fails to provide a range of alternatives for providing the additional storage water to irrigation districts. minimizesAn EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project. The EIS should also offer alternatives that minimizes environmental degradation. 9

I request that the BuRec and Ecology each provide separate responses to the above comments. Please send me a copy of any FEIS that is released.

Thank you for considering my comments.

Raelene Gold
4028 NE 196th St.

Lake Forest Park, WA 98155
206-303-7218
raelene@seanet.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus SDIES

1 message

Candace Gratama <cgratama@gmail.com> Wed, Jul 11, 2018 at 1:04 PM
To: kkbt@usbr.gov

Dear Ms. McKinley:

I have attached a letter including comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

Best,

Candace Gratama

20 Crestview Court

Easton, WA 98925

Kachess and Keechelus SDEIS.docx
23K

Submitted via email to: Kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

Dear Ms. McKinley,

Our family has been enjoying the beauty of Lake Kachess since 1992 when we first discovered the campground. We spent much of our time on the lake and enjoyed nature. In 2007, after 15 years of camping, we were finally able to recognize our dream and purchase a house on the lake, which we live in 50% of the time. 2

We strongly believe the proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. I'm particularly concerned that there are no efforts to line the tunnels that transport the water. 3

Please accept these comments/questions regarding the KDRPP SDEIS.

Comments

1. Alternative 1 No Action I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 4

2. Failure to consider alternatives The DEIS and the SDEIS really only consider two alternatives: drain a natural lake to benefit downstream irrigators with no senior water rights or don't drain the lake. No other alternatives are considered to meet the irrigation security needs of the Roza Irrigation District farmers. My questions related to this topic are as follows: 5
   a. Why was water conservation, including repairs to the Roza open trenches not considered or at least integrated into the plan to reduce the additional water needs?
   b. Why was taking water from the Columbia River not considered?
   c. Why wasn't appropriate crop selection on lands without senior water rights considered?
   d. Why wasn't advanced water conservation methods considered?
   e. How does this DEIS and SDEIS meet the requirement to consider a range of reasonable alternatives which is required by NEPA?

3. Mitigation for reduced property values. I own and live part-time in a home located at 20 Crest View, Easton, WA 98925. My daughter currently lives there fulltime. My home is waterfront. Should the KDRPP be approved and implemented, there is no question that the value of my property will be significantly reduced. My questions related to this topic are as follows: 6

a. Why does the SDEIS not address any mitigation for reductions in private property values effected by this proposed action?
b. Will mitigation be provided for property owners whose property values are reduced by this action?
c. How will any mitigation be calculated?
d. If the parties do not agree on the mitigation amount, how will any disputes be resolved?
e. Who will pay any mitigation?
f. What timeframe will be involved in the mitigation process?
g. Because the SDEIS does not address any mitigation for reductions in private property values, what assurances would private property owners have that mitigation would be available?

4. Impact on Campers and recreational users at Lake Kachess Despite having the information and ability to do so, the DEIS and SDEIS process failed to notify a large segment of the public who would be effected by this plan. The over 23,000 annual campground visitors and 11,000 annual boaters are entirely unaware of this plan. We have been visiting the campground weekly in an effort to notify these users and have been met with a complete lack of awareness of the proposal. In fact, we have been told we cannot distribute information within the campground to raise awareness on the issue. My questions related to this subject are as follows:
a. Why has no effort been made to communicate with this segment of the public who should have been given an opportunity to participate in the process?
b. When will this group receive communication on the KDRPP proposal?
c. Will they be provided any opportunity to comment or participate in the process?
d. Simply telling them about it after it's a done deal fails to meet the SDEIS's public information obligation.
e. Why were no SDEIS public information sessions held West of the Cascades, when it is well known that a large population of the public who live on the West side of the Cascades regularly use Lake Kachess, many for decades or generations.
f. On page ES-Xii, the following suggestions are given to address recreational use of the lake "Extend boat ramps at Kachess Reservoir…if feasible, and construct new east shore ramp that would be available at all reservoir levels. My questions related to this topic are as follows:
i) Would extending boat ramps at Kachess Reservoir include both public and private ramps?
ii) Under what conditions would extending those ramps be feasible or not feasible?
iii) What analysis of the lake geography has been done to suggest is extending any of the ramps for use during a KDRPP-FPP drawdown is truly feasible or not?
iv) Describe the geography of the East shore ramp location and what the slope of the ramp will be during a drawdown. Will it be physically possible to use the ramp or will the slope simply be too steep for practical use as a boat launch?

7

5. Increased forest vulnerability and Fire Hazard. The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility for fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and

8

repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. We demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. We ask this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. Under the guise of addressing the potential of global warming, this proposal fails to adequately address another element of global warming – that of added fire risk. In fact, this plan exacerbates that fire risk. My questions related to this topic are as follows:

a. Given that the SDEIS identifies damage to the natural environment will be caused by the proposed action, what responsibility will those who approve and execute on this plan have for those ongoing damages?
b. If there is a significant wildfire in the area that it exacerbated by a KDRPP-FPP draw down and cannot be adequately battled due to the unavailability of Kachess water for firefighting, who will be responsible for the damage and certain public outrage to follow?
c. If, as a result of a KDRPP draw down, trees die on my property or on the property of the homeowners association to which I belong, who will pay for the cost of removal of those dead trees?

6. Refill timing How long the lake will take to refill is paramount to my concerns about the proposed action. While it may be difficult to precisely predict the refill timing after a KDRPP-FPP draw down, the variations between the DEIS and the SDEIS raise questions as to the accuracy of the hydrology in both reports. The DEIS stated that without the KKC, Lake Kachess would likely not refill for 20 years. Now the SDEIS as much as throws out the KKC and states that after a KDRPP drowdown, Lake Kachess will take two to five years for refill without the benefit of KKC water (although a chart within the SDEIS shows a maximum of eight years to refill vs. five). My questions related to this topic are as follows: 9

a. Please provide the detailed hydrology that the 2015 DEIS was based on that purposed that the KKC was required as a refill mechanism without which Lake Kachess would like not refill for 20 years.
b. Please explain in detail what changed between 2015 and 2018 that now allows a refill prediction of 2-8 years when the 2015 prediction was 20 years or more.
c. Which report should be relied on? 2015 KKC is required as a part of KDRPP, or 2018 KDRPP doesn't need KKC and will refill 2-4 times faster than previously predicted?
d. How can the public be expected to make informed comments with such seemingly inconsistent hydrology predictions? Can either report be relied upon?

7. Impact on private wells My home is served by a public "group A" water system located a few hundred feet from the Lake Kachess shoreline with senior water rights dating back to Pre-May 10, 1905. This water system serves water to 162 homes in our community, to our fire hydrants and for fire-fighting. Our community provided comments to the DEIS which included a request for specifics regarding mitigation in the probable event that our well goes dry due to a draw down and subsequent refill period. The SDEIS states clearly that wells in the area are in danger of being "de-watered". In the 2.5 years since the DEIS, the best the SDEIS can offer in regards to drying up private wells is to "monitor and mitigate" without any specificity as to how a dried up well can be mitigated. My questions related to this topic are as follows: 10

a. By what right does any entity, whether BofR, Roza or any other "participating entity" usurp the senior water rights of 162 homeowners (plus others in other communities around Lake Kachess) and take an action that they know will dry up senior water rights wells. Please state specifically what gives the BofR, Roza or any other entity the right to usurp senior water rights.
b. How can I, or my neighbors, make informed comments on this SDEIS when have no idea what "monitor and mitigate" might mean?
c. Why does the SDEIS not provide or even discuss any funding for well-dewatering mitigation?
d. Who will pay for mitigation?
e. Please provide a detailed action plan for well-dewatering mitigation in a supplemental SDEIS with appropriate comment period.

Thank you.

Candace and Pete Gratama
20 Crestview Ct.
Easton, WA 98925
(No Mail Delivery at this address)

MAILING ADDRESS
Candace and Pete Gratama
12851 111 Ave NE
Kirkland, WA 98034

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake kachess

1 message

oleg greben <oleg.greben@yahoo.com> Tue, Jul 10, 2018 at 10:53 PM
To: kkbt@usbr.gov

I am opposed to any of the kachess SDEIS active alternatives, a pumping plant and/or pipeline at lake kachess, no action is the only acceptable alternative. 1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus SDEIS

1 message

Galina Greben <ggreben@aol.com>
To: kkbt@usbr.gov
Cc: ggreben1@yahoo.com

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

Dear Ms. McKinley,

Please accept these comments/questions regarding the KDRPP and KKC projects.

We are opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only 1

Section 3.9.3 of the KDRPP and KKC SEIS has a short section on bull trout, but virtually no information on Box Canyon Creek. Attached is a photo tak 2
disappears into the mud flats created by the existing draw down of Lake Kachess.
It also shows efforts by Washington Department of Fish and Wildlife (WDFW) to create an artificial channel from Little Kachess Lake to Box Canyon Cr
been scattered and allowed to enter the water. This would appear to be a discharge of pollutants (straw and plastic) into Lake Kachess. Did the WDF 3
System (NPDES) permit or a Department of Ecology 401 Water Quality Certification, or a Shoreline Management Act Substantial Development Permit

Sincerely,

Paul and Galina Greben
21 Summer Park Court

Easton, WA 98925
(NO MAIL DELIVERY AT THIS ADDRESS)

MAILING ADDRESS
Paul and Galina Greben
24106 7th Ave SE

Bothell, WA 98021

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KRDPP questions

1 message

Josh Guilfoyle <jasta@devtcg.org>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Tue, Jul 10, 2018 at 9:51 PM

I generally oppose the KRDPP project on the basis of significant environmental damage to the area and have a few questions for the final EIS: 1

1. Drought years in the past suggest that this project may need to be active for on average 1 in every 4 years, but the refill timing can be up to 5 years. This suggests the project will nearly permanently see the lake in a fully or partially drained state and would likely totally collapse recreation in the area. 2
2. The conveyance project was initially floated as being critally tied to the KDRPP project but now appears to not be the proposed action plan in the SDEIS. This feels like a bait and switch and I'd like to see detailed analysis for why the project is no longer considered essential to KDRPP. 3
3. NEPA requirements suggest that genuine alternative strategies be explored and documented fully, including the reason they were not selected. In this case I believe that obviously excludes conservation strategies and infrastructure improvements for instance in the existing channel carrying water from Lake Kachess. The only serious plans on the table involve substantial environmental damage to a naturally formed lake with no real consideration of more conservative strategies. 4

Thank you for your consideration.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess project

1 message

Carrera Halwachs <bellacoche@gmail.com> Tue, Jul 10, 2018 at 10:32 PM
To: kkbt@usbr.gov

Hi, Ms. McKinley,

I am writing regarding the project intended to use water in Lake Kachess for irrigation (KDRPP and KKC SEIS). This plan seems rush and ill-advised, and benefits big farmers. 1

I have concerns that the Roza water district has mismanaged it's whole crop plan. It was known that the area did not have enough water on its own to support crops, and yet they planted. It was also known that they would need to purchase senior water rights. Finally, the ditches used to store water are in need of repair, and they leak this precious resource. With all of these known issues, what assurances do we have that the water pulled from Lake Kachess will be properly used? Are there plans to repair the current irrigation ditch? 2

What plans are in place to "mitigate" if the wells around Lake Kachess dry up when the water is pumped out of the lake? We cannot expect homeowners to live in homes with no water supply. Nor can we expect them to be able to sell their homes and relocate to areas that have water - there is no resale value in beautiful home without running water. Could you please elaborate on the proposed mitigation in case this happens? 3

Has the Roza irrigation district fully investigated all other options for crop irrigation, including root irrigation? What was the outcome of that research, and why did they decide against those options? 4

How will the project be funded? Will it be funded through taxpayer bonds, or will there be any government assistance provided? Historically, taxpayer bonds for water projects have a very low rate of repayment, and it seems unfair to ask homeowners to pay a tax that will fund a project that could rob their homes of all water. 5

There are also environmental concerns for wildlife, including bull trout. Has this been fully addressed? Outside of the bull trout, the lake is a significant water source for all other wildlife and plant life. If the lake is drained, has the study been completed to understand how that will affect all plant and animal species in that water basin? 6

Lake Kachess is a water resource during wildfires, which happen during the same drought years when the lake would be drained. Please explain what solid and feasible plans are in place to provide water to fight wildland fires if Lake Kachess is not available. 7

I appreciate your time, and I look forward to your response.

Best,
Carrera Halwachs
317 Powell Ave SW
Renton, WA 98057

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS Comment

1 message

Alistair Hamilton <alistair.hamilton@gmail.com> Tue, Jul 10, 2018 at 8:47 PM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office

KDRPP & KKC SDEIS Comment

The SDEIS makes very clear statements about the devastating impact of this pumping project and the recommendation of the bureau shows that they are not being open to data or facts that go against their foregone conclusion that draining Lake Kachess is the way to solve future droughts.

There are sustainable alternatives that have not been explored in favor of this “easy” answer of putting a straw into a pristine glacial lake.
We need to work harder and commit to economically viable and ecologically responsible approaches with ALL stakeholders. The impacts described are severe and irreversible.

1

Thank you,

Alistair Hamilton
425-442-9554

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS Comment

1 message

Grace Hamilton <gracechamilt@gmail.com> Wed, Jul 11, 2018 at 9:51 AM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office

KDRPP & KKC SDEIS Comment

The SDEIS makes very clear statements about the devastating impact of this pumping project and the recommendation of the bureau shows that they are not being open to data or facts that go against their foregone conclusion that draining Lake Kachess is the way to solve future droughts.

There are sustainable alternatives that have not been explored in favor of this “easy” answer of putting a straw into a pristine glacial lake. Not only are these alternatives sustainable, but more likely to actually solve the problems that we are looking to solve and better serve everyone that this touches.

We need to work harder and commit to economically viable and ecologically responsible approaches with ALL stakeholders. The impacts described are severe, irreversible, and ineffective.

Thank you,

Grace Hamilton
631-512-1145

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess SDEIS - No Action!

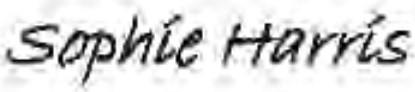
1 message

Sophie Harris <sophieharris@outlook.com> Wed, Jul 11, 2018 at 3:08 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. 1

Alternative #1, No Action is the only acceptable alternative.

Thanks,



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K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Geraldine Haugen <haugen.deane@yahoo.com> Wed, Jul 11, 2018 at 9:08 AM
Reply-To: "haugen.deane@yahoo.com" <haugen.deane@yahoo.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 1 2

Thank you.

Sent from Yahoo Mail on Android

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Comments on KKC/KDRPP SDEIS

1 message

Edward Henderson <edhenderson57@comcast.net> Tue, Jul 10, 2018 at 9:49 PM
To: kkbt@usbr.gov

Dear Ms McKinley,

Attached please find my comments on the KKC/KDRPP SDEIS. I am also including my March 10, 2015, comments on the DEIS just incase you lost the original. 1

Ed Henderson

2 attachments

KKC-KDRPP SDEIS Comments.docx
150K

KKCKDRPP DEIS Comments.docx
139K

Edward M. Henderson, Jr.
407 Smith Street
Seattle, Washington 98109
edhenderson57@comcast.net
(206) 283-6497

March 10, 2015

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058
Via Email to: kkbt@usbr.gov

RE: Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC), Comments on Draft Environmental Impact Statement (DEIS).

Dear Ms. McKinley:

This DEIS should be withdrawn. It is incomplete, inadequate and premature. It fails to provide alternatives to and details of the proposed projects that would allow sufficient evaluation of the environment impacts. While the Bureau of Reclamation and Department of Ecology are crafting a more comprehensive DEIS, please consider the following.

I am familiar with the Final Programmatic Environmental Impact Statement (FPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (The Integrated Plan or IP). In the FPEIS for the Integrated Plan the impacts of many basin wide issues are glossed over to be "dealt with later in project specific EIS's." This transparent attempt to lose these issues between the Tier 1 programmatic FPEIS for the Integrated Plan and the Tier 2 project DEIS's is disingenuous and unacceptable. Therefore the scope of this Environmental Impact Statement (EIS) must be broad enough to address these basin wide impacts and not be limited to only local, site-specific impacts. This EIS must deal with all impacts in the context of the Yakima River Basin Integrated Plan and fully consider the cumulative effects on the entire Yakima River Basin by all the elements of the Integrated Plan. This DEIS for the KDRPP & KKC fails to do that. 2

By failing to provide a reasonable Conservation Alternative this DEIS violates the requirements of NEPA to consider appropriate alternatives to the proposed action.

The National Environmental Policy Act (NEPA) of 1969 states, in part, as follows:

"SEC. 102. The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall— . . .
(D) study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources;"

The DEIS for these projects must present a conservation alternative to meet the Purpose and Need stated for public examination and comment.

A comprehensive and mandatory conservation program in the Yakima River Basin could provide the same amount, 200,000 acre-feet, of water to the junior water right irrigators as the proposed KKC and KDRPP projects. This water would be available without either the environmental impacts or financial cost of the proposed construction project.

Why aren't fish passage structures at lakes Kachess and Keechelus included in the DEIS?

The first of the Integrated Plan's seven elements is the restoration of fish passages at reservoirs. This DEIS recognizes that anadromous fish, salmon, were present in natural glacial lakes Keechelus and Kachess prior to construction of irrigation control structures, dams and spillways, in the early twentieth century. See Section 3.6 Fish page 3-55/56:

> *The historical lakes and tributaries of the upper Yakima basin formerly supported anadromous spring Chinook, summer steelhead, coho, and sockeye salmon as well as resident bull trout. However, the construction of dams and irrigation storage reservoirs has precluded anadromous fish access to over 70 miles of productive, historically available habitat within the basin. Kachess and Keechelus dams represent passage barriers for returning anadromous fish, and no anadromous fish species are present in either reservoir or in tributaries upstream of the dams (Haring, 2001).*

2

The construction plans presented in this DEIS for both the KKC and KDRPP are rudimentary and conceptual only. It is therefore impossible to evaluate the environmental impacts that construction of these projects will have. When withdrawing and rewriting this DEIS please address the following questions:

- Section 2.2 Alternatives Development Process on page 2-2 cites feasibility studies of the KKC & KDRPP projects to be finalized in 2015. Isn't it premature to propose these projects before completing studies as to whether or not they are even feasible? When will these studies be finalized and available?
- Alternatives 2A & 2B (KDRPP) and 3A & 3B (KKC) all estimate excavation in excess of 100,000 cubic yards of spoil. Where will this spoil be dumped and how will it be transported to the disposal site?
- If Alternative 2A, the eastside pumping station is selected, over 100,000 cubic yards of fill material will be required to bury the 13 foot diameter discharge pipe in a ditch to insure that it doesn't float. If the spoil excavated from this ditch, at the bottom of Lake Kachess, proves to be unsuitable for fill material, where will suitable material be acquired and how will it be transported to the site?
- What is the size (horsepower) of the pumps to be used in either Alternative 2A or 2B?
- When will the final location and alignment of the proposed tunnels in Alternatives 3A & 3B be determined?
- Both Alternative 3A & 3B envision a discharge structure and energy dissipating spillway structure on the shore of Lake Kachess. Below the stilling basin there would be a riprap apron down into the lake. To what elevation will this apron extend? What is the estimated quantity of riprap required for this apron?
- For Alternate 3B - KKC South Tunnel Alignment in section 2.7.1.2 on page 2-48 the tunnel from the I-90 Exit 62 portal to the Lake Kachess portal is shown as rising from elevation 2260 to 2360. How will this water, 400cfs, be persuaded to flow 100 feet uphill?

The cost for construction and 100 years of operation of all four alternatives is given in Tables 2-13 and 2-14 on pages 2-54 and 2-55. In all four cases this amounts to multiple hundreds of millions of dollars. What are the direct economic benefits of this expenditure of public money?

In Chapter 4 Environmental Consequences, section 4.3.6.2 *Operation* [of the KKC North Tunnel Alignment Facilities] in the section on *water supply* on page 4-33 states that:

> *Hydrologic modeling indicates Alternative 3A – KKC North Tunnel Alignment would provide a very small (less than 1 percent) improvement in water supply for proratable water users during drought years. Table 4-11 summarizes the expected change in prorationing percentage. Water supply would remain well below the 70 percent of entitlement goal. Therefore, KKC would not have a significant benefit to water supply.*

It further states on page 4-34 that: *Kachess Reservoir levels would remain within current operating ranges and no significant effect on water resources would occur.*

Why should multiple hundreds of millions of dollars be spent on the KKC for a paltry drop-in-the-bucket of no significant benefit to water supply? Note: Alternate 3B – South Tunnel Alignment will provide the same insignificant benefit to water supply.

The Bull Trout Enhancement (BTE) projects are appended, Appendix C, to both the KKC & KDRPP projects and are made integral to those projects. Why isn't the BTE presented as a stand-alone project? All five of the physical projects listed are required now under the current operations, i.e. the summer draw down for irrigation from both Kachess and Keechelus Lakes, and will be needed for any and all of the Alternatives including the No Action Alternative in the future. Why isn't a program proposed for the Kachess River cascade between Little (upper) Kachess Lake and Kachess Lake, which will be exposed when the KDRPP goes into operation and pumps water out of Lake Kachess below the current low pool elevation of 2190'? 2

When the KDRPP goes into operation and lowers the pool level in Lake Kachess below elevation 2190', the natural spillway elevation, the only outflow from Lake Kachess will be by water pumped over the dam. How will anadromous fish be able to migrate up the restored reservoir fish passage?

Once again I urge you to withdraw this totally inadequate and embarrassingly pitiful DEIS. Go back to your drawing boards and produce a document that meets the statutory requirements of the NEPA and SEPA to provide reasonable alternatives and more nearly complete construction plans that allow for a realistic comparison and evaluation.

Thank you for the opportunity to comment on the DEIS for this project and to make recommendations for issues to be addressed. Please notify me when a revised DEIS and the Final EIS is published.

Sincerely,

/S/ Ed Henderson

Edward M. Henderson, Jr.

cc: North Cascades Conservation Council
WA State Representative, Reuven Carlyle
Sierra Club, David Ortman
ESC, Brock Evans
FOBL, Chris Maykut

Edward M. Henderson, Jr.
407 Smith Street
Seattle, Washington 98109
edhenderson57@comcast.net
(206) 283-6497

July 10, 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058
Via Email to: kkbt@usbr.gov

RE: Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC), Comments on Supplemental Draft Environmental Impact Statement (SDEIS).

Dear Ms. McKinley:

On March 10, 2015, I submitted extensive comments on the DEIS for the KKC/KDRPP. While neither the Bureau of Reclamation, nor the Department of Ecology have answered or responded to my comments or those of anyone else, a "Supplemental" DEIS (SDEIS) is issued. I am assuming that all statements and information presented in the original DEIS remain operative unless revised, superseded or deleted by the SDEIS. My comments on the SDEIS are predicated on that assumption. My comments on the original DEIS in my letter of March 10, 2015, remain germane. I await answers to the questions raised in this letter and in 2015. 3

This SDEIS should be withdrawn. It is incomplete, inadequate and premature. It fails to provide alternatives to and details of the proposed projects that would allow sufficient evaluation of the environment impacts. While the Bureau of Reclamation and Department of Ecology are crafting a more comprehensive DEIS, please consider the following. 4

I am familiar with the Final Programmatic Environmental Impact Statement (FPEIS) for the Yakima River Basin Integrated Water Resource Management Plan (The Integrated Plan or IP). In the FPEIS for the Integrated Plan the impacts of many basin wide issues are glossed over to be "dealt with later in project specific EIS's." and then they are not! This transparent attempt to lose these issues between the Tier 1 programmatic FPEIS for the Integrated Plan and the Tier 2 project DEIS's is disingenuous and unacceptable. Therefore the scope of this Environmental Impact Statement (EIS) must be broad enough to address these basin wide impacts and not be limited to only local, site-specific impacts. This EIS must deal with all impacts in the context of the Yakima River Basin Integrated Plan and fully consider the cumulative effects on the entire Yakima River Basin by all the elements of the Integrated Plan. Both the DEIS, January 2015, and this SDEIS for the KDRPP & KKC fail to do that. 5

The SDEIS lacks any clear statement of Purpose and Need. One must revert to the DEIS to find that the Purpose of this project is to provide drought relief irrigation water to the junior water 6

right holders and to enhance Bull Trout survivability. The only Purpose stated in the SDEIS is to find some entity, either the Bureau of Reclamation, the Department of Ecology, the Roza Irrigation District or others to undertake one or more of the projects and the Need is to find financing. Such groping around is not reassuring.

By failing to provide a reasonable Conservation Alternative this SDEIS violates the requirements of NEPA to consider appropriate alternatives to the proposed action

The National Environmental Policy Act (NEPA) of 1969 states, in part, as follows:

"SEC. 102. The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall— . . .
(D) study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources;"

7

Both the DEIS and this SDEIS for these projects must present a conservation alternative to meet the Purpose and Need stated for public examination and comment.

A comprehensive and mandatory conservation program in the Yakima River Basin could provide the same amount, 200,000 acre-feet, of water to the junior water right irrigators as the proposed KKC and KDRPP projects. This water would be available without either the environmental impacts or financial cost of the proposed construction project.

The first of the Integrated Plan's seven elements is the restoration of fish passages at reservoirs. The DEIS recognized that anadromous fish, salmon, were present in natural glacial lakes Keechelus and Kachess prior to construction of irrigation control structures, dams and spillways, in the early twentieth century. See Section 3.6 Fish page 3-55/56:

> *The historical lakes and tributaries of the upper Yakima basin formerly supported anadromous spring Chinook, summer steelhead, coho, and sockeye salmon as well as resident bull trout. However, the construction of dams and irrigation storage reservoirs has precluded anadromous fish access to over 70 miles of productive, historically available habitat within the basin. Kachess and Keechelus dams represent passage barriers for returning anadromous fish, and no anadromous fish species are present in either reservoir or in tributaries upstream of the dams (Haring, 2001).*

8

Why aren't fish passage structures at Lakes Kachess and Keechelus included in both the DEIS and SDEIS?

Multiple times in the SDEIS it is recognized that in subsequent non-drought years following a drought year and a drawdown of some or all of the 200,000 acre-feet of water from the inactive storage below elevation 2190 feet in Lake Kachess, it will be necessary to pump water out of the inactive storage to meet normal flow obligations. (See section 2.3.3 Typical Annual Operations, page 2-17 and others.) And yet the SDEIS presents no plan to refill the inactive storage.

9

When the drought relief pumping plant withdraws an additional 200,000 acre-feet from Lake Kachess, lowering the lake level 80 feet below the gravity spillway, how and when will the

water be replaced? Lake Kachess normally receives 213,398 acre-feet of water annually from the catchment basin. (See table 3-1, page 3-8 of the 2012 FPEIS, for the Integrated Plan) This water is allocated to various water right holders. So when additional water is withdrawn for drought relief, there will be a deficit of much as 413,398 acre-feet. Should the next year be an average year, there will only be 213,398 acre-feet of precipitation in the catchment basin to replace the deficit. It will be necessary to run the pumps to deliver most of the normal allocation from the lake below the level of the gravity spillway. After the drought of 2001 when Lake Kachess was drawn down to normal low pool at the level of the gravity spillway, it took eight years to again reach full pool elevation. And that was without drawing down another 80 feet by pumping out 200,000 acre-feet from the inactive storage. Do Reclamation and Ecology have any plans to managing the water resources in the entire Yakima River Basin to replace this deficit? The SDEIS doesn't mention them. Will the junior water right holders be allocated less than 100% of their allocation in order to "repay" the 200,000 acre-feet they borrowed during the drought? The SDEIS doesn't say. 9 10

The construction plans presented in this SDEIS for both the KKC and KDRPP are rudimentary and conceptual only. It is therefore impossible to evaluate the environmental impacts that construction of these projects will have. When withdrawing and rewriting this DEIS please address the following questions: 11

- In the DEIS Section 2.2 Alternatives Development Process on page 2-2 cites feasibility studies of the KKC & KDRPP projects to be finalized in 2015. Was that study ever completed? And if so why aren't it and the conclusions reached cited in the SDEIS? 12
- All the construction alternatives require excavation and disposal of considerable spoil. A potential disposal area in the old Lake Kachess Reservoir Spillway is identified in section 2.3.2.8 Temporary Construction Facilities, Spoil Disposal Area on page 2-15, however no provisions are made for alternate disposal sites should the proposed site be unusable. A vague statement that an offsite locale will be found somewhere within 12 miles is offered. That's an area of 450 square miles. This hardly represents an action for which the impacts can be evaluated. A positive site(s) must be identified along with the proposed route(s) for transporting the spoil. 13
- If Alternative 2 or 5A, the eastside pumping station is selected, over 70,000 cubic yards of fill material will be required to bury the 11.33 foot diameter discharge pipe in a ditch to insure that it doesn't float, section 2.3.1.3 Pipeline, page 2-10. If the spoil excavated from this ditch, at the bottom of Lake Kachess, proves to be unsuitable for fill material, where will suitable material be acquired and how will it be transported to the site? 14
- When will the final location and alignment of the proposed tunnel in the KKC be determined? 15
- In the DEIS, the KKC envisions a discharge structure and energy dissipating spillway structure on the shore of Lake Kachess. Below the stilling basin there would be a riprap apron down into the lake. To what elevation will this apron extend? What is the estimated quantity of riprap required for this apron? 16

The cost for construction and 100 years of operation of all six alternatives is given in Tables 2-5 and 2-6 on pages 2-59 and 2-60. In all cases this amounts to multiple hundreds of millions of dollars. What are the direct economic benefits of this expenditure of public money? 17

In the DEIS in Chapter 4 Environmental Consequences, section 4.3.6.2 *Operation* [of the KKC North Tunnel Alignment Facilities] in the section on *water supply* on page 4-33 states that:

> *Hydrologic modeling indicates Alternative 3A – KKC North Tunnel Alignment would provide a very small (less than 1 percent) improvement in water supply for proratable water users during drought years. Table 4-11 summarizes the expected change in prorationing percentage. Water supply would remain well below the 70 percent of entitlement goal. Therefore, KKC would not have a significant benefit to water supply.*

It further states on page 4-34 that: *Kachess Reservoir levels would remain within current operating ranges and no significant effect on water resources would occur.*

18

Assuming that this remains true, why should multiple hundreds of millions of dollars be spent on the KKC for a paltry drop-in-the-bucket of no significant benefit to water supply?

In the DEIS the Bull Trout Enhancement (BTE) projects are appended, Appendix C, to both the KKC & KDRPP projects and were made integral to those projects. Now the SDEIS proposes a Volitional Bull Trout Passage. (See Section 1.5.3 Changes to BTE from DEIS, page 1-13.) A conceptual design and an estimated budget of $23 million is provided, but this project is not include in the SDEIS Alternatives. Before any pumping plant can operate, drawing the level of lower Lake Kachess below elevation 2190 feet and exposing the Shelf and the Narrows, provisions must be made to protect the Bull Trout. The SDEIS does not do that. Who will be responsible for financing and constructing the Volitional Bull Trout Passage?

19

When the KDRPP goes into operation and lowers the pool level in Lake Kachess below elevation 2190', the natural spillway elevation, the only outflow from Lake Kachess will be by water pumped up over the dam. How will anadromous fish be able to migrate up the restored reservoir fish passage and then down into the lowered lake?

20

Once again I urge you to withdraw this totally inadequate and embarrassingly pitiful SDEIS. As a tax payer I am incensed that the Bureau and Ecology have taken three years and spent God knows how much money to produce this sloppy, unprofessional piece of trash! Go back to your drawing boards and produce a document that meets the statutory requirements of the NEPA and SEPA to provide reasonable alternatives and more nearly complete construction plans that allow for a realistic comparison and evaluation.

21

Thank you for the opportunity to comment on the SDEIS for this project and to make recommendations for issues to be addressed. Please notify me when a revised DEIS and the Final EIS are published.

22

Sincerely,

/S/ Ed Henderson

Edward M. Henderson, Jr.

cc: North Cascades Conservation Council
WA State Senator, Reuven Carlyle
Sierra Club, David Ortman
ESC, Brock Evans
FOBL, Chris Maykut

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus DEIS

1 message

Brooke Hendricks <b.hendricks381@gmail.com> Tue, Jul 10, 2018 at 8:42 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

I am writing to express my comments that I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No action" is acceptable to me.

My family uses this lake recreationally, and the impact is unacceptable for me as a member of the general public. 1

Please let me know if you need further information.
Thank you for your consideration.

Brooke Hendricks
25905 NE 27th Dr
Redmond WA 98053

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Opposition to KDRPP

1 message

jonhowland@gmail.com <jonhowland@gmail.com> Wed, Jul 11, 2018 at 8:26 AM
To: kkbt@usbr.gov

Hi there,

About a week ago I learned about the plan to use water in Kachess to supply farms in the Yakima area.

My hope is that the voices of tribal leaders have been centered in this discussion and that an eye is kept on doing the most good for species throughout the region. Moreover, before such a drastic plan goes into effect I would hope that the agricultural interests involved have taken steps to implement the most water efficient industry practices. 1

My fear is that the plan is poorly conceived and unfair to many stakeholders.

In addition, I read that this process is several years old now; at the same time I've heard from several people in just the last few days who are just now learning of the plan. For whatever reason, people who have a stake in this did not know. So, at minimum, extending the comment period sounds warranted. 2

Sincerely,
Jon Howland
3021 23rd Ave S Seattle

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus SDEIS

1 message

Irinel Susan <irinel_susan@yahoo.com> Wed, Jul 11, 2018 at 12:14 AM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: Kachess and Keechelus SDEIS

Dear Ms. McKinley:

Please accept my comment regarding the KDRPP SDEIS:

Alternative 1 No Action: I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 1

Thank you,
Irinel Susan

11009 178th CT NE Redmond WA 98052

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP and KKC 2018 SDEIS feedback

1 message

Brad Jonas <bradjo1@msn.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: Brad Jonas <bradjo1@msn.com>

Wed, Jul 11, 2018 at 1:54 AM

To Candace McKinley,
Please read and respond to my feedback on the Lake Kachess SDEIS.
Thank you,
Brad Jonas

1

Lake Kachess_ response to SDEIS.docx
30K

Submitted via email to kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 march Road
Yakima, Wa 98901-2058

RE: Kachess and Keechelus DEIS

Dear Ms. McKinley,
I am writing you to voice my concern with the KDRPP and KKC 2018 SDEIS and get answers to my questions.
First I want to give you some **background on my experience with Lake Kachess**. As of today, July 9th 2018 it was exactly 63 years ago when my parents first took me camping to Lake Kachess. I was 2 months old. Since then I have rarely missed a year of camping or picnicking at Lake Kachess. 5 generations of my family have frequently used this spectacular recreational area. We took both our daughters camping their when they were only a few months old as well and continued through their childhood. Now that they have children they have also continued the tradition so their kids can grow tc respect the beauty and learning experiences of the outdoors. Over those years I have seen Lake Kachess at all levels. Multiple times I've seen it drained down to its current lowest possible levels where there was actually a small waterfall at the narrows between the Little and Big lakes. I also know for a fact tha it has taken 3-4 years to refill a couple different times.
For full disclosure; because of our love for this lake and area, in 2007, we purchased property near the lake (Kachess Village). I've spent years building our cabin from the ground up (only family members contributed to the building of it) with hopes that our family can enjoy the lake for many generations to come. But with that said; the least of my concern is our property investment.

2

After reviewing the April 2018 SDEIS and attending multiple meetings **I am strongly against** any of the Alternatives except for Alternative #1 – No Action.
The following is a list of my concerns and questions which I would like you and your team to comment on.

3

- **KDRPP Alternatives 1-5**. Lets be real. There are really only two alternatives that the 2018 SDEIS has considered, not five. The other 3 are just different locations of the pump to make it look like you have submitted multiple alternatives: The two are do nothing or install pumps on a natural lake to drain it for the benefit of a just a few irrigators, which have no senior water rights.
  Please answer the following questions/concerns:
  - Why did it not include any other alternatives such as relining the delivery ditches, building other reservoirs in vacant valleys near Yakima, and other state of the art alternatives?
  - Why was taking water from the Columbia River not considered?
  - The original DEIS indicated that the KDRPP and the KKC tunnel project would a single action. Why did that get eliminated for all but one alternative in the SDEIS?
  - Will the KKC be implemented before any pumps are installed on Lake Kachess? If not, WHY? I think we all know if the pumps get installed first the tunnel will never be built, this is the same tactic retail stores use to get customers to come into their stores, its called "Lost Leader."
  - Why not just implement the KKC tunnel on its own? To me this would make a lot of sense. During drought years it would help fill Lake Kachess quicker. I've personally seen Lake Kachess take 3-4 years to refill after drought years or construction drainage. If the KKC tunnel would

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have been installed back then it could have possibly shorted the fill time of Lake Kachess by a year. This would have helped the farmers and the counties recreational income, not to mention make a lot of outdoor recreational folks happy. There would be no impact to Lake Keechelus.

- ? As for Alternative 4, floating pumping plant where is the study results which show the impacts to fish and other aquatic creatures due to the noise and vibration that will be distributed through the water?
- ? I don't see how you even got to this stage without a proper study of noise impacts to the surrounding wildlife, aquatic creatures and the residences. If there is a completed study please publish it so we can all understand the impacts.
- ? Why not add an alternative to dredge the Western end of Lake Keechelus? The western end of the lake is usually dry every year by mid to late August, if not earlier
- ? How will you meet the requirement to consider a range of reasonable alternatives which is required by NEPA?

❖ **Campground and other recreational activities:**

As I stated in my background 5 generations of my family have been camping at Lake Kachess. My first trip was July 9th 1955. I've learned that approximately 25000 people visit the campground every year due to it being one of the largest and most beautiful campgrounds so close to Seattle. Besides campers there are thousands of people that visit the lake as a day trip for a picnic, kayaking, boating (I learned to water ski on this lake), and hiking. They charge you $10 just to use the day use area and boat launch.

Two things have an impact on the number of campers.

- **The first is the lake level**. When the lake is low not as many campers visit the campground.
- **The second is outdoor campfires** (in the campground fire pits). When the fire hazard is high they implement a burning ban, even at the campground. Many campers cancel their reservations if a burning ban goes on. When you draw down the lake another 80' and it takes years to refill, if it ever does refill, the fire hazard will be extremely high due to all the foliage/forests being so dry or dead. Again this will greatly impact the recreational revenue for Kittitas County.

  Please answer the following questions/concerns:

  - ? If you draw the lake down another 80 feet have you studied the impact on the recreational income of this area? Im not talking just about the first year but it will take at least 8+ years to refill, if it refills at all. This seems it would be a huge financial impact on the county.
  - ? Is Kittitas county represented in this study and are aware of the lost revenue for potentially years?
  - ? Will Roza be responsible for this revenue loss or is BOR? It would be their doing.
  - ? Please describe to me how you have contacted the general public as to what the impact will be to the campground? Will you let them know who will be benefiting from the lake drainage (a few Roza farmers)?
  - ? I didn't see any real data in the SDEIS as to what the impact will be to the forests, Please provide me a document or link of that study.
  - ? Who will be responsible for injuries at the campground/lake area due to the extremely steep banks/cliffs? The Forest Service or the Bureau of Reclamation?
  - ? Who will be responsible for fencing off the areas of danger during these times?
  - ? What analysis of the lake Geography has been done to suggest extending any boat launches on Lake Kachess?

I just don't understand how the Bureau of Reclamation would allow just a few greedy farmers to impact the lives of thousands of people.

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- **Increased forest vulnerability and Fire Hazard.** This is one of the most important impacts!
  The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. I think we can all agree that removing hundreds of thousands acres feet of water from a natural lake (yes by then you will be tapping way into the natural lake) for possibly years or even decades the surrounding forest will be extremely impacted and very acceptable to fires. Erosion will begin on the mountain sides and sediment will flow down into the lake eventually partially filling the lake creating less "storage". The fresh water clams will disappear (yes there are clams in that lake, I can provide you with pictures), fish will die, wildlife will leave the area, people will stop paying property taxes and give up their properties. All of this because a few Roza farmers want to make more money.
  The Snoqualmie Pass Fire and Rescue agency has the primary responsibility for fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. We demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. We ask this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. Under the guise of addressing the potential of global warming, this proposal fails to adequately address another element of global warming – that of added fire risk. In fact, this plan exacerbates that fire risk.
  Please answer the following concerns:
  - ? Given that the SDEIS identifies damage to the natural environment will be caused by the proposed action, what responsibility will those who approve and execute on this plan have for those ongoing damages?
  - ? If there is a significant wildfire in the area that it exacerbated by a KDRPP-FPP draw down and cannot be adequately battled due to the unavailability of Kachess water for firefighting, who will be responsible for the damage and certain public outrage to follow?
  - ? Why have all the meeting requests from the Snoqualmie Pass Fire and Rescue agency been ignored?
  - ? Is fire hazard not as important to the BoR as is the Roza farms?
  - ? **Do you agree or disagree that destroying our forests for generations to come is less of a concern as some farmers losing income on their annual crops? Are the forests less valuable than a farmers crops?**

6

- **Water Rights and future grabs:** We have senior water rights up at the Kachess Village area. The Roza farmers have Junior water rights. Please answer the following concerns:
  - ? Please explain to me how an area with Junior water rights (such as the Roza farmers) have the right to possibly take water from Senior water right areas?
  - ? So this SDEIS basically states that you will be able to buy cheaper land due to Junior rights but still be able to take water from senior right areas? This is setting precedence.

  These Farmers knew what they were buying into when they purchased the land and started farming. They also should know there are limitations to resources and they need to farm within their means. Don't make the general public suffer because of their ignorance and greed.

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- What is to stop them from wanting more water in the future?
- If Roza and the special interest politicians get their way and drain the lake what is to stop them from just using the water to expand their farming and not just during droughts?
- Would BoR want to move the bump to a deeper part of Lake Kachess?
- What is to stop BoR for going after other Mountain lakes such as pumping Snow Lake down into Keechelus, Rachael Lake into Kachess, or Cooper Lake into Lake Cle Elum? And the list could go on. You are setting a precedence allowing/helping Roza acquire this water.
- Explain to me how you will control Roza's use of the water and what the consequences are if they break the rules?

❖ **Impact to Private Wells:** Per the SDEIS it states that lowering the lake level will have a negative impact on private wells. Some wells would be "dewatered". And your remedy is to monitor and mitigate. This statement really means you have not done a thorough study and have no idea what will really happen. If lowering the lake does impact the local aquifers you could impact not only the Lake Kachess area but also all of the Easton area that rely on these aquifers for their wells. This is like the Special Odessa Subarea Study that the BOR did back in 2012 which shows the aquifers in the Odessa area are declining which is putting the farmer's ability to irrigate at risk.
Please answer the following questions:

- Who will be responsible for the mitigation costs for these private wells? BoR or Roza?
- Who will be responsible for the mitigation costs if drawing down this lake does impact the aquifers that support the Easton area?
- Where do I find the detailed studies that have been performed and by whom?
- Again explain to me what right does BoR or Roza have to take water from senior water rights holders?
- Please provide a detailed action plan for the well-dewatering mitigation in a supplemental SDEIS.

8

❖ **Lake Refill cycle times:** As I have stated I have seen this lake at its lowest at least 3 different times where it took between 2-4 years to refill. This was back in the 70's, 80's, and 90's prior to all this "global warming" warnings. Documented in the DEIS and the SDEIS there seems to be a huge discrepancy. The DEIS states that without the KKC Lake Kachess could take 20 years to refill. This obviously didn't bode well with the Roza Farmers and seems to be changed in the SDEIS to reflect a 2-5 year refill process. Seems a bit fishy.
Please answer the following questions/concerns:

- Why is there such a difference between the two reports? Please send me the detailed studies (Hydrology) that were done for both the 2015 DEIS and the 2018 SDEIS.
- How can the public be expected to make informed comments with such seemingly inconsistent hydrology predictions? Can either report be relied upon?

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❖ **Bull Trout;** Now this is interesting. Bull trout is on the endangered species list. They are the only Trout that is native to these lakes. Signs are posted at the Lake Kachess Boat Launches stating that if you catch one you have to release it because it is on the endangered species list. Yet if this passes and the lake is drained many or all of the Bull trout could die and eventually be nonexistent in Lake Kachess.

The SDEIS shows a volitional passage to allow the bull trout to migrate between little and big Lake Kachess during draw down periods. When the lake is 140 feet down there will be a significant cliff on the north end of the big lake where the narrows is. I can't understand how anyone could build a "fish passage" without significant investment and maintenance.
Please answer the following questions/concerns:

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- Can you send me the detailed study on how this "volitional passage" will be constructed based on the lake being down 140 vertical feet for possibly years at a time?

❖ **Mitigation for reduced property values**

- Why does the SDEIS not address any mitigation for reductions in private property values effected by this proposed action?
- Will mitigation be provided for property owners whose property values are reduced by this action?
- How will any mitigation be calculated?
- If the parties do not agree on the mitigation amount, how will any disputes be resolved?
- Who will pay any mitigation?

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❖ **Drought definition:**

- Who determines the definition of a drought?
- Who will manage/monitor the usage of these pumps?
- Will there be a neutral third party to monitor the managers in order to make sure the water isn't being pumped out during now drought years and to whom?
- Will there be a penalty for those who abuse the use of these pumps?

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❖ **In Conclusion:**

It appears that the modeling used or lack of is very inadequate. There are many admissions that modeling is inaccurate or incomplete.
This SDEIS truly appears to be written with bias in favor of a few special interest groups/politicians whom are more concerned with their profits than the potential huge environmental impact this will have. Seems there could be many conflicts of interest to be challenged if this is to move forward.
It just boggles my mind thinking how it has got this far. You are talking about farmers who knew what they were investing in when they started or purchased their farms. These are farmers with Junior water rights. Water is a critical resource and should be used wisely. These farmers need to quit expanding and need to realize there will be years with droughts and they could lose crops/income. That has always been a risk for farmers. But now they want to destroy one of this states most beautiful recreational areas used by thousands just to cover their own greed and ignorance. We need to understand who their customers are (wineries, breweries, etc).
Millions of public dollars have been spent trying to push this forward; the taxpayers need to understand what they are paying for and what they will get from it.
This is a natural glacial Lake. Only the top 30 feet are manmade according the BoR's website.
Today's children have very limited outdoor resources such as Lake Kachess to go explore. I hate to see one more thing taken away for the youngsters in this great state.

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Thank you for your time and I look forward to your responses.

Sincerely,
Brad Jonas

1309 224th PL NE
Sammamish, Wa
98074

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS Comment

1 message

Jessica Kast <jessicakast01@gmail.com> Wed, Jul 11, 2018 at 10:17 AM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office

KDRPP & KKC SDEIS Comment

The SDEIS makes very clear statements about the devastating impact of this pumping project and the recommendation of the bureau shows that they are not being open to data or facts that go against their foregone conclusion that draining Lake Kachess is the way to solve future droughts.

There are sustainable alternatives that have not been explored in favor of this “easy” answer of putting a straw into a pristine glacial lake. Not only are these alternatives sustainable, but more likely to actually solve the problems that we are looking to solve and better serve everyone that this touches. 1

We need to work harder and commit to economically viable and ecologically responsible approaches with ALL stakeholders. The impacts described are severe, irreversible, and ineffective.

Thank you,

Jessica Kast

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Natalie Keilholz <natalie.keilholz@gmail.com> Tue, Jul 10, 2018 at 7:46 PM
To: kkbt@usbr.gov

Dear Ms. Candace McKinley,

Please save Lake Kachess, we love the beauty of this lake and hope our boys will be able to enjoy it for years to come. We'd hate for it to become a mud pit.

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative. 1

2 attachments

image1.jpeg
40K

ATT00001
1K

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant

1 message

r1kirkham@aol.com <r1kirkham@aol.com> Wed, Jul 11, 2018 at 12:13 PM
To: kkbt@usbr.gov

As a small farmer who understood the rosa had secondary water rights, I have based my operation on the ability to adjust the amount of crops I support depending on the water available. I will be hurt by more expensive water, and I am opposed to this expansion. I also think it is unfair to the property owners near the lake as I will lower there property value. If the rosa wants to make a two tier level for charging for water, those who get the extra water pay extra, and those who accept what percentage is prorated as in the past pay the base rate, then it would be fair. 1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant

1 message

r1kirkham@aol.com <r1kirkham@aol.com> Wed, Jul 11, 2018 at 12:34 PM
To: kkbt@usbr.gov

Now I take off my small farmer hat and put on my scientist hat.
I am a working scientist with Masters in Soils and PhD in Forestry. This pumping of extra water from the lake is an old school idea, and does not take into account the new technologies that make for more cost effective ways to supplement irrigation water. 1

The water shortage should be addressed with more localized storage of water in the elevated areas above the canal delivery system. As building dams is not cost effective, the water should be stored as ice where the water is frozen in the winter when cold
temperatures are available to freeze water, and unused water is flowing in the rivers. The ice is maintained by large solar panel covers that both shade the ice and provide power as need to keep the ice frozen. This system becomes a power producer when the
electricity is not need to maintain freezing temperatures under the solar panel structure. The solar panel field is build provide shade, insulation and to rise and fall as the ice field height changes. 2

I know this is a simplistic description and the true benefits of this approach can only be explained by covering a lot of different technological advances in several different energy related fields and describing the unique environment provided by the Cascade mountains and associated rain shadow. I am currently working up the methodology and required integration of a multifield description that will address the methodologies and technologies required to make this work and turn the investment required to increase irrigation water availability to a less costly or even money producing endeavor. 3

Randy Kirkham PhD

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Lake Drainage Plan Concerns & Questions

1 message

Sarah Kitchell <sckitchell@gmail.com> Wed, Jul 11, 2018 at 2:00 PM
To: kkbt@usbr.gov

Hi Candice,

I have some serious concerns about the government's plan to drain the natural Lake Kachess. Most importantly, if we are willing to continue draining lakes on a practice that has been proven to be uneconomical and environmentally damaging, how far are we willing to go before we are just out of water in the cascades? It sounds silly and potentially impossible, but in our world, it also seems inevitable. 1

Why do we NOT expect the corporate farmers in kittitas valley to pay for their increased water usage during drought while the taxpayers are holding the burden?

How many of the crops grown in the kittitas valley and yakima river basin are drought resistant??

What percentage of the crops grown in the kittitas and yakima valley basin are sold locally in the United States vs shipped oversees?? 2

If (WHEN) this plan to supply farms with water from lake Kachess doesn't work, what are the subsequent lakes that the farming lobby will pursue draining and the government will approve??

Instead of spending taxpayer money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies in farming, and water markets during drought years. 3

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess should not be built. 4

I look forward to your response.

Best,

Sarah Kitchell

--
Sarah Kitchell
206.963.8822
sckitchell@gmail.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Sandy/Gary Knauft <knauff@comcast.net> Tue, Jul 10, 2018 at 9:46 PM
To: kkbt@usbr.gov

I recently learned Kittitas County is requiring sprinklers in new- build homes on rural wooded lots as part of the new fire prevention measure. The only way around the install of sprinklers is to ensure standing trees are a particular distance from the residence and that the trees left standing must have their branches ten feet from the nearest tree. This is an almost impossibility as Lake Kachess homes are basically built into the mountains, which would almost certainly cause them to adhere to installing expensive sprinkler systems. Since this will be the case, if the lake (which is currently drained more than sixty feet) is drained another 80 feet, where will these new sprinkler installed homes get their water if there is an encroaching fire in order to save them. Taking additional water from the lake while this new requirement goes into effect doesn't make sense to me. 1

Sandy Knauft
Knauff@comcast.net

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Billie <billiez1@centurytel.net> Wed, Jul 11, 2018 at 9:44 AM
To: kkbt@usbr.gov

I am writing to you to register my strong concern about —and my opposition to —the plan to drain Lake Kachess. I urge you to seriously consider the substantial flaws of the plan under consideration. Sincerely

1

Billie Z Lawson Full-time Resident PO Box 202, Snoqualmie Pass Wa.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake kachess

1 message

Leanne Lewis <theadventurecontinues@gmail.com> Wed, Jul 11, 2018 at 11:21 AM
To: kkbt@usbr.gov

I am writing concerning the proposed plans to take water from Lake kachess. I currently love in Virginia, but I am originally from the Pacific Northwest. I have been to the Lake Kachess area, and I am aware of the impact that this would have on the National Forest, the residents, and fish and wildlife in the area. I am asking that you preserve the lake as it is and not carry out your proposed plan. I am aware that there are many proposals for conservation, crop selection and other measures that would preserve the lake and work to meet people's needs. please research and Implement these other options and do not take water from Lake kachess. 1

Thank you.

Sincerely,

Leanne Lewis

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SDEIS comments

1 message

Stacie <sloftus28@gmail.com>
To: kkbt@usbr.gov

Wed, Jul 11, 2018 at 4:12 PM

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation

Columbia- Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 2

Thank you.

Jeff and Stacie Loftus

24815 230th Way SE

Maple Valley, WA 98038

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Please DO NOT drain Lake Kachess!

1 message

Stacie Loftus <sloftus28@gmail.com> Wed, Jul 11, 2018 at 6:48 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Dear Candace,

Our family is in very strong opposition to this proposition. Draining this pristine, Pleistocene era lake that was formed by glaciers (it is not a reservoir!) would be like killing the goose who lays the golden eggs. The lake likely would take years, if ever, to refill, and then what? The hugely expensive pump would sit in a mud puddle, the farmers wouldn't get the water they were promised and would be paying an absurd price for in the first place? Please, the only option to consider is NOT going forward with this project at all. We simply cannot afford it, monetarily, morally and environmentally. 1

Thank you,

Stacie Loftus

24815 230th Way SE

Maple Valley, WA 98038

Sent from Mail for Windows 10

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS Comment

1 message

Andrew Craig Magnuson <acmagnuson@centurylink.net> Tue, Jul 10, 2018 at 10:45 PM
To: Candace McKinley <kkbt@usbr.gov>

Hello,

I support Alternative 1 - No Action. I think that Lake Kachess should not be drained below the original natural lake level. I think that would be detrimental to the natural aquatic environment. I think that water should be pumped from the dammed Columbia River to the nearby Yakima River Basin. I think that water from the Columbia River should be pumped from behind either Wanapum Dam or Priest Rapids Dam.

1

2

Sincerely,

Andrew Craig Magnuson
P.O. Box 2495
Forks, WA 98331

Home Phone: (360) 374-5468

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

joe mallory <joe98925@yahoo.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Wed, Jul 11, 2018 at 1:33 PM

Submitted via email to kkbt@usbr .gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

RE: Kachess and Keechelus DEIS

Dear Ms. McKinley:

I am submitting both comments specific to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018 and also those comments by The Alpine Lakes Protection Society, The Sierra Club, The Wise Use Movement and The North Cascades Conservation Council which were made about the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) Draft Environmental Impact Statement (DEIS), dated January 9, 2015. All comments are submitted under both NEPA and SEPA. 1

Comments

1) Alternative 1 No Action We oppose all active alternatives of the KDRPP and KKC projects. Only 2

Alternative 1, “No Action” is acceptable.

2) The Yakima Plan programmatic FEIS failed to provide a range of alternatives —just the Yakima Basin

Integrated Water Management Plan (YBIP) and No Action. How will this be rectified?

3) Failure to comply with NEP A requirement for consideration of alternatives. The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of “reasonable alternatives” means all state-of-the-art alternatives must be rigorously explored and properly evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party.

4

The stated purpose of the DEIS was to “provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I,

January 2015). The 2018 Supplemental EIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS.

The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS goes to great contortions to try to make these appear to be several different

alternatives, they are in fact one alternative…extracting water from a natural lake to benefit downstream special interests.

Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

We have previously noted this deficiency in the 2015 DEIS, and repeat it for the 2018 SDEIS. Both the DEIS and the SDEIS fail to comply with the NEPA requirement of considering all reasonable alternatives to achieve the stated purpose. In fact, this fatal flaw originates from the Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Programmatic Yakima Plan EIS not only failed to consider a range of alternatives, as required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Programmatic Yakima Plan EIS and do it correctly. We ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose.

We ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of special interest groups". We ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given…including data, references, and review procedures…for excluding each alternative.

The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and we therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

1) Involve all affected native tribes The SDEIS notes the Yakama Nation has historical ties to the Lake
Kachess area, and documents historical and cultural heritage connections. The Snoqualmie Tribe also has roots in the Lake Kachess area, and artifacts from that federally recognized tribe have been found along the shoreline of Lake Kachess. How will the Snoqualmie Tribe's historical and cultural standing be recognized in regard to this project, and they be brought into the discussion? How will the Snoqualmie Tribe be contacted, the potential impact of this project on their culture be explained, and will they be given an opportunity to provide comment prior to a Final DEIS and/or ROD? Also please describe what happens with Native American artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level. 5

2) Impact on Campers at Lake Kachess The impact on 23,000 annual visitors and 11,000 annual boaters at
USFS Lake Kachess Campground will be devastating. Page 2-6 indicates the lake could be drawn down 80 feet "as early as June in severe drought years." [NOTE: The campground typically opens on Memorial Day Weekend…June 1st.] In other words, the campground would not open, possibly for a number of years. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. As noted below with respect to ES-xii, we noted the inadequacy of a post hoc communication strategy to inform recreational users of the impact of KDRPP-FPP. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users will be contacted and the timeline for this process. 6

3) Objectivity vs "Suggestion" Executive Summary , page ES-v The SDEIS asserts the presence of a
"value analysis study that suggested the feasibility of a floating pumping plant". The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion", brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. Please provide full descriptions of the "suggestions,' including the methods, data, and conclusions implied by the inadequate and confusing term "suggestions." 7

1) Funding ambiguity requires another SDEIS Page ES-viii The SDEIS states the Bureau of 8

Reclamation will "fund…some or all, or authorize Roza to fund" the KDRPP-FPP. This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FP. Please provide the legal, legislative, and/or other basis for stating Bureau of Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how "all or some" will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (BoR, Dept. Ecol., Roza, etc.) will be responsible for what action (fund, design, construct, operate, etc.). These are not "details" to be clarified at a later time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period.

2) Change in Scope Page ES-viii The SDEIS states that the KDRPP-FPP is the "proposed action" and
BoR/Dept. Ecology have not identified a "preferred alternative." This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner, would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are "acceptable" in 2018. This explanation should also serve to inform citizens as to why no "preferred alternative" is provided. This explanation is critical to citizens' understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. BoR must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS.

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3) Impact on private wells Page ES-xi The negative impact of lowering the water level of Lake
Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of "monitor and mitigate." Well failures ("dewatering") will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. We ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD.

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Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry?

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria, will these effects be calculated.

-

4) Lack of communication to the affected public Page ES-xiii The DEIS states the project will implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to understand the potential impact on individuals and families, and to participate meaningfully in the deliberative process. Given the SDEIS documentation of negative impact on recreational activity, and the acknowledgement most affected individuals come from the Seattle area, it is clear NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area.

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5) Misrepresentation of Lake Kachess Chapter 1, Section 1.2 The SDEIS indicates Kachess Reservoir was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. Thus, every drop of water to be pumped by the KDRPP will come from Big Kachess Lake. It is a misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Big Kachess Lake. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. We ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by BoR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. KDRPP has nothing to do with Kachess Reservoir. We ask that this confusion and misrepresentation stop, and accurate terminology be used that informs rather than confuses the public. This requires

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modification of language used in the SDEIS and all public communications, including correction of schematics such as Page 1-7.

6) Who will be responsible for costs, implementation and operation? Chapter 1, Table 1-11 on page 1-11 This SDEIS Table indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) "Fund, design, construct, operate…etc.…the selected alternative." This can only refer to the KDRPP-FPP. This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public's mind, largely due to conflicting public comments by Roza representatives and BoR representatives. It is imperative that this confusion be removed before any Final DEIS and/or ROD be issued. We ask, therefore, that a complete and unambiguous statement of financial obligation of KDRPP-FPP be issued. The statement should make clear that 100% of the costs of implementing KDRPP-FPP, including all mitigation, litigation, and other assigned costs, will be borne by Roza Irrigation District or if not Roza, then by which entity/entities. 13

7) Teanaway Community Forest Chapter 1, Section 1.8.2 on Page 1-18 The terms and conditions of the purchase of the Teanaway Property (TCF) is misrepresented with regard to its relationship to KDRPP-FPP and does so in a way that introduces extreme bias in favor of the project proponents. Page 1-18 indicates 214,000 acre-feet of additional water supply must be in place by 2025, and if not the Board of Natural Resources is authorized to transfer the TCF to the common school trust and manage it for the beneficiaries of the trust. 14

The proponents of KDRPP-FPP make public representations that this means, unless their project is implemented, the TCF will be sold, clear-cut for timber revenue, and the property lost forever for recreation purposes. Simply stated, that is not true. The terms of the TCF do not require the property be reverted to the educational trust; that is only one alternative provided among many. (See RCW 90.38.130 Authorization to purchase land---management and disposal of land) Other options include continued management of the property for recreation, maintaining wildlife habitat, implementing conservation projects, and other beneficial purposes.

In fact, the only obligation is that a report be submitted indicating what progress has been achieved toward the milestone and requiring submission of a new plan if the milestone is not achieved. This can continue until the year 2045. It further states the milestone can be achieved through any of a combination of methods: conservation, improved management techniques, water marketing strategies, storage, and others. In fact, the report is required to state how much "net increase in available water" (the correct term, not "additional water supply" as stated in the SDEIS which implies all milestone water must be from storage). To date, the SDEIS claims 124,131 acre-feet of net increase in water due to conservation, and in the past has claimed as much as 300,000 acre-feet in future conservation savings. This would more than fulfill the 214,000 acre-feet milestone, were the planned conservation projects fully implemented.

Finally, if the very unlikely possibility of a reversion to trust fund management and clearcutting is selectively highlighted in the SDEIS, then the far more likely alternatives should be given equal space. After a decade of public recreation use, with untold thousands of new citizen-recreationists advocating for the Teanaway as a new resource, and an army of volunteer citizens and organizations upgrading the Teanaway, the public backlash against clearcutting would be overwhelming. With its misrepresentation of the Teanaway Purchase, the SDEIS has veered into a political speculation that is both inappropriate and inaccurate. However, given that SDEIS

has now opened the door, in a subsequent SDEIS it must clarify, correct, and accurately inform the public of what is, and is not, required and implied by the Teanaway Purchase. We ask that this be done not only in a future SDEIS, but in all communication about the relationship between Teanaway and KDRPP-FPP, or any other element of YBIP. In addition, we asked that a notification of clarification be immediately issued stating that based on current and future water conservation savings, it is anticipated that the obligations under RCW 90.38.130 will be met with no additional water needed from the YBIP projects.

8) Accurate Cost Estimate Chapter 2, Sections 2.7 The statement of budget (Page 2-59) for KDRPP-FPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for KDRPP-FPP. Because the estimate is not a measure of central tendency (i.e., neither mean, median, or mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; e.g.

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Low Estimate	Projected Estimate	High Estimate
197,400,000	282,000,000	423,000,000

as opposed to showing a single estimate of 282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a "low" or "high" correction, each will be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates.

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show KDRPP-FPP the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the KDRPP-FPP budget should present a $423,000,000 base. In all cases, the mitigation costs must be included. For some reason the required Bull Trout Volitional Passage is stated in the text (Page 2-60) to cost $23,000,000 (preliminary estimate) but is not included. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for the KDRPP-FPP.

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. We request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented

in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

1) Accurate view of exposed shoreline Chapter 2, Section 2.10 Regarding depiction of Lake Kachess after drawdown of 80 ft. The SDEIS (Page 2-66) indicates the 80 ft. drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An "imposed line" on the water conceals the true impact of 628 acres of exposure. We ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as "thatched", "outlined water" or other techniques, but as mud or silt consistent with aerial pictures. An additional note; residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation. 16

2) Bull T rout Chapter 2, Section 2.10 and elsewhere in the SDEIS The Bull Trout Volitional Passage project is described on Page 2-67, Table 2.9. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed, this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage.

In some years (e.g., conditions such as occurred between 2001 – 2008) the pump… and therefore the channel…will be in continuous operation. Eight years of steep slope conditions, requiring 8 years of Bull Trout dependence on the volitional passage, represents 2-3 spawning cycles. In other words, the entire population of Lake Kachess Bull T rout will be destroyed if the volitional passage is not effective. No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not included in the budget costs, it cannot be assumed to be part of the project going forward. Another concern is the lack of water flowing into tributaries of Little Kachess Lake, which will be the water needed to charge the volitional passage. The SDEIS states the tributary water disappears at the end of the year… when the water will be needed in the passage. There is no description of the length of the passage (the length and Southern outlet are never described in text, numeric, or schematic terms). 17

Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo and geo receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

For all of these reasons, the public demands more than a "conceptual design" of the volitional passage. This mitigation must be described in ways that make sure sufficient water will be available to charge the passage, the length, slope, and other characteristics of the passage will not deter Bull Trout passage, the returning redds will be able to find the entry point of the volitional passage, and the passageway to

Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population.

We ask that the volitional passage design and operation be updated to address all of these concerns, and that the revised design be available to citizens for review and comment in a subsequent SDEIS, prior to any Final DEIS or ROD.

Also, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS." What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the proposed alternative and all the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives and the proposed alternative meet these legal requirements? 17

3) USFWS BiOp It is known that the USFWS is conducting a Biological Opinion on the existing Yakima watershed with respect to the current operation of existing dams and irrigation districts. That BiOp is not expected to be published until sometime in the fall of 2018. We request that another SDEIS be produced after said BiOp is published as it could impact the entire watershed including the necessity for the projects named in the current SDEIS for Kachess.

4) Increased forest vulnerability and Fire Hazard. The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. We demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. We ask this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. 18

5) Impact to private property. The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected, but a better description would be "substantial numbers of private residences…etc." Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This easily number 300 homesites, far more than would be inferred from the term "several." The systematic bias against 19

representing impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. We ask for an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline.

6) Impact to private property . BoR commissioned a study by Dean Potter LLC, a real estate appraisal firm, to determine the negative impact on private properties resulting from the pumping drawdown. This study showed a negative impact of 5-10%, but even this was an under-estimate. The Potter study imposed a primary screening criterion that the only value a lake had, was the view it provided to a homesite. This eliminated 85% of the homesites in the immediate area of the lake, even though the residents had chosen their homes because of access to the lake. The Potter LLC study claimed that even though the lake could become inaccessible for years at a time, people who lived there to enjoy boating, fishing, hiking, picnicking, and other water-related activities, wouldn't notice the lake had disappeared. The only ones who would be adversely affected would be those people with a view…but not just any view, an "unfiltered view" (no description of what this might mean). Even this was perverted, to say only people with unfiltered views within 0.1 mile of the lake would be affected. The study actually claimed that a view of a full lake within 0.1 miles, and a view of the drawn down lake more than 0.1 miles away, would be equivalent. There is no precedent for such exclusionary criteria, and there is no justification using standard methods of appraisal. The entire exercise is a transparent effort to minimize any negative impact. Even so, a 5-10% negative on impacted properties was reported.

Even though the BoR commissioned this study, and even though the study went to extraordinary lengths to minimize impact, the BoR declared in the SDEIS there was "no way to reliably assign or assess impacts…" The only analysis reported was that conducted by Dean Potter LLC, it used flawed methods that were biased to under-reporting of negative impacts on private property values, but it still reported significant (5-10%) negative impacts. Yet strangely, even these were rejected, without providing any data to support the rejection.

Lake Kachess homeowners have repeatedly requested to be involved in designing a valid and reliable study of the negative impacts on property values of proposed alternatives. BoR has ignored and rejected all requests, and instead contracted for a study that (although flawed by its obvious intent to minimize findings of damage) still showed significant damage to private property caused by the 80 ft. drawdown. Despite overwhelming evidence to the contrary…and their own analysis…BoR now claims the study they just completed, in fact can't be done!

The implications of negative impact on private property values go beyond the affected citizens. A reduction in property values affects the tax base of the county and fire departments, and will reduce available resources to provide essential services. This is acknowledged in SDEIS Page 4-326 as follows: "while effects on property values would most directly affect property owners, the wider community would also experience effects." In other words, private property owners, fire departments, city and county governments, and others would also be negatively impacted.

It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. We demand that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued.

7) Impact on Senior W ater Rights How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? We request further studies about this and communication to those senior water rights holders of possible impacts to them by the SDEIS active alternatives. Then another public comment period be opened for their comments. 20

8) Drought Definition Who will define the 70% of prorated water? What unbiased, non-irrigation district, party will make that determination? Page 2-6 of the SDEIS says, "Project proponents would use the pumping plant during drought years and could possibly use it in following years as the reservoir refills to a level above the existing gravity outlet." Does this mean the definition of when the pumps could be used has changed from the prior definition of drought (less than 70% of prorated water expected to be available)? Why would the pump be used in following years "as the reservoir refills to a level above the existing gravity outlet?" Would that not prevent or delay refill? 21

9) New Water Rights Table 1-2 on p 1-20 notes that ecology will "issue water rights as necessary." We've been told over and over that no new rights will be generated from this plan. How will new water rights be issued? To whom? 22

10) Water Conservation and Market Reallocation Page 1-4 notes that the Yakima Basin Integrated Plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation). Define the number of acre-feet saved by water conservation and market reallocation in the whole Yakima watershed. 23

11) Noise Only the preferred alternative has pumps at lake level, exposed to the environment (all others have pumps at the bottom of a shaft). P2-75 notes the maximum permissible environmental noise is 55 dBA. What is the expected noise level in dBA at 100 feet from the pumps? At 1000 feet? Will the pumps be running 24/7 once they start running? 24

12) KKC tunnel material 115,000 cubic yards of KKC tunnel excavated material comes out on Kachess Lake Road with no mention of where it will be trucked to or the impact of over 5000 truckloads of material being hauled off. Where will the 115,000 cubic yards of KKC tunnel material be deposited? What safety measures and scheduling of hauling equipment will be made during the tunnel construction to insure the safe and customary use of Lake Kachess County Road by campground users and local property owners and guests? 25

13) Turbidity . P2-68 notes all action alternatives will result in localized short-term exceedance of turbidity standard. Define the degree of turbidity exceedance and the effect it will have on native fish populations

26

14) Permanent Habitat Loss P2-71 notes permanent habitat loss with the preferred alternative. Define the effect of permanent habitat loss on the spotted owl, bull trout, and other endangered / listed species.

27

15) Decreased Recreation Desirability . P2-73 notes decreased recreation desirability and conflict with "established SIL/VOQ" Quantify the economic impact of the decreased recreation desirability. Under what authority are established SIL/VOQ permitted to be violated?

28

16) Purchase of private property . P2-76 notes that the parcels north of the existing beach road on the East side are indeed private and may need to be purchased from their current owners for the boat ramp and parking lot. There is no money in the SDEIS for property purchase. How many lots and at what expected price will be purchased? These additional costs should be included in the SDEIS Alternatives. A revised SDEIS is warranted.

29

17) Water Impairment P3-29, 3-45: both Keechelus and Kachess are listed as "category 5" water impairment because of PCB contamination. In the 2015 DEIS, only Keechelus was noted to have PCB contamination. Please release the report which also indicates that Kachess has a similar contamination. Would dredging and construction activities not stir up sediment containing PCBs? What increase of PCB levels is expected on the basis of the proposed alternative construction activities?

30

18) Water Filtering How will the water from Keechelus be moved to Kachess? What kind of filtration system will be installed to prevent any I-90 pollutants in Lake Keechelus from being transferred to Lake Kachess? If any hydraulic equipment is used, how will any PAH be kept from entering Lake Kachess?

31

19) Lake Drainage during construction The description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff). Describe the mechanics of draining the lake to allow construction. What happens to the excess water, and how is the "flip-flop" flow pattern maintained if the lake is drained early in the season? What is the effect on the Easton reach of the Yakima river spawning?

32

Additionally Please answer the following.

When Senior water users take all their water, then Roza takes the water they are planning to remove from Lake Kachess during a drought. The data I have seen says it is

33

possible it may take years to refill the Lake. What happens when?

1. There is no water the following year for the senior water rights users? 34

2. The Kachess river doesn't flow due to lake not having enough water? 35

3. What is the impact on the Federally protected Bull trout population of this lake? 36

4. On a low water year, if they tunnel from Lake Keechelus to Lake Kachess and remove the water from Lake Keechelus and upper Yakima river goes dry? What happens to the trout? Salmon? 37

5. What happens when the Yakima Indian Nations have no water for their hatcheries due to low water in the river. 38

6. Will Lake Easton still have water in it in drought years, or years after the drought when the Lakes in question aren't refilled? 39

7. Will Lake Easton State Park have to close because of lack of water in the lake? 40

8. Will the National Forest Service Campgrounds on Lake Kachess have to be shut down? 41

9. What will be the financial impact of lack of campers and boaters in the Easton/ Kachess areas? 42

10. What is the economic impact on the upper and lower Kittitas county if the Senior water rights users don't have water available because the lake hasn't refilled? Who is going to take responsibility for these impacts? 43

11. Most of the wells in the upper county will be above the level of the lake once Roza steals the water, Once these wells go dry including my own who will be held accountable for hundreds of homes no longer habitable? Who will be held responsible for this? 44

12. Who will cover the costs of potentially hundreds of lawsuits when wells go dry and businesses fail due to empty lakes? 45

13. In 2015 when the project was anticipated to cost $58 million and it didn't make financial sense and now its estimated to be over $400 million it works? This is a boonddoggle of the highest kind! Please explain how the everyday small farmers can afford this expense? 46

14. What will be the noise impact of diesel generators on the lake? To the wildlife? To the residents? To the recreational users? 47

15. What will be the ecological impact when diesel spills occur on the lake? Fish wildlife in the Lake? In the River? 48

16. With less water in the 2 lakes and realistically in the aquifer the fire danger in the surrounding areas is very likely to increase. What is the plan to mitigate increased fire risk/danger? 49

Because both the NEPA and SEPA process must be followed, we request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments.

50

Please send me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Please Respond with answers back to me at

Joe Mallory

P.O. Box 523

Easton, WA 98925

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Ash Man <mankusashley@gmail.com> Tue, Jul 10, 2018 at 9:51 PM
To: kkbt@usbr.gov

Hi there,
My family has lived in the upper county including Easton WA for over 4 generations! Draining lake kachess has never been a topic and seems ridiculous now! How can this be ok!? Having a toxic diesel pump in the lake is not ok! The fish including silvers, lingcod and more would suffer! Ecosystems, deer, elk, big horn sheep, ducks, and more would be at stake! How often would the lake be drained? Where would this pump be located? Have you contacted the town of Easton, or Kittitas county, if this is ok? Where is the money coming from to do this? Who is paying for it? Little Kachess is a natural lake, would that be destroyed!? Where is the water going?
Answers will need to be given! A town meeting with your board needs to be scheduled asap!
Warm regards,
Ashley Mankus
Life time resident
EASTON, WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kacheess SEDIS No action is the only Alternative

1 message

Cathie McShane <Cathie.McShane@calaway.net> Wed, Jul 11, 2018 at 8:28 AM
To: "Kkbt@usbr.gov" <Kkbt@usbr.gov>

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 2

Cathie McShane
131 wood house loop
Ellensburg Wa 98926

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Leave Lake Kachess Alone

1 message

William Misocky <wmisocky@gmail.com> Wed, Jul 11, 2018 at 7:58 AM
To: kkbt@usbr.gov

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Only the first, No Action alternative is acceptable. Please leave Lake Kachess alone. 1

William Misocky
4270 Kachess Lake Rd
Easton, WA 98925

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess and Keechelus SDEIS

1 message

Anca Moldoveanu <anca_miti@yahoo.com> Wed, Jul 11, 2018 at 7:40 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

Kachess and Keechelus SDEIS

Dear Ms. McKinley:

Please accept my comment regarding the KDRPP SDEIS:

1

Alternative 1 No Action: I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, “No Action” is acceptable.

Thank you,

Anca Moldoveanu

2730 232nd St SE

Bothell, WA 98021

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Lake DEIS

1 message

brian murphy <brianmurphy@comcast.net> Wed, Jul 11, 2018 at 4:37 PM
To: kkbt@usbr.gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

We are categorically opposes to pumping Kachess Lake below the natural lake level.

Property values have plummeted since this discussion was announced. Until recently, we owned as much as 176 acres, comprising approximately 2/3 miles of lakefront. We have lost hundreds of thousands of dollars in the sale of two parcels on the east side of the lake. We own two more, and have witnessed a severe decline in interest due to the uncertainty of future lake levels. We own senior water rights on all properties, these rights date prior to 1890.

1

We initially purchased our first parcel in 1993, at the time, the B of R assured us the lake would never drop below the natural lake level. I still have that documentation.

The Final EIS provides no dollar mitigation for land values and wells affected by lowered lake levels.

How we are to be compensated the financial hit we are taking as a result of this disastrous plan?

We look forward to your immediate response to this correspondence.

Brian Murphy

Murphy at Loch Kachess LLC

240 Kachess Lane

PO Box 463

Easton WA 98925

3121 Broadway East

Seattle WA 98102

206.799.2293

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Amy Ness <zanieone@gmail.com> Wed, Jul 11, 2018 at 1:48 PM
To: kkbt@usbr.gov

Via email to: Kkbt@usbr.gov
Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 2

Thank you.

Amy Stevenson-Ness
Covington, WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess T unnel Project

1 message

Steven Ness <saness1@comcast.net>
To: Kkbt@usbr.gov

Wed, Jul 11, 2018 at 4:49 PM

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 1 2

Thank you.

Steven Ness
Covington, WA. 98042

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Katie Newman <katnew0207@gmail.com> Wed, Jul 11, 2018 at 12:21 PM
To: kkbt@usbr.gov

To Whom It May Concern,

My parents are 50% cabin owners on the east side of Lake Kachess and our family has had this property for four generations. We hold a senior water right - our cabin is served by a newly constructed well. Members of my family spend their summers at the cabin, including my in-laws, aunt and uncle, and cousins. Our property and our quality of life stand to be affected by the plan. I have a number of concerns and questions about the Kachess Drought Relief Pumping Plant proposals that I would like the agency to address: 1

1. How much water would be made available to the downstream farms via the KDRPP, compared to how much could be available through the adoption of drip irrigation systems and other water conservation methods? 2

2. What would be the cost of drip irrigation systems sufficient to provide the same amount of water to the farms as the KDRPP? Please include in this analysis the dollar value of Lake Kachess' recreational value and the value of the bull trout population. 3

3. How much dust would be generated by wind hitting the dry lakebed when the lake would be drawn down in drought years? What would be the health effects of that dust to cabin owners? Our family includes people who suffer from asthma and allergies. Would there be compensation for medical expenses and nights when we would not be able to stay at the cabin due to dust? If so, what amount of compensation would be offered for medical expenses and nights when the cabin was uninhabitable? 4

4. What is the explanation for the senior water rights of our family being overruled by the junior water rights of the interests downstream? Would our family be compensated for the taking of those rights, and if so, in what amount? 5

5. What decibel levels would the pump generate, and for how many hours per drought year? 6

6. What protections are contemplated for the fossil bed on the southwestern shore of the lake? 7

7. What is the plan for disposal of PCB-contaminated soil from the project, and how much will that disposal cost? 8

Our cabin and the lake mean the world to me. I look forward to receiving a response to these questions. 9

Thank you,

Katherine Newman

Sent from my iPhone

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Destroying Lake Kachess

1 message

Wesley Nye <wesleynye@msn.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Wed, Jul 11, 2018 at 11:40 AM

Ms.McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. 2

Plus a real concern is the loss of property value associated with this project and how the property owners will be compensated. 3

Thank you,

Wes and Debbie Nye
170 Alpine Lane P.O. Box 702
Easton, WA 98925

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Att: Candice Mckinley regarding Lake Kachess DEIS

1 message

KURT OPEL <sendkurtemail@me.com> Wed, Jul 11, 2018 at 4:31 PM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058
RE: Kachess and Keechelus DEIS

Dear Ms. McKinley:

I am submitting both comments specific to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018 and also those comments by The Alpine Lakes Protection Society, The Sierra Club, The Wise Use Movement and The North Cascades Conservation Council which were made about the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) Draft Environmental Impact Statement (DEIS), dated January 9, 2015. All comments are submitted under both NEPA and SEPA

1

I support Alternative 1 with no action and oppose all active alternatives of the KDRPP and KKC projects. My reasoning is due to the fact that there were not enough range of alternatives explored and believe that the Yakima Plan FEIS failed to provide a reasonable amount thereof. The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of “reasonable alternatives” means all state-of-the-art alternatives must be rigorously explored and properly evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party.

2

Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

3

I ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess

Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) “slanted to the interest of special interest groups”. I ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given… including data, references, and review procedures…for excluding each alternative.
The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and I therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

The SDEIS notes the Yakama Nation has historical ties to the Lake Kachess area, and documents historical and cultural heritage connections. The Snoqualmie Tribe also has roots in the Lake Kachess area, and artifacts from that federally recognized tribe have been found along the shoreline of Lake Kachess. How will the Snoqualmie Tribe’s historical and cultural standing be recognized in regard to this project, and why are they not be brought into the discussion? How will the Snoqualmie Tribe be contacted, the potential impact of this project on their culture be explained, and will they be given an opportunity to provide comment prior to a Final DEIS and/or ROD? Also please describe what happens with Native American artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level. 4

The impact on 23,000 annual visitors and 11,000 annual boaters at USFS Lake Kachess Campground will be devastating. Page 2-6 indicates the lake could be drawn down 80 feet “as early as June in severe drought years.” [NOTE: The campground typically opens on Memorial Day Weekend…June 1st.] In other words, the campground would not open, possibly for a number of years. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. As noted below with respect to ES-xii, we noted the inadequacy of a post hoc communication strategy to inform recreational users of the impact of KDRPP-FPP. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users will be contacted and the timeline for this process. 5

The SDEIS states the Bureau of Reclamation will “fund…some or all, or authorize Roza to fund” the KDRPP-FPP.
This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FP. Please provide the legal, legislative, and/or other basis for stating Bureau of Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how “all or some” will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (BoR, Dept. Ecol., Roza, etc.) will be responsible for what action (fund, design, construct, operate, etc.). These are not “details” to be clarified at a later time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period. 6

The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be “dewatered.” It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of “monitor and mitigate.” Well 7

failures (“dewatering”) will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. I ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD.
Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry? The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and
into the town of Easton. How will draining the lake affect wells downstream of the lake?
By what criteria, will these effects be calculated? What accurate and defined methods have been used to determine loss of property values in the immediate area? How will property owners be compensated for such a loss?

Misrepresentation of Lake Kachess Chapter 1, Section 1.2 The SDEIS indicates
Kachess Reservoir was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and
Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. Thus, every drop of water to be pumped by the KDRPP will come from Big Kachess Lake. It is a misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Big Kachess Lake. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. We ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as “dead storage” and “inactive pool” be eliminated. The correct term should be either “Lake Kachess” or “Big Kachess Lake”. There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by BoR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. KDRPP has nothing to do with Kachess Reservoir. We ask that this confusion and misrepresentation stop, and accurate terminology be used that informs rather than confuses the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as Page 1-7. When driving either East or West on I-90, the sign states “Lake Kachess” and not “Reservoir Kachess”.

8

I have a very hard time understanding how this process can be put on the table to benefit private interests at the expense of others as well as the general public. Therefore, the only rational and fair decision is to choose no action.
Please send me a copy of any additional SDEIS, FEIS or Record of Decision that is released.
Thank you for considering and acting on these comments.

9

Sincerely,
Kurt Opel
371 Kachess River RD
Easton, WA 98925
425-678-5800

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP & KKC SDEIS

1 message

J Owens-Fountain <50centfreedom2@gmail.com>
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

Wed, Jul 11, 2018 at 1:29 PM

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County. 1

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used.

--
Ms JJ Owens-Fountain
50centfreedom2@gmail.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Please do not drain Lake Kachess

1 message

Kathryn Pizzo <katpizzo@comcast.net> Wed, Jul 11, 2018 at 11:46 AM
To: kkbt@usbr.gov

Hello,

I am writing to ask you to please stop the process that would lead to the draining of Lake Kachess. There are so many economic and environmental reasons this is a poor idea. Some specific questions include: 1

- In the 2015 DEIS, only Keechelus was noted to have PCB contamination. Please release the report which also indicates that Kachess has a similar contamination. 2
- As a homeowner on the lake, I'd like to see the plan for buying the currently waterfront property that will have a severely impacted property resale value. What is the county prepared to offer to buy the existing land from homeowners? 3
- Loss of habitat for wildlife, including endangered species. What is the detailed plan to relocate and/or otherwise protect these animals? 4
- We and our neighbors just spent years and thousands of dollars getting the required permits and processes to install a shared well. If the water table is lowered, what is the county/state prepared to offer in mitigations to compensate land owners for loss of use of their wells, essentially making the homes unlivable with no water? Additionally, I have senior water rights for my well. According to the SDEIS, my well will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater my well which has senior water rights? 5 6
- Lake Kachess is a significant outdoor recreation economic contributor. What is the plan for recovering this revenue source? 7

I look forward to these specific answers and improved transparency in the process, along with additional public meetings for all those affected to be able to be part of the conversation. 8

Regards,

Kathryn Pizzo

Homeowner on Lake Kachess

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Fwd: KDRPP & KKC SDEIS (Lake Kachess)

1 message

danplouse@yahoo.com <danplouse@yahoo.com> Wed, Jul 11, 2018 at 3:10 PM
To: kkbt@usbr.gov

Sent from my iPad

Begin forwarded message:

From: danplouse@yahoo.com
Date: July 11, 2018 at 2:32:51 PM PDT
To: kkbt@usdr.gov
Subject: KDRPP & KKC SDEIS (Lake Kachess)

Attention, Candace McKinley, Environmental Program Manager.

Dear Bureau of Reclamation,
This letter is about Kachess Lake and Reservoir. My understanding of the reasoning behind the proposed pumping and/or piping of the Lake is to gain more access to the Lake's water supply. There might be an alternative way to increase the Lake's water supply.
Would it be possible to excavate the lower end (south east end) of the Lake? During autumn the lower end of the Lake is a reservoir of stumps, sand, rock and mud, not much water is left. If the lower end were excavated perhaps the increased water storage capacity might offset or minimize the need to pump and/or pipe the Lake.
The excavated materials could be used to build up the shoreline and reclaim the old logging roads on the north side of the Lake. The stumps could be processed in a stump grinder. New habitat could be installed for the fish.
All the excavating could be "off-road", eliminating any traffic concerns.
Excavating may be a solution which adequately increases the amount of usable water in the Lake or Reservoir, enhances the fish habitat and preserves the natural beauty of the Lake.

1

Sincerely,
Dan Plouse
Easton, Wa

Sent from my iPad

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] RE: Kachess irrigation - comments

1 message

Baraka Poulin <bpoulin1@gmail.com> Tue, Jul 10, 2018 at 9:53 PM
To: kkbt@usbr.gov
Cc: Bruce Poulin <brucepoulin3@yahoo.com>

Candace,

I request Alternative #1: no action.

It continues to appear that along with many other issues, this project lacks a substantive cost/benefit analysis and justification for implementation.

1

As I have not heard any response or learned further information to affirm why this project makes sense- I urge the agency to take no action.

Thank you.

Baraka Poulin

From: Baraka Poulin [mailto:bpoulin1@gmail.com]
Sent: Monday, June 4, 2018 4:19 PM
To: kkbt@usbr.gov
Cc: 'Bruce Poulin' <brucepoulin3@yahoo.com>
Subject: Kachess irrigation - comments

Hi,

I reviewed the Kachess Drought Relief Pumping Plant Supplemental Draft Environmental impact statement dated April 2018 and would like to offer the following questions and observations.

2

Observations:

- Power cost looks like an order of magnitude to low. 260kW average? Are there backup calculations I could review? 3
- Both the construction and operating CO2 emissions are incredibly large. The EPA's social cost of carbon should be applied to this lifetime value (8000 tons/yr * $50/ton) as part of the life cycle cost. Although below significance thresholds, this is NOT in-line with state goals. 4
- $450M is an tremendously expensive burden for taxpayers to bear with the benefit going to only a select few individuals during infrequent drought years. This study needs to show the estimated cost per gallon, the number of people directly impacted, and the alternative cost (ie not planting year)- I suspect it may be less expensive to leave the field fallow and pay a distribution to the farmer. 5
- With lake drawdown decreasing rim stability – what is the estimated cost if implementing the proposed erosion control measures (what are these measures?) 6

My general concern is lack of cost/benefit quantification and analysis. 7

I look forward to your feedback.

Thanks.

Baraka Poulin

WA State Professional Engineer #51231

206.445.2037

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Drainage Project Questions & Concerns

1 message

Sarah Kitchell <kitchellforthequinn@gmail.com> Wed, Jul 11, 2018 at 2:02 PM
To: kkbt@usbr.gov

Hi Mrs. McKinley,

I have some questions about the upcoming plans to drain the beautiful natural Lake Kachess. This is a terrible plan, lacking transparency, and it pains me that such negligence is happening in the great state of Washington. 1

What are the plans to support residents and property owners who have property on lake Kachess if the natural wells are unable to supply running water to the families living and visiting there? 2

How do you expect this to impact visitors to the Kachess campground and surrounding hiking trails? 3

What is the plan to support the Lake Kachess fire department if the wells aren't supplying running water? 4

What research has been completed and shared with the taxpayers that confirms draining the lake will (1) effectively and long-term support drought prevention for farms in the area and (2) that the lake will ever recover from being drained past it's natural/original height?? 5

I look forward to your responses.

Best,

Stuart Quinn & Sarah Kitchell

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess coating pump

1 message

Heidi Reeves <reevesh3@gmail.com> Wed, Jul 11, 2018 at 12:34 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Good afternoon,
I am writing today to inform you of my opposition to the proposed floating pump in lake Kachess for additional drainage of water in times of drought. This plan has many many cons to the small pro of water shipment, and will devastate the lake and lake environment that exists today. Please take this into consideration.
-Heidi Huynh

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] SDEIS Response KKC KDRPP John S Reeves

1 message

John Reeves <johnscottreeves@live.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: John Reeves <johnscottreeves@live.com>

Wed, Jul 11, 2018 at 4:15 PM

Please find attached my response to the SDEIS.

Please confirm receipt of delivery.

1

Thanks,

John Reeves

SDEIS Response Final JSR 7.1 1.18.pdf
1046K

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation

Columbia-Cascades Area Office

1917 Marsh Road

Yakima, WA 98901-2058

Via email: kkbt@usbr.gov

Re: **SUBJECT: Comments submitted in response to Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus-to-Kachess Conveyance (KKC) Projects Supplemental Draft Environmental Impact Statement**

Please accept this comment in response to the Supplemental Draft Environmental Impact Statement (SDEIS) comment period for the proposed Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) Projects. This comment letter is in addition to prior comments and incorporates the comments of others. 2

I am OPPOSED to the implementation of any of the alternatives (other than "no action") under the SDEIS. 3

Please consider, although not a legal or environmental expert, I have spent more time at Lake Kachess than any consultant, any Bureau of Reclamation employee, and any Washington State Department of Ecology Employees. I make this comment not to discredit work by these people, rather to emphasize my understanding of the intricacies of Lake Kachess. I apologize in advance of any comments that may be taken personally. This issue is not only a personal issue to me, it is also a responsibility issue as a Steward of Lake Kachess and its ecosystem. I make these comments and submissions as an individual and do not represent any group although I will advocate for the inclusion of certain groups. The work of addressing water needs across various stakeholders is a tough. No disrespect is intended. I look forward to working with these agencies to develop real solutions to meet needs. 4

The Bureau of Reclamation and Department of Ecology (the "Agencies") have failed to adequately comply with regulatory requirements. It has not disclosed the impacts to affected environments, quantified those impacts or disclosed any mitigation strategies. 5

The Agencies have failed to consider reasonable alternatives and instead have attempted to simply implement a plan developed by conflicted and interested parties to the exclusion of all others. 6

The Agencies have not only failed to notify impacted parties, they have failed identify the authority under which they will take private property in-order to provide private uses to third parties. 7

The DEIS and SDEIS must either be redrafted and resubmitted with the appropriate research, data and disclosures or the "no action" alternative selected. 8

I ask that you acknowledge receipt of these comments at the earliest opportunity. Please enter these comments and my opposition to the KKC/KDRPP Projects into the public record. 9

Name: John Reeves

Address: PO BOX 33, Fall City, WA 98024

Email: johnscottreeves@live.com

Phone: (425) 395-6123

To: (via e-mail)

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation

Columbia-Cascades Area Office

191 7 Marsh Road

Yakima, WA 98901-2058

Phone: 509-575-5848, ext. 603

Fax: 509-454-5650

Email: kkbt@usbr.gov

COMMENTS / CONCERNS / QUESTIONS

PROJECT NAME

The name Kachess Drought Relief Pumping Plant is a misnomer. This is not about drought relief. Drought Relief is keeping vegetation alive in a drought, Crop Insurance (USDA) and Federal Dust Bowl Era programs. The title is misleading and meant to distract the public's understanding. This is about maintaining agriculture's profits at the expense of natural resources through a drought period. Water Districts could build their own in-district water storage facilities.

10

- Why are options of onsite storage facilities or Water District Reservoirs on their own land that they can control in times of drought need not addressed?

11

- How will the title Drought Relief be properly addressed in the EIS?

12

MISSION STATEMENTS

Mission Statements

The U.S. Department of the Interior protects America's natural resources and heritage, honors our cultures and tribal communities, and supplies the energy to power our future.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

The mission of the Department of Ecology is to protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations.

13

The claim is the Yakama Nation is on board. Putting them in a position of having to pick and chose what they will allow, when they should have all their salmon runs returned to ALL lakes. Other tribal considerations should be taken in account as well and not force them into a corner and them claim a plan is integrated.

- How is draining a natural lake honoring the "cultures and tribal communities"?
- Is this just another example of government forcing native cultures into a situation where they have no choice?

14

"Protect water and related resources in an environmentally and economically sound manner in the interest of the American Public"

Packaging the KKC and KDRPP with other projects is not an economically sound manner. Alone both projects have a negative Net Present Value.

- How is a pumping a natural alpine lake to expose earth that has never seen the light of day protecting water resources in an environmentally sound manner?

15

"enhance Washington's environment and promote the wise management of our air, land, and water for the benefit of current and future generations."

- Will the emissions from the diesel operated plant be completely calculated and displayed?
- Will the Methane Gas release of never exposed lakebed be researched and displayed?
- How is draining a naturally formed alpine lake wise management?
- Will the negative Net Present Values be clearly explained?

16

- Please explain how these and other issues meet the promoted mission statements of the three departments.

17

NOTIFICATION CONFUSION

It is inherent to notify citizens of projects such as this. The general-public does not clearly understand the process. I met several citizens in the town of Easton that were confused by the notification process, what little there was. This is a SUPPLIMENTAL DEIS. Most citizens were of the belief this project went away. Citizens in general do not clearly understand the DEIS process let alone a supplement. Not only is it inherent to notify citizens, it is necessary to do so in a manner that citizens can understand. 90-day notice to respond to a 900-page document is a giant task for most citizens; 60-day notice if they chose to attend the informational meetings in Cle Elum or Ellensburg. If they attended those meetings they were greeted with outdated poster boards and representatives from Bureau of Reclamation and Ecology that were stand offish and defensive of the plan. There was a US BR Kachess Reservoir (Lake) Bull Trout Passage Report issued in May 2016, so clearly the process continued after the DEIS and Roza backing out of the Temporary Pumping Plant plan. The SDEIS clearly states Roza Irrigation has remained in direct contact with BoR and Ecology OCR. 18

- Why were citizens not kept abreast of developments as this process continued behind closed doors?
- Why were stakeholders not contacted with developments prior to release of the SDEIS?
- Why were citizens that clearly opposed on record as opposing the DEIS not contacted prior to the April 2018 release?
- How will better communication methods be utilized in future correspondence with citizens?

IRRIGATION SYTEMS AND INFRASTRUCTURE NOT ADDRESSED

There is no mention of the delivery method of this water once it reaches the Water District. Most water district infrastructure date back to just after the Great Depression and 1950's. 19

- How will conservation of this valuable resource (water) be addressed once it leaves the Natural Lake? *(Water taken below approximately 2200'-2223' is from the natural lake)*

Capacitors in the irrigation system are not addressed in the SDEIS. Irrigation is most effective in the early AM, irrigation ditches run 24/7. A properly constructed ditch, with no leaks, and with gates could house millions of gallons of water to be used in drought relief and allow for water to be better utilized at the proper time of day.

20

- How will more efficient use of the natural resource water be addressed in the EIS?
- Will improvements, redesign and construction of the irrigation system(s) be considered as an alternative to draining a natural resource?
- Will there be requirement for fixing the ditches?
- Will gate systems within the ditch be required for better utilizing and storing water?
- Will on site mini lakes and small reservoirs within the irrigation districts delivery system be addressed?
- Will utilizing the water for Evaporative Cooling be outlawed for water transmitted from this project?

WATER NEEDS IN ACRE FEET / STATED ACCOMPLISHMENTS BY THE OFFICE OF THE COLUMBIA RIVER

The Washington State Department of Ecology is named in the SDEIS. The Office of the Columbia River is the department named on the SDEIS. In 2005 the OCR was charged with "aggressively seek out new water supplies." With a maximum drawdown of 239,000-acre feet and an annual refill average of 210,000-acre feet, Kachess is already a deficit watershed. In the December 3, 2016 "Powers Report" / "Department of Ecology Office of the Columbia River: The Last Ten Years (Prepared for the Sierra Club), it is noted the OCR reported it had developed 396,000-acre feet of water. The additional 200,000-acre feet of Kachess water would be necessary to meet that stated accomplishment.

21

200,000-acre feet is clearly an arbitrary number. So much so the .75' adjustment was added to the schematic profile between the DEIS and SDEIS. This implies the number is driven only by promises made by OCR and overstatements of "developed water" by OCR. There is no evidence that this is the magical number that the lake can sustain. The calculations in the 1910-1913 dam construction are more appropriate of designing a reservoir over a natural lake by having similar numbers of annual refill of approximately 210,00-acre feet with a reservoir that can produce 239,000-acre feet.

At face value the objective of 200,000AF seems to be clearly a result of stated accomplishments and not any way related to the best use of resources for citizens of the State of Washington.

- Why is 200,000-acre feet the amount of water desired for this project?
- Does 439,000-acre feet (the additional 200,000-acre feet plus the original 239,000-acre feet) best suit Kachess Lake water source availability?
- How is taking water from a lake well below its natural pre-dam levels finding new water supplies?
- How is pumping water from a lake below it's ability to recharge 'developing water'?

- How will the lake re-fill with these numbers? *(The SDEIS uses historical numbers to predict future levels, no account is made for the additional 'drought relief'/ additional draw by Roza and/or other Junior Water Rights Holders)*
- Are there expectations of greater precipitation in climate forecast models?
- How can a 439,000-acre foot 'reservoir' in a 210,000-acre foot watershed meet the criteria of sustainability?

This plan depicts "creating" 200,000-acre feet of water. 200,000 additional acre feet will not be available on a year to year basis. Access to the 200,000-acre feet may develop a greater fudge factor on a year by year basis, understood.

22

- What is the additional number of acre feet needed for "drought relief" on an annual basis?

Since Roza Irrigation District implies they will fund this project:

23

- What is the annual drought relief (with responsible planting) that Roza Irrigation needs? (*This number would be well below 50,000-acre feet, below 30,000-acre feet per Roza Irrigation's own internal documents. *(Water Transfer Market Overview Paper 7-8-16.pdf))*

CONFUSING DISPLAYS AND LACK OF & INCONSISTENT BATHYMETRY

SDEIS Low Pool Elevation

CleElum Public Meeting Pool Elevation

There has been little consistency in data presented. The visual in the SDEIS depicts two islands, while the visual presented at the public meeting in CleElum does not. The Public Meeting Visual is clearly taken from the DEIS. Many people rely on visual communication as not everyone can read an entire 800+ page document. Lack of consistency in the visuals can only mean incompetence, laziness, or an outright maneuver to deceive and confuse. Officials perpetuating this plan should notice these inconsistencies especially if they are chosen to face the public at public meetings and answer questions.

24

- Which is correct?
- How will consistent data be included in the EIS?
- Why was it not important enough to produce an up to date visual for the public?
- How can we expect the leaders at a management level of this plan (in it's various agencies) fully understand the details if they cannot notice simple inconsistencies such as the displays above?

- Will a new set of DEIS and/or SDEIS be necessary to eliminate the confusion made by continual presentations of moving targets?

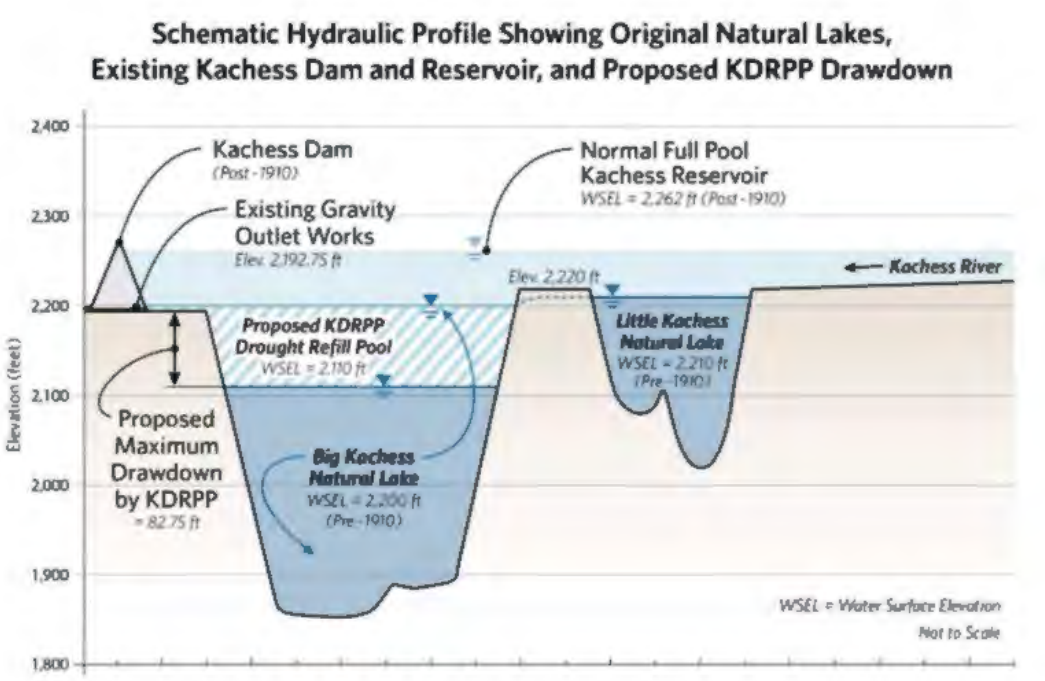
There is no bathymetric data displayed in the SDEIS. The Bureau of Reclamation and Department of Ecology clearly have access to this data as displayed in the May 2016 "Kachess Reservoir Bull Trout Appraisal Report".

25

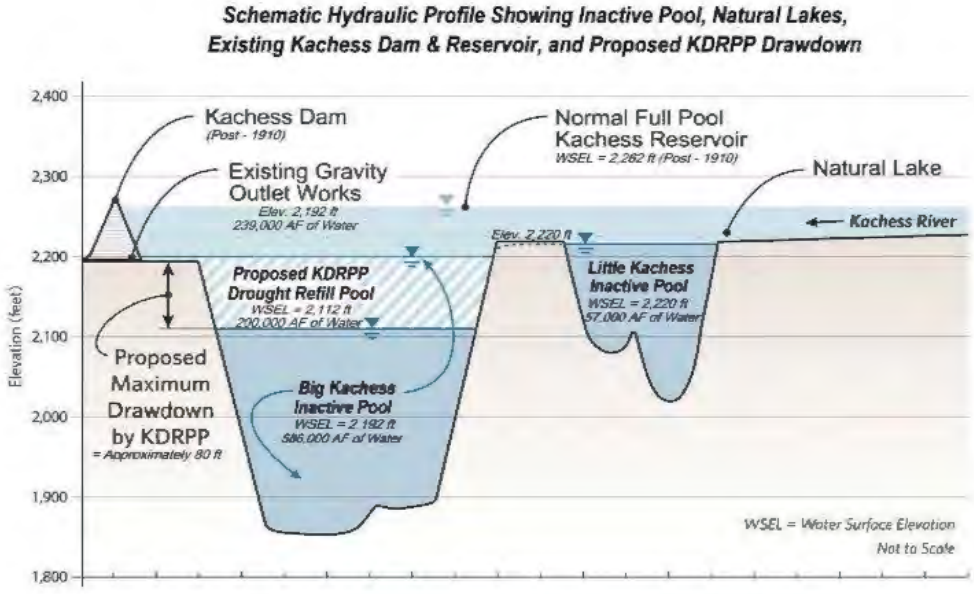
- Why was full bathymetric data not shared in the DEIS and SDEIS?
- Why was Bathymetry used in the May 2016 Bull Trout Appraisal Report and not in the 2018 SDEIS?
- Will Bathymetric data be shared in the FEIS?
- How will erosion of the islands be addressed in the FEIS?
- Are there even islands at the low pool level?
- How will intermediate islands (that become peninsulas at lower levels as they are exposed) be erosion controlled as lake levels drop?

VARIATIONS IN HYDRAULIC PROFILES:

SDEIS



DEIS ….and Poster Board at Cle Elum Public Meeting May 2018



USBR Kachess Reservoir (Lake) Bull Trout Passage Report May 2016

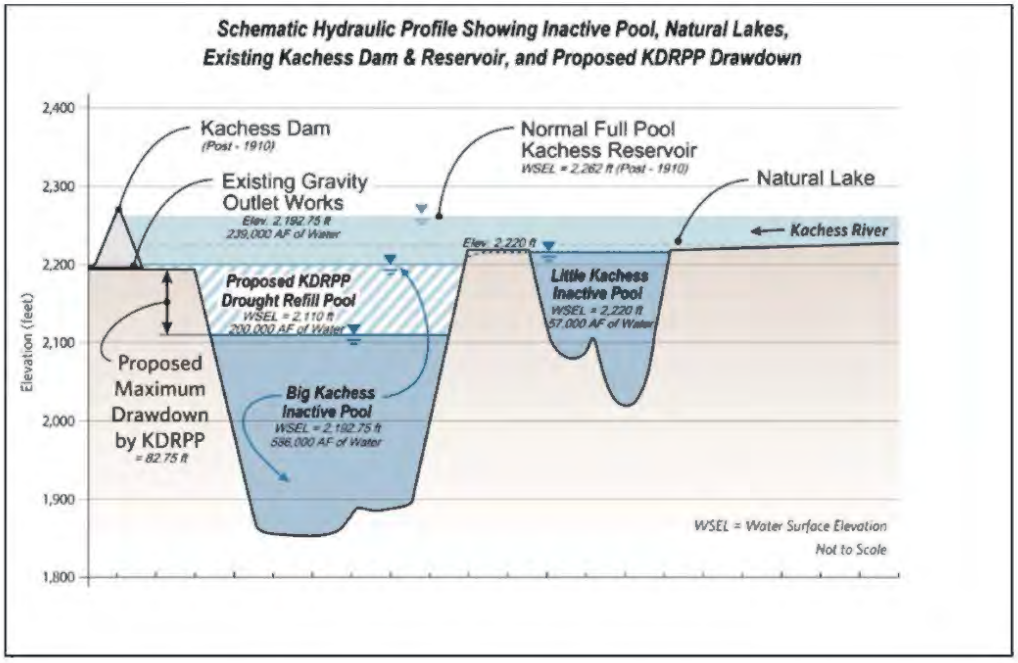
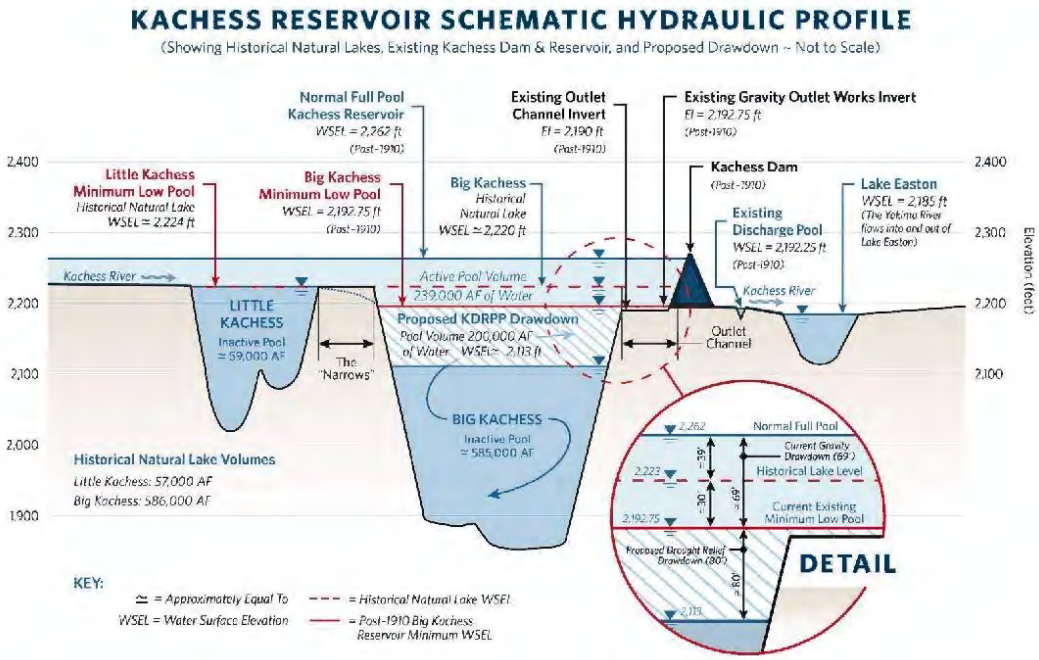


Figure 9-6. Schematic hydraulic profile showing the inactive pool, natural lakes, existing Kachess Dam and Reservoir, and the proposed Kachess Drought Relief Power Plant (KDRPP) drawdown.

From Julia Long, USBR via email to Christine Johnson 6/14/18



The least accurate of these profiles is the most recent! Repeat, the least accurate is the most recent in the SDEIS. Little Lake Kachess has dropped to a level of 2210, a full 10' below the stated narrows level of 2220' which may not even be accurate. This high-water mark of Kachess Natural Lake is depicted as 2192.75. Historical records and previous schematic profiles show the height of the original lake 2220', 2223' per the DETAIL on the "Julia Long" USBR document. These errors are just one example of many throughout the document. The use of outdated materials for public meetings only adds an exclamation point to the confusion. 26

I have concentrated on this one piece of confusion and it has detracted from time I could have spent on other sections. I choose these diagrams to show a track record of sloppy work. (Apologies, but it needs to be said.)

- Is this an effort to rush a project and not fully vet the information presented?
- Is the public expected to proof-read such an important document?

Dam construction by Bureau of Reclamation began in 1910 and completed in 1912. The lake could not have reached 2262' until 1912 or 1913. Calling the lake post 1910 level makes one think the preparers of this document do not even have a clear understanding of the history of the lake. 27

- How can they be expected to produce quality documentation with so little understanding?

The addition of .75' between the 2015 and 2016 diagrams, while a more precise description (if accurate), can only be to achieve the 200,000AF above the 2210' level. It is quite clear 200,000 is the target number with no regard for the 'wise use' of natural resources so long as the arbitrary target is met. There are numerous other inconsistencies with these and other documents in the SDEIS.

- How can the public fully digest and respond to this massive project when the target is constantly moving?
- Is it necessary, due to all the errors, to scrap all issued documents and produce a new DEIS the public can properly respond to?
- Why do the diagrams, even though not to scale, over-exaggerate the section of Kachess River flooded north of Little Kachess in all profiles?
- What steps will be taken to make sure document preparers are properly trained and updated on the history and factual elevations when preparing the FEIS? 28
- How can the writers better understand the lake before preparing the FEIS?
- Were these documents outsourced?
- If the documents were outsourced who prepared them and how were they funded?

- Why was it not important enough to produce current visuals directly form the SDEIS for use at public meetings?

- Was the use of outdated visuals purposeful or just a mistake?

ENVIRONMENTAL JUSTICE

The counties of Kittitas, Benton, and Yakima were included in the SDEIS. Many property owners at Kachess, Easton, Hyak, and Snoqualmie Pass are residents of King, Pierce, Snohomish, and other counties not included in the SDEIS Environmental Justice. The proof is in the addresses of the few notification letters that were sent to property owners many if not most were mailed outside of the 3 counties noted in the environmental justice section. I personally have spent much time of every year of my 49 years of life at Lake Kachess, all as a King County resident, I am not the only one with a similar story.

29

- Will King County residents at Snoqualmie Pass be included in Environmental Justice?
- Will King, Pierce, Snohomish, and other counties of property owner stakeholders and campground user stakeholders be included in Environmental Justice?

King County is just to the west of Keechelus and it is quite possible the Snoqualmie Pass Aquifer crosses the county line of Kittitas and King Counties as it sits below the crest of the Cascade Range at Snoqualmie Pass. Manipulation of the Keechelus watershed will very likely affect the Snoqualmie Pass Aquifer.

30

- Will the Snoqualmie Pass Aquifer / Water Table be addressed in the FEIS?
- Will King County be included in Environmental Justice?

ENVIRONMENTAL CONCERNS

BULL TROUT – PROTECTED SPECIES

In May 2016 the USBR issued the USBR Bull Trout Appraisal Report. There was no opportunity for participation by any Kachess stakeholders. There was no opportunity for participation of Easton residents and outdoors-people. We are the ones that spend the most time at this lake and understand it's intricacies the best. We are the people that observe Box Canyon Creek, the Narrows, and the Lake the most in their various stages year-round. We are left to assume this may have been an effort of secrecy to keep working the plan without our knowledge. At minimum it was a giant missed opportunity to develop a better understanding of a lake one can not get from a desk in Ellensburg or Yakima. The term Bull Trout Enhancement clearly does not apply here. The lake is currently stopped from being lowered below 2199.5' due to Bull Trout Passage concerns. Construction of a "roughened channel" or other ideas below 2199.5' are clearly about grabbing more water and not about Enhancement. Construction of such apparatuses can clearly not be done until the lake is lowered and the damage is done. Any reference to Bull Trout Enhancement or BTE is clearly mis-leading, perhaps intentionally. There is a lack of Salmon recovery efforts noted in the SDEIS. Salmon frye and juvinille Salmon are know food sources for Bull Trout.

31

- How will stakeholders, local-residents, and outdoorspeople be better utilized in the FEIS and other fish passage studies regarding Bull Trout and other species?
- How can lowering the lake below 2199.5' even be associated with the term Bull Trout Enhancement?

- Will Salmon recovery for the purpose of Salmon Recovery and Bull Trout food source be addressed in the FEIS?
- Will the term Bull Trout Enhancement be eliminated in future documents regarding the KDRPP?
- With a threat of Bull Trout Decimation; will the more appropriate term Bull Trout Mitigation be used?

FRESHWATER MUSSELS –

Freshwater mussels are an "Species of Greatest Conservation Need" to the Washington State Department of Fish and Wildlife. There is much mystery surrounding these creatures and these animals are 'very sensitive to environmental changes'. They are transported in host fish, which may possibly include Bull Trout. Their impact on the overall ecosystem and specifically the Endangered Bull Trout should not be underestimated as mussels provide many benefits to water quality and other native species.

32

72% percent of North American freshwater mussels are either extinct or imperiled, meaning that they are one of the most at-risk groups of animals in the United States.

Native freshwater mussels have both ecological and cultural significance. Mussels can greatly improve water quality by filtering out pollutants, to the benefit of both humans and aquatic ecosystems. Freshwater mussels also provide benefits to native fish by increasing the visibility and availability of food for fish. These animals can be very sensitive to changes to habitat and water quality and have the potential for use as water quality indicator species. Freshwater mussels have been historically important sources of food, tools, and other implements for many Native American tribes in North America. Mussels have been harvested by Native Americans in the interior Columbia Basin for the last 10,000 years, and mussels are still important to tribes today. ~ https://xerces.org/western-freshwater-mussels/

WESTERN PEARLSHELL (Margaritifera falcata) NEAR THREATENED (IUCN Red List)

The Western Pearlshell has been observed "east of Kachess Lake". Anything observed east of Kachess Lake is clearly a tributary to Kachess Lake, because over Kachess Ridge the description would be west of Lake CleElum or near Cooper Lake. The Western Pearshell is Near Threatened with a decreasing population trend. It also uses species of salmon and trout as hosts, and it is possible they use the endangered Bull Trout as a host fish.

- Will inclusion of this species be addressed in the FEIS?
- Will the Xerces Society who has record of this observation be contacted?
- Additional Mussel questions after next section pertinent to this species above

WESTERN FLOATER (Anodonta kennerlyi)

The Western Floater is observed in sand beds of Lake Kachess as the water recedes. Their existence ends as the sand turns to clay beds as the water continues to recede in its current 'reservoir' status (which is actually below the pre-1903 original crib dam level). Since the Mussels will be decimated as the water recedes they will no longer play a role in filtering the water in Kachess. Freshwater mussels also play an important role in the food chain. Because some species of floaters use salmon and trout for host fish, it is possible they use the endangered Bull Trout as a host fish and that the freshwater mussel in return plays a part in the food sources and other life features of the Bull Trout. Rotting freshwater mussels will pose an olfactory nuisance and add to the methane gas release.

- What mitigation is planned for cleaning up all the dead and rotting freshwater mussels?
- How will the decimation of this animal impact the Kachess ecosystem?
- How will the methane gas release of rotting mussels be considered, calculated, and mitigated?
- What assurances are there that this animal does not play a vital role in the life span of Bull Trout?
- What understanding is there in regard to freshwater mussels on Bull Trout and other species?
- Will the massive reduction to extirpation of freshwater mussels be included in the environmental impact as it pertains to the ecosystem and specific species such as Bull Trout?
- Will the Xerces Society, Confederated Tribes of the Umatilla Reservation, and other freshwater mussel experts be consulted prior to completion of the FEIS?
- Since the species travels in host fish and the Umatilla Nation is downstream of Kachess, will the Confederated Tribes of the Umatilla Reservation's "culture" be "honored" as per the Department of Interior's Mission Statement?

SHORLINE EXPOSURE OF ISLANDS AND SHORELINES

Shoreline erosion is more destructive in years of concurrent low pools (never reaching 2262'), shorelines are clearly affected by historical visual inspection.

33

- Has the erosion effect been adjusted for the known circumstance of concurrent/multiple years never reaching 'full pool'?
- How will erosion of islands be addressed in the FEIS?
- How will property owners by financially supported by further erosion due to subsequent years of not reaching a full pool?

VISUAL IMPACT ANSD NOISE OF PUMP AND FACILITIES UNDERSTATED IN THE SDEIS

The sight at certain distance and color is only considered. The shock of such a machine in an otherwise natural looking environment is understated. There is no reference to the buoy and "do not enter" zone. Noise generation of pumps only considered with no consideration of power generation noise.

34

- How will the shock value of an industrial machine in a mountain lake environment be minimized?
- What safety zone and buoys will be needed, and will they be addressed as additional visual pollution?
- What no fly zones for drones will be extended?
- What additional areas will no longer be available to boaters and other water activities?
- How will the noise crested by diesel powered electrical plants be included in the FEIS?
- Will power generation Noise be added to pump operation noise?
- Will noise and other environmental factors of recurring diesel fuel deliveries be addressed in the FEIS? 35
- How will noise of fuel deliveries be addressed?
- Will the dust suppression of fuel deliveries be addressed?
- How will Carbon emissions of diesel exhaust be considered? 36

WILDLIFE CONNECTIVITY AND UNKNOWN (NOT OBSERVED) SPECIES

At great extent the Washington State Department of Transportation is constructing Wildlife Overpass on Interstate 90 (approx. milepost 60-61). The ecosystems of Keechelus and Kachess both stand to be affected by the proposed KKC and KDRP projects. The KKC seems to pass very near to this obviously environmentally important piece. Animals will likely be affected by a man made underground river/tunnel (vibrations, noise) and another construction project just as animals try and learn a new path to safely improve wildlife habitat connectivity. 37

Consideration of other species such as wolves, marmots, wolverines, owls, goats, and other unknown recovery species. Species have been found to inhabit ecosystems long be for they are ever officially 'observed'?

- Will every effort been made to assure even unidentified creatures that multiple projects have tried to enhance habitat for in the Cascade Range be made in the FEIS?
- Have non-observed species known or desired to be repopulating the Cascade Range been considered? How will they be considered?

THE NARROWS

There is a distinct possibility the elevation change at the narrows will greatly change 38

- What is being done to mitigate further erosion of the narrows and the subsequent lowering of Little Kachess Lake's low pool elevation?
- How will all the sediment of this erosion be addressed?

TRAFFIC

- What consideration will be made as to employee, service vehicles, fuel deliveries, etc. associated with the pumping plant? 39
- How will Kittitas County be compensated for increased traffic on their roads?

- How will the Forest Service be compensated for additional traffic on their roads?
- How will dust control be addressed?
- How will additional impervious surfaces of new buildings, roads, and parking be addressed?

NATIVE TRIBE CONCERNS

It is my personal belief the Yakama Tribe cannot be happy about this proposed plan and views it as a compromise at best. Forcing the Yakama Nation to think in terms of the "Greater Good" at the expense of their heritage is not honoring a native culture. The Confedrated Tribes of The Umatilla Nations downstream are very concerned about freshwater mussels. Snoqualmie Tribe claims to have "run to Snoqualmie Pass". It has come to my attention the has been a promise to return salmon to all the lakes in the Yakima Reservoir system and a treaty pre-dating the dams assure salmon in the lakes. A treaty between US Government and Puget Sound Tribes in 1885 protects their right to hunt and gather on "open and unclaimed lands" of which nearly everyone consider National Forest Land as open Land. 40

Is this just another compromise by the Yakama Nation?

How does compromise honor a native culture?

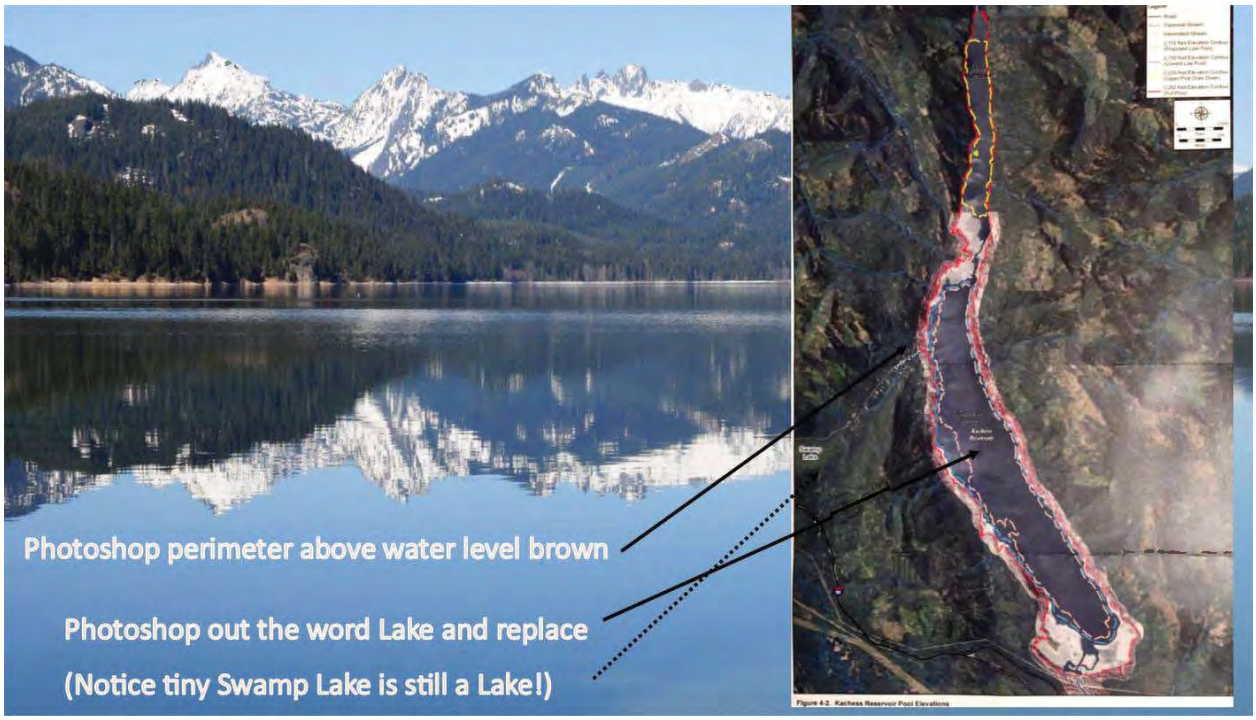
Will concerns other nations / tribes throughout the northwest be addressed and taken into consideration in the FEIS?

Will other nations / tribes in the Puget Sound Tribal Treaty and Northwest be informed of this project prior to the FEIS?

Will Northwest Treaty Tribes be informed of further environmental damage to Keechelus and Kachess ecosystems and public lands?

USE OF PHOTOSHOP AND PURPOSEFUL PHOTOGRAPHIC CONFUSION

The SDEIS includes multiple images manipulated by Photoshop or other editing techniques. The high-water mark (red line) on figure 4-2 is clearly highlighted by extended the brown shoreline of the lake at a lower level. The brown area has clearly been used to cover existing timber. This makes the look like something it is not. This brown area treatment was not applied to Upper Lake Kachess. The word Kachess Lake are still slightly visible with the words Kachess Reservoir have been clearly replaced. Tiny Swamp Lake has not been edited and is further proof of this manipulation. Upper Lake Kachess is a no wake zone and considered by many to be an environmentally sensitive area. Its tributaries lead right up to the protected Alpine Lakes Wilderness area. There are no pictures of upper Lake Kachess in the SDEIS. There is one small photo of Box Canyon Creek. There a no photos of Lake Kachess looking north into snowcapped mountains. This is deceiving to the public. 41



- Why is it necessary to deceive the public in such an important document?
- How will shorelines be properly depicted in the FEIS?
- Will documents such as aerial photos and be presented in their original format without the use of photoshop in the FEIS?
- Will there be a balance of photos depicting the entire lake system and not just the dam area wasteland created by the Bureau of Reclamation 1910-1913?
- What assurances will be made to the public that the problems of propaganda and manipulated images and information when the FEIS is released?

WHO OWNS THE WATER

Lakes in Washington State are owned by the public. Kachess Reservoir was constructed ontop of Kachess Natural Lake and some are below its natural outlet. All water drawn below 2220-2223' is from the original natural lake. Portions of natural lake are already being utilized in the reclamation process.

- Who has the right to this water below 2220'/2223'?
- Who currently has the right to water below the current 2192.75' gravity outlet works?
- How will rights to water below 2192.75' be obtained and allocated?
- Is there any current dispute over water taken from the levels 2220' through 2192.75'?
- How will future disputes over rights to water at various levels be addressed?
- What will be the court setting for such in lake water "ownership" disputes? *(in the opinion of BoR and Ecology separately please)*

42

OVER FARMING

The Roza Water District specifically has irresponsibly replaced crops with drought intolerant crops such as apples, grapes, and Hops (62% per Roza White Paper document). Most products are not food sustenance needs. Portraying this project as food needs is inaccurate. An appropriate term might be Economical Opportunity Agriculture. With natural resources at play the consideration of planting techniques and choices of a water district should be considered before just giving them more water. The problem of Drought Relief was self-imposed by the farmers themselves when they chose to plant these riskier crops that can produce higher profits. This plan seems to reward reckless plant choice. 43

- How will plant choices and drought tolerant crop mixes be accounted for in the FEIS?
- With so much at stake, should limits be placed on the amount of drought intolerant species planted in specific water districts?
-

ODD FEDERAL PURCHASES, TRANSFERS, AND CLOSURES

For sale signs still appear on trees at the south end of the lake where property has already been acquired by the federal government (Forest Service, sub department of USDA). Save Lake Kachess signs in this area were removed and the 'for sale' signs clearly remain. Kittitas County records show that property has already been purchased by the Forest Service (Federal Government). The State Park was transferred to the National Forest Service two years ago and failed to be open for Memorial Day weekend 2018. The park did not open the next weekend as well. As a large park one would think it would be at the top of the list for tree felling work. This gives the impression proponents consider this a done deal. 44

- Why is there no disclosure of Federal Ownership of the southeast end property in the SDEIS?
- Why was the State Park transferred to the Forest Service?
- Why was the state park transferred to the Forest Service in 2018?
- Why was the park closed until June 9, 2018?

EVAPORATIVE COOLING

Irrigation is watering of crops. It has come to attention Apple Orchards are using water to temperature control their crops to keep their fruit below 88 (+\-) degrees by over-spraying entire orchards to drop the air temperature: Evaporative Cooling. 45

- Will all the water from the KDRPP be used for irrigation (and in-stream flow)?
- Will using the natural resource water for purposes of climate control / evaporative cooling be outlawed in the EIS?
- What restrictions will be placed on participating water districts to insure sustainable practices and responsible planting?

SDEIS PROBLEMS

The number of mistakes and lack of information nears egregious and makes it look as if the public is expected to do the work that a properly written SDEIS should have included. The word Draft may be an overstatement.

- How was the SDEIS Funded?
- Who Funded the SDEIS?
- Who wrote the SDEIS?
- Please name the Consultants that contributed or wrote in full the SDEIS?
- Will a new DEIS and/or SDEIS be required?

46

CLOSING COMMENT:

I am opposed to allowing public resources to be given to private individuals in the name of economic (agriculture) development. Only the alternative NO ACTION is acceptable. Any alternatives other than NO Action are impractical solutions in today's modern world.

47

Under the NEPA and SEP processes I request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments.

48

I look forward to seeing responses to these comments.

Respectfully,

John Reeves

Citizen of Washington State and Lifelong Steward of Lake Kachess

PO Box 33

Fall City, WA 98024

(425) 395-6123

johnscottreeves@live.com

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

A Rodstrom <rodstrom.a@gmail.com> Wed, Jul 11, 2018 at 8:26 AM
To: kkbt@usbr.gov

Ms. McKinley,

I am writing today to express my opposition to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative.

I grew up on Lake Kachess. Our family enjoyed boating, camping and hiking through the nature it provides. These activities are something that I want my two children be able to experience too. Lake Kachess is important to me and my family in immeasurable ways. Even taking my family out of the equation, the potential negative impact on the environment should be a big enough deterrent. Unnecessarily pulling excessive amounts of water from the lake will negatively impact it in irreparable ways, especially if dropping it below its historic natural level. 1

Please take my and many others opposition into consideration. I reiterate, Alternative #1, No Action is the only acceptable alternative.

Thank you for your time,

Angelina Rodstrom

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Inna Roshchuk <sunnyface0214@icloud.com> Tue, Jul 10, 2018 at 10:53 PM
To: kkbt@usbr.gov

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative!!!!!!

1

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Lake

1 message

delaneybcryan@gmail.com <delaneybcryan@gmail.com> Wed, Jul 11, 2018 at 12:24 AM
To: Kkbt@usbr.gov

I am a concerned citizen opposed to draining Lake Kachess.

Section 3.9.3 of the KDRPP and KKC SEIS has a short section on bull trout, but virtually no information on Box Canyon Creek. I have reviewed recent photographic evidence where Box Canyon Creek disappears into the mud flats created by the existing draw down of Lake Kachess. This evidence can be made available for your review upon request. 1

The same evidence also shows efforts by Washington Department of Fish and Wildlife (WDFW) to create an artificial channel from Little Kachess Lake to Box Canyon Creek by the use of plastic and straw bales, which have been scattered and allowed to enter the water. This would appear to be a discharge of pollutants (straw and plastic) into Lake Kachess. Did the WDFW obtain a National Pollutant Discharge Elimination System (NPDES) permit or a Department of Ecology 401 Water Quality Certification, or a Shoreline Management Act Substantial Development Permit for this project? 2

Sincerely,

Delaney Ryan

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

C R <sonshinefarm@outlook.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Tue, Jul 10, 2018 at 9:25 PM

July 10, 2018

Submitted via email to kkbt@usbr .gov

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 Marsh Road

Yakima, WA 98901-2058

RE: Kachess and Keechelus SDEIS

Dear Ms. McKinley:

We are submitting comments on the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13, 2018.

1

Attached are prior comments by Alpine Lakes Protection Society, Sierra Club, Wise Use Movement and North Cascades Conservation Council and a letter by the Kittitas County Fire District #8 about the KDRPP and KKC initial Draft

Environmental Impact Statement (DEIS), dated January 9, 2015. These comments and concerns are hereby included in our 2018 comments.

All comments are submitted under both NEPA and SEPA.

Comments

1) Alternative 1 No Action We oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 2

2) The Yakima Plan programmatic FEIS failed to provide a range of alternatives. The only alternatives presented were the Yakima Basin Integrated Water Management Plan (YBIP) and No Action. How will this be rectified? 3

3) Failure to comply with NEPA requirement for consideration of alternatives. The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of "reasonable alternatives" means all state-of-the-art alternatives must be rigorously explored and properly evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party. 4

The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 Supplemental EIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess

could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS.

The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS goes to great contortions to try to make these appear to be several different alternatives, they are in fact one alternative…extracting water from a natural lake to benefit downstream special interests.

Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

We have previously noted this deficiency in the 2015 DEIS, and repeat it for the 2018 SDEIS. Both the DEIS and the SDEIS fail to comply with the NEPA requirement of considering all reasonable alternatives to achieve the stated purpose. In fact, this fatal flaw originates from the Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Programmatic Yakima Plan EIS not only failed to consider a range of alternatives, as required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Programmatic Yakima Plan EIS and do it correctly. We ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose.

We ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA

guidance) “slanted to the interest of special interest groups”. We ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given…including data, references, and review procedures…for excluding each alternative.

The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and we therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

4) Involve all affected native tribes The SDEIS notes the Yakama Nation has historical ties to
the Lake Kachess area, and documents historical and cultural heritage connections. The Snoqualmie Tribe also has roots in the Lake Kachess area, and artifacts from that federally recognized tribe have been found along the shoreline of Lake Kachess. How will the Snoqualmie Tribe’s historical and cultural standing be recognized in regard to this project, and they be brought into the discussion? How will the Snoqualmie Tribe be contacted, the potential impact of this project on their culture be explained, and will they be given an opportunity to provide comment prior to a Final EIS and/or ROD? Also, please describe what happens with Native American artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level. 5

5) Impact on Campers at Lake Kachess The impact on 23,000 annual visitors and 11,000
annual boaters at USFS Lake Kachess Campground will be devastating. Page 2-6 indicates the lake could be drawn down 80 feet “as early as June in severe drought years.” [NOTE: The campground typically opens on Memorial Day Weekend…June 1st.] In other words, the campground would not open, possibly for a number of years. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. As noted below with respect to ES-xii, we noted the inadequacy of a post hoc communication strategy to inform recreational users of the impact of KDRPP-FPP. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure 6

are needed to correct this failure. Please provide a written plan as to how the past campground users will be contacted and the timeline for this process.

6) Impossible to Evaluate The SDEIS presents four construction projects, the tunnel and three different pumping plants. The plans shown are very rudimentary and conceptual only. The locations are only general, indicating that little or no on-site investigation or detailed design has been carried out. In these circumstances it is impossible to evaluate what if any environmental impacts may result from the construction and subsequent operation of the proposed facilities. Please provide detailed designs for both the KDRPP and KKC in a subsequent SDEIS. 7

7) Water Deficit and Water Rights Mitigation When the pumping plant withdraws an additional 200,000 acre-feet from Lake Kachess, lowering the lake level 80 feet below the gravity spillway, how and when will the water be replaced? Lake Kachess normally receives 213,398 acre-feet of water from the catchment basin. This water is allocated to various water right holders. So, when additional water is withdrawn for drought relief there will be a deficit of as much as 413,398 acre-feet. Should the next year be an average year, there will only be 213,398 acre-feet of precipitation in the catchment basin to replace the deficit. It will be necessary to run the pumps to deliver most of the normal allocation from the lake below the level of the gravity spillway. After the drought of 2001 when Lake Kachess was drawn down to normal low pool at the level of the gravity spillway, it took eight years to again reach full pool elevation. And that was without drawing down another 80 feet by pumping out 200,000 acre-feet from the natural lake (inaccurately named inactive storage). Do Reclamation and Ecology have any plans on managing the water resources in the entire Yakima River Basin to replace this deficit? The SDEIS doesn't mention them. Will the junior water right holder be allocated less than 100% of their allocation in order to "repay" the 200,000 acre-feet they borrowed during the drought? The SDEIS doesn't say. A subsequent SDEIS is required to provide detailed answers to these questions. 8

8) Objectivity vs "Suggestion" Executive Summary, page ES-v The SDEIS asserts the presence of a "value analysis study that suggested the feasibility of a floating pumping plant". The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion", brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. Please provide full descriptions of the "suggestions,' including the methods, data, and conclusions implied by the inadequate and confusing term "suggestions." 9

9) Funding ambiguity requires another SDEIS Page ES-viii and Page 1.11 Page 1-11, Table 1-1, indicates the Role and Responsibility of 10

the Department of Ecology, as an agency of the State of Washington is to provide "potential funding of the selected alternatives." This apparently refers to the passage of Senate Bill 2SSB(5367) Sec. 11 (1)(a) in 2013 which indicates the State of Washington will pay up to one-half of the project costs from additional tax or revenue resources that would have to be identified at a future time. The SDEIS implies the Department of Ecology will fund the project from its annual budget. That is not correct; it is clear any funding of the project will require Washington State taxpayers to come up with not more than 50% of the plan from funds that have neither been identified or appropriated. The statement should read “Washington taxpayers may be required to fund not more than 50% of the plan from funds not currently available.” The preface to the SDEIS states the Department’ of Ecology's purpose is to protect and preserve the environment. To suggest it now has a “purpose” to spend unappropriated funds is hyperbole, at best, and deception at worst. We ask that the statement be corrected, to indicate that Washington State taxpayers are not currently obligated to pay for any part of the plan, but may in the future be obligated to fund up to 50% of the plan.

Also, the Dept of Ecology has for the past 10 years, continuing in the current biennial budget, been expending funds for design, review, promotion, communication, and development of the YBIP, primarily under contract with BoR. Since 2015, or before, substantial state funds have been expended on the KDRPP-FPP. We ask that these funds be included in any representation of the costs of KDRPP-FPP. Any representation of the cost of KDRPP-FPP, without these tax funds included, understates the true costs of this project to taxpayers and participating entities.

With regard to funding of the yet-to-be-selected alternative, Table 1-1 further confuses the matter by indicating it is a Role and Responsibility of the Bureau of Reclamation to provide potential funding of the selected alternative. There is no reference to a legislative or executive action that would make this statement true. If there is a commitment by the federal government, in the form of either authorized or appropriated funds, to make this statement true, it must be included in the SDEIS. We ask that any passed...not contemplated, pending, or speculative...federal, state, or regulation that commits federal funding through the Bureau of Reclamation be identified in a subsequent SDEIS.

To further confuse the matter, Page 1-11 states: "For full implementation of the selected alternative, Roza proposes to fund, design, construct, operate, and maintain a pumping plant at Kachess Reservoir." There is no legally binding legislative, contractual, public statement, or other documentation that would prove this statement to be true. We ask that whatever obligatory

documentation from Roza that exists be provided to allow citizens to assess the legitimacy of this statement, and that this be provided in a future SDEIS.

In summary, the funding of the "selected alternative" is a collection of speculative obligations that may or may not commit State of Washington citizens, Roza farmers, and/or U.S. citizens to all or a portion of the selected alternative. This confusion and obfuscation is unacceptable. We ask that the actual amounts of funding obligation by all entities be revealed for public review, and this be provided in a future SDEIS.

10) Change in Scope Page ES-viii The SDEIS states that the KDRPP-FPP is the “proposed action” and BoR/Dept. Ecology have not identified a “preferred alternative.” This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a “single action and cannot be separated.” The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner, would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are “acceptable” in 2018. This explanation should also serve to inform citizens as to why no “preferred alternative” is provided. This explanation is critical to citizens’ understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. BoR must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS.

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11) Impact on private wells Page ES-xi The negative impact of lowering the water level of
Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be “dewatered.” It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of “monitor and mitigate.” Well failures (“dewatering”) will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final EIS and/or ROD. We ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FEIS or ROD.

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Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry?

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria, will these effects be calculated.

12) Lack of communication to the affected public Page ES-xiii The DEIS states the project
will implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to understand the potential impact on individuals and families, and to participate meaningfully in the deliberative process. Given the SDEIS documentation of negative impact on recreational activity, and the acknowledgement that most affected individuals come from the Seattle area, it is clear the NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. A subsequent SDEIS must be published with accompanying public comment period and the public informed. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area.

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13) Misrepresentation of Lake Kachess Chapter 1, Section 1.2 The SDEIS indicates
Kachess Reservoir was constructed over a naturally occurring glacial lake… [joining]…Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. Thus, every drop of water to be pumped by the KDRPP will come from Big Kachess Lake. It is a

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misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Big Kachess Lake. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. We ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by BoR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. KDRPP has nothing to do with Kachess Reservoir. We ask that this confusion and misrepresentation stop, and accurate terminology be used that informs rather than confuses the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as Page 1-7.

14) Who will be responsible for costs, implementation and operation? Chapter 1, Table 1-1 on page 1-11 This SDEIS Table indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) "Fund, design, construct, operate…etc.…the selected alternative." This can only refer to the KDRPP-FPP. This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public's mind, largely due to conflicting public comments by Roza representatives and BoR representatives. It is imperative that this confusion be removed before any Final EIS and/or ROD be issued. We ask, therefore, that a complete and unambiguous statement of financial obligation of KDRPP-FPP be issued. The statement should make clear that 100% of the costs of implementing KDRPP-FPP, including all mitigation, litigation, and other assigned costs, will be borne by Roza Irrigation District or if not Roza, then by which entity/entities. 15

15) Misrepresentation about the Teanaway Community Forest Chapter 1, Section 1.8.2 on Page 1-18 The terms and conditions of the purchase of the Teanaway Property (TCF) is misrepresented with regard to its relationship to KDRPP-FPP and does so in a way that introduces extreme bias in favor of the project proponents. Page 1-18 indicates 214,000 acre-feet of additional water supply must be in place by 2025, and if not the Board of Natural Resources is authorized to transfer the TCF to the common school trust and manage it for the beneficiaries of the trust. 16

The proponents of KDRPP-FPP make public representations that this means, unless their project is implemented, the TCF will be sold, clear-cut for timber revenue, and the property lost forever for recreation purposes. Simply stated,

that is not true. The terms of the TCF do not require the property be reverted to the educational trust; that is only one alternative provided among many. (See RCW 90.38.130 Authorization to purchase land---management and disposal of land) Other options include continued management of the property for recreation, maintaining wildlife habitat, implementing conservation projects, and other beneficial purposes.

In fact, the only obligation is that a report be submitted indicating what progress has been achieved toward the milestone and requiring submission of a new plan if the milestone is not achieved. This can continue until the year 2045. It further states the milestone can be achieved through any of a combination of methods: conservation, improved management techniques, water marketing strategies, storage, and others. In fact, the report is required to state how much "net increase in available water" (the correct term, not "additional water supply" as stated in the SDEIS which implies all milestone water must be from storage). To date, the SDEIS claims 124,131 acre-feet of net increase in water due to conservation, and in the past has claimed as much as 300,000 acre-feet in future conservation savings. This would more than fulfill the 214,000 acre-feet milestone, were the planned conservation projects fully implemented.

Finally, if the very unlikely possibility of a reversion to trust fund management and clearcutting is selectively highlighted in the SDEIS, then the far more likely alternatives should be given equal space. After a decade of public recreation use, with untold thousands of new citizen-recreationists advocating for the Teanaway as a new resource, and an army of volunteer citizens and organizations upgrading the Teanaway, the public backlash against clearcutting would be overwhelming. With its misrepresentation of the Teanaway Purchase, the SDEIS has veered into a political speculation that is both inappropriate and inaccurate. However, given that SDEIS has now opened the door, in a subsequent SDEIS it must clarify, correct, and accurately inform the public of what is, and is not, required and implied by the Teanaway Purchase. We ask that this be done not only in a future SDEIS, but in all communication about the relationship between Teanaway and KDRPP-FPP, or any other element of YBIP. In addition, we asked that a notification of clarification be immediately issued stating that based on current and future water conservation savings, it is anticipated that the obligations under RCW 90.38.130 will be met with no additional water needed from the YBIP projects.

16) Accurate Cost Estimate Chapter 2, Sections 2.7 The statement of budget (Page 2-59) for KDRPP-FPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a

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variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for KDRPP-FPP. Because the estimate is not a measure of central tendency (i.e., neither mean, median, or mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; e.g.

Low Estimate	Projected Estimate	High Estimate
197,400,000	282,000,000	423,000,000

as opposed to showing a single estimate of 282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a "low" or "high" correction, each will be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates.

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show KDRPP-FPP the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the KDRPP-FPP budget should present a $423,000,000 base. In all cases, the mitigation costs must be included. For some reason the required Bull Trout Volitional Passage is stated in the text (Page 2-60) to cost $23,000,000 (preliminary estimate) but is not included. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for the KDRPP-FPP.

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. We request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final EIS and/or ROD is released.

17) Accurate view of exposed shoreline Chapter 2, Section 2.10 Regarding depiction of Lake Kachess after drawdown of 80 ft. The SDEIS

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(Page 2-66) indicates the 80 ft. drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An "imposed line" on the water conceals the true impact of 628 acres of exposure. We ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as "thatched", "outlined water" or other techniques, but as mud or silt consistent with aerial pictures. An additional note; residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation.

18) Fish Passage The Yakima Plan envisions seven components for improvements in the Yakima River basin. The SDEIS ignores two very relevant ones: Reservoir Fish Passage and Enhanced Water Conservation. The initial DEIS in 2015 recognized that anadromous fish (salmon) were present in natural glacial lakes Keechelus and Kachess prior to construction of irrigation control structures, dams and spillways, in the early twentieth century. Why aren't there any plans for enhanced fish passage at either Lake Kachess or Lake Keechelus included in either the DEIS or the SDEIS?
When Fish Passage is finally provided for Lake Kachess and the inactive storage water is pumped out, lowering the lake level behind the dam, how will the migrating salmon coming up the fish passage get down to the lower lake level?

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19) Bull Trout Chapter 2, Section 2.10 and elsewhere in the SDEIS The Bull Trout Volitional Passage project is described on Page 2-67, Table 2.9. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed, this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage.

In some years (e.g., conditions such as occurred between 2001 – 2008) the pump…and therefore the channel…will be in continuous operation. Eight years of steep slope conditions, requiring 8 years of Bull Trout dependence on the volitional passage, represents 2-3 spawning cycles. In other words, the entire population of Lake Kachess Bull Trout will be destroyed if the volitional passage is not effective. No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not

included in the budget costs, it cannot be assumed to be part of the project going forward. Another concern is the lack of water flowing into tributaries of Little Kachess Lake, which will be the water needed to charge the volitional passage. The SDEIS states the tributary water disappears at the end of the year…when the water will be needed in the passage. There is no description of the length of the passage (the length and southern outlet are never described in text, numeric, or schematic terms).

Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo and geo receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

For all of these reasons, the public demands more than a "conceptual design" of the volitional passage. This mitigation must be described in ways that make sure sufficient water will be available to charge the passage, the length, slope, and other characteristics of the passage will not deter Bull Trout passage, the returning redds will be able to find the entry point of the volitional passage, and the passageway to Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population.

We ask that the volitional passage design and operation be updated to address all of these concerns, and that the revised design be available to citizens for review and comment in a subsequent SDEIS, prior to any Final EIS or ROD.

Also, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS." What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the proposed alternative and all the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives and the proposed alternative meet these legal requirements?

20) <u>USFWS BiOp</u> It is known that the USFWS is conducting a Biological Opinion on the existing Yakima watershed with respect to the current operation of existing dams and irrigation districts. That BiOp is not expected

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to be published until sometime in the fall of 2018. We request that another SDEIS be produced after said BiOp is published as it could impact the entire watershed including the necessity for the projects named in the current SDEIS for Kachess.

21) Increased forest vulnerability and Fire Hazard. The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility for fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. We demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. We ask this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final EIS or ROD. 21

22) Impact to private property. The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected, but a better description would be "substantial numbers of private residences… etc." Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This easily numbers 300 homesites, far more than would be inferred from the term "several." The systematic bias against representing impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. We ask for an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline. 22

23) Impact to private property . BoR commissioned a study by Dean Potter LLC, a real estate appraisal firm, to determine the negative impact on private properties resulting from the pumping drawdown. This study showed a negative impact of 5-10%, but even this was an under-estimate. The Potter study imposed a primary screening criterion that the only value a lake had, was the view it provided to a homesite. This eliminated 85% of the homesites in the immediate area of the lake, even though the residents had chosen their homes because of access to the lake. The Potter LLC study claimed that even though the lake could become inaccessible for years at a time, people who lived there to enjoy boating, fishing, hiking, picnicking, and other water-related activities, wouldn't notice the lake had disappeared. The only ones who would be adversely affected would be those people with a view…but not just any view, an "unfiltered view" (no description of what this might mean). Even this was perverted, to say only people with unfiltered views within 0.1 mile of the lake would be affected. The study actually claimed that a view of a full lake within 0.1 miles, and a view of the drawn down lake more than 0.1 miles away, would be equivalent. There is no precedent for such exclusionary criteria, and there is no justification using standard methods of appraisal. The entire exercise is a transparent effort to minimize any negative impact. Even so, a 5-10% negative on impacted properties was reported.

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Even though the BoR commissioned this study, and even though the study went to extraordinary lengths to minimize impact, the BoR declared in the SDEIS there was "no way to reliably assign or assess impacts…" The only analysis reported was that conducted by Dean Potter LLC, it used flawed methods that were biased to under-reporting of negative impacts on private property values, but it still reported significant (5-10%) negative impacts. Yet strangely, even these were rejected, without providing any data to support the rejection.

Lake Kachess homeowners have repeatedly requested to be involved in designing a valid and reliable study of the negative impacts on property values of proposed alternatives. BoR has ignored and rejected all requests, and instead contracted for a study that (although flawed by its obvious intent to minimize findings of damage) still showed significant damage to private property caused by the 80 ft. drawdown. Despite overwhelming evidence to the contrary…and their own analysis…BoR now claims the study they just completed, in fact can't be done!

The implications of negative impact on private property values go beyond the affected citizens. A reduction in property values affects the tax base of the county and fire departments, and will reduce available resources to provide essential services. This is acknowledged in SDEIS Page 4-326 as follows:

"while effects on property values would most directly affect property owners, the wider community would also experience effects." In other words, private property owners, fire departments, city and county governments, and others would also be negatively impacted.

It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. We demand that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final EIS or ROD is issued.

24) Impact on Senior Water Rights How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? We request further studies about this and communication to those senior water rights holders of possible impacts to them by the SDEIS active alternatives. Then another public comment period be opened for their comments. 23

25) Drought Definition Who will define the 70% of prorated water? What unbiased, independent, non-irrigation-district expert or organization will make that determination? Page 2-6 of the SDEIS says, "Project proponents would use the pumping plant during drought years and could possibly use it in following years as the reservoir refills to a level above the existing gravity outlet." Does this mean the definition of when the pumps could be used has changed from the prior definition of drought (less than 70% of prorated water expected to be available)? Why would the pump be used in following years "as the reservoir refills to a level above the existing gravity outlet?" Would that not prevent or delay refill? 24

26) New Water Rights Table 1-2 on p 1-20 notes that ecology will "issue water rights as necessary." We've been told over and over that no new rights will be generated from this plan. How will new water rights be issued? To whom? 25

27) Water Conservation and Market Reallocation Page 1-4 notes that the Yakima Basin Integrated Plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market 26

reallocation). Define the number of acre-feet saved by water conservation and market reallocation in the whole Yakima watershed.

28) Noise Only the preferred alternative has pumps at lake level, exposed to the environment (all others have pumps at the bottom of a shaft). P2-75 notes the maximum permissible environmental noise is 55 dBA. What is the expected noise level in dBA at 100 feet from the pumps? At 1000 feet? Will the pumps be running 24/7 once they start running? 27

29) KKC tunnel material 115,000 cubic yards of KKC tunnel excavated material comes out on Kachess Lake Road with no mention of where it will be trucked to or the impact of over 5000 truckloads of material being hauled off. Where will the 115,000 cubic yards of KKC tunnel material be deposited? What safety measures and scheduling of hauling equipment will be made during the tunnel construction to insure the safe and customary use of Lake Kachess County Road by campground users and local property owners and guests? 28

30) Turbidity . P2-68 notes all action alternatives will result in localized short-term exceedance of turbidity standard. Define the degree of turbidity exceedance and the effect it will have on native fish populations 29

31) Permanent Habitat Loss P2-71 notes permanent habitat loss with the preferred alternative. Define the effect of permanent habitat loss on the spotted owl, bull trout, and other endangered / listed species. 30

32) Decreased Recreation Desirability . P2-73 notes decreased recreation desirability and conflict with “established SIL/VOQ” Quantify the economic impact of the decreased recreation desirability. Under what authority are established SIL/VOQ permitted to be violated? 31

33) Purchase of private property . P2-76 notes that the parcels north of the existing beach road on the East side are indeed private and may need to be purchased from their current owners for the boat ramp and parking lot. There is no money in the SDEIS for property purchase. How many lots and at what expected price will be purchased? These additional costs should be included in the SDEIS Alternatives. A revised SDEIS is warranted. 32

34) Water Impairment P3-29, 3-45: both Keechelus and Kachess are listed as “category 5” water impairment because of PCB contamination. In the 2015 DEIS, only Keechelus was noted to have PCB contamination. Please release the report which also indicates that Kachess has a similar contamination. Would dredging and construction activities not stir up sediment containing PCBs? What increase of PCB levels is expected on the basis of the proposed alternative construction activities? 33

35) Water Filtering How will the water from Keechelus be moved to Kachess? What kind of filtration system will be installed to prevent any I-90 pollutants in Lake Keechelus from being transferred to Lake Kachess? If any hydraulic equipment is used, how will any PAH be kept from entering Lake Kachess? 34

36) Lake Drainage during construction The description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff). Describe the mechanics of draining the lake to allow construction. What happens to the excess water, and how is the "flip-flop" flow pattern maintained if the lake is drained early in the season? What is the effect on the Easton reach of the Yakima river spawning? 35

Because both the NEPA and SEPA process must be followed, we request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments. 36

Please send us a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

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Attachments

cc: elected officials

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[EXTERNAL] Lake Kachess

1 message

Kaitlyn Seguin <knseguin@gmail.com> Wed, Jul 11, 2018 at 3:50 PM
To: Kkbt@usbr.gov

The amount of environmental problems that WILL. Not may... will come out of draining this lake is extensive. Not to mention the minor effects it has on every homeowner in this area economically. Having a lake access home myself that is a major role in having this place. Now I understand this is a small lake but the whole point people are fighting draining the lake even more is because there is no natural counterbalance for the lakes water levels. This lake is enjoyed by many people every summer by people and animals alike. Without the lake there will be no habitat left for the fish that inhabit it currently. Now of course there's that tube system that has been proposed in the past but to put it bluntly is the worst option there is. These fish have been living here for years. There are other methods that are easily applicable for the farmers that need this water. For example, watering at night instead of in the heat of the day or using drip irrigation instead of those other systems that are horribly inefficient. Or here's the real kicker.... not try growing crops where they can't natually be sustained like in a desert.... I know, crazy right? Not growing plants that need excessive amounts of water in the middle of a desert.... who would've thought? The point is there are many other options besides destroying the beautiful ecosystem that has thrived here for centuries. Protect these beautiful pieces of nature that we can live in harmony with instead of leaving it a wasteland as soon as you pump the lake the proposed additional amount. Maybe instead of looking at the profit of what the pumping system will get you this year get outside and come down and look at what you will destroy if this goes through which I pray will never happen. 1

Regards,
Kaitlyn Seguin

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake

1 message

Kaitlyn Seguin <knseguin@gmail.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Wed, Jul 11, 2018 at 3:33 PM

RE: Kachess and Keechelus DEIS

Dear Ms. McKinley:

We are submitting both comments specific to the KachessDrought Relief Pumping Plant (KDRPP) and KeechelusReservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018 and also those comments by The Alpine Lakes Protection Society, The Sierra Club, The Wise Use Movement and The North Cascades Conservation Council which were made about the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) Draft Environmental Impact Statement (DEIS), dated January 9, 2015. All comments are submitted under both NEPA and SEPA. 1

Comments

1. Alternative 1 No Action We oppose all active alternatives of the KDRPP and KKC projects. Only 2
Alternative 1, “No Action” is acceptable.

2. The Yakima Plan programmatic FEIS failed to provide a range of alternatives —just the Yakima Basin 3
Integrated Water Management Plan (YBIP) and No Action. How will this be rectified?

3. Failure to comply with NEP A requirement for consideration of alternatives. The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of “reasonable alternatives” means all state-of-the-art alternatives must be rigorously explored and properly evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with 4

regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party.

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The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 Supplemental EIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS.

The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS goes to great contortions to try to make these appear to be several different alternatives, they are in fact one alternative…extracting water from a natural lake to benefit downstream special interests.

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Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

We have previously noted this deficiency in the 2015 DEIS, and repeat it for the 2018 SDEIS. Both the DEIS and the SDEIS fail to comply with the NEPA requirement of considering all reasonable alternatives to achieve the stated purpose. In fact, this fatal flaw originates from the Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Programmatic Yakima Plan EIS not only failed to consider a range of alternatives, as

required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Programmatic Yakima Plan EIS and do it correctly. We ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose.

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We ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of special interest groups". We ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given…including data, references, and review procedures…for excluding each alternative.

The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and we therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

4. Involve all affected native tribes The SDEIS notes the Yakama Nation has historical ties to the Lake

Kachess area, and documents historical and cultural heritage connections. The Snoqualmie Tribe also has roots in the Lake Kachess area, and artifacts from that federally recognized tribe have been found along the shoreline of Lake Kachess. How will the Snoqualmie Tribe's historical and cultural standing be recognized in regard to this project, and they be brought into the discussion? How will the Snoqualmie Tribe be contacted, the potential impact of this project on their culture be explained, and will they be given an opportunity to provide comment prior to a Final DEIS and/or ROD? Also please describe what happens with Native American artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level.

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5. Impact on Campers at Lake Kachess The impact on 23,000 annual visitors and 11,000 annual boaters at

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USFS Lake Kachess Campground will be devastating. Page 2-6 indicates the lake could be drawn down 80 feet "as early as June in severe drought years." [NOTE: The campground typically opens on Memorial Day Weekend…June 1st.] In other words, the campground would not open, possibly for a number of years. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. As noted below with respect to ES-xii, we noted the inadequacy of a post hoc communication strategy to inform recreational users of the impact of KDRPP-FPP. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users will be contacted and the timeline for this process.

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6. Objectivity vs " Suggestion" Executive Summary ,, page ES-v The SDEIS asserts the presence of a

"value analysis study that suggested the feasibility of a floating pumping plant". The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion", brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. Please provide full descriptions of the "suggestions,' including the methods, data, and conclusions implied by the inadequate and confusing term "suggestions."

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7. Funding ambiguity requires another SDEIS Page ES-viii The SDEIS states the Bureau of Reclamation will "fund…some or all, or authorize Roza to fund" the KDRPP-FPP. This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FP. Please provide the legal, legislative, and/or other basis for stating Bureau of Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how "all or some" will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (BoR, Dept. Ecol., Roza, etc.) will be responsible for what action (fund, design, construct, operate, etc.). These are not "details" to be clarified at a later

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time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period.

8. Change in Scope Page ES-viii The SDEIS states that the KDRPP-FPP is the "proposed action" and

BoR/Dept. Ecology have not identified a "preferred alternative." This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner, would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are "acceptable" in 2018. This explanation should also serve to inform citizens as to why no "preferred alternative" is provided. This explanation is critical to citizens' understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. BoR must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS.

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9. Impact on private wells Page ES-xi The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of "monitor and mitigate." Well failures ("dewatering") will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. We ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD.

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Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Rozairrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other

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justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry? 13

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria, will these effects be calculated. 14

10. Lack of communication to the affected public Page ES-xiii The DEIS states the project will

implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to understand the potentialimpact on individuals and families, and to participate meaningfully in the deliberative process. Given the SDEIS documentation of negative impact on recreational activity, and the acknowledgement most affected individuals come from the Seattle area, it is clear NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area. 15

11. Misrepresentation of Lake Kachess Chapter 1, Section 1.2 The SDEIS indicates Kachess Reservoir

was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. Thus, every drop of water to be pumped by the KDRPP will come from Big Kachess Lake. It is a misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Big Kachess Lake. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. We ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should 16

be either “Lake Kachess” or “Big Kachess Lake”. There is a KachessReservoir, the approximately 65 ft. of water currently managed by BoR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. KDRPP has nothing to do with Kachess Reservoir. We ask that this confusion and misrepresentation stop, and accurate terminology be used that informs rather than confuses the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as Page 1-7. 16

12. Who will be responsible for costs, implementation and operation? Chapter 1, Table 1-11 on page 1-11 This SDEIS Table indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) “Fund, design, construct, operate… etc.…the selected alternative.” This can only refer to the KDRPP-FPP. This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public’s mind, largely due to conflicting public comments by Roza representatives and BoR representatives. It is imperative that this confusion be removed before any Final DEIS and/or ROD be issued. We ask, therefore, that a complete and unambiguous statement of financial obligation of KDRPP-FPP be issued. The statement should make clear that 100% of the costs of implementing KDRPP-FPP, including all mitigation, litigation, and other assigned costs, will be borne by Roza Irrigation District or if not Roza, then by which entity/entities. 17

13. Teanaway Community Forest Chapter 1, Section 1.8.2 on Page 1-18 The terms and conditions of the purchase of the Teanaway Property (TCF) is misrepresented with regard to its relationship to KDRPP-FPP and does so in a way that introduces extreme bias in favor of the project proponents. Page 1-18 indicates 214,000 acre-feet of additional water supply must be in place by 2025, and if not the Board of Natural Resources is authorized to transfer the TCF to the common school trust and manage it for the beneficiaries of the trust.

The proponents of KDRPP-FPP make public representations that this means, unless their project is implemented, the TCF will be sold, clear-cut for timber revenue, and the property lost forever for recreation purposes. Simply stated, that is not true. The terms of the TCF do not require the property be reverted to the educational trust; that is only one alternative provided among many. (See RCW 90.38.130 Authorization to purchase land---management and disposal of land) Otheroptions include continued management of the property for recreation, maintaining wildlife habitat, implementing conservation projects, and other beneficial purposes. 18

In fact, the only obligation is that a report be submitted indicating what progress has been achieved toward the milestone and requiring submission of a new plan if the milestone is not

achieved. This can continue until the year 2045. It further states the milestone can be achieved through any of a combination of methods: conservation, improved management techniques, water marketing strategies, storage, and others. In fact, the report is required to state how much "net increase in available water" (the correct term, not "additional water supply" as stated in the SDEIS which implies all milestone water must be from storage). To date, the SDEIS claims 124,131 acre-feet of net increase in water due to conservation, and in the past has claimed as much as 300,000 acre-feet in future conservation savings. This would more than fulfill the 214,000 acre-feet milestone, were the planned conservation projects fully implemented.

Finally, if the very unlikely possibility of a reversion to trust fund management and clearcutting is selectively highlighted in the SDEIS, then the far more likely alternatives should be given equal space. After a decade of public recreation use, with untold thousands of new citizen-recreationists advocating for the Teanaway as a new resource, and an army of volunteer citizens and organizations upgrading the Teanaway, the public backlash against clearcutting would be overwhelming. With its misrepresentation of the TeanawayPurchase, the SDEIS has veered into a political speculation that is both inappropriate and inaccurate. However, given that SDEIS has now opened the door, in a subsequent SDEIS it must clarify, correct, and accurately inform the public of what is, and is not, required and implied by the TeanawayPurchase. We ask that this be done not only in a future SDEIS, but in all communication about the relationship between Teanaway and KDRPP-FPP, or any other element of YBIP. In addition, we asked that a notification of clarification be immediately issued stating that based on current and future water conservation savings, it is anticipated that the obligations under RCW 90.38.130 will be met with no additional water needed from the YBIP projects. 18

14. Accurate Cost Estimate Chapter 2, Sections 2.7 The statement of budget (Page 2-59) for KDRPP-FPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for KDRPP-FPP. Because the estimate is not a measure of central tendency (i.e., neither mean, median, or mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; e.g. 19

Low Estimate	Projected Estimate	HighEstimate
197,400,000	282,000,000	423,000,000

as opposed to showing a single estimate of 282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a "low" or "high" correction, each will

be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates.

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show KDRPP-FPP the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the KDRPP-FPP budget should present a $423,000,000 base. In all cases, the mitigation costs must be included. For some reason the required Bull Trout Volitional Passage is stated in the text (Page 2-60) to cost $23,000,000 (preliminary estimate) but is not included. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for the KDRPP-FPP. 19

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. We request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

15. Accurate view of exposed shoreline Chapter 2, Section 2.10 Regarding depiction of Lake Kachess after drawdown of 80 ft. The SDEIS (Page 2-66) indicates the 80 ft. drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An “imposed line” on the water conceals the true impact of 628 acres of exposure. We ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as “thatched”, “outlined water” or other techniques, but as mud or silt consistent with aerial pictures. An additional note; residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation. 20

Sincerely,
Kaitlyn Seguin

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Response to K Projects SDEIS

1 message

Jeanne Sheldon <JeanneS@outlook.com> Wed, Jul 11, 2018 at 12:30 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: Jeanne Sheldon <jeannes@outlook.com>

Ms. McKinley:

1 Attached please find my comments on the SDEIS for the Kachess Drought Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance.

Thank you,

Jeanne Sheldon

425.869-1945

18810 NE 150th Ct

Woodinville WA 98072

Response to K Projects SDEIS.pdf
135K

Jeanne Sheldon

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Phone: (425) 869-1945

Ms, Candace McKinley
Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades
Area Office
1917 Marsh Road
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(509) 575-5848

Subject: Response to Supplemental Draft Environmental Impact Statement, Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance

Dear Ms. McKinley

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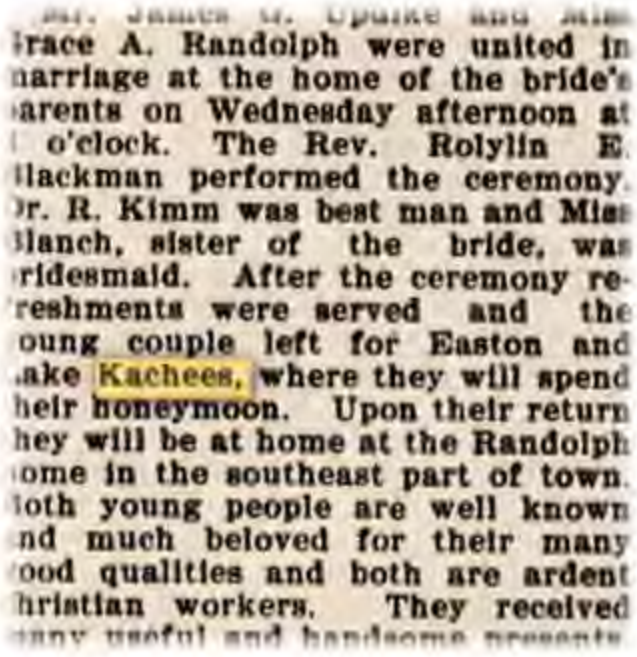

race A. Randolph were united in
narriage at the home of the bride's
arents on Wednesday afternoon at
o'clock. The Rev. Rolylin E.
lackman performed the ceremony.
r. R. Kimm was best man and Miss
lanch, sister of the bride, was
ridesmaid. After the ceremony re-
reshments were served and the
oung couple left for Easton and
ake Kachees, where they will spend
heir honeymoon. Upon their return
hey will be at home at the Randolph
ome in the southeast part of town.
oth young people are well known
nd much beloved for their many
ood qualities and both are ardent
hristian workers. They received

Figure 1: 1905 Yakima Herald Wedding Announcement

Introduction: Thank you for the opportunity to provide comment on the 2018 K Projects DEIS. My remarks below do not pretend to be comprehensive, but it covers several potential environmental impacts I consider serious. Thank you also for your commitment to ensure that the spirit of the federal and state laws designed to

2 cont protect people, wildlife, property and the environment from the impact of deleterious side effects of ill-conceived projects is met with full fidelity.

3 One thing that I've been able to learn as I've discussed the proposed plan for the lake with many people, both local and distant is that responses are both visceral and horrified. The devastation that would cause to the ancient natural lake is clear. This is not about a few hundred landowners who are "concerned about their view" as some have characterized it, it is about people feeling appalled by the lack of will to sustain a beautiful natural lake for the enjoyment of our children and their children. The second thing that I've learned is that just about no one who has a recreational interest in the lake or the outdoor recreation economy it provides for, knows about the K Projects. People from Seattle, Bellevue, Redmond, Issaquah, Snoqualmie, Easton and Cle Elum who are emotionally and often economically attached to the lake (and have been for generations), have never heard about the plan. The reaction is often disbelief: it is too outrageous to be possible.

4 I don't think that the people that have been working through the plan for decades are bad or evil people. I think they have just been so immersed in viewing the lake as nothing more than a vast pool of inactive storage that needs to be converted that they have forgotten to really look hard at the natural beauty and rich, varied habitat of the lake. They've stopped listening to the concerns as more than just a nuisance and an obstacle to fight their way through. Others, from the Yakama Nation, to a variety of small environmental groups, probably winced at some point, then decided that the lake was a sacrifice that they had to do to get some of the other important and valuable wins in the plans. Everyone needs to stop and realize that if this is actual implemented, there is no going back or pretending that any sustainable good will come out of it. The only supportable option in the SDEIS is Alternative 1 – No Action. The profound risk of irreversible damage to the human and natural community that surround the lake, the stunning lack of genuine mitigation in the SDEIS – including no real cost analysis of mitigations – and the lack of consideration or serious investment in the options presented by the Water Research Council in their scathing analysis of the YBIP make the other options unacceptable.

5 **The official name is "Kachess Lake":** That name was decided upon by the Board on Geographic Names in 1893 and reaffirmed in 1964. It is inappropriate for a government agency to use a different name than the official USGS appellation. It suggests an ulterior motive, which is to obfuscate the plan to remove natural lake water to be wastefully transported in open rivers and often unlined canals to a different part of the state over 100 miles away. A reservoir comprises water impounded by a dam. The entire Kachess reservoir which sits on top of Kachess Lake impounds more natural lake water as well as the pool raise from the dam. Kachess Reservoir is already made available for irrigation in its entirety!

6 **Destruction of one of the most popular campgrounds in the state:** On the occasion of the 1984 opening of the new Lake Kachess boat ramp, Roger Skistad of the Cle Elum Forest Ranger District told the Ellensburg Daily Record that the boat ramp was expected to make the park even more popular (it was already one of the most heavily used Forest Service campsites in the Northwest) because the ramp could be used even when the lake is at its lowest level and that, "If the lake can be lowered even more, the Forest Service hopes to install concrete planks to extend the launching facility even farther into the water." Please advise, if this mitigation is still under consideration, what are the associated costs and risks. Is it even remotely feasible? And does it save any recreational use if only Little Kachess is available from the campground? Construction of an east shore boat ramp is poorly defined. There will need to be substantial parking on location, too – the map look inadequate (11,000 boaters a year?). Will there need to be more imminent domain land acquisition? For a boat ramp and required

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7 cont parking? There is no discussion of the construction impact of that boat launch but grading to a ramp of less than 15 degrees, wide enough to keep driving a vehicle and trailer in reverse safe for the entire length of the drawdown (plus 4 or 5 feet) on the steepest side of the lake is non-trivial. How will that be maintained and stabilized? What about mitigation of the private boat ramps and the docks left floating on long stretches of mud flats?

8 In the same newspaper article, Skistad also described the selective cutting of hollowed out trees to preserve "the character of the area". Given the likelihood of tree loss from dewatering and disease and the Forest Service's commitment at the time to keeping the character of the area, has the Forest Service simply abandon any hope of that goal? If they have, where do they expect that high volume of campers to go instead? What preparations are being made for those properties? What is the anticipated economic effect of that dislocation? Mitigation? Why have the plans never been communicated to the millions of people who have camped and boated on Lake Kachess. What plans are there to correct that oversight while there is still opportunity for feedback? Why is notification of the campers planned for far too late to participate in the process?

9 Earlier engineering study found the floating pump option to be impractical: The floating pump option was "deemed to be an impractical alternative for Lake Kachess" in an earlier engineering study prepared by HDR Engineering, Inc. in March 2011 (USBR, Yakima River Basin Study: Lake Kachess Inactive Storage Technical Memorandum). What caused the attempt to fail on Cle Elum Lake and what suddenly made it a preferred choice? What is the fallback when it fails in operation? Because construction will be draining of the lake to prepare for the system, environment damage will occur regardless of whether it is available for Roza farmers. Who pays for correcting that and where is the plan for that?

10 **Volitional bull trout channel:** While it is of entertaining to talk about fish volition, a subject not covered in my biology classes, why is this mitigation planned for the years after completing the works. Wouldn't you want to have it when the drawdown begins? And if there is any expectation at all this would do any good, why is the bull trout enhancement programs elsewhere in Yakima Valley even included in this report? It is not acceptable mitigation to extirpate one community of an endangered species by augmented with a genetically distinct other community of the same species in another location. This is no more than expedient sleight of hand.

11 **Socio-economic impacts discussion does not include outdoor recreation economy:** Anecdotally, I've learned that the tourism/outdoor recreation that comes into Easton and Cle Elum is an import factor in the local economy. The impact of similar tradeoffs in areas such as Bear's Ear show that it has been consistently undervalued and misunderstood by the government agencies involved. What are the impacts of substantial losses in recreation opportunities in the county?

12 **Recreational use of the lake and surrounds would not only be limited by less boating opportunity.** Tree loss would make the campsites less attractive and less shaded. It is not just "some seasons" that the camping opportunities would be diminished. Hiking, which is very popular on both sides of the lake could become less safe, particularly on the east side of the lake, where, in many places, the very steep sides of the exposed lake bed would increase risk of falls, or rock instability. Are trails going to be examined? Reworked? What about roads and even driveways?

13 **Property value impacts are not unknowable:** There have been at least two sets of opinions provided (though one is flawed by artificial limits set of what could be considered). This is absolutely knowable and a study with agreed-upon, commonly accepted methods must be a part of any such study. The text suggests that the issues are

13 cont

entirely around view and ability to reach the water for recreation (again, undervalued in the discussion), but do not include the impact to property values when wells are dewatered, surrounding trees and wildlife are lost and fire fighting capabilities have been severely compromised. Since this involves a fundamental constitutional issue around taking property from a private citizen or concern to benefit another private citizen or concern, it deserves a far more studied answer.

14

Impacts of turbidity caused by pumping: the surface quality is discussed and that government standards would be exceeded on a fairly regular basis. What are all the effects of that turbidity? Will the dam outlet and channel need more frequent clearing because the pumping needs to be occurring right until the point when the water reaches the outlet? Would that increase dependence on pumping?

15

Mitigations common to all alternatives: Most mitigations as described are wholly unacceptable! "Using best practices" as mitigation?? Come on, as if not using them was really an option? "Monitor and mitigate" – I don't even know what that means since you have attached no agencies, roles, schedules or costs to it. These do not meet SEPA or NEPA standards. And are there not things you would cause that are unmitigable? The lake geology is exceptionally varied because of earthquake folding, volcanic activities and the impact of glaciers. Are you really going to catch a rockslide or avalanche before it happens, including ones that could affect safety both on the lake and downstream from it? Those are entirely too hand-wavy to have any meaning.

16

The most serious flaw in all but the no action alternative: In multiple places, the document refers to "the need for action" because of changing climate conditions. The entire program has been sold on the premise that the available water will not meet the needs of the existing water rights holders in the Yakima Basin under future climate conditions. That means that all the analyses of drawdown years and forecasting of the frequency that the pump would be needed are fundamentally flawed because they are based on select ranges of historical data. Surely you have realized already that the proposed actions could easily yield far less benefit and with losses far greater than forecasted within your documents. When you say that action is necessary because of climate change, but do not account for climate change in your modeling, that is called, "Talking out of both sides of your mouth." You must fix that. Such circumstances could well create risks for even the most senior water rights holders and financial risk for Roza which have, as proratable water right holders undeservedly taken water they were not entitled to. Action that leads to disaster, both environmental and financial is far worse than no action. This is a very costly mistake. Farmers may recover, but the lake – yes lake, not reservoir - never will. Your reservoir is working fine and already yielding 239,000 acre-feet of water in the worst years. Do the fish passage and restoration work – that is a debt you've long owed – but leave the ancient and beautiful lake alone.

17

Learning from history: When engineers planned for the dam, they calculated the dam height and the lowest level below the dam they could build it and dredge out a channel to the outlet. They had two criteria: the engineering complexity and the available water run-off from the 63 square mile watershed, which averaged 209,000 acre-feet per year in the preceding few years. Accordingly, they constructed it precisely to yield 210,000 acre-feet of active storage. In 1936, that yield was increased to 236,000 acre-feet by raising the spillway for flood control, which allowed the capture of more water in very wet years. That science has not changed in the past 110 years, but the climate is changing, so somehow someone thinks that it is a very good idea to take 439,000 acre-feet because there is less water available.

Those ancestors also developed an approach that allowed farmers to plan appropriately by knowing that their water supply was proratable. That system needs updating to improve barrier-free transfers and exchanges and,

absolutely, the water containment and irrigation practices continue to be updated, but please engage the engineering and science know-how that was well understood and applied in 1909 and stop encouraging people to imagining there is magic water available. It won't be there when the dependence is most established, and you will be in the center of that controversy.

Respectfully yours,

Jeanne Sheldon

7/11/2018

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Jessica Siegel <jls1212@hotmail.com>
To: "Kkbt@usbr.gov" <Kkbt@usbr.gov>

Tue, Jul 10, 2018 at 9:39 PM

Dear Ms. McKinely,

1 My family's place away from home is Lake Kachess and I have been going to this beautiful lake for over 30 years. It breaks my heart to think that it could possibly be drained beyond recognition.

2 Section 3.9.3 of the KDRPP and KKC SEIS has a short section on bull trout, but virtually no information on Box Canyon Creek. Attached is a photo taken on October 18, 2018, where Box Canyon Creek disappears into the mud flats created by the existing draw down of Lake Kachess.

3 It also shows efforts by Washington Department of Fish and Wildlife (WDFW) to create an artificial channel from Little Kachess Lake to Box Canyon Creek by the use of plastic and straw bales, which have been scattered and allowed to enter the water.

This would appear to be a discharge of pollutants (straw and plastic) into Lake Kachess. Did the WDFW obtain a National Pollutant Discharge Elimination System (NPDES) permit or a Department of Ecology 401 Water Quality Certification, or a Shoreline Management Act Substantial Development Permit for this project?

Thanks in advance for your attention to this.

Jessica Siegel
1628 9th Ave W.
Seattle, WA 98119

P1090293.jpg
958K

3 cont

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] KDRPP

1 message

Stephen Simmons <simmons@myself.com> Tue, Jul 10, 2018 at 9:38 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

1 At this time I, as a concerned taxpayer, cannot support the Kachess Drought Relief Pumping Plant. As outlined in my attached comments the data does not support spending $500 million in taxpayer dollars for such an insignificant benefit.

Please consider these comments on any future decisions for this project.

Regards,

Stephen

KDRPP public comments - Stephen Simmons.pdf
350K

Stephen Simmons
23402 NE 29th PL
Sammamish WA 98074

July 11, 2018

Bureau of Reclamation, Columbia-Cascades Area Office
Attention: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058

Submitted by email to kkbt@usbr.gov

Dear Ms. McKinley,

2 The Kachess Drought Relief Pumping Plant (KDRPP) is not a public benefit and must not be enacted, either by the Bureau of Reclamation and Department of Ecology, or by the Proratable Entities interested in implementing it. It is inconsistent with adopted plans, does not comply with NEPA requirements, the analysis is based on missing data and questionable assumptions, proposed mitigation is lacking, groundwater impacts could be detrimental to property owners and public recreationists, there are insignificant agricultural impacts given the negative recreation and environmental impacts, lake habitat for fish is negatively impacted, and it could potentially increase the fire susceptibility of the area while decreasing the ability of emergency responders to fight fires. It also radically changes the use of the Yakima Project, which has been managed for over 100 years as a system for all users and instead essentially earmarks one reservoir for one irrigation district.

Inconsistency with Mission and Adopted Plans

Comprehensive planning within the State of Washington requires that all plans and projects be consistent with adopted policies; KDRPP does not appear to meet that test in several regards, including contrasting with the mission of the proposing agencies.

3

The opening page of the DSEIS cites the missions of the US Department of the Interior, the Bureau of Reclamation, and the state Department of Ecology. While all agencies have mission facets that can compete with one another, making mission-project consistency a balancing act, this project does <u>not</u> fit with the adopted missions more than it does.

4

- Though the US Department of the Interior is directed to "supply the energy to power our future," this part of the mission is tertiary to protecting natural resources, which KDRPP does not do. Instead, it denigrates a natural environment in order to provide economic benefit to a small group.

- Reclamation is directed to "manage, develop and protect water" and clearly KDRPP fits within that purview. However, Reclamation must also do this work "in an environmentally and economically sound manner," which is not descriptive of the proposed project.

- This project is most inconsistent with the state Department of Ecology's mission to "protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations." Undertaking KDRPP has significant negative environmental and recreational impacts which are not consistent with Ecology's mission.

5

The DSEIS states in Section 4.3.3 that "Alternative 1 No Action does not meet the purposes of the Proposed Action because it does not address water supply for proratable irrigators or instream flow conditions in the upper Yakima River basin" (pg 4-21). Later, in Section 4.24 (pg 4-349) the DSEIS suggests that the proposed project meets several of the Integrated Plan's goals when, in fact, it does not. The noted goals include:

6

- Provide opportunities for comprehensive watershed protection, ecological restoration and enhancement, addressing instream flows, aquatic habitat, and fish passage

7

This plan does not provide "comprehensive watershed protection" and instead increases the vulnerability of an entire watershed to wildfire risks by lowering groundwater levels and reducing access to surface water for emergency responders. No ecological restoration or enhancement is provided other than improving a minority of instream flows analyzed; negative impacts are projected for aquatic habitat in the lakes and for fish passage as well.

- Improve water supply reliability during drought years for agricultural and municipal needs

8

While KDRPP does provide some benefit in drought years, it is insignificant when the adverse climate change scenario is modeled. A 3% gain in water is hardly worth the monetary costs, nor the negative environmental and recreational impacts that could permanently occur.

- Improve the ability of water managers to respond and adapt to potential climate change effects

9

As noted above, potential climate change effects would severely limit the benefit provided by KDRPP.

- Contribute to the vitality of the regional economy and sustain the riverine environment

10

Again, while there are some instream flow objectives that would be met, not all flow targets would benefit and some are projected to worsen. KDRPP does not meet the established economic indicator threshold of 1% and ignores the negative impacts to what is likely a large sector of the economy: recreation.

Further, KDRPP is inconsistent with several adopted plans at both the County and Federal levels.

11

- Kittitas County Shoreline Master Program (SMP): Lakes Keechelus and Kachess are designated as lakes of statewide significance under the State Shoreline Management Act. The Kittitas County SMP designates the shoreline of both lakes as "conservancy shoreline environment," which requires "maintaining the natural character of the shoreline area" (Section 3.15, pg 3-161). The development of any of the pumping facilities would be in conflict with this requirement as they would significantly alter the character of Lake Kachess.

11 cont

Section 3.15 further goes on to state: "Under the draft SMP, the majority of both lakes would be designated as rural conservancy. The purpose of the rural conservancy environment is to protect ecological functions, natural resources, and valuable historic and cultural areas in order to provide for sustained resource use, natural flood plain processes, and recreational activities." All of these elements of the Lake to be protected would be negatively impacted by KDRPP.

12

- Ecology Upper Kittitas County Groundwater Rule (WAC 173-529A): Section 3.5.1 notes that Ecology in 2011 placed a moratorium on the development of new unmitigated groundwater withdrawals in upper areas of Kittitas County (pg 3-53). On its face, it does not seem that a project that could further deplete groundwater resources in this area could possibly be consistent with this rule. How is KDRPP compatible with this rule?

13

- Forest Service Criteria, 1990 Wenatchee National Land and Resource Management Plan for Lake Kachess: The USFS has designated Lake Kachess as land allocation Developed Recreation (RE-1) Retention VQO, Scenic Travel 1 and 2 Retention VQO, and Partial Retention VQO. As stated in section 3.10.4, "The USFS considers visual quality to be one of the most important resources to be protected under this land allocation" (pg 3-127). Due to the changes in pool levels that would make the lake a less dominant element on the landscape, the proposed project is not consistent with these Forest Service criteria.

Failure to Comply with NEPA Requirements

4

The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of "reasonable alternatives" means all state-of-the-art alternatives must be rigorously explored and properly evaluated, and those other alternatives which are eliminated from detailed study must be described with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party.

15

The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 DSEIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

16

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS.

17 The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS goes to great contortions to try to make these appear to be several different alternatives, they are in fact one alternative: extracting water from a natural lake to benefit downstream special interests.

18 Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

19 This fatal flaw originates from the Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Yakima Plan Programmatic EIS not only failed to consider a range of alternatives, as required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Yakima Plan Programmatic EIS and do it correctly. I ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose.

20 I ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Lake Kachess pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of special interest groups." I ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given – including data, references, and review procedures – for excluding each alternative. The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and I therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

21 In addition, it is clear NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. The DEIS states the project will implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to understand the potential impact on individuals and families, and to participate meaningfully in the deliberative process. The SDEIS documents negative impact on

21 cont recreational activity and acknowledges most affected individuals come from the Seattle area. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area.

22 In all subsequent communications with the public, the misrepresentation of Lake Kachess must be corrected. The SDEIS indicates Kachess Reservoir was constructed over a naturally occurring glacial lake [joining] Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, as the reservoir water (stated on page 1-1 to be the water over the natural lake) is already spoken for. Thus, every drop of water to be pumped by KDRPP will come from the natural lake, Big Kachess Lake. It is a misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. I ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by Reclamation; below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. I ask that this confusion and misrepresentation stop, and accurate terminology be used that informs, rather than confuses, the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as on Page 1-7.

Modeling/Data Analysis Questions

23 A number of admissions within the DSEIS cast doubt on the accuracy and usefulness of the modeling used in the analysis and even note aspects of the project that were not included in modeling or evaluation. Data and analysis that are outright missing from this document include:

24
- Section 3.7: no formal wetland delineations or plant surveys were conducted for this analysis. Please explain why these were not conducted.

25
- Section 4.4.2 (pg 4-81): "Lake Keechelus was not included in drought operations surface temperature modeling completed by PSU" and "Extended or multi-year drought, or refill conditions were not included in the PSU water temperature model and potential effects of these conditions are not quantified." Please explain why these aspects were not modeled and what the implication is on the modeling that was completed.

26
- Section 4.4.7.2 (pg 4-98): water temperature effects and their impacts on the Little Kachess basin from the inflow from Keechelus (through KKC) are unknown, indicating that this aspect of the project was also not modeled. Please explain why this was not modeled.

27
- Section 4.6.4 (Pg 4-129): "Additional hydrodynamic modeling is needed to precisely estimate reductions in zooplankton abundance…" Please explain why this study was not completed.

28

- Section 4.10: SketchUp (or similar) renderings of all proposed facilities to aid in adequate visual quality analyses are absent. Enough details are provided regarding building mass and location, and amount and location of vegetation to be cleared to provide these basic models as evidence in this document. Please explain why these models were not developed, or if developed not shared with the public.

29

- Section 4.21: The socioeconomic analysis does not analyze the No Action alternative for economic impacts. This glaring lack of data makes it impossible to compare the predicted economic impacts of the alternatives. Please explain why not all alternatives were modeled with IMPLAN software and how the public is expected to make sufficient comparisons between the alternatives without this analysis.

30

- Section 4.21: The socioeconomic analysis also does not describe the impacts of the project to the recreation economy of the four-county region. Despite noting in Section 3.14 that "visitors to the lakes are an important part of the economy of upper Kittitas County" (pg 3-147), the economic analysis does not account for the recreation industry or even describe it as a piece of the whole 4-county regional economy. Please explain why this economic sector is missing from the analysis, or which sector it is a part of if it is considered part of a larger sector, and how the public is expected to fully understand the economic impacts of the project without an analysis of this sector.

31

One of the fish habitat "benefits" noted in the DSEIS is reduced water temperature in Lake Kachess due to reduced shallow water areas that would be warmed along the shoreline. The acknowledgement that modeling of prolonged droughts that could result in multiyear drawdowns of the Lake raises questions about the accuracy of this identified "benefit" and is among other questions raised by admissions within the DSEIS:

32

- Section 4.3.7 (pg 4-60) discusses differences that are "likely due to reservoir balancing in the modeling that may not occur during actual operation" but no explanation is given about how actual operation may differ from what is reflected in the modeling. Are these differences based on assumptions built into the model that are not accurate or is "reservoir balancing" too complex to accurately capture in a model? Please better explain this statement to either acknowledge deficiencies in the model or the highly variable nature of reservoir operation.

33

- Water temperature in Lake Kachess is predicted to decrease with drawdowns, but Section 4.6.4 notes "there is uncertainty around whether prolonged droughts… could cause warming." Is this uncertainty related to the fact that multi-year and prolonged droughts were not modeled? What is the level of uncertainty? Why were prolonged droughts not included in the modeling?

34

- A discrepancy is found in Section 4.7.4 (pg 4-156) which states that it could take 2-8 years for Lake Kachess to return to normal operating levels, as opposed to all other sections of the document which refer to a 2-5 year refill period. Why are two refill periods identified, and which is more accurate? With the predicted increase in frequency of droughts, how was the refill period determined?

35

In addition, there are some aspects of the analysis which are not explained adequately, such as:

35 cont

- How is target pool elevation determined? If Keechelus does not meet its "target pool elevation" in some years following drought pumping of Kachess, how much longer would it take for Kachess to refill, assuming KKC is implemented?

36

- Construction methods and plans are fairly detailed for all aspects of the proposed project except for the Volitional Bull Trout Passage Improvements. Why is there no detailed construction data for this element of the project?

37

- KDRPP was originally proposed to allow pumping of 50,000 acre-feet of water from Lake Kachess but this number has increased to 200,000 acre-feet. What instigated this significant change in the amount of water to be pumped?

38

- The SDEIS asserts the presence of a "value analysis study that suggested the feasibility of a floating pumping plant." The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion," brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. Please provide full descriptions of the "suggestions," including the methods, data, and conclusions implied by the inadequate and confusing term "suggestions."

39

- The SDEIS states Reclamation will "fund… some or all, or authorize Roza to fund" the KDRPP. This statement inadequately informs Washington citizens, as well as Roza farmers, of their likely obligations for financial support of KDRPP. Please provide the legal, legislative, and/or other basis for stating that Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how "all or some" will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (Reclamation, Ecology, Roza, or other) will be responsible for what action (fund, design, construct, operate, etc.). These are not "details" to be clarified at a later time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period.

40

SDEIS Table 1-1 (pg 1-11) indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) "Fund, design, construct, operate… etc…. the selected alternative." This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public's mind, largely due to conflicting public comments by Roza representatives and Reclamation representatives. It is imperative that this confusion be removed before any Final DEIS and/or ROD be issued. I ask, therefore, that a complete and unambiguous statement of financial obligation of KDRPP be issued. The statement should make clear that 100% of the costs of implementing KDRPP, including all mitigation, litigation, and other assigned costs, will be borne by Roza Irrigation District or if not Roza, then by which entity/entities.

41

- The SDEIS states that the KDRPP-FPP is the "proposed action" and that Reclamation and Ecology have not identified a "preferred alternative." This represents a major departure from the previous

41 cont

DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are "acceptable" in 2018. This explanation should also serve to inform citizens as to why no "preferred alternative" is provided. This explanation is critical to citizens' understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. Reclamation must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS.

42

- The statement of budget (Pg 2-59) for KDRPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for Alternative 4. Because the estimate is not a measure of central tendency (i.e., neither mean, median, nor mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; as opposed to showing a single estimate of $282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a "low" or "high" correction, each will be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates.

43

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the Alternative 4 budget should present a $423,000,000 base.

44

In all cases, the mitigation costs must be included. For some reason, the required Bull Trout Volitional Passage is stated in the text (Pg 2-60) to cost $23,000,000 (preliminary estimate) but is not included in the stated project costs. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for Alternative 4.

45 In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. I request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

46
- Section 4.13.4.2 notes that noise from operation of the pumping plant is "anticipated" to fall within a certain range. The construction noise analysis is relatively detailed compared to the analysis of operations. Why is noise data from similar projects not cited or used as a proxy for this analysis? Additionally, the noise analysis notes that the closest noise sensitive receptors would not be affected but does not detail what these receptors are. What are the closest noise sensitive receptors, and where are they located?

47
- Section 4.15 notes that KDRPP would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." What regulatory guarantees are in place to ensure that no additional agricultural uses or intensifications are allowed after this project is constructed? This is a relevant question given the fact that the original 1902 legislation authorized the Tieton and Sunnyside divisions of the Yakima Basin (Section 1.8.1), but others have been added over time. How will Reclamation prevent other new agricultural uses from demanding additional water from this project which were not originally intended?

48 Further, it is not even clear that limiting agriculture to existing uses is truly intended. Table 1-2 (pg 1-20) notes that Ecology will "issue water rights as necessary." How will new water rights be issued and to whom? How is this in keeping with "not increase(ing) the amount of irrigated land?" Section 4.21 notes that the model allows for identification of agricultural activity that "could" occur (pg 4-319), which seems to allow the door to be open for more or intensified agricultural uses.

49
- Section 4.21 suggests that the Volitional Bull Trout Passage Improvements are expected to have positive economic benefits (pg 4-324). In what way would these improvements have economic impacts? What additional detail is needed about these improvements to estimate their economic impact?

50 Completely missing from the SDEIS (perhaps best located in Section 4.23 Health and Safety) is an analysis of the impact of the project on the fire susceptibility of the surrounding area and the ability of emergency responders to utilize water from Lake Kachess to fight fires that occur. Local fire departments make use of water from Lake Kachess to fight fires in the area; how have these organizations been involved in this process and what mitigation is proposed to address this potential issue?

51 Finally, the depiction of Lake Kachess after drawdown of 80' is inaccurate. The SDEIS (Pg 2-66) indicates the 80' drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An "imposed line" on the water conceals the true impact of 628 acres of exposure. I ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as "thatched," "outlined water" or other techniques, but as mud or silt consistent with aerial pictures. An additional note;

51 cont residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation.

Mitigation

Mitigation measures proposed in the SDEIS are severely lacking. While detailed mitigation methods are proposed related to the construction of the proposed facilities, few definitive mitigation methods are proposed for the negative impacts stemming from the operation of the proposed facilities. Those sections missing proposed operational mitigation methods include:

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- 4.2.5.2: (pg. 4-9) Erosion control measures would be implemented prior to implementation of the project "if erosion is identified as a problem." Isn't an EIS the opportunity to identify erosion as a problem? If not identified as a problem at this stage, when would it be identified prior to implementation of the project? What types of erosion control measures would be implemented?

53

- 4.5.4: (pg 4-106) A well monitoring program is proposed to be implemented to analyze groundwater levels associated with drawdown but no "appropriate mitigation strategies" are identified for implementation. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. I ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD.

54

- 4.6.10: (pg 4-148) A water quality monitoring program is proposed to be implemented to document changes in water temperature but no subsequent mitigation is proposed to address water quality impacts to fish. Please explain how this monitoring program would be implemented and how Ecology would address impacts to fish based on the data collected.

55

- 4.13: Noise mitigation only addresses construction, not operation of the project. Please explain what types of noise mitigation would be implemented to address noise from the operation of KDRPP.

56

- 4.14: A myriad of negative impacts on recreation are identified but no mitigation is proposed, other than a boat launch on the opposite end of the lake from the campground. Will alternative recreation sites for activities other than boating or fishing be provided elsewhere? How else will recreation impacts be mitigated?

57 At the very least, mitigation strategies utilized by other agencies on similar projects with similar effects could be listed as examples of what Reclamation and Ecology might implement, should any future negative effects occur.

As detailed above, Section 4.15 notes that the project would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." I ask that specific regulatory restrictions be put in place as mitigation for this project to ensure that no additional

57 cont agricultural uses or intensifications are allowed after this project is constructed. Without these measures, Reclamation could not prevent other new, or intensifications of existing, agricultural uses from demanding additional water from this project. Please describe the regulations that would be enacted and include the specific codes to be amended.

58 Section 4.23 notes steep slopes would be a potential safety hazard to the public and proposes a communication strategy with the public and lake users regarding the hazards and safety measures. Who is liable for injuries sustained by users due to the steep slopes caused by operation of KDRPP? Further, Section 4.2.4.2 notes that slope instability could result "where relatively steep or unstable areas are exposed" (pg 4-7) and that instability could be caused by "rapid drawdown, heavy or steady rain, a rain-on-snow event, and earthquake shaking." While Reclamation proposes to refrain from rapid drawdowns, it is noted that rain-on-snow events could become more common in the future thus increasing the risk of exposed slope stability. How will this negative impact be mitigated?

Groundwater Impacts

59 Impacts to groundwater in the area could be severe to private property owners, public recreation sites, and wildlife and vegetation. Only 6 of the approximately 107 wells in the area were monitored; please describe how this number and their location is representative. The fact that the only 2 privately owned wells to be monitored were added after the 2015 EIS was published suggests that groundwater analysis is lacking.

60 Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells could run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza Irrigation District can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry?

61 Both sections 3.5 and 4.5 indicate that "groundwater levels near the lake are influenced by lake elevations, especially during the dry time of the year when very little recharge is occurring and groundwater elevations are dropping because of discharge from the aquifer" (pg 3-57). Section 4.5.2 notes that well operations could be interrupted due to additional drawdowns, including the well supporting the USFS Kachess Campground (pg. 4-105/6). What the document does not indicate is the effect of lowered groundwater levels on vegetation in the area. Lowered groundwater levels would presumably dry out significant amounts of vegetation, further increasing wildfire risks in the area. Wildfire risks have increased significantly in all Western states over the last decade, and the costs—both to fight the fires and the economic costs incurred by those damaged by fires—have significantly increased as well. To undertake a public works project that increases those risks is negligent.

62 The vegetation and wetlands (pg 2-70) and densely forested watershed (pg 3-98) will, according to the SDEIS, suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility for fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due

62 cont

to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, Reclamation has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. I demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, Reclamation and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. I ask that this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD.

63

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria will these effects be calculated?

Insignificant Agricultural Benefits

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For the overall cost of the project and the number and degree of negative impacts to the environment, wildlife and recreation, KDRPP does not even appear to address the need of Roza district water users to a significant degree. Under Alternative 1: No Action, proration occurs in 15 out of 90 years; under any of the action alternatives, proration occurs in 13 out of 90 years, a benefit of only 2 years. The document suggests that completing multiple additional projects would necessary to provide a meaningful improvement to proratable water users (Section 4.3.2, pg 4-19). The likelihood of securing permits and funding for the full list of projects needed to provide meaningful improvement is extremely low given the state of state and federal budgets. Undertaking KDRPP, and risking permanent drawdown of this lake, is not in the public's best interest or the best use of taxpayer money.

At best, under the historical modeling, the action alternatives would "improve water supply to proratable water users by up to 22 percentage points in the worst single-drought years" (Section 4.3.2, pg 4-19). However, agricultural demand for irrigation water is projected to increase due to climate change, at the same time that "natural runoff and streamflow in the system would decrease by 50% or more in some months when compared with the historic scenario; therefore irrigation demands and instream flow targets would have to be met by releasing larger amounts of water from the existing lakes. Currently, there are many years when the lakes are not capable of meeting these demands" (Section 3.12.3.4 Climate Change, Changes in Water Supply, pg. 3-138). Additionally, prolonged or multi-year droughts are expected to occur more frequently in the future (odds of a drought increase from 17% to 49% in any given year, according to Section 4.21.4, pg 4-329), and modeling under the adverse climate change scenario shows only a 3% improvement in proratable water delivery (pg 4-251). Further, the analysis finds that "the improvement under (the Action Alternatives) would be less in the third year of a multiyear drought because some of the inactive storage in Lake Kachess would be used in the first one or two years of drought, leaving less for a third year of drought" (Section 4.3.2, pg 4-19).

Section 3.21 notes that "agriculture is the third largest sector at the four-county scale" and accounts for approximately 11% of the four-county economy. No analysis is provided of the economic impact of the

64 cont

No Action alternative, only the conjecture that the impact of reduced prorationed water supplies "could be greater than 1 percent of the agricultural sector output" (pg 4-323). Without this information, it is difficult to make a meaningful comparison between the economic impacts of the No Action and action alternatives. However, a comparison is not necessarily valuable given that Section 4.21.4 states that "the average annual impacts during operation on output, personal income, and employment are well below the 1 percent threshold for the impact indicators at the four-county regional level" (pg 4-325). If the economic benefit is projected to not meet the identified threshold of significance, why are Reclamation and Ecology considering implementing a project that could cost over $225M to construct (including interest, for the preferred alternative, though costs increase to $675M should another alternative be chosen) and $25M a year to operate, not accounting for potential cost increases of 30-50 percent?

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In addition to providing only a negligible improvement in water deliveries under the adverse scenario (3% improvement), permanent risks to the lake and the surrounding wildlife and vegetation significantly worsen: "The predicted changes in snowpack and runoff associated with climate change would alter KDRPP operations by producing larger and more frequent drawdowns, and would more frequently result in years when Lake Kachess fails to refill" (Section 4.12.3, pg 4-238). "Compared with Alternative 1 under the adverse scenario, the mean lake level would be approximately 42' lower over the period of record, and 20-90' lower in drought years" (Section 4.12.5, pg 4-248). This is a significant difference that could lead to long-term impacts to groundwater levels, recreation opportunities, fish and wildlife habitat, and fire susceptibility of the region.

Recreation Impacts

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Recreation was specifically authorized as an additional purpose of the Yakima Project in Section 1205 of YRBWEP in 1994, but it does not appear that any recreation organizations have been involved in the development of this plan, other than USFS. What outreach was made to recreation organizations, or users (such as the estimated 23,000 annual users of the Lake Kachess Campground), to provide notice of this proposal? The DSEIS notes that a communication strategy related to the project is called for in the future, but why has one not been undertaken to educate and seek input on the project during the development stage? The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users, many with families that have been camping there for generations (such as my own), will be contacted and the timeline for this process.

67

Due to its proximity to the greater Seattle area, Lake Kachess is an invaluable recreation location; 3.61 million people in the Seattle-Tacoma-Bellevue Metropolitan Statistical Area are within a roughly one-to-two hour drive of the camping, hiking, boating, fishing and other general opportunities to appreciate nature offered at this lake. Section 3.14 notes that "population increases have increased demand for recreation and the campground is routinely full… Kachess has a higher number of recreational visitors than Keechelus or Cle Elum Lakes… (pg 3-147) The Cle Elum Ranger District is the busiest in the area and

67 cont

its campgrounds tend to be completely booked on summer weekends… The Kachess Campground is the most popular in the district… (pg 3-149)." In addition, this section notes that dispersed recreation at informal camp locations along the lake is common in the summer when the campground is full.

Despite this increasing need, and the positive economic benefit it has for Kittitas County, this project could reduce recreation opportunities in the area by:

- Potentially impacting well operations at the campground and privately owned residences along the lake to a degree that these sites are unusable;
- Increasing the distance from the campground and residential areas along the west shore to the water line from 400' at the current maximum drawdown to 1,500' (over ¼ mile) at the proposed maximum drawdown. Section 4.10.4.2 (pg 4-215) notes that "In most areas, the reservoir pool would recede approximately 200 additional feet under the maximum drawdown condition…";
- In addition to increasing the distance between users and the shoreline, the slope of the shoreline near some recreation areas would be hazardous to humans (and presumably animals attempting to access the lake for water) at 20-30 degrees near the campground and private development on the west side of the lake, and 20-40 or 40-60 degrees on the east side. These steep slopes also pose risks to boaters using the lake (Section 4.23, pg 4-343); and
- These reductions in recreation opportunities would then increase pressure at other nearby recreation sites such as Lake Cle Elum or Lake Easton.

68

Section 4.14 Recreation identifies two impact indicators for recreation: "loss of fishing access or reduction of fishing opportunities that exceeds current seasonal loss of use due to existing drawdown conditions; reduction of usability of recreation due to construction activities or the receding of the shoreline more than 100' from the recreation site or with a slope greater than 20 degrees" (pg 4-275). The action alternatives have "major impacts on recreation" (pg 4-277) when evaluated by these indicators. Mitigation proposed for the first impact indicator is a new boat launch on the East shore, which could be usable at all lake levels; no mitigation is proposed for the second impact indicator. This boat launch would be on the opposite shore (east vs. west) and lake end (south vs. north) of the lake from the campground: what is the drive distance and time from the campground to the proposed boat launch? How is this acceptable mitigation for campers? Would it really even be usable by them, or only by day visitors intending solely on boating? Due to the steep slopes, how would any boaters access developed recreation sites? What mitigation is offered for the "reduction of usability of recreation?"

69

Assuming that recreation (including camping, hiking, fishing, boating, day trips and the presence of secondary homeowners who conduct personal business in the area) is as negatively impacted as noted in the DSEIS, what are the economic impacts to Kittitas County and the four-county region as a whole? Section 3.21 notes that "the service industry is responsible for the most employment at the state and four-county scales and is roughly double the next largest sector" (pg 3-178); is recreation included as part of the service industry or does it stand on its own? State wide, outdoor recreation is a $26.2B industry, which provides for 201,000 jobs, generates $7.6B in wages and salaries, and produces $2.3B annually in state and local tax revenue; surely a fair share of that is going to this four-county region. This

69 cont part of the economy is ignored in Section 4.21 Socioeconomics but deserves consideration or, at the very least, acknowledgement.

Negative Fish Impacts

70 While there are some positive benefits to KDRPP and KKC related to meeting desirable stream flows on certain river reaches during some parts of the year, the overall impact to stream flow is not positive. Further, the DSEIS notes that fish would need ten consecutive years of positive conditions in these reaches in order to boost their numbers to those projected in Section 4.6.7 (pg 4-147); given the climate predictions for the future, achieving ten consecutive years of positive conditions is highly unlikely, especially given that winter and spring flows are unlikely to meet targets, so the benefits of KDRPP for stream flows are even less significant. Section 4.6.2 notes that under all Action Alternatives, "increases in annual instream flows, and in July-August instream flows during drought years in the Easton Reach, would decrease the quantity of rearing habitat available to spring Chinook and rainbow trout subyearlings, resulting in a negative impact to these species during drought years" (pg 4-117). So although the same section notes that instream flows would be benefited in the spring, flows later in the year would be negatively impacted, which may negate the earlier benefits. The same situation is described for the Keechelus Reach: that instream summer flows are projected to be met more often, but winter and spring flows are negatively impacted; without meeting instream flows throughout the year, what benefit is it to these fish populations to meet flow targets only occasionally, and particularly when so many additional negative impacts would occur for these species in Lake Kachess?

71 Fish, including Bull Trout and salmon in Lake Kachess would be negatively impacted by all Action Alternatives in several ways, including increased turbidity (pg 4-117), decreased hydraulic residence time, lower minimum lake levels, reduction of shoreline vegetation, degraded thermal refugia for predator and prey species (pg 4-116), disturbances to fish near the pumps, and increased risk of entrainment in the facility (Table 4-79, pg 4-115). As noted above, the water temperature modeling is inadequate, so the potential benefit of lowered water temperature is questionable, as the DSEIS notes in several sections that water temperatures may increase due to prolonged or multi-year droughts. Taken together, these impacts result in a reduction of available prey within the lake, more overlap between predator and prey species, reduced feeding efficiency of predators that visually locate prey, and reduction in habitat complexity. Section 3.6.2.1 notes that "Kokanee in Lake Kachess exhibit slow growth and small size at age compared to other lake populations and the population is at risk of a feed and growth bottleneck in summer" (pg 3-74); KDRPP puts this population at further risk. Prior to the construction of the Kachess Dam, Lake Kachess supported a variety of anadromous species that no longer have access to the lake (pg 3-66); KDRPP would put those species left in the lake at further risk of survival.

72 Section 3.2.3 notes that "around the rim of Lake Kachess, 31 creeks flow into the lake from the uplands. Twenty-two creeks flow into the Little Kachess basin" (pg 3-7). Section 4.3.10 (pg 4-77) specifically notes that bull trout would be adversely affected by the loss of access to upstream tributaries. How will connectivity to these creeks be mitigated when the lake is 80' lower and up to 1,500' farther away from their current connection points?

73 The only negative impact that is proposed to be mitigated by this project is the loss of connection between Little and Big Kachess Lakes: the Volitional Bull Trout Passage Improvement would be constructed. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed; this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage. Purporting that this "improves surface water connectivity" is a misstatement – it replaces a naturally functioning connection that this project completely destroys. No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not included in the budget costs, it cannot be assumed to be part of the project going forward. Further, there is no description of the length of the passage (the length and Southern outlet are never described in text, numeric, or schematic terms).

74 Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo- and geo-receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

For all of these reasons, the public demands more than a "conceptual design" of the volitional passage. This mitigation must be described in ways that make sure sufficient water will be available to charge the passage; the length, slope, and other characteristics of the passage will not deter Bull Trout passage; the returning redds will be able to find the entry point of the volitional passage; and the passageway to Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population. I ask that the volitional passage design and operation be updated to address all of these concerns, and that the revised design be available to citizens for review and comment in a subsequent SDEIS, prior to any Final DEIS or ROD.

75 Also, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually are), and mitigating with improved populations elsewhere. Page 1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS." What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives meet these legal requirements?

Yakima Project is a System

76 The Yakima Project includes five major storage reservoirs that provide irrigation water to six districts, as well as flood control, instream flow requirements, and municipal uses. As is clearly stated in Section 1.2.1 Yakima Project (emphasis added): "Reclamation manages these storage reservoirs as a system, and does not designate any one reservoir or storage space to a specific irrigation district." How does

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allowing one particular district to build and operate this project on one particular reservoir meet the objective of managing these reservoirs as a system? To a taxpaying, recreating citizen, it appears to be a taking of a public good for the economic development of private entities, which undertook a risky business venture attempting to start or maintain a farm in a district without Senior water rights.

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How will those with senior water rights to the existing 239,000 acre-feet of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? I request this be further studied, possible impacts of the SDEIS action alternatives communicated to those senior water rights holders, and another public comment period opened for their comments.

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Besides not providing a significant amount of water in drought years, this water is likely to be wasted due to the condition of the irrigation canals used by Roza. The district's canal system is 97 miles long, and 67 miles of these canals are unlined, open air, earthen ditches built in the Yakima desert. In a 2016 Capital Press article, Roza representatives state that water seepage in these earthen ditches "is lessened by fast flowing water creating a hard pan of silt on the canal bottom." However, during drought, when the water has slowed considerably, this layer of silt is broken up and dispersed, causing the canals to leak. Before undertaking any projects that would take additional water from reservoirs, all of these canals must be improved with concrete or plastic liners to prevent water waste. I ask that the efficiencies gained by improving these canals be analyzed, and the results shared with the public for review and comment.

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The fact that only one of the six irrigation districts has expressed genuine interest in this project suggests that it is for the benefit of the few and not the whole. Rather than implement a costly public works project with significant negative environmental and public impacts, perhaps a more systemic solution could be found that creates appropriate incentives for all water users to use water sustainably. Section 1.2.3 notes that a Market Reallocation effort is a part of the Integrated Plan. This would reallocate "water resources through a 'water market' or 'water bank' where water rights would be bought, sold or leased on a temporary or permanent basis to improve water supply and instream flow conditions." Such a solution would create incentives for all water districts, not just those that are proratable users, to invest in water conservation methods that allow water to be used more wisely. Given the fact that KDRPP cannot meet the projected need (and falls far short of meeting that need given climate change assumptions), implementing a water market reallocation first makes much more sense. If such a reallocation were highly successful, it might negate the "need" for KDRPP or any of the other public works projects proposed as part of the Integrated Plan.

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Additional storage for water that is currently "wasted" could also be effective in meeting some of the need without causing permanent, or long-term, negative environmental and recreational impacts. Section 4.3.7 notes that "in most years, Reclamation spills water from Lake Keechelus because it cannot store all of the runoff from its watershed" (pg 4-49). Section 3.12.2.1 notes that "snowpack is considered the 'sixth reservoir' in the Yakima River basin… (but that) only about 30% of the average annual total natural runoff above the Parker stream gage can be stored in the current Yakima River basin reservoirs" (pg 3-134). Winter flows in the Yakima River area high and are projected to increase. Are there alternative storage options for this water that is currently not put to use later in the season

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when demand is high? Aside from an additional reservoir, could water be stored on farms in cisterns for use on demand? Are there other out of the box ideas that could be considered that might offer greater flexibility with less cost? Please explain how these alternatives have been considered in this process, the degree to which they meet the need of project proponents, their cost, and why they are not included as alternatives in this document.

Cumulative Impacts

After reading the entirety of this DSEIS, it is extremely difficult to understand how the project proponents can assert that there would be "ongoing beneficial effect" for vegetation, and "no cumulative impacts" to surface water, reservoir elevation, ESA-listed fish, or land use. The following are excerpts from the DSEIS describing the level of Lake Kachess under Alternative 2 (which is representative of all Action Alternatives) as compared to Alternative 1, emphasis added (Section 4.3.4, pg 4-23 and 4-25):

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- ...levels would be lower than those under Alternative 1 in 44 years out of 90 years modeled. In 31 of the 44 years, Alternative 2 had a lower Lake Kachess level than Alternative 1 for every day of the year… both when Reclamation operates KDRPP in drought years and in years following droughts when the lake is refilling to its normal operating levels.

- Lake Kachess would be below the level at which the two lake basins become separated (elevation 2,220) in 76 out of 90 years modeled, and increase of 3 years from Alternative 1. The mean duration would be 154 days per year, an increase of 76 days per year compared with Alternative 1. … The duration would increase during all months under Alternative 2; under Alternative 1, the separation of the lake basins occurs from Sept to March.

The DSEIS claims, almost consistently, that Lake Kachess would refill in 2-5 years following a drought, however, this is based on "the historical record of droughts." Even without accounting for the adverse climate change scenario, more recent historical records suggest that it is unlikely the lake would refill within 2-5 years (emphasis added):

> During multiyear drought conditions such as those in 1992-1994, Reclamation would draw the lake down as much as 80' below the existing outlet elevation. Following a multiyear drought comparable to that of 1992-1994, lake levels would recover to normal operating levels 2 years later when followed by a wet year such as 1996. In a single-year drought, such as occurred in 2001, the lake would be drawn down to 50' below the existing outlet elevation. Full recovery would not have been achieved until 2008, because of a series of dry years (2003 & 2004) and a subsequent drought (in 2005). During the 2005 drought year, the lake level would be 40' below the existing outlet elevation. (pg 4-25)

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Given that the adverse climate change scenario predicts that droughts are nearly three times more likely in any given year, it is reasonable to conclude that following a significant drawdown, Lake Kachess might never refill completely. This is most certainly a "cumulative impact," not only to surface water, reservoir elevation, fish, and land use, but more generally to the recreating public or those that value the environment in its own right. Please explain how the conclusion of "no cumulative impact" was reached.

82 Beyond the environmental and recreational impacts of concern above, the construction, maintenance and operating costs are also a significant cumulative impact to the public. Although the Proratable Entities claim to intend to undertake and pay for the project themselves, there is dissention among their ranks with some members foreseeing an inability to pay for the water resulting from the project, and presumably all of the associated project construction and operating costs. As disclosed in the DSEIS, construction costs could range from $225M-$675M (depending on the selected alternative) and operating costs could be as high as $25M annually. Construction cost estimates for the project alternatives could increase by 30-50% (depending on project alternative), and inflation is not accounted for in the annual maintenance and operation estimates. This is an unacceptable cost to add to taxpayer burden at the same time that recreation opportunities are taken from the public.

83 Overall, the benefits associated with the small amount of water provided do not outweigh the significant negative environmental and recreational impacts. I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable.

84 Please send me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Respectfully Submitted,

Stephen Simmons

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Comments re: Kachess and Keechelus DEIS - Attn: Ms. Candace McKinley

1 message

Kelly Snow <kelsnow@hotmail.com> Wed, Jul 11, 2018 at 4:07 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: Kelly Snow <kelsnow@hotmail.com>, "koleasnow@hotmail.com" <koleasnow@hotmail.com>

1 Ms. McKinley - Please find attached my comments regarding the Kachess and Keechelus SDEIS. I would appreciate it if you would acknowledge receipt.

Regards.

Kelly Snow

SDEIS comment letter (Kelly Snow).pdf
104K

Submitted via email to ***kkbt@usbr.gov***

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

2 I am submitting both comments specific to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018. All comments are submitted under both NEPA and SEPA.

Comments

3 **Alternative 1 No Action** -- I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable.

4 **Impact to private property** -- Comments provided by myself and others to the prior DEIS expressed serious concerns regarding the likely impact of the proposed project on our property values. I was very disappointed to see that those concerns were not substantively addressed in the updated SDEIS, which expressly states its intent to respond to these concerns. The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected. "Several" seems to be a purposeful misrepresentation to understate the extent of the number of properties that would be impacted and is indeed misleading to any reader of this study when trying to evaluate the impact of the proposed project. Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This amounts to approximately 300 homesites – nobody would equate this to "several." The systematic bias in the presentation of the impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. I ask for an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam Road and eastern shoreline road, and private residences within 5.0 miles of the shoreline.

5 **Quantification of the impact to private property values** -- The SDEIS makes an unsupported reference to a study that showed a negative impact of 5-10% on private properties. However, the document does not include the study, and therefore does not allow a reader to understand the key assumptions, scope or methods. This is unacceptable and completely inconsistent with the

5 cont

purpose of this analysis. To minimize the expected impact without support is again a clear bias in the preparation of this document.

6

Even this unsupported number appears to be a gross understatement of the expected impact on valuation. The homes and communities around Lake Kachess are not built there arbitrarily – they were built there because of the lake. This is reflected in higher current values, as noted in this SDEIS. While lake views (which will be severely impacted by this proposal) certainly impact home values, proximity to the lake (even for those properties without view) also significantly enhances home values as such proximity provides access to boating, fishing, hiking, picnicking, and other water-related activities – all of which will be significantly curtailed or eliminated for years after a draw down. All proposed pumping alternatives are expected to severely impact lake access for all uses, and therefore will have significant negative impact on the values of all properties in proximity to the lake – with or without a view. Additionally, the lake serves as a water source for firefighting, which results in lower insurance rates than would otherwise apply without such proximity. It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. I demand that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued.

7

Despite the unsupported reference in the SDEIS to the negative impact of property values, the document states that the impact on property values can't be determined. Not only is this contradictory, but the notion is absurd. An entire profession exists for the express purpose of making such estimates. Every county assessor in the country performs such exercises on a daily basis. The omission of a comprehensive, supported and reviewed analysis is a glaring omission of one of the most obvious impacts of the proposed project and requires rectification. Please execute such a study, performed under the accepted standards of the valuation profession, and provide in an updated SDEIS for comment and response prior to a Final EIS or ROD.

8

Finally, while acknowledging the negative impact of the proposed project on property values, the SDEIS includes no plan for mitigation of impact. What is the mitigation plan? Given that all of the additional water that is proposed to be pumped by the proposed project would come from the naturally occurring lake (Big Kachess) it is not reasonable that a property owner would have an expectation that they would bear the cost of such a proposal. I demand that you update your analysis to identify, in detail, the mitigation plan for the negative impact on property values including planned funding for such mitigation and provide in an updated SDEIS for comment and response prior to a Final EIS or ROD.

9

Erosion -- The SDEIS includes numerous references to the expectation of increased erosion as a result of the various pumping alternatives. However, the SDEIS includes no analysis of the specifics of such erosion, particularly private property within the created zone of instability

9 cont

expected after the proposed maximum drawdown. The study also does not evaluate the impact on erosion in proximity to streams, where newly exposed slope below the current minimum lake level would be subject to continuous undercutting and enhanced erosion - my home is in such an area. The newly exposed slope after a drawdown below the historic minimum would be highly vulnerable to erosion as the proximate material is lightly compacted – even more so with a stream running through it the newly exposed embankment. The current embankment is stable, but would seek a new stable slope in response to the proposed draw down. A comprehensive analysis could establish the likely area of impact and thus frame the scope of required mitigation. If mitigation is not undertaken prior to occurrence of the expected increased erosion, property will be damaged despite the advanced expectation of such damage occurring as a direct result of the pumping plan (as noted in this SDEIS). I demand that an updated SDEIS include a comprehensive strategy, its details, costs and operational features, be described in detail and citizens be provided with this information along with an appropriate comment period, prior to a Final DEIS or ROD.

10

Impact on private wells -- The SDEIS states that wells in proximity of Lake Kachess may be "dewatered" as a result of the various pumping alternatives and the resulting lowered lake levels. The included data from a small number of monitoring wells in proximity to Lake Kachess supports this expectation as the well levels clearly demonstrate correlation with the rise and fall with the lake level – including those wells where the water level is typically above the lake level. However, the SDEIS does not include any advance mitigation plan for this expected impact on residential wells. Prediction of a significant negative impact to wells as a direct result of the pumping alternatives while not addressing planned mitigation to prevent such impact is not consistent with the purpose of this SDEIS. The notion that residents would lose their residential water supply for an indefinite period of time with no mitigation plan in place is unconscionable. "Monitor and mitigate" is not acceptable for residents that will find their home without potable water.

A comprehensive strategy composed of proven techniques that can be implemented immediately upon need, is required prior to a Final DEIS and/or ROD. What is the mitigation plan? I demand that a comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD

11

Fire Suppression -- As has been noted in comments to the prior DEIS, the proposed pumping alternatives present significant negative impacts on both fire risk and fire suppression.

The SDEIS notes that the surrounding shoreline will be dewatered as a result of the proposed pumping alternatives. This significantly reduced lake level will result in this dewatering persisting for years, while the lake refills. This will subject the shoreline trees and vegetation to a reduced ground water condition never experienced in the history of the lake, and likely result in significant die-off. Such dead vegetation will ultimately present an increase in fire risk (as well as an increase in erosion as this slope stabilizing vegetation is eliminated). I demand that an updated SDEIS include a comprehensive strategy, its details, costs and operational features, be

11 cont described in detail and citizens be provided with this information along with an appropriate comment period, prior to a Final DEIS or ROD.

11 Additionally, the BoR has been made aware that the lake is the designated second source for firefighting within the Lake Kachess Village HOA. The proposed additional 80 foot reduction in lake level would render the lake inaccessible for firefighting purposes due to the topography of the shoreline as well as the muddy composition of the newly exposed shoreline (e.g. fire equipment could not get there). The SDEIS provides no mitigation for elimination of firefighting water, including the economic impact to homeowners due to resulting decrease in home values and increase in home insurance rates as a result. Increasing the risk to homeowners without mitigation is unacceptable and a glaring omission for the SDEIS. I demand that an updated SDEIS include a comprehensive strategy, its details, costs and operational features, be described in detail and citizens be provided with this information along with an appropriate comment period, prior to a Final DEIS or ROD. Such plan should address not only the mitigation of the fire suppression impact of the lake, but mitigation of any financial impact impacted residents would be expected to incur as a result of an implemented pumping plan.

12 **The Yakima Plan programmatic FEIS failed to provide a range of alternatives** —just the Yakima Basin Integrated Water Management Plan (YBIP) and No Action. How will this be rectified?

13 Because both the NEPA and SEPA process must be followed, we request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments.

Please send us/me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

Kelly L. Snow

Kelly L. Snow
3500 Via Kachess Rd
Easton, WA 98925
(NO MAIL DELIVERY AT THIS ADDRESS)

MAILING ADDRESS
Kelly Snow
10625 NE 16th Street
Bellevue, WA 98004

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] K to K, and pumping stations

1 message

craig stemley <csremodelinginc@hotmail.com> Tue, Jul 10, 2018 at 9:50 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>, "bocc@co.kittitas.wa.us" <bocc@co.kittitas.wa.us>

To Whom it may concern.

I do not support the projects, to Lower lake levels add pumping stations or water tunnels between or in the lakes. 1
I own property in Gold creek valley, and pay taxes in Kittitas county.

The Yakima agricultural water district needs to improve its antiquated supply system before it just adds more water.

Thanks,
Craig Stemley

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Kachess Lake Drainage

1 message

Ashley Stroup <ashleybreanne@yahoo.com> Wed, Jul 11, 2018 at 9:50 AM
To: kkbt@usbr.gov

Hello,

1 I am writing to express options regarding the proposition to drain Kachess Lake. I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess.

It makes zero sense to me that on drought years conservation efforts aren't enforced. Conserve don't drain.

Thank you,

Ashley Stroup
509 W. Raye St.
Seattle, Wa 98119

XXX Kachess Lake Rd.
Easton, Wa 98925
Tax ID: 951102

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Comment on Lake Kachess

1 message

starrtavenner88 <starrtavenner88@comcast.net> Wed, Jul 11, 2018 at 2:13 PM
To: kkbt@usbr.gov

1 I am a land developer, conservationist, voter and political activist. I would like to strongly voice my opposition to the proposed plan to drain Lake Kachess and use it for further irrigation.

Starr Tavenner

PO Box 1048

Issaquah, WA 98027

PO Box 571

Nine Mile Falls, WA 99026

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lakes Kachess and Keechelus DEIS

1 message

Joel Thomas <joelthom@live.com> Tue, Jul 10, 2018 at 9:48 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Candace McKinley
Environmental Program Manager
Bureau of Reclamation

Dear Ms. McKinley,

1 I am opposed to any of the Kachess SDEIS active alternatives (2-5), the pumping plant and/or pipeline at Lake Kachess. Only the first, No Action alternative is acceptable. Efforts should be put into more sensible alternatives.

Alternatives could and should include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

These Lake Kachess projects should be last resort options, if considered at all.

Sincerely,

Joel Thomas

PO Box 624

Easton, WA 98925

Sent from Mail for Windows 10

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Do not take water from Lake Kachess for Y akima Basin

1 message

Emily T idball <ewtidball@gmail.com> Tue, Jul 10, 2018 at 8:59 PM
To: Kkbt@usbr.gov

Dear Ms. McKinley,

1 The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS.

2 The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years.

As a homeowner in the Alpental community and frequent hiker and skier in the area, I do not want to see this pristine area damaged by water removal.

Best regards,

Emily Tidball

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Re: YBSA COMMENTS KDRPP& KKC SDEIS

1 message

Duane Unland <duane.unland@gmail.com> Wed, Jul 11, 2018 at 8:29 AM
To: Charlie de La Chapelle <charliedela@gmail.com>
Cc: kkbt@usbr.gov, Sid Morrison <MrSidWMorrison@aol.com>, Chuck Klarich <klarichcj@charter.net>, "Tom Carpenter, Jr." <tom@carpenterranches.com>, Larry Vinsonhaler <larryvinsonhaler@msn.com>, Larry Johnson <ok_larry@msn.com>, Bob Hall <bhall@bobhallauto.com>, Bob Tuck <salmon1242@fairpoint.net>, Dan Martinez <martinezlivestock@wildblue.net>, Glenn Rice <algkrice@aol.com>, Natalie Martinkus <natb02@gmail.com>

I think this looks pretty good! Perhaps you should forward to Dave W.... see what he has to say.
Duane

On Wed, Jul 11, 2018 at 5:45 AM, Charlie de La Chapelle <charliedela@gmail.com> wrote:

Good morning
Thank you for the opportunity to provide questions on the KDRPP & KKC SDEIS
1 These are the written questions submitted on behalf of YBSA by Charlie de La Chapelle.
charliedela@gmail.com

1. Who pays how much and when.
2 We have seen the projection ranging from $150M to $450M when mitigation is included. A breakdown of capital costs, O&M, mitigation and interest. It should be divided by 72,000 acres to get per acre cost if Roza is to pay 100%. And would Roza be expected to pay 100% of K-to-K pipeline too?
This information needs to be quickly disseminated to their growers so decisions can be made and contracts signed ASAP.
Also, I don't see the estimated pumping cost in the event the dead storage is needed to fulfil the obligation to supply senior water contracts over the period of record. Are we further correct that
3 should that event occur, Roza growers would receive no water from the project but would incur the full pumping bill? How can they be expected to pay if they receive no water to grow their crops? Lenders will want to know too.

2. Performance of the project.
4 Can we ask for an analysis of how well the project performs over the period of record with the UW assumption for climate change, relative to the 70% target goal?
We are especially interested in the back to back drought years.

3. Salmonid restoration.
Can we ask for a comparative analysis of the project on instream flows below Parker.
5 We are concerned about the impacts to flow volumes, temperatures, predation and survival of the Sockeye runs in the lower 100 miles. We also think some of the studies cited for survival are over 50 years old and need to be updated with more current data. The quick analysis comparing the Sockeye mortality of 2015 and 2017 need to be addressed!

4. Pumped storage.

6 As costs climb ever upward we need to investigate additional sources of revenue generation. One of the possibilities of the K-to-K pipeline is to incorporate pumped storage to take advantage of the imbalance between power supplies and power demand to store solar and wind surpluses. Even if the possibilities are marginal or negative we should be learning what modifications can be made to offer values that other sectors will pay to have.
Can we ask for analysis of profit potential of a pumped storage project on the k-to-k pipeline, complete with limiting factor analysis.

5. Value

7 Initially three irrigation entities of the Yakima Project were identified as needing a supplemental water supply in drought years. However, if the costs are beyond their ability to pay how are these needs to be met?

Thanks for your attention.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess drawdown

1 message

Scott W alker <swalker@therushcompanies.com> Wed, Jul 11, 2018 at 6:50 AM
To: "Kkbt@usbr.gov" <Kkbt@usbr.gov>
Cc: Scott Walker <swalker@therushcompanies.com>, "Scott Walker (scottwalker253@comcast.net)" <scottwalker253@comcast.net>

1 The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built. Instead, of spending money on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years.

I own two lots in Kachess Village. This will ruin our lake, potentially damage our domestic water supplies, is an irresponsible waste of money, and proposes to use federal money and resources for the benefit of private enterprise

Respectfully,

Scott A. W alker / V ice President
swalker@therushcompanies.com
c (253) 224-6844

Rush Residential, Inc.
253-858-3636
6622 Wollochet Drive NW, Gig Harbor, WA 98335
Gig Harbor | Seattle
http://www.therushcompanies.com/residential

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess and Keechelus DEIS

1 message

Michael Aiken <poco.aiken@gmail.com> Tue, Jul 10, 2018 at 1:18 PM
To: kkbt@usbr.gov

Submitted via email to ***kkbt@usbr.gov***

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

1 In addition to the many concerns and questions you have received regarding the SDEIS for the YBIP plan I have a few simple ones.

2 1) The existing 3 dams have been in use for over 100 years helping to provide water to the Yakima basin and Kittitas Valley for domestic use and irrigation. Why now is additional water needed given that due to climate change the rainfall will increase 9% in the Northwest? If the proposed alternative is implemented will additional land be put into irrigation?

3 2) Why not raise the levels of Lake Keechelus and Lake Kachess as is planned for Lake Cle Elum?

4 3) Has the possibility of using water from the Columbia river been studied? Is so can you direct me to a copy?

5 4) Has building a dam North of I90 near Hyak, and creating a "Gold Creek" reservoir been looked at? It could capture the runoff you say Lake Keechelus cannot hold. Surely would be cheaper than drilling a tunnel between Lake Keechelus and lake Kachess.

6 5) Who will pay? Farmers? Taxpayers? Is it really economically feasible? Water is expensive. Make the best use of what you have.

7 Pumping water out of the existing Lake Kachess would cause irreversible damage and my family is totally opposed to that prospect. Your solution is to pump up to 200,000 a/f of water from the existing lake then hope for that water to be replaced plus the additional 239,000 a/f in the following year. How many years has the Kachess watershed produced 439,000 a/f of water? Ever? Once pumped you are now in the same situation you are in now. 200,000 a/f pumped, 200,000? a/f flow in, 200,000 a/f pumped. . . . It would take 6 years of normal 239,000 a/f per year to fill up. A second drought in that 6 years and you start over. Once pumped you only get what comes next year. Makes no sense to me.

Sincerely,

The family of
Mike and Madeline Aiken
220 Mountain View lane
Lake Kachess, WA

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Comments on SDEIS for the Kachess Drought Relief Pumping Plant (KDRPP)

1 message

Mike Owen Benediktsson <mob201@gmail.com> Tue, Jul 10, 2018 at 8:44 AM
To: kkbt@usbr.gov

To Whom It May Concern,

1 My family has owned a cabin on the east side of Lake Kachess for four generations. We hold a senior water right - our cabin is served by a newly constructed well. Members of my family spend their summers at the cabin, including my parents and my children, ages 7 and 3. Our property and our quality of life stand to be affected by the plan. I have 5 concerns and questions about the Kachess Drought Relief Pumping Plant proposals that I would like the agency to address:

2 1. A major concern is how our cabin will receive water once our well is dewatered, as forecast by the impact statement. "Mitigation" measures are mentioned, but there are no specifics that I can see on what these might involve. Will a new well be necessary or will our existing well be deepened? What will the timeline for this work be, and how can we be certain that we will not be deprived of water for some undetermined period, once the drought relief process is initiated?

3 2. Moreover, I am confused about the legal and ethical decision that is being made. If we hold senior water rights, why would any measure be considered that would violate, even temporarily, that senior right on behalf of a junior right holder in the valley? This does not seem entirely fair or legal - some clarification should be in the impact statement itself, but I could not find it. The diversion of water rights from a senior holder to a junior holder seems like a taking. If we are deprived of water for some period, will there be compensation of some sort?

4 3. I'm also worried about the plan to refill Kachess with water from Keechelus. Is the Keechelus water of similar quality? Apparently PCB levels are high in Keechelus, and I think it needs to be conclusively shown that the proposal would not spread higher PCB levels from one lake to another (and then into the valley).

5 4. Fourthly, as an avid (catch and release) trout fisherman, I am concerned about all aquatic species in the lake, including the protected Bull Trout, and I have been told that the plan would involve killing off some percentage of the population in Little Kachess. What percentage of the current population is expected to be killed and what measures are being taken to minimize this loss?

6 5. Lastly, I understand that the new plan involves building a boat launch accessed via Kachess Dam Road. This will result in significant traffic on that road, but there are no plans that I can see to improve the road. What steps will be taken to insure that this added traffic does not cause safety issues or environmental issues in that area of Kachess's shoreline? It seems like there should be a plan in place to improve the road and provide adequate infrastructure and facilities, comparable to those currently at the campground on the opposite side.

Thank you for your time - I look forward to your reply.

Sincerely,
Mike Benediktsson
Cabin Owner

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Impact to Private Property: SDEIS

1 message

chris.black@wellsfargoadvisors.com <chris.black@wellsfargoadvisors.com>
To: kkbt@usbr.gov
Cc: jblack5745@charter.net

Mon, Jul 9, 2018 at 1:20 PM

1 Good Afternoon. I hope you had a nice 4th of July. I am just writing/emailing for the record, a question I have for Candace McKinley: In the event that Lake Kachess is drawn down to a level that would deem our water supply to be "dewatered" "dried up" or "no longer available", can you tell me if we 1. Would be allowed to drill another, deeper well? And 2. Who would be accountable for any monetary damages to my families' property if we no longer had water to our home or if it were "red tagged"?

2

3 And No……..our property does **not** have a view of Lake Kachess!

4 I am opposed to any of the Kachess SDEIS alternatives 2-5 and would only support Alternative # 1 at this time: No Action

5 Finally, as a person with a college degree in Business-Finance, I am a little surprised and confused by the "proposed Alternative #4" which has an enormous amount of variance from the projected cost of $282MM.! Wouldn't it be appropriate to revise the presentation so the average prudent person or average farmer could understand what this may actually cost, and who will actually pay for it? I'm just asking if you could release the actual numerical values of the ranges of variance…..oh, and of course, who would pay for all of this.

6 My father (cc'd above) and I both thank you for your time today.

Christopher W. Black CRPC ®

First Vice President – Investment Officer
Wells Fargo Advisors | 1201 3rd Avenue, Suite 3500 | Seattle, WA 98101
Tel 206-344-6513 | Toll-Free 800-426-8790 | Fax 206-344-6698

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Website: https://home.wellsfargoadvisors.com/chris.black

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K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess proposed drought relielf pumping plant and Keechelus Reservoir

1 message

S Bocek <smbocek@gmail.com> Mon, Jul 9, 2018 at 8:26 PM
To: kkbt@usbr.gov

Salutations,
I am writing to express my extreme opposition to the proposed plan as stated in the subject line above. I hope I don't need to belabor the very good points that have been made already, including the huge negative impact for the environment and the ill-logic of yet another short-term solution to the perennial water shortage for the Kittitas & Yakima valleys. 1
I cannot state strongly enough that Kachess Lake and surrounding ecosystem should NOT be subject to this ill-conceived proposal.
I would like to have the following answered:
What other solutions have the farmers/ranchers/orchardists come up with (or at least TRIED to come up with) in all these years for irrigation? I frequently visit the Kittitas Valley for recreation and I often see irrigation systems "watering the air" in full sunlight. Is this really the best solution? If not, WHY haven't other methods been tried ? 2
I appreciate your kind attention to this matter.
Thank you.
S.Bocek

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Comments regarding the KDRPP and KCC 2018 SDEIS

1 message

THOMAS BOCEK <tbocek@comcast.net> Mon, Jul 9, 2018 at 9:28 AM
Reply-To: THOMAS BOCEK <tbocek@comcast.net>
To: kkbt@usbr.gov

1 I am writing this letter to express my concerns regarding the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS).

2 Many deficiencies have been identified by other groups and individuals regarding the the SDEIS. These deficiencies include:

1) Failure to comply with the National Environmental Protection Act (NEPA) regarding a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18].

3 2) The lack of any plan to mitigate the impacts to 23,000 annual visitors and users of the USFS Lake Kachess Campground.

4 3) Failure to address the funding ambiguity of the current project plan. The SDEIS states the Bureau of Reclamation will “fund…some or all, or authorize Roza to fund” the KDRPP-FPP. This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FP. Please provide the legal, legislative, and/or other basis for stating Bureau of Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how “all or some” will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (BoR, Dept. Ecol., Roza, etc.) will be responsible for what

4 cont

action (fund, design, construct, operate, etc.). These are not “details” to be clarified at a later time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period.

5

4) Impacts on private wells. The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be “dewatered.” It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of “monitor and mitigate.” Well failures (“dewatering”) will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. Some of these wells are held by property owners with senior water rights. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights?

6

5) I am a home owner in the Lake Kachess Village HOA. The SDEIS does not make any provision for mitigation of the inevitable devaluation of my home. When the lake gets drained, I may not be able to sell my home for even half of its current value. The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to “several private parcels and homes or cabins” that will be affected, but a better description would be “substantial numbers of private residences…etc.” Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This easily number 300 homesites, far more than would be inferred from the term “several.” The systematic bias against representing impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. I request an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline.

7 I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative.

Thomas M. Bocek

Property owner of 2900 Via Kachess Rd., Easton WA 98925

tbocek@comcast.net

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] SAVE THE LAKE

1 message

Austin Burke <austinmarkburke@gmail.com> Mon, Jul 9, 2018 at 8:00 AM
To: kkbt@usbr.gov

I am writing to express my grave concern and opposition to the controversial Yakima River Basin Water Enhancement Project (YRBWEP). This proposal would transfer water from Lake Keechelus and Lake Kachess to junior water rights holders in the Yakima Basin at a cost approaching $1 billion. It would drain 200,000 acre feet of water a year from the two lakes and spill it into the Yakima River, to be taken out by irrigators. To be clear, an acre foot of water is one acre, one foot deep in water. Now imagine one acre of water…38 miles high! Or think of it as an acre of water the height of 14 Mt. Rainiers! That is the additional amount of water that would be drained from the two lakes. 1

The devastating impacts of such an act on our environment is hard to imagine. However the Draft Environmental Impact Statement (DEIS) just released on this project acknowledges it will deplete the aquifer, endanger threatened fish species, reduce recreational opportunities for individuals and families, probably cause wells to fail, and permanently destroy a elements of fragile ecosystem enjoyed by thousands of Washingtonians. Despite the clear risks represented by the project, the DEIS only states that it will monitor and attempt to mitigate damages after they occur. This is unacceptable and should be opposed by everyone who cares about protecting our environment for future generations.

But the damage to our environment is not even the worst of this controversial project. A study conducted by distinguished scientists from Washington State University and the University of Washington, at the request of the Washington State Legislature, documented it is not only an environmental disaster, it is an economic disaster. A team of scientists and economists conducted a Benefit-to-Cost analysis of the two projects that are now being considered by the Legislature. They showed conclusively that costs would far exceed benefits. In fact one project would lose $.80 of every taxpayer dollar spent, and the other project would lost $.54 of every taxpayer's dollar. No private enterprise would consider such a venture, and no public initiative should either. At a time when our State is facing serious challenges with regard to funding critical needs in education and infrastructure, it is unacceptable to waste taxpayer money in such a manner. 2

And I have some very specific questions: 3

1. Why do all the studies exclude the historical lake levels (using all information available since 1900)?
2. What are the very specific mitigation plans if the community wells surrounding Lake Kachess are impacted? 4
3. How will any negatively affected properties be compensated (What agencies will determine the negative impact to propertly owners? How will they be compensated? Is there a formula?). 5
4. Why is this project being driven by bureaucrats and junior water rights (outside of Kittitas County) without any regard to a ROI on the outragous project costs? 6

7

In summary, YRBWEP represents an effort by special interests in Yakima Basin to drain water from two pristine lakes, and even worse, to drain dollars from Washington taxpayers for this environmental and economic disaster. In the strongest terms possible, I urge you to oppose the YRBWEP; neither we nor our environment can afford it.

Best regards,

Austin

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess

1 message

Wende Cadwalader <wendejc@comcast.net> Sun, Jul 8, 2018 at 2:50 PM
To: kkbt@usbr.gov

1 In favor of the NO ACTION option— no pumping station or pipeline @ Lake Kachess!!!

Wende Cadwalader
Bellingham WA

Sent from my iPhone

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess SDEIS

1 message

KAREN CAMPBELL <kcemail@prodigy.net> Mon, Jul 9, 2018 at 9:00 PM
Reply-To: KAREN CAMPBELL <kcemail@prodigy.net>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Attn: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058,

Dear Ms McKinley,

1 I would like to go on record in opposition of any Kachess SDEIS alternative, be it a pumping plant and/or pipeline at Lake Kachess.

2 There is evidence the Lake may never recover, private wells may run dry, Kittitas County farmers will not benefit, of a negative impact on the environment and fish, a negative impact on fire-fighting efforts in upper Kittitas, property values will be reduced, recreational activity for a popular campground will be negatively impacted, and the list goes on.

3 I, along with residents of Kittitas County and the State of Washington would ask how this project can be supported when there is conflicting data and it will allow only one special interest group, the Roza Irrigation District, to receive any benefit from public water.

4 Public trust is at a all time low in this country and this flawed project only serves to feed that distrust.

Karen Campbell
31 Brookside Court
Easton, WA 98925
509-656-0220
Property owner and taxpayer in Kittitas County since 1977.

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess

1 message

d cernick <rcernick@gmail.com> Sun, Jul 8, 2018 at 7:29 PM
To: kkbt@usbr.gov

1 I feel that it would be money and time well spent if the existing irrigation systems were upgraded. There is so much water lost. If the systems were upgraded/improved, then there would be plenty of water in the dams as they are.
Thank you.
Debbie Cernick

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance

1 message

Michael Coan <coan66@gmail.com> Tue, Jul 10, 2018 at 9:25 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

1 I and many in the state of Washington are opposed to the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County.

2 The study is flawed and the data and assumptions are not accurate. For example, the science of the Yakima basin plan as it relates to the refill rates of Lake Kachess are flawed. A study by Washington State University confirms this fact.

3 Questions:'
- Why is the Bureau of Reclamation and the Washington State Department of Ecology focused on' sourcing new water sources instead of water conservation? '

4 - Many industries and farmers nationwide are implementing water conservation and water efficiency methods to increase their water supply, why doesn't the Bureau of Reclamation and the Washington State Department of Ecology promote water conservation and water efficiencies as the' first option for the Yakima River Basin?'

5 Instead of spending money on uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years.

6 Please note my disapproval of this plan to lower Lake Kachess. I specifically oppose the Kachess SDEIS active alternatives 2-5 and support only Alternative #1 of the Kachess SDEIS -- no action.

Thank you,'
Michael Coan'

La Canada, CA'

206-313-2773'

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP Project

1 message

Greg Daly <amnesiakdotcom@gmail.com> Fri, Jul 6, 2018 at 4:01 PM
To: kkbt@usbr.gov

Hello,
I have lived in Western Washington all of my life, and many of my finest memories have been in the snoqualmie pass area. Now, at 38, with a 10 year old daughter, she is also enjoying skiing at Alpental and camping at Lake Kachess. Lake Kachess is truly a special place - it's rare that you can get to such a peaceful, gorgeous, and large mountain lake an hour from a major city. Literally millions of people are a short drive away from this place. I have memories here ranging from watching the Perseid showers in August, to taking my daughter kayaking. One drought year with the KDRPP would tear away the possibility of a child enjoying this place with their family for several of their most formative years. Washington is a beautiful state, with lots of jobs and limitless potential of all kinds. I am strongly opposed to anything that would disturb what our state has at Lake Kachess, and leaving it as it is benefits many more people than it would if this project were executed - not to mention, we wouldn't be spending that money.
Thanks,
-Greg Daly, Seattle

1

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant

1 message

Doug Davidson <dougda1959@hotmail.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Sat, Jul 7, 2018 at 11:34 AM

To whom it may concern:

I would like to express my concern with the proposed action to pump additional water from Lake Kachess.

1

From my review of the project, the cost, and the impact to recreation and the environment outweigh the benefit to farming. Having lived in the Yakima valley from 1959 to 1983 and worked on a small farm and orchard, I am aware of the importance of agricultural water needs. The additional pumping of Lake Kachess cannot be the appropriate answer. Further conservation and land management improvements is a longer term sustainable solution.

I urge your not to vote “yes” for the pumping option.

Respectfully,

Doug

Doug Davidson

82 Cascade Key

Bellevue, WA 98006

dougda1959@hotmail.com

206-369-1113 mobile

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess SDEIS

1 message

Tracey Donovan <tracey@tdexcavating.com> Tue, Jul 10, 2018 at 11:24 AM
To: kkbt@usbr.gov

1 I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Only the first, No Action alternative is acceptable. Please leave Lake Kachess alone.

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Public Comment and questions regarding Kachess Drought Relief Pumping Plant

1 message

Aaron Dressler <aarondressler@gmail.com> Mon, Jul 9, 2018 at 5:40 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

1 I am writing to voice my opposition to the Kachess Drought Relief Pumping Plant. Not only is this project not in the best interests of Washington taxpayers, it harms the fish and wildlife around Lake Kachess, it harms the local businesses and property values (tax revenues), and it is absolutely not the way we should be thinking about our natural resources here in the beautiful State of Washington.

2 The information provided in the DEIS and SDEIS is both inaccurate and inconsistent, demonstrating a complete lack of understanding on the part of government agencies about the damage and side effects sure to be caused by this absolutely idiotic plan to add a pumping plant to Lake Kachess.

3 What programs and points of contact will property owners around the lake have access to if damage is caused to their property due to this plan? Will property owners be financially compensated for damaged wells directly related to the draining of the lake? Who will be responsible to pay such compensation? The US Government? WA State? Roza? Other than “monitoring” wells, what active measures are being taken to mitigate damage to private property?

4 For an Environmental Impact Statement, hardly any effort was spent stating the adverse impact to the environment. Erosion was completely missing from this document. What kind of erosion damage will the lake suffer from draining it over 100 feet lower than it has ever been drained? How will the 100 year old earthen dam cope with being high and dry for much longer than it ever has before?

5 What is being done to protect the endangered Bull Trout in Lake Kachess? You can’t claim to be saving the endangered species on Lake Keechelus, but then turn a blind eye to the damage that would be done to Bull Trout in Lake Kachess. There was no definitive answer to this question in the latest SDEIS. There was absolutely no mention of the freshwater clams in Lake Kachess that would also be impacted by this pumping plant. Nor was there any mention of the Lamprey, and many other species of fish that would be affected by this plant.

6 Additionally, the financial benefit of the KDRPP to the taxpayer is nonexistent. In fact, taxpayers will lose money from this pumping plant, in effect, subsidizing Senior Water Rights assurances given to junior water rights landowners in the Roza irrigation district. These farmers bought their cheaper land knowing that water would be turned off during drought. Instead of planting crops that are more tolerant to drought, like hay, Roza growers have taken a risk by planting thirsty, more profitable crops. This risk is THEIR risk. So, question: What benefits do taxpayers receive? If not financial, then why would this project be publicly-funded, especially since the water is being directed entirely to the private growers in Roza who made risky decisions?

7 What does Roza intend to do with this water? According to Roza's own documents, they only need 50,000 acre feet of water during drought years. Why do they need such a powerful pumping system, capable of accessing 200,000 acre feet? What assurances do we as taxpayers get that they will not just turn around and sell OUR water to other districts, and keep the profit? Who

8 determines when they turn the pump on? Will they be allowed to turn the pump on if the lake fails to refill after a drought year, and senior water rights landowners around the Yakima valley can't get their gravity-fed water? Would that be considered an official drought?

9 Why weren't common-sense alternatives included in the SDEIS? Spring runoff collection? Modernization of the irrigation system? What would be the cost of building a 50,000 acre feet reservoir near the Roza dam and why wasn't that studied for feasibility? None of these alternatives were included in the SDEIS, only plans to drain a natural lake. I'm ashamed that 5 different variations of a pump are the only ideas our State could come up with.

10 Why aren't we talking about getting Salmon back into Lake Kachess, the lake that means "many fish" in Native American? Why, instead of a fish ladder like at Lake Cle Elum, are we getting a pumping plant at Lake Kachess?

Please rethink this proposal. If this pump plan succeeds, I will actively spend the rest of my life advocating for the removal of this absolutely asinine pumping plant. You've spent enough taxpayer money researching this horrible project, it's time to look at real commonsense "Drought Relief" solutions.

Sincerely,

Aaron Dressler

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Save Lake Kachess

1 message

Andy Dulin <andy.dulin.b7wc@statefarm.com> Mon, Jul 9, 2018 at 11:24 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

1 I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative.\

2 Renaming Lake Kachess to the Kachess Reservoir if classic manipulation.

3 The Level to which the lake is currently drawn down is the reservoir….. any additional draw down, is simply the draw down of a natural alpine lake….. and is unacceptable.

4 Repairing and replacing existing Roza delivery ditches, and then monitoring the improvement is water delivery is a much better initial option…… before any other additional projects are considered.

5 NO one other that a governmental agency could violate laws in the way this project bases its projections.

Andy Dulin

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Save Lake Caches

1 message

James Elder <jimbarbelder@gmail.com> Sun, Jul 8, 2018 at 11:14 PM
To: kkbt@usbr.gov

We have had a cabin on Lake Kachess since 1981 and have spent many happy hours water skiing and canoeing in the pristine waters of the lake. Our 3 children who were babies when we built the cabin loved to go “to the lake” and still do as adults with their own children. Many years ago the lake was drained way down and the lake became totally unusable and was pretty ugly looking. I would hate to see that happen again. We were at our cabin this last weekend as were most of our neighbors enjoying the clear waters and warm eastern Washington weather. It is a beautiful lake and judging by the fact that the campground at the lake is full all summer, many others agree. Please do NOT allow the lake to be drained. 1

Barbara Elder

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Save Lake Kachess

1 message

GREG ENGBERG <gkengberg@msn.com> Mon, Jul 9, 2018 at 7:48 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Too often, we take for granted the beauty of our forests, lakes and nature's wildernesses and exploit its resource for the benefit of a few while at the detriment of a much larger base users such as campers, fishermen, vacationers, property owners and the resource itself. Placing pumping stations on Lake Kachess is one of these instances. 1

If the pumps are installed and are used to take Lake Kachess down to the reported levels, doing so cuts off Little Kachess (as it's referred to) from the rest of the primary body of water, stagnating the water, increasing water temperatures and endangering fish and fish habitat. This is the damage from exploitation. 2

Lake Kachess was previously modified decades ago to hold additional water for irrigation . Pumping water out of Lake Kachess is not its natural process. Taking the Lake down to new low levels means water will have to be pumped continually until such tome as the Lake recovers to its natural flow process. This will take years. Actually, there's a belief that pumping Lake Kachess down to its lower level will be a "one-and-done" scenario never recovering because there will never be a reduction in water demand in any future years to support recovery. Lake Kachess is a limited resource. One and done. Please think about this statement. Exploiting a resource to the level of never recovering. 3

I ask for your support it opposing the installation of pumps in Lake Kachess. It's not a responsible decision/action to spend one-half billion dollars to effectively pull additional water out of limited resource, damage a resource beyond recovery, thus requiring water be pulled from Lake Kachess by pump rather than its natural process of seasonal snow melt and flow. 4

Manage our resources by managing demand of usage, not use a resource to its demise.

Thank you for your time and consideration.

Sincerely,

Greg Engberg

Sent from my iPad

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess

1 message

Camille Fitzpatrick <camfitzpatrick@gmail.com> Mon, Jul 9, 2018 at 5:07 PM
To: kkbt@usbr.gov

Please do not drain Lake Kachess!!

I have been going to Lake Kachess since I was a child in the 70's and enjoyed swimming in the lake, paddling and I even remember the dock that was in the middle of the lake. We take our family there now for camping and boating and greatly enjoy the beautiful scenery and pristine lake.

1

There is no need to drain the lake, there is plenty of water available. It will decimate the trout, ruin the campground and the lake itself, one of the natural wonders of our beautiful state.

We strongly encourage you to leave the lake alone!!

Thank you.

Camille Fitzpatrick
13321 47th Pl. W
Mukilteo, WA 98275

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Fwd: KDRPP

1 message

gernor@comcast.net <gernor@comcast.net> Sun, Jul 8, 2018 at 3:28 PM
To: kkbt@usbr.gov

From: gernor@comcast.net
To: "www kkbt" <www.kkbt@usbr.gov>
Sent: Sunday, July 8, 2018 3:25:12 PM
Subject: Fwd: KDRPP

From: gernor@comcast.net
To: "www kkbt" <www.kkbt@usbr.gov>
Sent: Wednesday, June 27, 2018 1:07:24 PM
Subject: KDRPP

I am writing to express my opposition to the proposed Lake Kachess Drought Relief Pumping Plant (KDRPP) that would drain Lake Kachess 80 vertical feet below the dam's current lowest level, or 110 feet below it's historic natural level. This would leave the pristine Lake Kachess campgrounds, one of the most beautiful and popular federal campgrounds in the country, a virtual mud-hole, perhaps indefinitely, as the lake may never refill to it's natural level. The cabins and year-round homes around the lake could be deemed uninhabitable because well water would be dried up and water for fire protection would be unavailable. One new home owner has already been denied homeowners insurance because they say the area is in a "extreme" fire danger zone because of possible water unavailability. 1

The cost of this plan has already gone from an initial estimate of $268 million dollars to $444 million dollars and some estimate one billion dollars!! This, of course, is to be paid by the taxpayers of the state. Independent studies have estimated that there will be a negative benefit of these funds, resulting in a loss of $0.90 for every dollar of taxpayer money spent.. 2

Through conservation techniques, new technology and water rights exchange programs, water could become available to the special interest groups in the 3

Yakima basin at a far less cost. Is another vineyard really worth $1 billion and the demise of pristine Lake Kachess???
Please vote "NO" on this proposal. 3

Gerald/Norma Golding
12821 SE 2nd St.
Bellevue, WA 98005
(425)455-2199

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL]

1 message

Carol Guilfoyle <cjguilfoyle@gmail.com> Sat, Jul 7, 2018 at 7:47 PM
To: kkbt@usbr.gov

I am opposed to any of the Kachess SDEIS active alternatives (2-5), the pumping plant and/or pipeline at Lake Kachess. Only the first, No Action alternative is acceptable. Please leave Lake Kachess alone. 1

Carol Guilfoyle

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP and KRKRC SDEIS

1 message

Judy Hallisey <hydrojude@gmail.com> Tue, Jul 10, 2018 at 8:32 PM
To: kkbt@usbr.gov
Cc: Barry Brunson <mathisfun@mac.com>, Brad <wheezard@gmail.com>, Tiffany Hallisey <rotnella@gmail.com>

Please accept my comments in the attached document.

2 attachments

Kachess Lake comments to SDEIS.pdf
75K

ATT00001
1K

Submitted via email to ***kkbt@usbr.gov*** on July 11, 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

My family owns property on Via Kachess Road within the analysis area of the Kachess Drought Relief Pumping Plant (KDRPP). I am a resident of Kittitas County, Washington State and use Lake Kachess for recreation and health purposes. Thus I have standing in this proposal of action against my sense of place. I have reviewed both the DEIS and the SDEIS and found they fail to comply with the NEPA requirement of considering all reasonable alternatives to achieve the stated purpose. No alternative considers water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies either separately or in combination of action alternatives to the proposed Kachess Lake pumping plant. These methods and technologies could achieve the purpose and need as stated in the DEIS and SDEIS without impacting Lake Kachess. Close to 70 miles of unlined, open air, earthen ditches carry water from Lake Kachess to Rosa Irrigation District. Why isn't enclosing and lining these conveyances included in action alternatives or offered as a separate action alternative? 1

The vegetation and wetlands and densely forested watershed as described in Chapter 3 of the SDEIS will suffer with reduced water levels in Lake Kachess. No where could I find analysis of effects and changes to flows, substrate erosion, and geomorphology of tributary streams. Thus the DEIS and SDEIS analysis of watershed effects is inadequate and does not meet the NEPA requirement of full disclosure of effects. These streams evolved to a natural base level established after the last glacial retreat. Since construction of the dam, the streams have deposited their sediment loads at their deltas in the reservoir. If the lake level is dropped below the natural base level (up to 80 feet!), headcutting in the tributaries will be initiated and begin working upstream to establish new equilibriums. Deposited sediments of the deltas will erode. Stream profiles will downcut and stream substrates will erode. Sediment budgeting will be upset. Downcutting of the stream profiles will result in disconnect of the stream to its hyporheic zone and to the water table. Biodiversity of the streams and their hyporheic zones will be adversely affected. Slope processes of the watershed will be adversely affected. These effects must be analyzed and quantified. As the DEIS and SDEIS currently stand, they do not assure favorable conditions of flows and slope stability as mandated in the Organic Administration Act of 1897. 2

Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible 3

that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? Please state specific statutes and other justifications where junior water rights override senior water rights. Mitigation for loss of well water is not described beyond monitor and mitigate. Please describe in detail what mitigations will occur. Where is the money for mitigation of loss of senior water rights and well water coming from and where is it included in the costs of the action alternatives? 3

The SDEIS indicates the Kachess Reservoir was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and Little Kachess Lake. These two Lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. It is a misrepresentation to assert this project involves Kachess Reservoir only and not the Lakes. When Kachess Dam was constructed to provide irrigation water, water distribution through water rights assignment was based on quantities provided by the Reservoir capacity, not including the Lakes capacity. To draw water below the natural Lakes levels will rob every Washington State resident of their right to the water. 4

The documents indicate approximately 115,000 cubic yards of material KKC tunnel will be excavated during construction of the KKC tunnel. Gravels and other rock types are salable materials and must be accounted for. How will this material be separated and accounted for amongst different mineral estate owners? Where will the 115,000 cubic yards of KKC tunnel material be deposited? There is no mention of effects of load haul on Kachess Lake Road. What safety measures and scheduling of hauling equipment will be made during the tunnel construction to insure the safe and customary use of Lake Kachess County Road by campground users and local property owners and guests? 5

I find the DEIS and SDEIS to be inadequate and fail to address NEPA requirements of offering a full range of alternatives and of disclosing effects of the proposed actions. I support the No Action Alternative. 6

Please send me a copy of any additional SDEIS, FEIS or Record of Decision.
Thank you for considering and acting on these comments.

Sincerely,

/s/ Judy E.I. Hallisey
380 Landers Lane
Cle Elum, WA 98922
hydrojude@gmail.com

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP & KKC SDEIS Comment

1 message

Alistair Hamilton <alistair.hamilton@gmail.com> Tue, Jul 10, 2018 at 8:47 PM
To: kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office

KDRPP & KKC SDEIS Comment

The SDEIS makes very clear statements about the devastating impact of this pumping project and the recommendation of the bureau shows that they are not being open to data or facts that go against their foregone conclusion that draining Lake Kachess is the way to solve future droughts.

1

There are sustainable alternatives that have not been explored in favor of this “easy” answer of putting a straw into a pristine glacial lake.
We need to work harder and commit to economically viable and ecologically responsible approaches with ALL stakeholders. The impacts described are severe and irreversible.

Thank you,

Alistair Hamilton
425-442-9554

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess project

1 message

Lorelle Hendricks <LorelleHen@comcast.net> Tue, Jul 10, 2018 at 11:18 AM
Reply-To: LorelleHen@comcast.net
To: kkbt@usbr.gov

Please DO NOT proceed with the proposed plan to partially drain down Lake Kachess to supply irrigation water to eastern Washington,. The impact study does NOT support this project both in terms of cost, environmental impact and effectiveness of the result. 1

Thank you.

Lorelle Edmonson Hendricks
2439 220th Place NE
Sammamish, WA 98074

425 269-7808

Dera, Karen <kdera@usbr.gov>

Fwd: [EXTERNAL] KDRPP EIS Comments

1 message

Long, Julia <jlong@usbr.gov> Tue, Jul 10, 2018 at 12:57 PM
To: Karen Dera <kdera@usbr.gov>, "Gregory, James" <James.Gregory@hdrinc.com>, "Teepe, Adam" <Adam.Teepe@hdrinc.com>

Comments from Joel Hubble.

Julia Long
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1917 Marsh Rd.
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---------- Forwarded message ----------
From: **Joel Hubble** <hubblejdcl@yahoo.com>
Date: Tue, Jul 10, 2018 at 12:51 PM
Subject: [EXTERNAL] KDRPP EIS Comments
To: Julia Long <jlong@usbr.gov>

Julia,

Sorry these comments are not using the BOR approved method using the WORD forms.

1. pg 3-76, 3rd par. should reference table 3-15 not 3-14.

2. pg 3-80, table 3-18. I would think that for the Wapato reach, for summer period that QD < QU, not the reverse (but I could be wrong).

3. pg 4-37, table 4-20 (Rimrock) for Prorated Years-Median. I'm not doubting the results, but wondering operationally why a -61% change?

4. pg 4-129, 1st sentence- "...(2 to 5 years to refill the reservoir)..." I think this phrase should be put into proper context (and it may be in another section, but could be repeated) as to how many times in the period of record it actually takes 2-5 years to fully fill again by the beginning of the next irrigation season. I know it happens, but as I recall it is infrequent.

5. pg 4-129, 3rd par, 1st sentence. strike the word "precisely"...from "...to precisely estimate..."; it sounds contradictory.

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6. pg 4-130, 1st par. Consider deleting the first 2 sentences and just state what seems to be the agreed upon conclusion based on the science.

7. pg 4-130, 2nd par. This was one of my pet peeve conclusions that I commented on from the previous draft... so I don't expect it to be modified, but here goes anyway-

To say that shoreline habitat complexity will decrease under KDRPP seems over stated. I agree that the construction footprint will negatively impact it. However, impacts due to the additional drawdown does not seem likely to me. The shoreline is already effected by the annual drawdown and has reach a point of equilibrium. The infrequent additional drawdown below lthe normal low pool elevation is well below the root zone of the shoreline vegetation; so it's hard for me to see why the drawdown would have an effect. OK, the rant is over... feel better!

Joel

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K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Leave Lake Kachess alone!

1 message

Jenny <mezzo1@comcast.net> Mon, Jul 9, 2018 at 11:56 AM
To: kkbt@usbr.gov

I am opposed to any of the Kachess SDEIS acv e alternav es (2-5). I oppose any construcon of a pumping plan t and/or pipeline at Lake Kachess. Alternav e #1, No Acon is the only accep table alternav e. 1

Thank you,

Jenny Hughart
Newcastle, WA

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Save Lake Kachess

1 message

Brandy Jahn <brandyjahn@gmail.com> Tue, Jul 10, 2018 at 9:32 AM
To: kkbt@usbr.gov

To Ms. Candace McKinley, Environmental Program Manager.

Dear Ms McKinley,
As I hope you already know, there are many citizens adamantly against the draining of Lake Kachess. I know you will do the right thing and not let this measure go through. I hope you take adequate time to go through all the opposing paperwork and see how much heart, time and energy people have put into saving this beautiful lake. The opposition is clear and well founded that this lake need not be drained.
I implore you to save Lake Kachess!!

—Brandy Jahn, resident Sammamish, WA
PH. 206.601.6923

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K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP Comments

1 message

Jayme Jonas <jaymejo1@msn.com> Tue, Jul 10, 2018 at 10:20 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Dear Ms. McKinley,
Please see my attached comments regarding the KDRPP DSEIS. I look forward to hearing back from you regarding these comments.

Sincerely,
Jayme Jonas

Sent from Windows Mail

KDRPP public comments - Jayme Jonas.pdf
348K

Jayme Jonas
23402 NE 29th PL
Sammamish WA 98074

July 11, 2018

Bureau of Reclamation, Columbia-Cascades Area Office
Attention: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058

Submitted by email to kkbt@usbr.gov

Dear Ms. McKinley,

I am a life-long recreationist who grew up camping at Lake Kachess; my family has been camping there since the 1950s. I credit this Lake for my love of the outdoors and appreciation of nature. I love that it's giving me the opportunity to pass that love and appreciation on to my children. Its proximity to the rapidly growing population of the Seattle metro area makes it all the more valuable for providing opportunities for urban dwellers to get out into nature and develop that love and appreciation as well. When I first heard of the Kachess Drought Relief Pumping Plant and its basic effects on the lake, my personal reaction was negative—not only because of the negative impacts I assumed would occur to the area around the lake, but also because I disagree in principle with draining a natural lake for private use. However, as a professional comprehensive planner with a Master's in Urban Planning and a Bachelor's in Economics, I wanted to be educated about the project and read the entirety of the DSEIS. I expected to be torn between my personal opinion and the professional analysis that presented significant economic benefits for water users, with moderate environmental and recreational consequences that were thoughtfully mitigated. As I read the document, I was impressed instead by how clear it is that this project is not worth any of the costs: monetary, environmental, or recreational. I am not a NIMBY. I am not concerned with property values: real estate is a gamble, and that includes starting a farm in an irrigation district that does not have senior water rights. I am purely concerned with protecting a natural lake, and its aquifer, wildlife and vegetation for all of the people of the state, as opposed to a few looking to financially benefit from its water. 1

The Kachess Drought Relief Pumping Plant (KDRPP) is not a public benefit and must not be enacted, either by the Bureau of Reclamation and Department of Ecology, or by the Proratable Entities interested in implementing it. It is inconsistent with adopted plans, does not comply with NEPA requirements, the analysis is based on missing data and questionable assumptions, proposed mitigation is lacking, groundwater impacts could be detrimental to property owners and public recreationists, there are insignificant agricultural impacts given the negative recreation and environmental impacts, lake habitat for fish is negatively impacted, and it could potentially increase the fire susceptibility of the area while decreasing the ability of emergency responders to fight fires. It also radically changes the use of the Yakima Project, which has been managed for over 100 years as a system for all users and instead essentially earmarks one reservoir for one irrigation district. 2

Inconsistency with Mission and Adopted Plans

Comprehensive planning within the State of Washington requires that all plans and projects be consistent with adopted policies; KDRPP does not appear to meet that test in several regards, including contrasting with the mission of the proposing agencies.

The opening page of the DSEIS cites the missions of the US Department of the Interior, the Bureau of Reclamation, and the state Department of Ecology. While all agencies have mission facets that can compete with one another, making mission-project consistency a balancing act, this project does not fit with the adopted missions more than it does.

- Though the US Department of the Interior is directed to "supply the energy to power our future," this part of the mission is tertiary to protecting natural resources, which KDRPP does not do. Instead, it denigrates a natural environment in order to provide economic benefit to a small group.

- Reclamation is directed to "manage, develop and protect water" and clearly KDRPP fits within that purview. However, Reclamation must also do this work "in an environmentally and economically sound manner," which is not descriptive of the proposed project.

- This project is most inconsistent with the state Department of Ecology's mission to "protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations." Undertaking KDRPP has significant negative environmental and recreational impacts which are not consistent with Ecology's mission.

3

The DSEIS states in Section 4.3.3 that "Alternative 1 No Action does not meet the purposes of the Proposed Action because it does not address water supply for proratable irrigators or instream flow conditions in the upper Yakima River basin" (pg 4-21). Later, in Section 4.24 (pg 4-349) the DSEIS suggests that the proposed project meets several of the Integrated Plan's goals when, in fact, it does not. The noted goals include:

- Provide opportunities for comprehensive watershed protection, ecological restoration and enhancement, addressing instream flows, aquatic habitat, and fish passage

  This plan does not provide "comprehensive watershed protection" and instead increases the vulnerability of an entire watershed to wildfire risks by lowering groundwater levels and reducing access to surface water for emergency responders. No ecological restoration or enhancement is provided other than improving a minority of instream flows analyzed; negative impacts are projected for aquatic habitat in the lakes and for fish passage as well.

- Improve water supply reliability during drought years for agricultural and municipal needs

  While KDRPP does provide some benefit in drought years, it is insignificant when the adverse climate change scenario is modeled. A 3% gain in water is hardly worth the monetary costs, nor the negative environmental and recreational impacts that could permanently occur.

- Improve the ability of water managers to respond and adapt to potential climate change effects

As noted above, potential climate change effects would severely limit the benefit provided by KDRPP.

- Contribute to the vitality of the regional economy and sustain the riverine environment

  Again, while there are some instream flow objectives that would be met, not all flow targets would benefit and some are projected to worsen. KDRPP does not meet the established economic indicator threshold of 1% and ignores the negative impacts to what is likely a large sector of the economy: recreation.

Further, KDRPP is inconsistent with several adopted plans at both the County and Federal levels.

- Kittitas County Shoreline Master Program (SMP): Lakes Keechelus and Kachess are designated as lakes of statewide significance under the State Shoreline Management Act. The Kittitas County SMP designates the shoreline of both lakes as "conservancy shoreline environment," which requires "maintaining the natural character of the shoreline area" (Section 3.15, pg 3-161). The development of any of the pumping facilities would be in conflict with this requirement as they would significantly alter the character of Lake Kachess.

  Section 3.15 further goes on to state: "Under the draft SMP, the majority of both lakes would be designated as rural conservancy. The purpose of the rural conservancy environment is to protect ecological functions, natural resources, and valuable historic and cultural areas in order to provide for sustained resource use, natural flood plain processes, and recreational activities." All of these elements of the Lake to be protected would be negatively impacted by KDRPP.

- Ecology Upper Kittitas County Groundwater Rule (WAC 173-529A): Section 3.5.1 notes that Ecology in 2011 placed a moratorium on the development of new unmitigated groundwater withdrawals in upper areas of Kittitas County (pg 3-53). On its face, it does not seem that a project that could further deplete groundwater resources in this area could possibly be consistent with this rule. How is KDRPP compatible with this rule?

- Forest Service Criteria, 1990 Wenatchee National Land and Resource Management Plan for Lake Kachess: The USFS has designated Lake Kachess as land allocation Developed Recreation (RE-1) Retention VQO, Scenic Travel 1 and 2 Retention VQO, and Partial Retention VQO. As stated in section 3.10.4, "The USFS considers visual quality to be one of the most important resources to be protected under this land allocation" (pg 3-127). Due to the changes in pool levels that would make the lake a less dominant element on the landscape, the proposed project is not consistent with these Forest Service criteria.

3

Failure to Comply with NEPA Requirements

The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of "reasonable alternatives" means all state-of-the-art alternatives must be rigorously explored and properly evaluated, and those other alternatives which are eliminated from detailed study must be described with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party.

4

The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 DSEIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS.

The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS goes to great contortions to try to make these appear to be several different alternatives, they are in fact one alternative: extracting water from a natural lake to benefit downstream special interests.

Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies. 4

This fatal flaw originates from the Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Yakima Plan Programmatic EIS not only failed to consider a range of alternatives, as required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Yakima Plan Programmatic EIS and do it correctly. I ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose.

I ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Lake Kachess pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of

special interest groups." I ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given – including data, references, and review procedures – for excluding each alternative. The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and I therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses. 4

In addition, it is clear NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. The DEIS states the project will implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to understand the potential impact on individuals and families, and to participate meaningfully in the deliberative process. The SDEIS documents negative impact on recreational activity and acknowledges most affected individuals come from the Seattle area. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area. 5

In all subsequent communications with the public, the misrepresentation of Lake Kachess must be corrected. The SDEIS indicates Kachess Reservoir was constructed <u>over</u> a naturally occurring glacial lake [joining] Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, as the reservoir water (stated on page 1-1 to be the water over the natural lake) is already spoken for. Thus, every drop of water to be pumped by KDRPP will come from the natural lake, Big Kachess Lake. It is a misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. I ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by Reclamation; below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. I ask that this confusion and misrepresentation stop, and accurate terminology be used that informs, rather than confuses, the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as on Page 1-7. 6

Modeling/Data Analysis Questions

A number of admissions within the DSEIS cast doubt on the accuracy and usefulness of the modeling used in the analysis and even note aspects of the project that were not included in modeling or evaluation. Data and analysis that are outright missing from this document include: 7

- Section 3.7: no formal wetland delineations or plant surveys were conducted for this analysis. Please explain why these were not conducted. 8

- Section 4.4.2 (pg 4-81): "Lake Keechelus was not included in drought operations surface temperature modeling completed by PSU" and "Extended or multi-year drought, or refill conditions were not included in the PSU water temperature model and potential effects of these conditions are not quantified." Please explain why these aspects were not modeled and what the implication is on the modeling that was completed. 9

- Section 4.4.7.2 (pg 4-98): water temperature effects and their impacts on the Little Kachess basin from the inflow from Keechelus (through KKC) are unknown, indicating that this aspect of the project was also not modeled. Please explain why this was not modeled. 10

- Section 4.6.4 (Pg 4-129): "Additional hydrodynamic modeling is needed to precisely estimate reductions in zooplankton abundance…" Please explain why this study was not completed. 11

- Section 4.10: SketchUp (or similar) renderings of all proposed facilities to aid in adequate visual quality analyses are absent. Enough details are provided regarding building mass and location, and amount and location of vegetation to be cleared to provide these basic models as evidence in this document. Please explain why these models were not developed, or if developed not shared with the public. 12

- Section 4.21: The socioeconomic analysis does not analyze the No Action alternative for economic impacts. This glaring lack of data makes it impossible to compare the predicted economic impacts of the alternatives. Please explain why not all alternatives were modeled with IMPLAN software and how the public is expected to make sufficient comparisons between the alternatives without this analysis. 13

- Section 4.21: The socioeconomic analysis also does not describe the impacts of the project to the recreation economy of the four-county region. Despite noting in Section 3.14 that "visitors to the lakes are an important part of the economy of upper Kittitas County" (pg 3-147), the economic analysis does not account for the recreation industry or even describe it as a piece of the whole 4-county regional economy. Please explain why this economic sector is missing from the analysis, or which sector it is a part of if it is considered part of a larger sector, and how the public is expected to fully understand the economic impacts of the project without an analysis of this sector. 14

One of the fish habitat "benefits" noted in the DSEIS is reduced water temperature in Lake Kachess due to reduced shallow water areas that would be warmed along the shoreline. The acknowledgement that modeling of prolonged droughts that could result in multiyear drawdowns of the Lake raises questions about the accuracy of this identified "benefit" and is among other questions raised by admissions within the DSEIS: 15

- Section 4.3.7 (pg 4-60) discusses differences that are "likely due to reservoir balancing in the modeling that may not occur during actual operation" but no explanation is given about how actual operation may differ from what is reflected in the modeling. Are these differences based on assumptions built into the model that are not accurate or is "reservoir balancing" too complex to 16

accurately capture in a model? Please better explain this statement to either acknowledge deficiencies in the model or the highly variable nature of reservoir operation. 16

- Water temperature in Lake Kachess is predicted to decrease with drawdowns, but Section 4.6.4 notes "there is uncertainty around whether prolonged droughts… could cause warming." Is this uncertainty related to the fact that multi-year and prolonged droughts were not modeled? What is the level of uncertainty? Why were prolonged droughts not included in the modeling? 17

- A discrepancy is found in Section 4.7.4 (pg 4-156) which states that it could take 2-8 years for Lake Kachess to return to normal operating levels, as opposed to all other sections of the document which refer to a 2-5 year refill period. Why are two refill periods identified, and which is more accurate? With the predicted increase in frequency of droughts, how was the refill period determined? 18

In addition, there are some aspects of the analysis which are not explained adequately, such as:

- How is target pool elevation determined? If Keechelus does not meet its "target pool elevation" in some years following drought pumping of Kachess, how much longer would it take for Kachess to refill, assuming KKC is implemented? 19

- Construction methods and plans are fairly detailed for all aspects of the proposed project except for the Volitional Bull Trout Passage Improvements. Why is there no detailed construction data for this element of the project? 20

- KDRPP was originally proposed to allow pumping of 50,000 acre-feet of water from Lake Kachess but this number has increased to 200,000 acre-feet. What instigated this significant change in the amount of water to be pumped? 21

- The SDEIS asserts the presence of a "value analysis study that suggested the feasibility of a floating pumping plant." The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion," brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. Please provide full descriptions of the "suggestions," including the methods, data, and conclusions implied by the inadequate and confusing term "suggestions." 22

- The SDEIS states Reclamation will "fund… some or all, or authorize Roza to fund" the KDRPP. This statement inadequately informs Washington citizens, as well as Roza farmers, of their likely obligations for financial support of KDRPP. Please provide the legal, legislative, and/or other basis for stating that Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how "all or some" will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (Reclamation, Ecology, Roza, or other) will be responsible for what action (fund, design, construct, operate, etc.). These are not "details" to be clarified at a later time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all 23

the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period.

SDEIS Table 1-1 (pg 1-11) indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) "Fund, design, construct, operate… etc.… the selected alternative." This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public's mind, largely due to conflicting public comments by Roza representatives and Reclamation representatives. It is imperative that this confusion be removed before any Final DEIS and/or ROD be issued. I ask, therefore, that a complete and unambiguous statement of financial obligation of KDRPP be issued. The statement should make clear that 100% of the costs of implementing KDRPP, including all mitigation, litigation, and other assigned costs, will be borne by Roza Irrigation District or if not Roza, then by which entity/entities. 23

- The SDEIS states that the KDRPP-FPP is the "proposed action" and that Reclamation and Ecology have not identified a "preferred alternative." This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are "acceptable" in 2018. This explanation should also serve to inform citizens as to why no "preferred alternative" is provided. This explanation is critical to citizens' understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. Reclamation must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS. 24

- The statement of budget (Pg 2-59) for KDRPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for Alternative 4. Because the estimate is not a measure of central tendency (i.e., neither mean, median, nor mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; as opposed to showing a single estimate of $282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a "low" or "high" correction, each will be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates. 25

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the Alternative 4 budget should present a $423,000,000 base.

In all cases, the mitigation costs must be included. For some reason, the required Bull Trout Volitional Passage is stated in the text (Pg 2-60) to cost $23,000,000 (preliminary estimate) but is not included in the stated project costs. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for Alternative 4. 25

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. I request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

- Section 4.13.4.2 notes that noise from operation of the pumping plant is "anticipated" to fall within a certain range. The construction noise analysis is relatively detailed compared to the analysis of operations. Why is noise data from similar projects not cited or used as a proxy for this analysis? Additionally, the noise analysis notes that the closest noise sensitive receptors would not be affected but does not detail what these receptors are. What are the closest noise sensitive receptors, and where are they located? 26

- Section 4.15 notes that KDRPP would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." What regulatory guarantees are in place to ensure that no additional agricultural uses or intensifications are allowed after this project is constructed? This is a relevant question given the fact that the original 1902 legislation authorized the Tieton and Sunnyside divisions of the Yakima Basin (Section 1.8.1), but others have been added over time. How will Reclamation prevent other new agricultural uses from demanding additional water from this project which were not originally intended? 27

  Further, it is not even clear that limiting agriculture to existing uses is truly intended. Table 1-2 (pg 1-20) notes that Ecology will "issue water rights as necessary." How will new water rights be issued and to whom? How is this in keeping with "not increase(ing) the amount of irrigated land?" Section 4.21 notes that the model allows for identification of agricultural activity that "could" occur (pg 4-319), which seems to allow the door to be open for more or intensified agricultural uses.

- Section 4.21 suggests that the Volitional Bull Trout Passage Improvements are expected to have positive economic benefits (pg 4-324). In what way would these improvements have economic 28

impacts? What additional detail is needed about these improvements to estimate their economic impact? 28

Completely missing from the SDEIS (perhaps best located in Section 4.23 Health and Safety) is an analysis of the impact of the project on the fire susceptibility of the surrounding area and the ability of emergency responders to utilize water from Lake Kachess to fight fires that occur. Local fire departments make use of water from Lake Kachess to fight fires in the area; how have these organizations been involved in this process and what mitigation is proposed to address this potential issue? 29

Finally, the depiction of Lake Kachess after drawdown of 80' is inaccurate. The SDEIS (Pg 2-66) indicates the 80' drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An "imposed line" on the water conceals the true impact of 628 acres of exposure. I ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as "thatched," "outlined water" or other techniques, but as mud or silt consistent with aerial pictures. An additional note; residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation. 30

Mitigation

Mitigation measures proposed in the SDEIS are severely lacking. While detailed mitigation methods are proposed related to the construction of the proposed facilities, few definitive mitigation methods are proposed for the negative impacts stemming from the operation of the proposed facilities. Those sections missing proposed operational mitigation methods include: 31

- 4.2.5.2: (pg. 4-9) Erosion control measures would be implemented prior to implementation of the project "if erosion is identified as a problem." Isn't an EIS the opportunity to identify erosion as a problem? If not identified as a problem at this stage, when would it be identified prior to implementation of the project? What types of erosion control measures would be implemented?

- 4.5.4: (pg 4-106) A well monitoring program is proposed to be implemented to analyze groundwater levels associated with drawdown but no "appropriate mitigation strategies" are identified for implementation. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. I ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD. 32

- 4.6.10: (pg 4-148) A water quality monitoring program is proposed to be implemented to document changes in water temperature but no subsequent mitigation is proposed to address water quality impacts to fish. Please explain how this monitoring program would be implemented and how Ecology would address impacts to fish based on the data collected. 33

- 4.13: Noise mitigation only addresses construction, not operation of the project. Please explain what types of noise mitigation would be implemented to address noise from the operation of KDRPP. 34

- 4.14: A myriad of negative impacts on recreation are identified but no mitigation is proposed, other than a boat launch on the opposite end of the lake from the campground. Will alternative recreation sites for activities other than boating or fishing be provided elsewhere? How else will recreation impacts be mitigated?

At the very least, mitigation strategies utilized by other agencies on similar projects with similar effects could be listed as examples of what Reclamation and Ecology might implement, should any future negative effects occur.

As detailed above, Section 4.15 notes that the project would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." I ask that specific regulatory restrictions be put in place as mitigation for this project to ensure that no additional agricultural uses or intensifications are allowed after this project is constructed. Without these measures, Reclamation could not prevent other new, or intensifications of existing, agricultural uses from demanding additional water from this project. Please describe the regulations that would be enacted and include the specific codes to be amended. 36

Section 4.23 notes steep slopes would be a potential safety hazard to the public and proposes a communication strategy with the public and lake users regarding the hazards and safety measures. Who is liable for injuries sustained by users due to the steep slopes caused by operation of KDRPP? Further, Section 4.2.4.2 notes that slope instability could result "where relatively steep or unstable areas are exposed" (pg 4-7) and that instability could be caused by "rapid drawdown, heavy or steady rain, a rain-on-snow event, and earthquake shaking." While Reclamation proposes to refrain from rapid drawdowns, it is noted that rain-on-snow events could become more common in the future thus increasing the risk of exposed slope stability. How will this negative impact be mitigated?

Groundwater Impacts

Impacts to groundwater in the area could be severe to private property owners, public recreation sites, and wildlife and vegetation. Only 6 of the approximately 107 wells in the area were monitored; please describe how this number and their location is representative. The fact that the only 2 privately owned wells to be monitored were added after the 2015 EIS was published suggests that groundwater analysis is lacking. 37

Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells could run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza Irrigation District can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry? 38

Both sections 3.5 and 4.5 indicate that "groundwater levels near the lake are influenced by lake elevations, especially during the dry time of the year when very little recharge is occurring and groundwater elevations are dropping because of discharge from the aquifer" (pg 3-57). Section 4.5.2 notes that well operations could be interrupted due to additional drawdowns, including the well supporting the USFS Kachess Campground (pg. 4-105/6). What the document does not indicate is the effect of lowered groundwater levels on vegetation in the area. Lowered groundwater levels would presumably dry out significant amounts of vegetation, further increasing wildfire risks in the area. Wildfire risks have increased significantly in all Western states over the last decade, and the costs—both to fight the fires and the economic costs incurred by those damaged by fires—have significantly increased as well. To undertake a public works project that increases those risks is negligent. 39

The vegetation and wetlands (pg 2-70) and densely forested watershed (pg 3-98) will, according to the SDEIS, suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility for fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, Reclamation has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. I demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, Reclamation and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. I ask that this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. 40

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria will these effects be calculated? 41

Insignificant Agricultural Benefits

For the overall cost of the project and the number and degree of negative impacts to the environment, wildlife and recreation, KDRPP does not even appear to address the need of Roza district water users to a significant degree. Under Alternative 1: No Action, proration occurs in 15 out of 90 years; under any of the action alternatives, proration occurs in 13 out of 90 years, a benefit of only 2 years. The document suggests that completing multiple additional projects would necessary to provide a meaningful improvement to proratable water users (Section 4.3.2, pg 4-19). The likelihood of securing permits and funding for the full list of projects needed to provide meaningful improvement is extremely low given the state of state and federal budgets. Undertaking KDRPP, and risking permanent drawdown of this lake, is not in the public's best interest or the best use of taxpayer money. 42

At best, under the historical modeling, the action alternatives would "improve water supply to proratable water users by up to 22 percentage points in the worst single-drought years" (Section 4.3.2, pg 4-19). However, agricultural demand for irrigation water is projected to increase due to climate change, at the same time that "natural runoff and streamflow in the system would decrease by 50% or more in some months when compared with the historic scenario; therefore irrigation demands and instream flow targets would have to be met by releasing larger amounts of water from the existing lakes. Currently, there are many years when the lakes are not capable of meeting these demands" (Section 3.12.3.4 Climate Change, Changes in Water Supply, pg. 3-138). Additionally, prolonged or multi-year droughts are expected to occur more frequently in the future (odds of a drought increase from 17% to 49% in any given year, according to Section 4.21.4, pg 4-329), and modeling under the adverse climate change scenario shows only a 3% improvement in proratable water delivery (pg 4-251). Further, the analysis finds that "the improvement under (the Action Alternatives) would be less in the third year of a multiyear drought because some of the inactive storage in Lake Kachess would be used in the first one or two years of drought, leaving less for a third year of drought" (Section 4.3.2, pg 4-19). 42

Section 3.21 notes that "agriculture is the third largest sector at the four-county scale" and accounts for approximately 11% of the four-county economy. No analysis is provided of the economic impact of the No Action alternative, only the conjecture that the impact of reduced prorationed water supplies "could be greater than 1 percent of the agricultural sector output" (pg 4-323). Without this information, it is difficult to make a meaningful comparison between the economic impacts of the No Action and action alternatives. However, a comparison is not necessarily valuable given that Section 4.21.4 states that "the average annual impacts during operation on output, personal income, and employment are well below the 1 percent threshold for the impact indicators at the four-county regional level" (pg 4-325). If the economic benefit is projected to not meet the identified threshold of significance, why are Reclamation and Ecology considering implementing a project that could cost over $225M to construct (including interest, for the preferred alternative, though costs increase to $675M should another alternative be chosen) and $25M a year to operate, not accounting for potential cost increases of 30-50 percent?

In addition to providing only a negligible improvement in water deliveries under the adverse scenario (3% improvement), permanent risks to the lake and the surrounding wildlife and vegetation significantly worsen: "The predicted changes in snowpack and runoff associated with climate change would alter KDRPP operations by producing larger and more frequent drawdowns, and would more frequently result in years when Lake Kachess fails to refill" (Section 4.12.3, pg 4-238). "Compared with Alternative 1 under the adverse scenario, the mean lake level would be approximately 42' lower over the period of record, and 20-90' lower in drought years" (Section 4.12.5, pg 4-248). This is a significant difference that could lead to long-term impacts to groundwater levels, recreation opportunities, fish and wildlife habitat, and fire susceptibility of the region. 43

Recreation Impacts

Recreation was specifically authorized as an additional purpose of the Yakima Project in Section 1205 of YRBWEP in 1994, but it does not appear that any recreation organizations have been involved in the development of this plan, other than USFS. What outreach was made to recreation organizations, or users (such as the estimated 23,000 annual users of the Lake Kachess Campground), to provide notice of 44

this proposal? The DSEIS notes that a communication strategy related to the project is called for in the future, but why has one not been undertaken to educate and seek input on the project during the development stage? The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users, many with families that have been camping there for generations (such as my own), will be contacted and the timeline for this process. 44

Due to its proximity to the greater Seattle area, Lake Kachess is an invaluable recreation location; 3.61 million people in the Seattle-Tacoma-Bellevue Metropolitan Statistical Area are within a roughly one-to-two hour drive of the camping, hiking, boating, fishing and other general opportunities to appreciate nature offered at this lake. Section 3.14 notes that "population increases have increased demand for recreation and the campground is routinely full… Kachess has a higher number of recreational visitors than Keechelus or Cle Elum Lakes… (pg 3-147) The Cle Elum Ranger District is the busiest in the area and its campgrounds tend to be completely booked on summer weekends… The Kachess Campground is the most popular in the district… (pg 3-149)." In addition, this section notes that dispersed recreation at informal camp locations along the lake is common in the summer when the campground is full.

Despite this increasing need, and the positive economic benefit it has for Kittitas County, this project could reduce recreation opportunities in the area by: 45

- Potentially impacting well operations at the campground and privately owned residences along the lake to a degree that these sites are unusable;

- Increasing the distance from the campground and residential areas along the west shore to the water line from 400' at the current maximum drawdown to 1,500' (over ¼ mile) at the proposed maximum drawdown. Section 4.10.4.2 (pg 4-215) notes that "In most areas, the reservoir pool would recede approximately 200 additional feet under the maximum drawdown condition…";

- In addition to increasing the distance between users and the shoreline, the slope of the shoreline near some recreation areas would be hazardous to humans (and presumably animals attempting to access the lake for water) at 20-30 degrees near the campground and private development on the west side of the lake, and 20-40 or 40-60 degrees on the east side. These steep slopes also pose risks to boaters using the lake (Section 4.23, pg 4-343); and

- These reductions in recreation opportunities would then increase pressure at other nearby recreation sites such as Lake Cle Elum or Lake Easton.

Section 4.14 Recreation identifies two impact indicators for recreation: "loss of fishing access or reduction of fishing opportunities that exceeds current seasonal loss of use due to existing drawdown conditions; reduction of usability of recreation due to construction activities or the receding of the shoreline more than 100' from the recreation site or with a slope greater than 20 degrees" (pg 4-275). The action alternatives have "major impacts on recreation" (pg 4-277) when evaluated by these 46

indicators. Mitigation proposed for the first impact indicator is a new boat launch on the East shore, which could be usable at all lake levels; no mitigation is proposed for the second impact indicator. This boat launch would be on the opposite shore (east vs. west) and lake end (south vs. north) of the lake from the campground: what is the drive distance and time from the campground to the proposed boat launch? How is this acceptable mitigation for campers? Would it really even be usable by them, or only by day visitors intending solely on boating? Due to the steep slopes, how would any boaters access developed recreation sites? What mitigation is offered for the "reduction of usability of recreation?" 46

Assuming that recreation (including camping, hiking, fishing, boating, day trips and the presence of secondary homeowners who conduct personal business in the area) is as negatively impacted as noted in the DSEIS, what are the economic impacts to Kittitas County and the four-county region as a whole? Section 3.21 notes that "the service industry is responsible for the most employment at the state and four-county scales and is roughly double the next largest sector" (pg 3-178); is recreation included as part of the service industry or does it stand on its own? State wide, outdoor recreation is a $26.2B industry, which provides for 201,000 jobs, generates $7.6B in wages and salaries, and produces $2.3B annually in state and local tax revenue; surely a fair share of that is going to this four-county region. This part of the economy is ignored in Section 4.21 Socioeconomics but deserves consideration or, at the very least, acknowledgement. 47

Negative Fish Impacts

While there are some positive benefits to KDRPP and KKC related to meeting desirable stream flows on certain river reaches during some parts of the year, the overall impact to stream flow is not positive. Further, the DSEIS notes that fish would need ten consecutive years of positive conditions in these reaches in order to boost their numbers to those projected in Section 4.6.7 (pg 4-147); given the climate predictions for the future, achieving ten consecutive years of positive conditions is highly unlikely, especially given that winter and spring flows are unlikely to meet targets, so the benefits of KDRPP for stream flows are even less significant. Section 4.6.2 notes that under all Action Alternatives, "increases in annual instream flows, and in July-August instream flows during drought years in the Easton Reach, would decrease the quantity of rearing habitat available to spring Chinook and rainbow trout subyearlings, resulting in a negative impact to these species during drought years" (pg 4-117). So although the same section notes that instream flows would be benefited in the spring, flows later in the year would be negatively impacted, which may negate the earlier benefits. The same situation is described for the Keechelus Reach: that instream summer flows are projected to be met more often, but winter and spring flows are negatively impacted; without meeting instream flows throughout the year, what benefit is it to these fish populations to meet flow targets only occasionally, and particularly when so many additional negative impacts would occur for these species in Lake Kachess? 48

Fish, including Bull Trout and salmon in Lake Kachess would be negatively impacted by all Action Alternatives in several ways, including increased turbidity (pg 4-117), decreased hydraulic residence time, lower minimum lake levels, reduction of shoreline vegetation, degraded thermal refugia for predator and prey species (pg 4-116), disturbances to fish near the pumps, and increased risk of entrainment in the facility (Table 4-79, pg 4-115). As noted above, the water temperature modeling is inadequate, so the potential benefit of lowered water temperature is questionable, as the DSEIS notes in several sections that water temperatures may increase due to prolonged or multi-year droughts. 49

Taken together, these impacts result in a reduction of available prey within the lake, more overlap between predator and prey species, reduced feeding efficiency of predators that visually locate prey, and reduction in habitat complexity. Section 3.6.2.1 notes that "Kokanee in Lake Kachess exhibit slow growth and small size at age compared to other lake populations and the population is at risk of a feed and growth bottleneck in summer" (pg 3-74); KDRPP puts this population at further risk. Prior to the construction of the Kachess Dam, Lake Kachess supported a variety of anadromous species that no longer have access to the lake (pg 3-66); KDRPP would put those species left in the lake at further risk of survival. 49

Section 3.2.3 notes that "around the rim of Lake Kachess, 31 creeks flow into the lake from the uplands. Twenty-two creeks flow into the Little Kachess basin" (pg 3-7). Section 4.3.10 (pg 4-77) specifically notes that bull trout would be adversely affected by the loss of access to upstream tributaries. How will connectivity to these creeks be mitigated when the lake is 80' lower and up to 1,500' farther away from their current connection points? 50

The only negative impact that is proposed to be mitigated by this project is the loss of connection between Little and Big Kachess Lakes: the Volitional Bull Trout Passage Improvement would be constructed. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed; this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage. Purporting that this "improves surface water connectivity" is a misstatement – it replaces a naturally functioning connection that this project completely destroys. No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not included in the budget costs, it cannot be assumed to be part of the project going forward. Further, there is no description of the length of the passage (the length and Southern outlet are never described in text, numeric, or schematic terms). 51

Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo- and geo-receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

For all of these reasons, the public demands more than a "conceptual design" of the volitional passage. This mitigation must be described in ways that make sure sufficient water will be available to charge the passage; the length, slope, and other characteristics of the passage will not deter Bull Trout passage; the returning redds will be able to find the entry point of the volitional passage; and the passageway to Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population. I ask that the volitional passage design and operation be updated to address all of these concerns, and that the revised design be available to citizens for review and comment in a subsequent SDEIS, prior to any Final DEIS or ROD.

Also, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually 52

are), and mitigating with improved populations elsewhere. Page 1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS." What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives meet these legal requirements? 52

Yakima Project is a System

The Yakima Project includes five major storage reservoirs that provide irrigation water to six districts, as well as flood control, instream flow requirements, and municipal uses. As is clearly stated in Section 1.2.1 Yakima Project (emphasis added): "Reclamation manages these storage reservoirs as a system, and does not designate any one reservoir or storage space to a specific irrigation district." How does allowing one particular district to build and operate this project on one particular reservoir meet the objective of managing these reservoirs as a system? To a taxpaying, recreating citizen, it appears to be a taking of a public good for the economic development of private entities, which undertook a risky business venture attempting to start or maintain a farm in a district without Senior water rights. 53

How will those with senior water rights to the existing 239,000 acre-feet of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? I request this be further studied, possible impacts of the SDEIS action alternatives communicated to those senior water rights holders, and another public comment period opened for their comments. 54

Besides not providing a significant amount of water in drought years, this water is likely to be wasted due to the condition of the irrigation canals used by Roza. The district's canal system is 97 miles long, and 67 miles of these canals are unlined, open air, earthen ditches built in the Yakima desert. In a 2016 Capital Press article, Roza representatives state that water seepage in these earthen ditches "is lessened by fast flowing water creating a hard pan of silt on the canal bottom." However, during drought, when the water has slowed considerably, this layer of silt is broken up and dispersed, causing the canals to leak. Before undertaking any projects that would take additional water from reservoirs, all of these canals must be improved with concrete or plastic liners to prevent water waste. I ask that the efficiencies gained by improving these canals be analyzed, and the results shared with the public for review and comment. 55

The fact that only one of the six irrigation districts has expressed genuine interest in this project suggests that it is for the benefit of the few and not the whole. Rather than implement a costly public works project with significant negative environmental and public impacts, perhaps a more systemic solution could be found that creates appropriate incentives for all water users to use water sustainably. Section 1.2.3 notes that a Market Reallocation effort is a part of the Integrated Plan. This would reallocate "water resources through a 'water market' or 'water bank' where water rights would be bought, sold or leased on a temporary or permanent basis to improve water supply and instream flow conditions." Such a solution would create incentives for all water districts, not just those that are 56

proratable users, to invest in water conservation methods that allow water to be used more wisely. Given the fact that KDRPP cannot meet the projected need (and falls far short of meeting that need given climate change assumptions), implementing a water market reallocation first makes much more sense. If such a reallocation were highly successful, it might negate the "need" for KDRPP or any of the other public works projects proposed as part of the Integrated Plan. 56

Additional storage for water that is currently "wasted" could also be effective in meeting some of the need without causing permanent, or long-term, negative environmental and recreational impacts. Section 4.3.7 notes that "in most years, Reclamation spills water from Lake Keechelus because it cannot store all of the runoff from its watershed" (pg 4-49). Section 3.12.2.1 notes that "snowpack is considered the 'sixth reservoir' in the Yakima River basin… (but that) only about 30% of the average annual total natural runoff above the Parker stream gage can be stored in the current Yakima River basin reservoirs" (pg 3-134). Winter flows in the Yakima River area high and are projected to increase. Are there alternative storage options for this water that is currently not put to use later in the season when demand is high? Aside from an additional reservoir, could water be stored on farms in cisterns for use on demand? Are there other out of the box ideas that could be considered that might offer greater flexibility with less cost? Please explain how these alternatives have been considered in this process, the degree to which they meet the need of project proponents, their cost, and why they are not included as alternatives in this document. 57

Cumulative Impacts

After reading the entirety of this DSEIS, it is extremely difficult to understand how the project proponents can assert that there would be "ongoing beneficial effect" for vegetation, and "no cumulative impacts" to surface water, reservoir elevation, ESA-listed fish, or land use. The following are excerpts from the DSEIS describing the level of Lake Kachess under Alternative 2 (which is representative of all Action Alternatives) as compared to Alternative 1, emphasis added (Section 4.3.4, pg 4-23 and 4-25):

- …levels would be lower than those under Alternative 1 in 44 years out of 90 years modeled. In 31 of the 44 years, Alternative 2 had a lower Lake Kachess level than Alternative 1 for every day of the year… both when Reclamation operates KDRPP in drought years and in years following droughts when the lake is refilling to its normal operating levels.

- Lake Kachess would be below the level at which the two lake basins become separated (elevation 2,220) in 76 out of 90 years modeled, and increase of 3 years from Alternative 1. The mean duration would be 154 days per year, an increase of 76 days per year compared with Alternative 1. … The duration would increase during all months under Alternative 2; under Alternative 1, the separation of the lake basins occurs from Sept to March.

58

The DSEIS claims, almost consistently, that Lake Kachess would refill in 2-5 years following a drought, however, this is based on "the historical record of droughts." Even without accounting for the adverse climate change scenario, more recent historical records suggest that it is unlikely the lake would refill within 2-5 years (emphasis added):

> During multiyear drought conditions such as those in 1992-1994, Reclamation would draw the lake down as much as 80' below the existing outlet elevation. Following a multiyear drought comparable to that of 1992-1994, lake levels would recover to normal operating levels 2 years later when followed by a wet year such as 1996. In a single-year drought, such as occurred in 2001, the lake would be drawn down to 50' below the existing outlet elevation. Full recovery would not have been achieved until 2008, because of a series of dry years (2003 & 2004) and a subsequent drought (in 2005). During the 2005 drought year, the lake level would be 40' below the existing outlet elevation. (pg 4-25)

Given that the adverse climate change scenario predicts that droughts are nearly three times more likely in any given year, it is reasonable to conclude that following a significant drawdown, Lake Kachess might never refill completely. This is most certainly a "cumulative impact," not only to surface water, reservoir elevation, fish, and land use, but more generally to the recreating public or those that value the environment in its own right. Please explain how the conclusion of "no cumulative impact" was reached.

Beyond the environmental and recreational impacts of concern above, the construction, maintenance and operating costs are also a significant cumulative impact to the public. Although the Proratable Entities claim to intend to undertake and pay for the project themselves, there is dissention among their ranks with some members foreseeing an inability to pay for the water resulting from the project, and presumably all of the associated project construction and operating costs. As disclosed in the DSEIS, construction costs could range from $225M-$675M (depending on the selected alternative) and operating costs could be as high as $25M annually. Construction cost estimates for the project alternatives could increase by 30-50% (depending on project alternative), and inflation is not accounted for in the annual maintenance and operation estimates. This is an unacceptable cost to add to taxpayer burden at the same time that recreation opportunities are taken from the public.

Overall, the benefits associated with the small amount of water provided do not outweigh the significant negative environmental and recreational impacts. I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 59

Please send me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Respectfully Submitted,

Jayme Jonas

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] concerns re Lake Kachess and KDRPP

1 message

Tina Kelley <tinapetekate@yahoo.com> Tue, Jul 10, 2018 at 6:55 PM
Reply-To: Tina Kelley <tinapetekate@yahoo.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

To Whom It May Concern,

With my husband, I am a 50% cabin owner on the east side of Lake Kachess and our family has had this property for four generations. We hold a senior water right - our cabin is served by a newly constructed well. Members of my family spend their summers at the cabin, including my in-laws, aunt and uncle, and cousins. Our property and our quality of life stand to be affected by the plan. I have a number of concerns and questions about the Kachess Drought Relief Pumping Plant proposals that I would like the agency to address:

1. How much water would be made available to the downstream farms via the KDRPP, compared to how much could be available through the adoption of drip irrigation systems and other water conservation methods? 1

2. What would be the cost of drip irrigation systems sufficient to provide the same amount of water to the farms as the KDRPP? Please include in this analysis the dollar value of Lake Kachess' recreational value and the value of the bull trout population. 2

3. How much dust would be generated by wind hitting the dry lakebed when the lake would be drawn down in drought years? What would be the health effects of that dust to cabin owners? Our family includes people who suffer from asthma and allergies. Would there be compensation for medical expenses and nights when we would not be able to stay at the cabin due to dust? If so, what amount of compensation would be offered for medical expenses and nights when the cabin was uninhabitable? 3

4. What is the explanation for the senior water rights of our family being overruled by the junior water rights of the interests downstream? Would our family be compensated for the taking of those rights, and if so, in what amount? 4

5. What decibel levels would the pump generate, and for how many hours per drought year? 5

6. What protections are contemplated for the fossil bed on the southwestern shore of the lake? 6

7. What is the plan for disposal of PCB-contaminated soil from the project, and how much will that disposal cost? 7

I look forward to receiving a response to these questions.

Thank you,

Elizabeth Kelley

Tina Kelley
author, Abloom & Awry, (CavanKerry Press, April 2017)
co-author, Almost Home: Helping Kids Move from Homelessness to Hope (Wiley, Oct. 2012)
on Twitter
on Facebook
on poetry

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP & KKC SDEIS comments

1 message

Carolyn Kitchell <carolyn.kitchell@gmail.com> Tue, Jul 10, 2018 at 11:20 PM
To: kkbt@usbr.gov

July 10, 2018

To the Bureau of Reclama on concerning the KDRPP & KKS SDEIS,

As landowners and tax payers in Ki tas County on Lake Kachess for 28 years, we have several ques ons:

How are landowners whose wells run dry going to be compensated for loss of water and loss of land values in this plan? 1

How will you address the loss of gene c diversity and natural migra on of trout? 2

What will happen to other wildlife?

How will you address that the lake water will be unavailable to fight forest fires? 3

What water conserva on efforts will be imposed downriver in every town before you drain a natural mountain lake? For example, will you limit watering gardens in the summer, washing cars? Will you hand out shower and faucet heads that limit water use? 4

Will you require that leaking and water was ng irriga on for farmers be corrected?

Will you include equal limita ons on senior and junior water rights owners? 5

Will you correct unfair laws and level the playing field between senior and junior water rights?

Will you work with our universi es and world wide experience to try new methods such as flooding fields in the spring runoffs to replenish aquifers and help crops prosper?

Should we consider rearranging what crops are grown? 6

Maybe ethically we need to consider what we will be ge ng for what we are destroying? Timothy hay for Japanese horses vs loss of a U.S. mountain lake.

How will you compensate all the people who camp at the public campground and hike, swim and fish the lake?

How will you address the loss of their summer vaca on spots?

7

This is not fiscally sound. The federal government and Washington state should not pay a dime for this plan.

8

The Yakima River Valley is a desert in July, August, September, which is why they Bureau of Reclama on built the dams on the mountain lakes over 100 years ago and then depleted them below their natural levels. They raised Lake Kachess 50 feet but then they take that and another 50 feet. This system has lasted for 100 years but now the Yakima River Valley has outgrown these needs. Maybe it's me to have everyone in this valley conserve water.

9

What will happen when the lakes can no longer replenish the annual drainage?

We do not want a pump sta on on Lake Kachess. If a pumping sta on is the choice we do not want any of our tax dollars to pay for it. The people who use it should pay for it and the mi ga on costs. If you make people pay for it, they will be less likely to squander the resource.

11

Please send us answers to our ques ons and a copy of your decision.

Sincerely,

Carolyn & Robert Kitchell
760 Via Kachess Road
Easton, WA 98925

Mailing address:
Drs. Robert & Carolyn Kitchell
233 36th Ave E
Seattle, WA 98112

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Input to SDEIS for KDRPP

1 message

dicklanden@aol.com <dicklanden@aol.com> Sat, Jul 7, 2018 at 10:10 AM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us, laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us

please read and place in the record of proceedings

KachessSaving2018.docx
17K

See bottom lines for Congressman Reichert and Land Commissioner Franz comments

I am a former "Rocket Scientist" who has studied the facts and falsehoods surrounding the SDEIS For the KDRPP/YBIP and find that even I cannot understand the logic and the conclusions drawn by Roza advocates proposing the pumping water plans for Kachess Lake! 1

Pumping down and ultimately creating permanent damage to one of the areas greatest lakes, Kachess, does not benefit anyone-especially the local farmers. Roza spokespersons do not fairly represent the ultimate monetary damage to water users who would be paying unacceptable fees to obtain water that may not even be needed and in subsequent years not having the water because the lake cannot recover. The irrigation district could use their dollars much more effectively by enhanced studies and engaging in better and more advanced water conservation methods. Tube siphoning and open canal transport have no place in efforts to conserve and provide for future water resources. 2

In addition, who can calculate the environmental impact to the recreational, water sourcing, fire prevention capacities, let alone the damage to the fisheries/trout saving efforts, from noise pollution, and wasted energy consumption. 3

The proponents say that if difficulties arise that they can be "mitigated"-you cannot recover drained and clogged wells, burned forests, and loss of tax dollars due to real estate devaluations and decreased recreational spending. 4

The following quotes even show how our elected officials feel about protecting/preserving the area. These are precious resources to thousands of guests, visitors, property owners and, as it stands today, renewable water resources. As a comparison, what Californians wouldn't want to turn back the clock from the mis-use of the Colorado River resource?

I strongly support for the SDEIS to conclude and accept alternative one: NO CHANGES.

Signed: Dick Landen, 22820 148th Ave Se, Kent, WA and 3160 Via Kachess, Easton, WA, July, 2018

1.) Dave Reichert, Newsletter, June, 2018

This week, the House overwhelmingly passed my bipartisan bill, the *Mountains to Sound Greenway National Heritage Act* (H.R. 1791), to designate the Mountains to Sound Greenway as a National Heritage Area. The spectacular landscape of the Mountains to Sound Greenway encompasses a vibrant mix of small towns, working farms, lush forests, and rugged mountains alongside one of the largest and fastest growing metropolitan areas in the country, tracing along Interstate 90 from Seattle, across the crest of the Cascade Mountains, to Ellensburg in Central Washington. This bill not only promotes this beautiful land, but it also includes important protections for private property owners and tribal communities.

I am proud of the work Rep. Adam Smith and I have done on this bill, and I am grateful for the support of government officials, businesses, outdoor recreation groups, and conservation and heritage organizations, including the Mountains to Sound Greenway Trust and Outdoor Alliance. Now, I urge the Senate to take up this important legislation, so that the Mountains to Sound Greenway receives the full recognition it deserves. 5

2.) Springtime seems to initiate a sense of excitement, knowing that we're one step closer to warmer weather and long summer days. Here at the department, we're moving full steam ahead to get ready for warmer temperatures, from opening up 17 miles of new mountain bike trail to readying our Vietnam-era helicopters for this year's fire season.

And, with Mother's Day right around the corner, it's a great reminder that each of us can inspire the next generation to be stewards of the outdoors, value public lands, and enjoy all that nature has to offer. As a mother of three boys, I hope you'll join me in celebrating the Washington moms out there this Mother's Day. With much gratitude, Commissioner of Public Lands, **Hilary S. Franz** , May, 2018

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant

1 message

Tom Lee <leeth89.tl@gmail.com> Tue, Jul 10, 2018 at 2:07 PM
To: kkbt@usbr.gov

Addressed to Ms. Candace McKinley, Environmental Program Manager of the US Bureau of Reclamation.

Ms.Mckinley,

It has come to my attention that the "Kachess Drought Relief Pumping Plant" are plans in place to drain the beautiful Lake Kachess, below its natural level in order to provide additional irrigation to the Roza district of Kittitas county during times of drought. 1

As an environmentally conscious American and an enthusiastic angler, I am concerned with how this could effect native fish populations as well as public access to the lake itself, being on public lands.

As an Engineer by trade I have looked over the plan overview availability on ecology.wa.gov and have concerns that the issue it seeks to solve would be better served by updating and improving the efficiency of the water transfer infrastructure and dykes between Kachess and the Roza district, in a way that preserves the lake's natural water levels and pristine beauty while still providing irrigation improvements to the water recipients in lower Kittitas county. 2

Being contained within the boundaries of the Wenatchee-Okanogan National forest, the lake and its surrounding grounds belong to the American people and should be used to serve the peoples needs and desires more heavily considered over the needs of a select few business owners who chose to set up their operation in a drought prone area. 3

I would like to close by making it clear that I oppose the construction of the "Kachess Drought Relief Pumping Plant".

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess SDEIS

1 message

roniaspamonia@gmail.com <roniaspamonia@gmail.com> Tue, Jul 10, 2018 at 10:56 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

In addition to my other comments on the KDRPP and KKC SDEIS give to the recorder at the Cle Elm meeting, I have the following comment:

Section 3.9.3 of the KDRPP and KKC SEIS has a short section on bull trout, but virtually no information on Box Canyon Creek. Attached is a photo taken on October 18, 2018, where Box Canyon Creek disappears into the mud flats created by the existing draw down of Lake Kachess. How will the endanger bull trout survive, thrive and spawn if the KDRPP removes even more water? I request a second SDEIS to thoroughly address the issues of protecting the bull trout from extinction and protecting its spawning grounds, in particular in Box Canyon Creek, to include detailed plans of proven methods. 1

The photo also shows efforts by Washington Department of Fish and Wildlife (WDFW) to create an artificial channel from Little Kachess Lake to Box Canyon Creek by the use of plastic and straw bales, which have been scattered and allowed to enter the water. This would appear to be a discharge of pollutants (straw and plastic) into Lake Kachess. Did the WDFW obtain a National Pollutant Discharge Elimination System (NPDES) permit or a Department of Ecology 401 Water Quality Certification, or a Shoreline Management Act Substantial Development Permit for this project? 2

As requested in Cle Elum, I would also like copies of all comments made with respect to the 2018 Kachess SDEIS.

Thank you.

Ann Lewis

roniaspamonia@gmail.com

86 – 157th Ave SE

Bellevue, WA 98008

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958K

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess SDEIS

1 message

The Moderys <eamodery@earthlink.net>
Reply-To: The Moderys <eamodery@earthlink.net>
To: kkbt@usbr.gov

Sun, Jul 8, 2018 at 3:15 PM

Dear Ms McKinley,

"I am opposed to any of the Kachess SDEIS active alternatives (2-5); the pumping plant and/or pipeline at Lake Kachess. Only the first, No Action alternative is acceptable. Please leave Lake Kachess alone." 1

It seems irresponsible to drain Lake Kachess in time of drought and then refill from Lake Keechelus later until all alternatives including water conservation, water efficiency, and water marketing **thoroughly explored**. 2

I have concerns about fire suppression in times of drought for the area if the lake is lowered.
I have concerns about the water quality for fish etc in the water from Lake Keechelus, due to road runoff. Do we want to move that water to Lake Kachess? 3
I have conerns about how the lowering of the lake will effect the recreational usage in the area and also the neighboring houses and their wells.

Again I support only the first NO ACTION Alternative,
Sincerely.
Elizabeth Modery
16209 NE 2nd street
Bellevue,WA 98008

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Attention Candace McKinley, 90-day comment period

1 message

Fairpoint.net <733lee@fairpoint.net>
To: kkbt@usbr.gov

Sat, Jul 7, 2018 at 10:19 AM

Re: Lake Kachess

Dear Ms. McKinley:

I strongly disagree with the proposed KDRPP and also KKC projects. No one has any idea of the cost of these programs. There are not even informed guesses. 1

I no longer own property at Lake Kachess. However, this is a beautiful and natural lake, and I am appalled at what is being proposed. Having observed the lake for about 25+ years, I can say with certainty that one year will not recharge the lake after a drought year. Perhaps three might.

The portion of the lake to be utilized, I think about 60 extra feet, will put the low water mark lower than the lake has ever been, and no one really knows what will happen then. If there is a drought the following year, there will be no water left to draw down. There are drop-offs not that far from shore. If you have cliffs left, there will be no water access for fire protection, and the campground will be closed for good. The fire protection alone is a huge liability. 2

Somehow the project managers have convinced people that farmers will get more water in a drought year. Well the Indians have first water rights, and if the salmon redds get low, no one gets anything. 3

Exactly why would a government spend $5 billion on something they may not even use? Or at least, that is what they said at one meeting. Right, we are just going to sit on this for 30 years in case we need it. 4

Farmers aren't stupid. I met several young ones at one of the meetings, and all of them told me that the cost of this project would drive them out of business. One said he specifically bought property with a well, and planted what he knew would be prudent to grow because he had junior water rights. This was the same meeting that a KRD official said there was "extreme likelihood" of a drought the following spring. Approximately three days later it snowed heavily and all drought danger was past. 5

Kachess Lake (not reservoir) is a natural resource of Kittitas County, and I do not know why we would ruin it. I know that once the water is gone, it is not coming back. Just because a bad decision has been made, it does not mean it is set in stone and can never be changed. 6

I implore you to reconsider this project.

Sincerely,

Lee Mundy

Ellensburg, WA
Sent from my iPad

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant comments

1 message

Alyse Nelson <alysesnelson@gmail.com> Tue, Jul 10, 2018 at 9:40 AM
To: kkbt@usbr.gov

Hello Ms. McKinley,

Please find my comments on the Kachess Drought Relief Pumping Plant project attached.

Thank you,
Alyse Nelson

comments_alyse_nelson.pdf
119K

Alyse Nelson
8061 Sportsman Club Rd NE
Bainbridge Island, WA 98110

Bureau of Reclamation, Columbia-Cascades Area Office
Attention: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058
kkbt@usbr.gov

Dear Ms. McKinley,

I have enjoyed recreating at Lake Kachess with family and friends for nearly a decade. It is a beautiful area that is particularly special due to its close distance to dense urban areas of the Puget Sound. Please find my comments on the Kachess Drought Relief Pumping Plant (KDRPP).

The KDRPP is not a public benefit and must not be enacted, either by the Bureau of Reclamation and Department of Ecology, or by the Proratable Entities interested in implementing it. It is inconsistent with adopted plans, the analysis is based on missing data and questionable assumptions, proposed mitigation is lacking, groundwater impacts could be detrimental to property owners and public recreationists, there are insignificant agricultural impacts given the negative recreation and environmental impacts, lake habitat for fish is negatively impacted, and it could potentially increase the fire susceptibility of the area while decreasing the ability of emergency responders to fight fires. It also radically changes the use of the Yakima Project, which has been managed for over 100 years as a system for all users and instead essentially earmarks one reservoir for one irrigation district. 1

Inconsistency with Mission and Adopted Plans

Comprehensive planning within the State of Washington requires that all plans and projects be consistent with adopted policies; KDRPP does not appear to meet that test in several regards, including contrasting with the mission of the proposing agencies.

The opening page of the DSEIS cites the missions of the US Department of the Interior, the Bureau of Reclamation, and the state Department of Ecology. While all agencies have mission facets that can compete with one another, making mission-project consistency a balancing act, this project does not fit with the adopted missions more than it does. 2

- Though the US Department of the Interior is directed to "supply the energy to power our future," this part of the mission is tertiary to protecting natural resources, which KDRPP does not do. Instead, it denigrates a natural environment in order to provide economic benefit to a small group.
- Reclamation is directed to "manage, develop and protect water" and clearly KDRPP fits within that purview. However, Reclamation must also do this work "in an environmentally and economically sound manner," which is not descriptive of the proposed project.
- This project is most inconsistent with the state Department of Ecology's mission to "protect, preserve and enhance Washington's environment, and promote the wise

management of our air, land and water for the benefit of current and future generations." Undertaking KDRPP has significant negative environmental and recreational impacts which are not consistent with Ecology's mission.

The DSEIS states in Section 4.3.3 that "Alternative 1 No Action does not meet the purposes of the Proposed Action because it does not address water supply for proratable irrigators or instream flow conditions in the upper Yakima River basin" (pg 4-21). Later, in Section 4.24 (pg 4-349) the DSEIS suggests that the proposed project meets several of the Integrated Plan's goals when, in fact, it does not. The noted goals include:

- Provide opportunities for comprehensive watershed protection, ecological restoration and enhancement, addressing instream flows, aquatic habitat, and fish passage

  This plan does not provide "comprehensive watershed protection" and instead increases the vulnerability of an entire watershed to wildfire risks by lowering groundwater levels and reducing access to surface water for emergency responders. No ecological restoration or enhancement is provided other than improving a minority of instream flows analyzed; negative impacts are projected for aquatic habitat in the lakes and for fish passage as well.

- Improve water supply reliability during drought years for agricultural and municipal needs

  While KDRPP does provide some benefit in drought years, it is insignificant when the adverse climate change scenario is modeled. A 3% gain in water is hardly worth the negative environmental and recreational impacts that could permanently occur. 2

- Improve the ability of water managers to respond and adapt to potential climate change effects

  As noted above, potential climate change effects would severely limit the benefit provided by KDRPP.

- Contribute to the vitality of the regional economy and sustain the riverine environment

  As noted above, while there are some instream flow objectives that would be met, not all flow targets would benefit and some are projected to worsen. KDRPP does not meet the established economic indicator threshold of 1% and ignores the negative impacts to what is likely a large sector of the economy: recreation.

Further, KDRPP is inconsistent with several adopted plans at both the County and Federal levels.

- Kittitas County Shoreline Master Program (SMP): Lakes Keechelus and Kachess are designated as lakes of statewide significance under the State Shoreline Management Act. The Kittitas County SMP designates the shoreline of both lakes as "conservancy shoreline environment," which requires "maintaining the natural character of the shoreline area" (Section 3.15, pg 3-161). The development of any of the pumping facilities would be in conflict with this requirement as they would significantly alter the character of Lake Kachess.

  Section 3.15 further goes on to state: "Under the draft SMP, the majority of both lakes would be designated as rural conservancy. The purpose of the rural conservancy

environment is to protect ecological functions, natural resources, and valuable historic and cultural areas in order to provide for sustained resource use, natural flood plain processes, and recreational activities." All of these elements of the Lake to be protected would be negatively impacted by KDRPP.

- Ecology Upper Kittitas County Groundwater Rule (WAC 173-529A): Section 3.5.1 notes that Ecology in 2011 placed a moratorium on the development of new unmitigated groundwater withdrawals in upper areas of Kittitas County (pg 3-53). On its face, it does not seem that a project that could further deplete groundwater resources in this area could be consistent with this rule. How is KDRPP compatible with this rule? 2

- Forest Service Criteria, 1990 Wenatchee National Land and Resource Management Plan for Lake Kachess: The USFS has designated Lake Kachess as land allocation Developed Recreation (RE-1) Retention VQO, Scenic Travel 1 and 2 Retention VQO, and Partial Retention VQO. As stated in section 3.10.4, "The USFS considers visual quality to be one of the most important resources to be protected under this land allocation" (pg 3-127). Due to the changes in pool levels that would make the lake a less dominant element on the landscape, the proposed project is not consistent with these Forest Service criteria.

Modeling/Data Analysis Questions

A number of admissions within the DSEIS cast doubt on the accuracy and usefulness of the modeling used in the analysis and even note aspects of the project that were not included in modeling or evaluation. Data and analysis that are outright missing from this document include: 3

- Section 3.7: no formal wetland delineations or plant surveys were conducted for this analysis. 4

- Section 4.4.2 (pg 4-81): "Lake Keechelus was not included in drought operations surface temperature modeling completed by PSU" and "Extended or multi-year drought, or refill conditions were not included in the PSU water temperature model and potential effects of these conditions are not quantified." 5

- Section 4.4.7.2 (pg 4-98): water temperature effects and their impacts on the Little Kachess basin from the inflow from Keechelus (through KKC) are unknown, indicating that this aspect of the project was also not modeled. 6

- Section 4.6.4 (Pg 4-129): "Additional hydrodynamic modeling is needed to precisely estimate reductions in zooplankton abundance…" 7

- Section 4.10: SketchUp (or similar) renderings of all proposed facilities to aid in adequate visual quality analyses are absent. Enough details are provided regarding building mass and location, and amount and location of vegetation to be cleared to provide these basic models as evidence in this document. 8

- Section 4.21: The socioeconomic analysis does not analyze the No Action alternative for economic impacts. This glaring lack of data makes it impossible to compare the predicted economic impacts of the alternatives. 9

- Section 4.21: The socioeconomic analysis also does not describe the impacts of the project to the recreation economy of the four-county region. Despite noting in Section 3.14 that "visitors to the lakes are an important part of the economy of upper Kittitas County" (pg 10

3-147), the economic analysis does not account for the recreation industry or even describe it as a piece of the whole 4-county regional economy.

One of the fish habitat "benefits" noted in the DSEIS is reduced water temperature in Lake Kachess due to reduced shallow water areas that would be warmed along the shoreline. The acknowledgement that modeling of prolonged droughts that could result in multiyear drawdowns of the Lake raises questions about the accuracy of this identified "benefit" and is among other questions raised by admissions within the DSEIS:

- Section 4.3.7 (pg 4-60) discusses differences that are "likely due to reservoir balancing in the modeling that may not occur during actual operation" but no explanation is given about how actual operation may differ from what is reflected in the modeling. Are these differences based on assumptions built into the model that are not accurate or is "reservoir balancing" too complex to accurately capture in a model? This statement should be better explained to either acknowledge deficiencies in the model or the highly variable nature of reservoir operation.
- Water temperature in Lake Kachess is predicted to decrease with drawdowns, but Section 4.6.4 notes "there is uncertainty around whether prolonged droughts… could cause warming." Is this uncertainty related to the fact that multi-year and prolonged droughts were not modeled? What is the level of uncertainty? Why were prolonged droughts not included in the modeling?
- A discrepancy is found in Section 4.7.4 (pg 4-156) which states that it could take 2-8 years for Lake Kachess to return to normal operating levels, as opposed to all other sections of the document which refer to a 2-5 year refill period. With the predicted increase in frequency of droughts, how was the refill period determined?

In addition, there are some aspects of the analysis which are not explained adequately, such as:

- How is target pool elevation determined? If Keechelus does not meet its "target pool elevation" in some years following drought pumping of Kachess, how much longer would it take for Kachess to refill, assuming KKC is implemented?
- Construction methods and plans are fairly detailed for all aspects of the proposed project except for the Volitional Bull Trout Passage Improvements. Why is there no detailed construction data for this element of the project?
- KDRPP was originally proposed to allow pumping of 50,000 acre-feet of water from Lake Kachess but this number has increased to 200,000 acre-feet. What instigated this significant change in the amount of water to be pumped?
- Section 4.13.4.2 notes that noise from operation of the pumping plant is "anticipated" to fall within a certain range. The construction noise analysis is relatively detailed compared to the analysis of operations. Why is noise data from similar projects not cited or used as a proxy for this analysis? Additionally, the noise analysis notes that the closest noise sensitive receptors would not be affected but does not detail what these receptors are. What are the closest noise sensitive receptors, and where are they located?
- Section 4.15 notes that KDRPP would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." What regulatory guarantees are in place to ensure that no additional agricultural uses or intensifications are allowed after this project is constructed? This is a relevant question

given the fact that the original 1902 legislation authorized the Tieton and Sunnyside divisions of the Yakima Basin (Section 1.8.1), but others have been added over time. How will Reclamation prevent other new agricultural uses from demanding additional water from this project which were not originally intended?

Further, it is not even clear that limiting agriculture to existing uses is even intended. Section 4.21 notes that the model allows for identification of agricultural activity that "could" occur (pg 4-319), which seems to allow the door to be open for more or intensified agricultural uses.

19

- Section 4.21 suggests that the Volitional Bull Trout Passage Improvements are expected to have positive economic benefits (pg 4-324). In what way would these improvements have economic impacts? What additional detail is needed about these improvements to estimate their economic impact?

20

Completely missing from the SDEIS (perhaps best located in Section 4.23 Health and Safety) is an analysis of the impact of the project on the fire susceptibility of the surrounding area and the ability of emergency responders to utilize water from Lake Kachess to fight fires that occur. Local fire departments make use of water from Lake Kachess to fight fires in the area; how have these organizations been involved in this process and what mitigation is proposed to address this potential issue?

21

Mitigation

Mitigation measures proposed in the SDEIS are severely lacking. While detailed mitigation methods are proposed related to the construction of the proposed facilities, few definitive mitigation methods are proposed for the negative impacts stemming from the operation of the proposed facilities. Those sections missing proposed operational mitigation methods include:

22

- 4.2.5.2: (pg. 4-9) Erosion control measures would be implemented prior to implementation of the project "if erosion is identified as a problem." Isn't an EIS the opportunity to identify erosion as a problem? If not identified as a problem at this stage, when would it be identified prior to implementation of the project? What types of erosion control measures would be implemented?
- 4.5.4: (pg 4-106) A well monitoring program is proposed to be implemented to analyze groundwater levels associated with drawdown but no "appropriate mitigation strategies" are identified for implementation.

23

- 4.6.10: (pg 4-148) A water quality monitoring program is proposed to be implemented to document changes in water temperature but no subsequent mitigation is proposed to address water quality impacts to fish.

24

- 4.13: Noise mitigation only addresses construction, not operation of the project.

25

- 4.14: A myriad of negative impacts on recreation are identified but no mitigation is proposed, other than a boat launch on the opposite end of the lake from the campground. Will alternative recreation sites for activities other than boating or fishing be provided elsewhere?

26

At the very least, mitigation strategies utilized by other agencies on similar projects with similar effects could be listed as examples of what Reclamation and Ecology might implement, should any future negative effects occur.

As detailed above, Section 4.15 notes that the project would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." Specific regulatory restrictions should be put in place as mitigation for this project to ensure that no additional agricultural uses or intensifications are allowed after this project is constructed. Without these measures, Reclamation could not prevent other new, or intensifications of existing, agricultural uses from demanding additional water from this project. 27

Section 4.23 notes steep slopes would be a potential safety hazard to the public and proposes a communication strategy with the public and lake users regarding the hazards and safety measures. Who is liable for injuries sustained by users due to the steep slopes caused by Roza's (or Reclamation's, in the event Roza cannot pay for construction and continued operation of the facility) operation of KDRPP? Further, Section 4.2.4.2 notes that slope instability could result "where relatively steep or unstable areas are exposed" (pg 4-7) and that instability could be caused by "rapid drawdown, heavy or steady rain, a rain-on-snow event, and earthquake shaking." While Reclamation proposes to refrain from rapid drawdowns, it is noted that rain-on-snow events could become more common in the future thus increasing the risk of exposed slope stability. How will this negative impact be mitigated?

Groundwater Impacts

Impacts to groundwater in the area could be severe to private property owners, public recreation sites, and wildlife and vegetation. Only 6 of the approximately 107 wells in the area were monitored; is this number and their location representative? The fact that the only 2 privately owned wells to be monitored were added after the 2015 EIS was published suggests that groundwater analysis is lacking. 28

Both sections 3.5 and 4.5 indicate that "groundwater levels near the lake are influenced by lake elevations, especially during the dry time of the year when very little recharge is occurring and groundwater elevations are dropping because of discharge from the aquifer" (pg 3-57). Section 4.5.2 notes that well operations could be interrupted due to additional drawdowns, including the well supporting the USFS Kachess Campground (pg. 4-105/6). What the document does not indicate is the effect of lowered groundwater levels on vegetation in the area. Lowered groundwater levels would presumably dry out significant amounts of vegetation, further increasing wildfire risks in the area. Wildfire risks have increased significantly in all Western states over the last decade, and the costs—both to fight the fires and the economic costs incurred by those damaged by fires—have significantly increased as well. To undertake a public works project that increases those risks is negligent. 29

Insignificant Agricultural Benefits

For the overall cost of the project and the number and degree of negative impacts to the environment, wildlife and recreation, KDRPP does not even appear to address the need of Roza district water users to a significant degree. Under Alternative 1: No Action, proration 30

occurs in 15 out of 90 years; under any of the action alternatives, proration occurs in 13 out of 90 years, a benefit of only 2 years. The document suggests that completing multiple additional projects would necessary to provide a meaningful improvement to proratable water users (Section 4.3.2, pg 4-19). The likelihood of securing permits and funding for the full list of projects needed to provide meaningful improvement is extremely low given the state of state and federal budgets. Undertaking KDRPP, and risking permanent drawdown of this lake, is not in the public's best interest or the best use of taxpayer money.

At best, under the historical modeling, the action alternatives would "improve water supply to proratable water users by up to 22 percentage points in the worst single-drought years" (Section 4.3.2, pg 4-19). However, agricultural demand for irrigation water is projected to increase due to climate change, at the same time that "natural runoff and streamflow in the system would decrease by 50% or more in some months when compared with the historic scenario; therefore irrigation demands and instream flow targets would have to be met by releasing larger amounts of water from the existing lakes. Currently, there are many years when the lakes are not capable of meeting these demands" (Section 3.12.3.4 Climate Change, Changes in Water Supply, pg. 3-138). Additionally, prolonged or multi-year droughts are expected to occur more frequently in the future (odds of a drought increase from 17% to 49% in any given year, according to Section 4.21.4, pg 4-329), and modeling under the adverse climate change scenario shows only a 3% improvement in proratable water delivery (pg 4-251). Further, the analysis finds that "the improvement under (the Action Alternatives) would be less in the third year of a multiyear drought because some of the inactive storage in Lake Kachess would be used in the first one or two years of drought, leaving less for a third year of drought" (Section 4.3.2, pg 4-19). 30

Section 3.21 notes that "agriculture is the third largest sector at the four-county scale" and accounts for approximately 11% of the four-county economy. No analysis is provided of the economic impact of the No Action alternative, only the conjecture that the impact of reduced prorationed water supplies "could be greater than 1 percent of the agricultural sector output" (pg 4-323). Without this information, it is difficult to make a meaningful comparison between the economic impacts of the No Action and action alternatives. However, a comparison is not necessarily valuable given that Section 4.21.4 states that "the average annual impacts during operation on output, personal income, and employment are well below the 1 percent threshold for the impact indicators at the four-county regional level" (pg 4-325). If the economic benefit is projected to not meet the identified threshold of significance, why are Reclamation and Ecology considering implementing a project that could cost over $225M to construct (including interest, for the preferred alternative, though costs increase to $675M should another alternative be chosen) and $25M a year to operate, not accounting for potential cost increases of 30-50 percent? Clearly, the public benefit is not obvious, nor is the benefit to farmers who would receive water, as in 2015, farmers in the Roza district refused to pay for a similar proposal estimated to cost $85M.

In addition to providing only a negligible improvement in water deliveries under the adverse scenario (3% improvement), permanent risks to the lake and the surrounding wildlife and vegetation significantly worsen: "The predicted changes in snowpack and runoff associated with climate change would alter KDRPP operations by producing larger and more frequent drawdowns, and would more frequently result in years when Lake Kachess fails to refill" (Section 4.12.3, pg 4-238). "Compared with Alternative 1 under the adverse scenario, the mean lake level would be approximately 42' lower over the period of record, and 20-90' lower in drought years" (Section 4.12.5, pg 4-248). This is a significant difference that could 31

lead to long-term impacts to groundwater levels, recreation opportunities, fish and wildlife habitat, and fire susceptibility of the region. 31

Recreation Impacts

Recreation was specifically authorized as an additional purpose of the Yakima Project in Section 1205 of YRBWEP in 1994, but it does not appear that any recreation organizations have been involved in the development of this plan, other than USFS. What outreach was made to recreation organizations, or users (such as the estimated 23,000 annual users of the Lake Kachess Campground), to provide notice of this proprosal? The DSEIS notes that a communication strategy related to the project is called for in the future, but why has one not been undertaken to educate and seek input on the project during the development stage? 32

Due to its proximity to the greater Seattle area, Lake Kachess is an invaluable recreation location; 3.61 million people in the Seattle-Tacoma-Bellevue Metropolitan Statistical Area are within a roughly one-to-two hour drive of the camping, hiking, boating, fishing and other general opportunities to appreciate nature offered at this lake. Section 3.14 notes that "population increases have increased demand for recreation and the campground is routinely full… Kachess has a higher number of recreational visitors than Keechelus or Cle Elum Lakes… (pg 3-147) The Cle Elum Ranger District is the busiest in the area and its campgrounds tend to be completely booked on summer weekends… The Kachess Campground is the most popular in the district… (pg 3-149)." In addition, this section notes that dispersed recreation at informal camp locations along the lake is common in the summer when the campground is full.

Despite this increasing need, and the positive economic benefit it has for Kittitas County, this project could reduce recreation opportunities in the area by: 33

- Potentially impacting well operations at the campground and privately owned residences along the lake to a degree that these sites are unusable;
- Increasing the distance from the campground and residential areas along the west shore to the water line from 400' at the current maximum drawdown to 1,500' (over ¼ mile) at the proposed maximum drawdown. Section 4.10.4.2 (pg 4-215) notes that "In most areas, the reservoir pool would recede approximately 200 additional feet under the maximum drawdown condition…";
- In addition to increasing the distance between users and the shoreline, the slope of the shoreline near some recreation areas would be hazardous to humans (and presumably animals attempting to access the lake for water) at 20-30 degrees near the campground and private development on the west side of the lake, and 20-40 or 40-60 degrees on the east side. These steep slopes also pose risks to boaters using the lake (Section 4.23, pg 4-343); and
- These reductions in recreation opportunities would then increase pressure at other nearby recreation sites such as Lake Cle Elum or Lake Easton.

Section 4.14 Recreation identifies two impact indicators for recreation: "loss of fishing access or reduction of fishing opportunities that exceeds current seasonal loss of use due to existing drawdown conditions; reduction of usability of recreation due to construction activities or the receding of the shoreline more than 100' from the recreation site or with a slope greater than 34

20 degrees" (pg 4-275). The action alternatives have "major impacts on recreation" (pg 4-277) when evaluated by these indicators. Mitigation proposed for the first impact indicator is a new boat launch on the East shore, which could be usable at all lake levels; no mitigation is proposed for the second impact indicator. This boat launch would be on the opposite shore (east vs. west) and lake end (south vs. north) of the lake from the campground: what is the drive distance and time from the campground to the proposed boat launch? How is this acceptable mitigation for campers? Would it really even be usable by them, or only by day visitors intending solely on boating? Due to the steep slopes, how would any boaters access developed recreation sites? 34

Assuming that recreation (including camping, hiking, fishing, boating, day trips and the presence of secondary homeowners who conduct personal business in the area) is as negatively impacted as noted in the DSEIS, what are the economic impacts to Kittitas County and the four-county region as a whole? Section 3.21 notes that "the service industry is responsible for the most employment at the state and four-county scales and is roughly double the next largest sector" (pg 3-178); is recreation included as part of the service industry or does it stand on its own? State wide, outdoor recreation is a $26.2B industry, which provides for 201,000 jobs, generates $7.6B in wages and salaries, and produces $2.3B annually in state and local tax revenue; surely a fair share of that is going to this four-county region. This part of the economy is ignored in Section 4.21 Socioeconomics but deserves consideration or, at the very least, acknowledgement. 35

Negative Fish Impacts

While there are some positive benefits to KDRPP and KKC related to meeting desirable stream flows on certain river reaches during some parts of the year, the overall impact to stream flow does not seem positive. Further, the DSEIS notes that fish would need ten consecutive years of positive conditions in these reaches in order to boost their numbers to those projected in Section 4.6.7 (pg 4-147); given the climate predictions for the future, achieving ten consecutive years of positive conditions seems highly unlikely, especially given that winter and spring flows are unlikely to meet targets, so the benefits of KDRPP for stream flows are even less significant. Section 4.6.2 notes that under all Action Alternatives, "increases in annual instream flows, and in July-August instream flows during drought years in the Easton Reach, would decrease the quantity of rearing habitat available to spring Chinook and rainbow trout subyearlings, resulting in a negative impact to these species during drought years" (pg 4-117). So although the same section notes that instream flows would be benefited in the spring, flows later in the year would be negatively impacted, which may negate the earlier benefits. The same situation is described for the Keechelus Reach: that instream summer flows are projected to be met more often, but winter and spring flows are negatively impacted; without meeting instream flows throughout the year, what benefit is it to these fish populations to meet flow targets only occasionally, and particularly when so many additional negative impacts would occur for these species in Lake Kachess? 36

Fish, including Bull Trout and salmon in Lake Kachess would be negatively impacted by all Action Alternatives in several ways, including increased turbidity (pg 4-117), decreased hydraulic residence time, lower minimum lake levels, reduction of shoreline vegetation, degraded thermal refugia for predator and prey species (pg 4-116), disturbances to fish near the pumps, and increased risk of entrainment in the facility (Table 4-79, pg 4-115). As noted above, the water temperature modeling is inadequate, so the potential benefit of lowered water temperature is questionable, as the DSEIS notes in several sections that water 37

temperatures may increase due to prolonged or multi-year droughts. Taken together, these impacts result in a reduction of available prey within the lake, more overlap between predator and prey species, reduced feeding efficiency of predators that visually locate prey, and reduction in habitat complexity. Section 3.6.2.1 notes that "Kokanee in Lake Kachess exhibit slow growth and small size at age compared to other lake populations and the population is at risk of a feed and growth bottleneck in summer" (pg 3-74); KDRPP puts this population at further risk. Prior to the construction of the Kachess Dam, Lake Kachess supported a variety of anadromous species that no longer have access to the lake (pg 3-66); KDRPP would put those species left in the lake at further risk of survival. 37

The only negative impact that is proposed to be mitigated by this project is the loss of connection between Little and Big Kachess Basins: the Volitional Bull Trout Passage Improvement would be constructed. Purporting that this "improves surface water connectivity" is a misstatement – it replaces a naturally functioning connection that this project completely destroys. Section 3.2.3 notes that "around the rim of Lake Kachess, 31 creeks flow into the lake from the uplands. Twenty-two creeks flow into the Little Kachess basin" (pg 3-7). Section 4.3.10 (pg 4-77) specifically notes that bull trout would be adversely affected by the loss of access to upstream tributaries. How will connectivity to these creeks be mitigated when the lake is 80' lower and up to 1,500' farther away from their current connection points? 38

Yakima Project is a System

The Yakima Project includes five major storage reservoirs that provide irrigation water to six districts, as well as flood control, instream flow requirements, and municipal uses. As is clearly stated in Section 1.2.1 Yakima Project (emphasis added): "Reclamation manages these storage reservoirs as a system, and does not designate any one reservoir or storage space to a specific irrigation district." How does allowing one particular district to build and operate this project on one particular reservoir meet the objective of managing these reservoirs as a system? To a taxpaying, recreating citizen, it appears to be a taking of a public good for the economic development of private entities, which undertook a risky business venture attempting to start or maintain a farm in a district without Senior, or even Junior, water rights. 39

Besides not providing a significant amount of water in drought years, this water is likely to be wasted due to the condition of the irrigation canals used by Roza. The district's canal system is 97 miles long, and 67 miles of these canals are unlined, open air, earthen ditches built in the Yakima desert. In a 2016 Capital Press article, Roza representatives state that water seepage in these earthen ditches "is lessened by fast flowing water creating a hard pan of silt on the canal bottom." However, during drought, when the water has slowed considerably, this layer of silt is broken up and dispersed, causing the canals to leak. Before undertaking any projects that would take additional water from reservoirs, all of these canals must be improved with concrete or plastic liners to prevent water waste. 40

The fact that only one of the six irrigation districts has expressed genuine interest in this project suggests that it is for the benefit of the few and not the whole. Rather than implement a costly public works project with significant negative environmental and public impacts, perhaps a more systemic solution could be found that creates appropriate incentives for all water users to use water sustainably. Section 1.2.3 notes that a Market Reallocation effort is a part of the Integrated Plan. This would reallocate "water resources through a 41

'water market' or 'water bank' where water rights would be bought, sold or leased on a temporary or permanent basis to improve water supply and instream flow conditions." Such a solution would create incentives for all water districts, not just those that are proratable users, to invest in water conservation methods that allow water to be used more wisely. Given the fact that KDRPP cannot meet the projected need (and falls far short of meeting that need given climate change assumptions), implementing a water market reallocation first makes much more sense. If such a reallocation were highly successful, it might negate the "need" for KDRPP or any of the other public works projects proposed as part of the Integrated Plan. 41

Additional storage for water that is currently "wasted" could also be effective in meeting some of the need without causing permanent, or long-term, negative environmental and recreational impacts. Section 4.3.7 notes that "in most years, Reclamation spills water from Lake Keechelus because it cannot store all of the runoff from its watershed" (pg 4-49). Section 3.12.2.1 notes that "snowpack is considered the 'sixth reservoir' in the Yakima River basin… (but that) only about 30% of the average annual total natural runoff above the Parker stream gage can be stored in the current Yakima River basin reservoirs" (pg 3-134). Winter flows in the Yakima River area high and are projected to increase. Are there alternative storage options for this water that is currently not put to use later in the season when demand is high? Aside from an additional reservoir, could water be stored on farms in cisterns for use on demand? Are there other out of the box ideas that could be considered that might offer greater flexibility with less cost? 42

Cumulative Impacts

After reading the entirety of this DSEIS, it is extremely difficult to understand how the document can assert that there would be "ongoing beneficial effect" for vegetation, and "no cumulative impacts" to surface water, reservoir elevation, ESA-listed fish, or land use. The following are excerpts from the DSEIS describing the level of Lake Kachess under Alternative 2 as compared to Alternative 1, emphasis added (Section 4.3.4, pg 4-23 and 4-25):

- ...levels would be lower than those under Alternative 1 in 44 years out of 90 years modeled. In 31 of the 44 years, Alternative 2 had a lower Lake Kachess level than Alternative 1 for every day of the year… both when Reclamation operates KDRPP in drought years and in years following droughts when the lake is refilling to its normal operating levels.
- Lake Kachess would be below the level at which the two lake basins become separated (elevation 2,220) in 76 out of 90 years modeled, and increase of 3 years from Alternative 1. The mean duration would be 154 days per year, an increase of 76 days per year compared with Alternative 1. … The duration would increase during all months under Alternative 2; under Alternative 1, the separation of the lake basins occurs from Sept to March. 43

The DSEIS claims, almost consistently, that Lake Kachess would refill in 2-5 years following a drought, however, this is based on "the historical record of droughts." Even without accounting for the adverse climate change scenario, more recent historical records suggest that it is unlikely the lake would refill within 2-5 years (emphasis added):

> During multiyear drought conditions such as those in 1992-1994, Reclamation would draw the lake down as much as 80' below the existing outlet elevation. Following a multiyear drought comparable to that of 1992-1994, lake levels would recover to normal operating

levels 2 years later when followed by a wet year such as 1996. In a single-year drought, such as occurred in 2001, the lake would be drawn down to 50' below the existing outlet elevation. Full recovery would not have been achieved until 2008, because of a series of dry years (2003 & 2004) and a subsequent drought (in 2005). During the 2005 drought year, the lake level would be 40' below the existing outlet elevation. (pg 4-25)

Given that the adverse climate change scenario predicts that droughts are nearly three times more likely in any given year, it is reasonable to conclude that following a significant drawdown, Lake Kachess might never refill completely. This is most certainly a "cumulative impact," not only to surface water, reservoir elevation, fish, and land use, but more generally to the recreating public or those that value the environment in its own right. 43

Beyond the environmental and recreational impacts of concern above, the construction, maintenance and operating costs are also a significant cumulative impact to the public. Although the Proratable Entities claim to intend to undertake and pay for the project themselves, there is dissention among their ranks with some members foreseeing an inability to pay for the water resulting from the project, and presumably all of the associated project costs. As disclosed in the DSEIS, construction costs could range from $225M-$675M (depending on the selected alternative) and operating costs could be as high as $25M annually. Construction cost estimates for the project alternatives could increase by 30-50% (depending on project alternative), and inflation is not accounted for in the annual maintenance and operation estimates. This is an unacceptable cost to add to taxpayer burden at the same time that recreation opportunities are taken from the public.

Overall, the benefits associated with the small amount of water provided do not outweigh the significant negative environmental and recreational impacts. This project must not be implemented. 44

Respectfully Submitted,

Alyse Nelson

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Comments on SDEIS for the Kachess Drought Relief Pumping Plant (KDRPP)

1 message

Pete Newman <newmanpete6@gmail.com> Tue, Jul 10, 2018 at 1:45 PM
To: newman pete <newmanpete6@gmail.com>, kkbt@usbr.gov

To Whom It May Concern,

I am a 50% cabin owner on the east side of Lake Kachess and my family has had this property for four generations. We hold a senior water right - our cabin is served by a newly constructed well. Members of my family spend their summers at the cabin, including my parents and my children, ages 7 and 3. Our property and our quality of life stand to be affected by the plan. I have a number of concerns and questions about the Kachess Drought Relief Pumping Plant proposals that I would like the agency to address: 1

1. A major concern is how our cabin will receive water once our well is dewatered, as forecast by the impact statement. "Mitigation" measures are mentioned, but there are no specifics that I can see on what these might involve. Will a new well be necessary or will our existing well be deepened? What will the timeline for this work be, and how can we be certain that we will not be deprived of water for some undetermined period, once the drought relief process is initiated? What cost will be covered and what cost will I have to incur if we have to re-drill the well? 2

2. Moreover, I am confused about the legal and ethical decision that is being made. We hold senior water rights, so why would any measure be considered that would violate, even temporarily, that senior right on behalf of a junior right holder in the valley? This does not seem entirely fair or legal - some clarification should be in the impact statement itself, but I could not find it. The diversion of water rights from a senior holder to a junior holder seems like a taking. If we are deprived of water for some period, will there be compensation of some sort? 3

3. I have a major concern over possible noise from the water pump. I suffer from tinnitus and am very sensitive to industrial noises, and one of the benefits of having property on the lake is the lack of noise. I need to know what the average decibel volume of the pump will be from my property (we are the cabin closest to the dam on the east side), how long will it run on a daily, weekly and monthly basis, is the pump going to run 24/7 and what the plan is to minimize the noise of the pump? 4

4. I'm also worried about the plan to refill Kachess with water from Keechelus. Is the Keechelus water of similar quality? Apparently PCB levels are high in Keechelus, and I think it needs to be conclusively shown that the proposal would not spread higher PCB levels from one lake to another (and then into the valley). 5

5. Fifth, as an avid (catch and release) trout fisherman, I am concerned about all aquatic species in the lake, including the protected Bull Trout, and I have been told that the plan would involve killing off some percentage of the population in Little Kachess. What percentage of the current population is expected to be killed and what measures are being taken to minimize this loss? 6

6) I'm concerned that the lake level will drop to such an extent that I will no longer be able to boat in the lake, yet my family has recently invested in a float for mooring the boat that is adjusted for current rising and falling water levels, new boating equipment, and improvements to our boat launch. What is the plan to compensate home owners for these improvements when the new lake levels will render boating impossible from existing infrastructure and what will be the resulting impact on my property value as a result? 7

7. Lastly, I understand that the new plan involves building a boat launch accessed via Kachess Dam Road. This will result in significant traffic on that road, but there are no plans that I can see to improve the road. What steps will be taken to insure that this added traffic does not cause safety issues or environmental issues in that area of Kachess's shoreline? It seems like there should be a plan in place to improve the road and provide adequate infrastructure and facilities, comparable to those currently at the campground on the opposite side. 8

I look forward to hearing back from you.

Sincerely,

Peter Newman
Cabin Owner - East Side of Lake Kachees

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Save Lake Kachess-watch the Future County Finances

1 message

Shenton Oh <shenoh@icloud.com> Mon, Jul 9, 2018 at 9:43 AM
To: kkbt@usbr.gov

Hello Kittitas County,
Draining Lake Kachess will not only never allow the lake to refill completely draining aquifers and deeply affecting the wetlands and changing the microclimate in this part of Kittitas. 1

Bodies of water like reservoirs and lakes and wetlands are known to reduce air and ground temperatures by 2-5 degrees F, in the immediate and surrounding areas. More importantly they also increase the air and ground humidity by 20-40 percent making the microclimate for example around Cle Elum and Ellensburg more stable.

Take that away and the forests become a tinder boxes with raging wildfires as in recent history in California and our own beautiful State. Combined with millions of standing dead trees we will likely see county firefighting budgets go through the roof. Besides these fires are much more dangerous to fight because they burn faster and hotter. 2
Endangering friends and relatives involved. Combine that with property values dropping and lowered revenues from those and other as yet unforeseen effects and we are looking at the long term budgets of the counties involved.

Talk to the counties in California that had the wildfires around pristine recreational areas. Not only did they emit 1000 times the carbon dioxide of all vehicles in the state.
But sent 10,00 times the toxic micro particles from burnt plastics, insulation and home furnishings into the high atmosphere that is now spreading like an expanding band around the globe. Does this have to do with the super heated northern hemisphere this summer?

We must stop this action by secondary water purveyors trying to gain on the primary by blackmailing the poor secondary water rights farmers and doing long term damage to wetlands and pristine areas of our State.

Politicians and administrations come and go but our farms and farmers and our pristine areas, children and grand children who enjoy them stay if we allow them to. We are here for the long haul! 3

Stop drawing more lakes and start looking at smarter alternatives to water use, sources and conservation. We are not alone in this endeavor.

Respectfully,

Shenton Oh, MD,MBA,CPE

Sent from my iPad

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] SAY NO TO KDRPP & KKC

1 message

C C Owens <epxccowens@gmail.com> Sun, Jul 8, 2018 at 11:58 AM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

Save LAKE Kachess. A group of special interest and large irrigators want to drain the natural glacial lake.
The new plan will pump water from the natural lake below the existing dam outlet. This is not sustainable because the watershed cannot replace the extra water taken. It will turn the lake into a deep pool of water surrounded mostly by canyon walls. The lake may never recover, and it will cost tax payers hundreds of millions of dollars to do this! 1

Pumping out extra water and lowering the lake will:
Severely limit access and recreation opportunities by campers and boaters

A rare accessible alpine lake will be lost 2

Cost Taxpayers hundreds of millions for a project that will ultimately fail

Make the cost of irrigation water unaffordable for most farmers

Compromise the efforts of local fire districts to suppress forest fires

The water will only benefit a few private irrigators in single water district Roza Irrigation district a district with no senior water rights

Waste of Taxpayer's money for one water district

There are NO benefits to Kittitas County

LAKE Kachess is a LAKE **NOT** a reservoir

Please **Do NOT** support the KDRPP or KKC projects.

Thank you, C C Owens

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] SAVE LAKE KACHESS

1 message

J P Owens <jpowens99@yahoo.com> Fri, Jul 6, 2018 at 3:41 PM
To: "laura.osiadacz@co.kittitas.wa.us" <laura.osiadacz@co.kittitas.wa.us>, "obie.obrien@co.kittitas.wa.us" <obie.obrien@co.kittitas.wa.us>
Cc: "kkbt@usbr.gov" <kkbt@usbr.gov>

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

LAKE Kachess is an ancient glacial lake. Only 40 vertical feet is a man-made reservoir. The dam at LAKE Kachess is properly sized for the water shed above it and has been working for over 100.

Taking a public asset as vital as water to benefit a single water district with no senior water rights is wrong.

2

LAKE Kachess is one of the most popular campgrounds in the state with over 23,000 visitors and 11,000 boat launches per year.

Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices?

Say NO TO KDRPP and KKC.

Joann Owens

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] SAVE LAKE KACHESS

1 message

J P Owens <epxcanyon@gmail.com> Fri, Jul 6, 2018 at 3:56 PM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County. 1

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Recreation, boating, hiking, picnicking, business and commercial access and general enjoyment of the lake will disappear as the water disappears.

What LAKE will be next? When LAKE Kachess isn't enough for unsustainable agricultural practices?

Say NO TO KDRPP and KKC.

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Say NO to KDRPP and KKC

1 message

J P Owens <kachess99@gmail.com> Sun, Jul 8, 2018 at 11:34 AM
To: laura.osiadacz@co.kittitas.wa.us, obie.obrien@co.kittitas.wa.us
Cc: kkbt@usbr.gov

Save LAKE Kachess. A group of special interest and large irrigators want to drain the natural glacial lake.
The new plan will pump water from the natural lake below the existing dam outlet. This is not sustainable because the watershed cannot replace the extra water taken. It will turn the lake into a deep pool of water surrounded mostly by canyon walls. The lake may never recover, and it will cost tax payers hundreds of millions of dollars to do this! 3

Pumping out extra water and lowering the lake will:
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Make the cost of irrigation water unaffordable for most farmers

Compromise the efforts of local fire districts to suppress forest fires

The water will only benefit a few private irrigators in single water district Roza Irrigation district a district with no senior water rights

Waste of Taxpayer's money for one water district

There are NO benefits to Kittitas County

LAKE Kachess is a LAKE **NOT** a reservoir

Please **Do NOT** support the KDRPP or KKC projects.

Thank you, J P Owens

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Serious Concerns about Draining Lake Kachess!

1 message

Jeff Parry <jeff@parryadvertising.com>
To: kkbt@usbr.gov

Tue, Jul 10, 2018 at 6:39 PM

Candace – I have serious concerns about the plans to drain or pump water out of Lake Kachess. Please stop it, now! 1

Some questions that I'd like answers to:

How loud are the pumps? 2

Who is paying for the pumping project? 3

How long will it take to replenish the lake to capacity if you pump it? 4

How does pumping the lake affect the fish in the lake? 5

Will pumping it close the campground? 6

Why pump it at all? 7

What are the peoples' names behind pumping the Lake? Who wants to pump the lake, essentially? 8

What efforts are being made to conserve water in Eastern Washington or improve the use of the water already available? 9

Who will pay for cost over-runs if you do pump? 10

Please don't ruin a beautiful lake for some hidden group's greed. 11

Thank you for your consideration and I look forward to your responses. 12

Jeff Parry

(206) 280-4398

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP/KKC SDEIS response

1 message

Harold.Reeves <Harold.Reeves@kiewit.com> Wed, Jul 11, 2018 at 4:53 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Dear Ms. McKinley,

In addition to the SDEIS not defining how it's to be used in conjunction with or in lieu of the DEIS, please consider my comments on the attached file. 1

Thank you,

Harold Reeves

Kiewit Infrastructure Group

33455 6th Ave S, Federal Way, WA 98003

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HReeves - 2018 SDEIS Response.pdf
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July 11, 2018

From:

Harold Reeves, on behalf of the family of resident:

REEVES, LYNORA E ETAL (Parcel 467136)
310 FSR 4828 - 124 Easton, WA
17206 SE 142nd St
Renton, WA 98059

To:

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Delivered via email: [redacted]

Subject: **Comments to Supplemental DRAFT Environmental Impact Statement (SDEIS) for: Kachess Drought Relief Pumping Plant and Keechelus Lake-to-Kachess Lake Conveyance**

Please accept these comments, in response to the SDEIS comment period for the proposed Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus-to-Kachess Conveyance (KKC) Projects.

I am vehemently opposed to the implementation of any of the alternatives the SDEIS (other than "no action") under the SDEIS. 2

This SDEIS, again, failed to adequately comply with regulatory requirements. It has not fully disclosed the impacts to affected environments, quantified those impacts or fully disclosed well-prepared mitigation strategies. 3

The SDEIS fails to consider reasonable alternatives and instead has attempted to simply implement a plan developed by conflicted and interested parties to the exclusion of all others. 4

The Bureau of Reclamation and the Department of Ecology (the "Agencies") have not only failed to notify impacted parties, they have failed to identify the authority under which they will take private property to provide private uses to third parties. 5

The Agencies have denied the public the ability to participate in the process and ensure the public - as a whole - is served fairly. It is apparent that talks of means to take more water out of Lake Kachess and Lake Kecheelus for the benefit of farming have been on-ongoing for at least the last 10 years. It was only through public uproar that the public was first provided an opportunity to respond when the Agencies 6

conducted a meeting in Cle Elum on April 4, 2015. In that meeting Kittitas County's Paul Jewell threatened to "shut down the meeting" at the slightest murmur of opposition from the crowd. Mr. Jewell made it very clear that the "meeting was not required" and that it was purely for the benefit of the Kachess stakeholders and interested public. That oligarchic tone would, unfortunately, be a sign of the way the process would be orchestrated.

After the inadequate 2015 Draft Environmental Impact Statement (DEIS) was proven to be just that, the Agencies went back to work excluding the public from collaborative participation. Just a few months later, we were invited to attend meetings (December 7-9, 2015) in Ellensburg, Cle Elum, and Sunnyside to attend "workshops" for what would then be proposed as an "emergency floating pump station" in Lake Kachess to ready for the upcoming proclaimed summer of 2016 drought. That plan was so flawed, obviously created devoid of public input, and so ill-conceived with respect to estimated costs, that it flamed out, as it should have.

Now, we've had our one "opportunity" to collaborate with the Agencies in the May 17 and 17, 2018. However, the advertised question/response format in the April 13, 2018 letter was not followed. Rather, the representative experts' had booths in cleverly segregated structure and strategically selected presentation material. It was obvious that the meeting was done for show and the presenters demonstrated possessive and defensive response to seemingly each question or comment brought forth by the public.

It is a fact that "workgroups" have been strategizing for at least 10 years regarding the proposed SDEIS methodologies. A public partnership in the process appears to be purposely avoided. A choice was made to exclude the public and just shove it down our throats at a time of the Agencies' choosing – the perception of which has been perpetuated to this day. Please provide public records that would demonstrate anything otherwise.

The SDEIS is, in many ways, inaccurate and insufficient and must be rejected. 7

Common themes of concern and objection are:

1. Disingenuous and misleading terms are used to publicly communicate the mission as if for the greater good and environmentally enhancing, particularly to fish rehabilitation – a politically charged concept dear to a growing majority of Americans - to "slip in" the environmentally damaging and economically non-viable KKC & KDRPP projects. Use of the term "reservoir" as opposed to the more appropriate term "Lake" is used in a way that takes the readers' focus away from the natural status of the areas affected. For example; Lake Kachess is so dear to so many whom have vacationed there, own properties there, visited friends there, or camped there that virtually everyone who has been there at least once raves about its beauty, its natural beauty 8

2. This plan is not fully thought through and mitigation efforts necessary to make informed decisions in order to avoid regretful and irreparable consequences of completing these projects are unknown. Throughout this submission and its attachments, as well as many other public response communications, you will see that many questions still exist- many unanswered or curiously left without real and measurable mitigation plans.

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3. Kachess, Keechelus, and Snoqualmie Pass property owners and users impacts are negligibly considered in this plan – passed off as insignificant with no plan to compensate. It appears the USBR and its partners are willing to sacrifice Lake Kachess in their myopic march to provide more irrigation capacity. One has to wonder why that is? How, in this time of environmental re-enlightenment can that be? That lack of compassion draws into question the motive behind it. It is neither customary nor legal to disregard property owners' rights to compensation in government property takes or developments affecting property values, well-water depletion, and the taking away a treasured haven of beauty, etc. It is noted that Kachess is surrounded in part by private residents, Keechelus is not. Keechelus is highly visible from Interstate 90, Kachess is not. How might that play in this decision to "sacrifice" Kachess? Tens of thousands use Kachess Campground per year. Why destroy that resource and deny these people a say?

10

4. Drawing down Kachess another 80 vertical feet will essentially destroy a natural lake – a lake that is not only used by the property owners on or adjacent to the Lake, but by thousands of other people who visit and treasure this area each year. It's irresponsible to present a plan that neither considers full Bull Trout mitigation methods nor the funding of such and that the proposal (and permits) to install a pump must be contingent upon a fully capable and funded Bull Trout mitigation plan.

11

5. The very objective of draining the natural Lake Kachess basin goes against the USBR's stated mission. The following statement taken from the DEIS:

12

Mission Statements

The U.S. Department of the Interior protects America's natural resources and heritage, honors our cultures and tribal communities, and supplies the energy to power our future.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

The mission of the Department of Ecology is to protect, preserve and enhance Washington's environment, and promote the wise management of our air, land and water for the benefit of current and future generations.

Additional Comments:

ROZA's claims that they would not take water out of Kachess but for extreme circumstances. What legal assurances were/would be in place that the project was fully funded by private sources prior to permits being issued? 13

Cost of pump facility – to construct. No consideration for operation at this point. 14

Leaking irrigation ditches in ROZA and other irrigation districts – what means of water conservation on the part of the users has/is considered in this proposal? 15

Individual storage measures not explored or referenced. 16

Fish passage at Kachess Dam is said to be included in the plan yet there is no information on how that will be done, only a "$23mil" preliminary cost estimate. This is irresponsible. 17

The name Kachess comes from a Native American term meaning "more fish", in contrast to Keechelus Lake, whose name means "few fish". Fish species native to Kachess also include kokanee salmon, cutthroat trout, and rainbow trout. Why is there no specific plan to rehabilitate Kachess fish survival? 18

Bull trout : water level of 2,200 fee separates upper and lower Kachess. Below 2,208 fee, the shelf impedes Bull Trout passage. The natural level of the lake pre-damming was about 2230. BoR's dam created the problem with Bull Trout in the first place. Dropping the lake another 80 vertical feet will almost assure the Bull Trout extinction in Lake Kachess. It's irresponsible to present a plan that neither considers full Bull Trout mitigation methods nor the funding of such and that the proposal (and permits) to install a pump must be contingent upon a fully capable and funded Bull Trout mitigation plan. 19

"The lake drawdown will not hurt the bull trout, and if anything, will help them, Jewell said. What hurt the fish in the first place was the creation of the reservoir destroying their habitat. The pumping will return both lakes closer to their natural state, he said." – +8+

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess proposed pumping station, etc...

1 message

Paige Ryan <paigecryan@gmail.com> Sun, Jul 8, 2018 at 12:22 PM
To: kkbt@usbr.gov

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative."

1

Also, why does the SDEIS not make any provision for mitigation of the inevitable devaluation of homes on or near Lake Kachess? As a homeowner, I object to the taking of my property without even addressing these issues.

2

Sincerely,

Paige and Scott Ryan

Dera, Karen <kdera@usbr.gov>

Fwd: [EXTERNAL]

1 message

McKinley, Candace <cmckinley@usbr.gov> Thu, Jul 12, 2018 at 7:01 AM
To: Gwendolyn Christensen <gchristensen@usbr.gov>, Julia Long <jlong@usbr.gov>, "Dera, Karen" <kdera@usbr.gov>

---------- Forwarded message ----------
From: **Jay Schwartz** <jays@jayschwartz.net>
Date: Wed, Jul 11, 2018 at 3:54 PM
Subject: [EXTERNAL]
To: Candace McKinley <CMckinley@usbr.gov>, "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: Jay Schwartz <jays@jayschwartz.net>

Hi Candace,

Please find attached my comments for the KDRPP and KKC SDEIS. Thanks for all of your work on this … it's a big job. 1

Best,

Jay

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Jay Schwartz

M 206 369-1326

jays@jayschwartz.net
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Candy McKinley
Environmental Program Manager
Bureau of Reclamation
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509/575-5848 x232
509/379-0780 cell

SDEIS Comments - Jay Schwartz 20180711.pdf
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Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental DRAFT Environmental Impact Statement

Dear Ms. McKinley,

On behalf of myself, my family, and the many people committed to preserving Kachess Lake, I respectfully submit the following public comments regarding the **Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement**.

2

Thank you for your attention addressing these critical issues.

Respectfully,

Jay Schwartz

781 26th Ave E
Seattle, Washington 98112

Land and home-owner in Section 29 above Kachess Lake

Introduction

For over three years I have been the dog who would not let go of the ankle of those trying to move the YBIP forward without objective and unbiased analysis and transparent and balanced process. I have reviewed literally thousands of pages of data and performed extensive external analysis in an effort to bring fair and trustworthy data and analysis forward.

My approach has focused on three critical issues:

1. How much additional water will the project deliver?
2. How much will the water cost and is this a good economic decision?
3. What impact will it have on Kachess Lake?

3

Unfortunately, rather than being a willing partner in providing simple answers to these simple questions, BuRec has steadfastly evaded and forestalled accountability to engage thoughtfully and transparently in providing these answers. I have played a game of "cat and mouse" with them now for over three years. Often, I had to find data on my own, force BuRec to review my analysis, and then receive little to no feedback as to how BuRec planned to respond to the significant data integrity and analytic concerns.

Perhaps a few examples would be helpful:

I. **Hydrology Data:** For three years I have had to force BuRec to provide the Riverware model output data needed to review the "projected" benefits presented in BuRec documents. In 2015, I literally downloaded 90-years of daily Hydromet data to provide my first set of outputs. Eventually, BuRec published the 2016 Phase II Hydrology Technical Memorandum and I used this extensive data set to present a number of meaningful concerns. BuRec then created a Phase III TM and failed to provide the report and left critical data out of the Phase III version that were included in the Phase II report. Then for the SDEIS, BuRec created unpublished hydrology data that were only fully released to me two weeks prior to the due date for SDEIS comments. Given the fact that I have had 4 in-person meetings to review in-depth hydrology data, one would think BuRec would inform me when new data is available. Accordingly, evaluating how much water the project will deliver and assessing the impact on Kachess Lake have consistently been compromised.

II. **Conservation Projects:** For some reason, BuRec included unplanned, unfunded and unknown conservation projects in all hydrology scenarios in the Phase II TM. While these projects had no tangible concepts or plans, BuRec insisted on including them with the results associated with KDRPP. I complained bitterly about the distortion created by this poor analytical decision. Nonetheless, BuRec proceeded to repeat the same approach in 2017 with the Phase III TM and the scope of the unplanned, unfunded and unknown conservation project increased significantly. They added over 1 million acre-feet of water to the project results. Surprisingly (and for unexplained reasons), the

unpublished SDEIS hydrology data appropriately removed the conservation projects and the ability to more accurately assess the impact of KDRPP is thus enabled.

III. **Comparisons to Actual Results:** The entire Riverware approach is built on a single model view of history and then re-runs this history assuming specific projects, like the KDRPP, are in place to provide updated alternative results. Unfortunately, no one-model set of assumptions can replicate history across the board. It invariably changes history as human decisions include error and adjustments over time. So while this reliance on a single-model is unavoidable, it needs to be tempered by comparison to actual results to keep the modeled expectations and projections in check with real-world experience. BuRec has consistently refused to compare hydrology projections to the actual real-world yearly results. Sadly, this continues to be a challenge with the data presented in the SDEIS. Fortunately, historical data is available to help address this issue.

As I have extensive analytic experience (Notre Dame Finance degree, Stanford MBA, 15 years of strategy consulting experience with McKinsey, Bain and Lake Partners) and meaningful exposure now after 3+ years of in-depth review of the KDRPP project, the purpose of these comments is to identify and call into question a number of material hydrological and economic deficiencies of the SDEIS. Specifically, I call into question the following:

1. Kachess Outflows vs Actual History
2. TWSA Proration Data
3. Kachess Outflows vs Total ID Diversions
4. Roza Diversions vs Actual
5. KRD Diversions vs Actual
6. Hydrology analysis at water elevation 2199.5
7. Economics

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Please note BuRec provided me the detailed Kachess Outflow, Kachess Storage, TWSA details, and ID Delivery data from the SDEIS Riverware model. This data has yet to be released publicly and BuRec reports they are in the process of preparing this data for public access. All of the analysis in these comments is from this BuRec SDEIS data set or from the BuRec Hydromet data for station KAC – Kachess Lake.

Issue 1: Kachess Outflows vs Actual History – the "No-Change" scenario incorrectly reduces Kachess Outflows in drought years, creating a significant error of projected additional water for irrigators with the "KDRPP" scenario.

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Without explanation, the Historical SDEIS hydrology analysis artificially reduces Kachess Lake outflows in drought years in the "No Change" scenario. This creates a significant error of the projected additional water for irrigators in the "KDRPP" scenario. As BuRec has widely reported, the average total water year Kachess Outflows are ~213 kAF. As can be seen below and focusing on the 1977-2015 water years, when you break out the historical Kachess

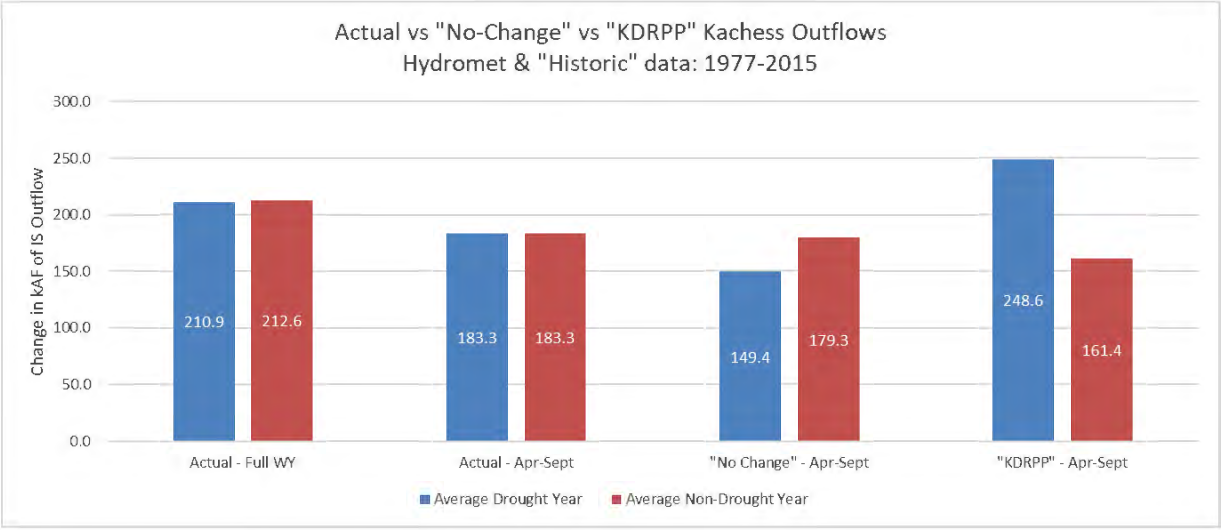
Outflows to drought years and non-drought years, the actual average Kachess Outflow history is for 210.9 kAF in drought years and 212.6 kAF in non-drought years. When focusing on the core irrigation season of April-Sept Kachess Outflows, the actual data shows 183.3 kAF for drought and non-drought years.

When reviewing the SDEIS hydrology data for Kachess Outflows, the model for some reason drops the drought year "No Change" Apr-Sept Kachess Outflows to 149.4 kAF. This removal of 33.4 kAF (18.5%) is unexplained and serves to reduce the baseline for which to compare the benefits of the KDRPP scenario. Interestingly, the non-drought year outflows remain relatively consistent with actual history at 179.3 vs 183.3 kAF (an acceptable 2.2% variance from actual).

The SDEIS then represents the "KDRPP" scenario as a significant increase from the "No Change" scenario of 248.6 vs 149.4 kAF (an increase of 99.3 kAF on average). This is factually incorrect as the irrigators received 183.3 kAF in drought years and the correct increase is 65.4 kAF on average. This is a 51.8% overstatement of benefits to irrigators. Sadly, this data is not presented for review but the claimed benefits are broadly stated in the SDEIS.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Kachess Outflow data? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model?*



	Actual Hydromet Data		Historic SDEIS Projections			
	Actual - Full WY	Actual - Apr-Sept	"No Change" - Apr-Sept	"No-Change" to Actual Variance	"KDRPP" - Apr-Sept	"KDRPP" to Actual Variance
Average Drought Year	210.9	183.3	149.4	-33.9	248.6	65.4
Average Non-Drought Year	212.6	183.3	179.3	-3.9	161.4	-21.8

	Actual Hydromet Data		Historic SDEIS Projections			
Water Year	Actual - Full WY	Actual - Apr-Sept	No Change - Apr-Sept	No-Change to Actual Variance	KDRPP - Apr-Sept	KDRPP to Actual Variance
1977	226.3	193.5	150.4	-43.1	299.0	105.5
1978	143.5	142.0	154.2	12.2	106.7	-35.3
1979	293.8	271.9	180.4	-91.5	112.3	-159.6
1980	103.6	92.8	152.5	59.7	135.1	42.3
1981	200.3	188.4	169.8	-18.6	144.3	-44.1
1982	209.9	199.4	173.1	-26.3	164.4	-35.0
1983	212.2	191.6	165.7	-25.9	165.7	-25.9
1984	235.1	212.8	180.3	-32.5	180.3	-32.5
1985	243.7	230.1	182.7	-47.4	182.7	-47.4
1986	230.8	221.4	181.9	-39.5	181.9	-39.5
1987	172.3	163.3	169.8	6.5	222.4	59.1
1988	161.0	155.0	153.0	-2.0	166.7	11.7
1989	144.8	139.3	159.7	20.4	125.9	-13.4
1990	194.3	160.6	182.4	21.8	154.3	-6.3
1991	301.9	190.5	199.9	9.4	199.9	9.4
1992	271.0	226.1	190.7	-35.4	252.8	26.7
1993	170.2	165.5	152.4	-13.1	242.2	76.7
1994	140.4	134.6	116.7	-17.9	197.5	62.9
1995	142.1	138.9	148.2	9.3	101.1	-37.8
1996	398.1	301.6	207.2	-94.4	142.4	-159.2
1997	212.5	211.8	246.3	34.5	231.1	19.3
1998	219.5	178.7	196.6	17.9	196.6	17.9
1999	241.6	197.7	185.1	-12.6	185.1	-12.6
2000	234.6	188.4	214.3	25.9	214.3	25.9
2001	247.9	202.6	127.1	-75.5	279.8	77.2
2002	138.2	134.5	159.4	24.9	104.2	-30.3
2003	248.1	206.6	170.2	-36.4	123.8	-82.8
2004	183.1	158.4	188.0	29.6	175.0	16.6
2005	203.5	167.5	111.1	-56.4	264.8	97.3
2006	119.9	112.5	163.2	50.7	107.8	-4.7
2007	213.8	177.2	183.3	6.1	133.6	-43.6
2008	182.8	145.6	142.7	-2.9	148.1	2.5
2009	247.2	207.6	177.3	-30.3	179.5	-28.1
2010	170.3	131.9	163.6	31.7	163.6	31.7
2011	260.5	218.7	192.9	-25.8	192.9	-25.8
2012	226.1	175.7	200.3	24.6	200.3	24.6
2013	237.9	189.8	185.4	-4.4	185.4	-4.4
2014	240.6	210.8	199.9	-10.9	199.9	-10.9
2015	255.4	212.9	176.7	-36.2	230.5	17.6
Total	8,279.0	7,148.0	6,754.4	-393.6	6,993.9	-154.1
Average	212.3	183.3	173.2	-10.1	179.3	-4.0

Issue 2: TWSA Proration Data – Due to the above reduction in the "No-Change" scenario, the baseline TWSA data is artificially lowered and the presented Proration data is also incorrectly reduced. This again creates a significant error in the projected TWSA and Proration benefits of the "KDRPP" scenario.

In addition to the above errors in Kachess Lake Outflows, the artificial reduction of the No-Change drought year water supply also distorts the TWSA and Proration projections presented in the SDEIS. As shown below, the Historic No-Change TWSA data significantly reduces the baseline Proration levels to an average of 45.4%. The "KDRPP" scenario then increases the Proration levels up to an average of 59.3% with SDEIS proclaiming increases of nearly 22% when referring to the 21.3% change in 2005.

6

When compared to the actual Sept 30 Proration levels published by the BuRec (but not provided in detail in the SDEIS), we see the actual baseline average Proration level of 53.3% and thus the overall benefit of "KDRPP" drops to 6.0% on average (a 56% reduction in benefits) with the SDEIS example of 2005 now showing only an 11.5% improvement.

The net effect of this error is like when a retailer increases the price of an item and then puts it "on-sale" back down to a price similar to the original price. The SDEIS artificially reduces the baseline "No-Change" scenario to imply to the public and irrigators a much more significant benefit of KDRPP than is factually true.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Proration data? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model?*
- *Given the artificial reduction in the "no-change" baseline scenario, should irrigators and the public be informed of the modeled benefits as well as the change from actual benefits? If not, please explain why?*

	Historic SDEIS Projections			Actual Hydromet Data	
Drought Year	Historic No-Change Proration	Historic KDRPP Proration	KDRPP vs No-Change	Actual BuRec Proration Data	KDRPP vs Actual
1977	42.8%	60.4%	17.6%	70.0%	-9.6%
1987	62.8%	70.0%	7.2%	68.0%	2.0%
1992	64.3%	64.1%	-0.2%	58.0%	6.1%
1993	52.5%	70.0%	17.5%	67.0%	3.0%
1994	24.0%	33.4%	9.4%	37.0%	-3.6%
2001	32.7%	52.7%	20.0%	37.0%	15.7%
2005	32.2%	53.5%	21.3%	42.0%	11.5%
2015	51.9%	70.0%	18.1%	47.0%	23.0%
Average	45.4%	59.3%	13.9%	53.3%	6.0%

Issue 3: Kachess Outflows vs Total ID Diversions – While the SDEIS presents a scenario as "KDRPP Only", there are clearly other operational changes occurring at the same time. This is made clear by comparing actual Kachess Outflows to the total Irrigation District Diversions whereby the ID Diversion increases are far in excess of the Kachess Outflow increases. Accordingly, there should be an additional alternative scenario that allows for operational changes without any other projects (like KDRPP) and in-excess of the "No Change" scenario. Further, the SDEIS should be more upfront in stating the benefits due to operational changes vs those from KDRPP.

The SDEIS goes to great lengths to model the benefits of multiple participating "Proratable Entities" and formally includes KRD, RID and WIP Irrigation Districts in the SDEIS Irrigation District Diversion analysis. However, under the "KDRPP-only" scenario, the modeled irrigation water benefits far exceed the amount of additional Kachess Outflow water. As shown below, in drought years, Kachess Outflows under "KDRPP" increase by 522.5 kAF of water (above historical actuals) but the projected ID Diversions increase by 966.9 kAF, (84.9% more than Kachess Outflows). Clearly there are other operational parameters at work here but no meaningful data is provided with which to assess these operational changes.

7

This concern is further compounded when assessing all years from 1977-2015. For the full period, the KDRPP scenario actually reduces total Kachess Outflows (from Actual) by 154.1 kAF yet ID Deliveries increase over this same time frame by 624.4 kAF. The resulting and unexplained variance of 778.5 kAF above and beyond Kachess Outflows represents an important alternative in and of itself and needs much further explanation.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Irrigation District Deliveries data? Why was it not presented in the SDEIS?*

- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model?*
- *Given the significant variance in water delivered outside of KDRPP, why are the operational changes not explained more fully? Why are they not run as an independent alternative in the SDEIS?*

Water Year	Historical KDRPP Change from Actual Hydromet	Historical KDRPP - KRD Impact	Historical KDRPP - Roza Impact	Historical KDRPP - WIP Impact	Historical - Total ID Impact	Variance kAF	Variance %
1977	105,456	58,752	70,838	66,055	195,645	90,189	85.5%
1987	59,103	9,006	16,546	15,737	41,289	-17,814	-30.1%
1992	26,708	-301	-482	-457	-1,240	-27,948	-104.6%
1993	76,747	28,077	42,504	40,209	110,790	34,043	44.4%
1994	62,939	38,118	34,259	34,328	106,705	43,766	69.5%
2001	77,151	72,513	73,053	66,461	212,027	134,876	174.8%
2005	97,270	74,767	75,314	71,559	221,640	124,370	127.9%
2015	17,551	26,685	28,614	24,763	80,062	62,511	356.2%
Drought Years	522,924	307,617	340,646	318,655	966,918	443,994	84.9%
Non-Drought Years	-677,032	-97,688	-87,502	-157,358	-342,548	334,484	-49.4%
Total	-154,107	209,929	253,144	161,297	624,370	778,477	-505.2%

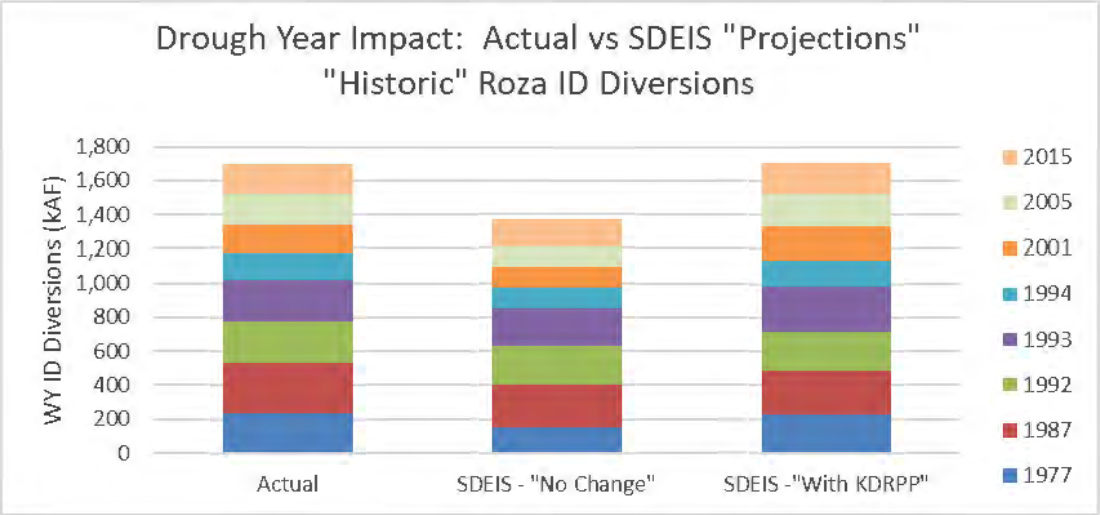
Issue 4: Roza Diversions vs Actual – The SDEIS itself only speaks to irrigation water increases in terms of changes in Proration levels. With the non-public BuRec SDEIS irrigation district diversion data and the historical actual diversion data (also provided by BuRec), an analysis of SDEIS projections vs actual irrigation district diversions is possible. In the case of Roza, the projected KDRPP diversions are scarcely more than the actual water delivered in drought years. This represents a glaring and material misstatement of benefits to irrigators and needs to be addressed.

8

As shown below, actual Roza diversions in drought years total 1,697 kAF. The SDEIS "No-Change" baseline scenario suggests Roza water deliveries in the same years would be 1,368 kAF, a decrease from the actual water deliveries of 329 kAF. Diversions under the "KDRPP" SDEIS scenario then increase to 1,709 kAF in drought years and are presented as a material improvement from the "No Change" scenario (an increase of 341 kAF). In fact, the "KDRPP" scenario only delivers a net increase of 12 kAF from the actual deliveries and in many years delivers less water. The failure to provide a comparison to actuals and to present this level of detail to the Roza irrigators is an egregious error.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Roza Irrigation District Deliveries data? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model as it relates to Roza deliveries?*
- *As Roza is the current and only committed ID, why should they fund a project that does not deliver any meaningful benefit to them?*



Roza

Drought Years - 1977-2015 (8 Years)

	Actual	SDEIS - "No Change"	SDEIS - "With KDRPP"	Variance: KDRPP vs Actual
1977	238	155	226	-12
1987	292	246	262	-29
1992	246	231	231	-15
1993	244	220	263	19
1994	159	119	154	-5
2001	160	127	200	40
2005	182	115	190	8
2015	176	154	183	7
Total	1,697	1,368	1,709	12
kAF		-329	341	

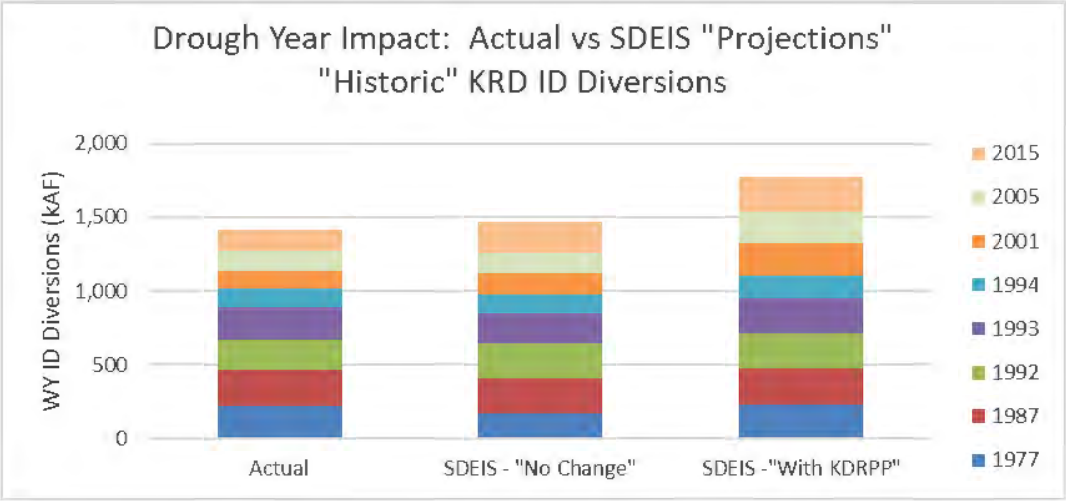
Issue 5: KRD Diversions vs Actual – The SDEIS itself only speaks to irrigation water increases in terms of changes in Proration levels. With the non-public BuRec SDEIS irrigation district diversion data and the historical actual diversion data (also provided by BuRec), an analysis of SDEIS projections vs actual irrigation district diversions is possible. In the case of KRD, the projected KDRPP diversions are significantly more than the actual water delivered in drought years. In fact, they are greater than the amounts delivered to Roza, who has 57 kAF more annual water rights than KRD. This seems to be both ill-advised and illegal, with significant litigation risk as well.

As shown below, actual KRD diversions in drought years total 1,419 kAF. The SDEIS "No-Change" baseline scenario suggests KRD water deliveries in the same years would be 1,465 kAF, roughly the same. However, diversions under the "KDRPP" SDEIS scenario increase to 1,773 kAF, a material improvement of over 300 kAF from both actual and "no-change" data. Unfortunately, the diversions for the same years are 74 kAF greater than Roza (1,709 kAF) who has 57 kAF more annual water rights. Further, Roza's increase over actual deliveries of only 12 kAF will call into significant legal question KRD's increase of over 300 kAF. The failure to address the KRD vs Roza delivery levels as well as a comparison to actuals and to present this level of detail to the Roza and KRD irrigators is unconscionable.

9

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS KRD Irrigation District Deliveries data in comparison to the Roza deliveries? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model as it relates to KRD deliveries?*
- *As Roza is the current and only committed ID, why should they fund a project that does not deliver any meaningful benefit to them yet provides significant benefits to a currently non-participating ID?*



KRD

Drought Years - 1977-2015 (8 Years)

	Actual	SDEIS - "No Change"	SDEIS - "With KDRPP"	Variance: KDRPP vs Actual
1977	219	175	234	15
1987	247	235	244	-3
1992	207	233	232	26
1993	220	209	237	18
1994	124	119	157	33
2001	122	146	218	96
2005	130	134	208	79
2015	150	215	242	92
Total	1,419	1,465	1,773	354
kAF		46	308	

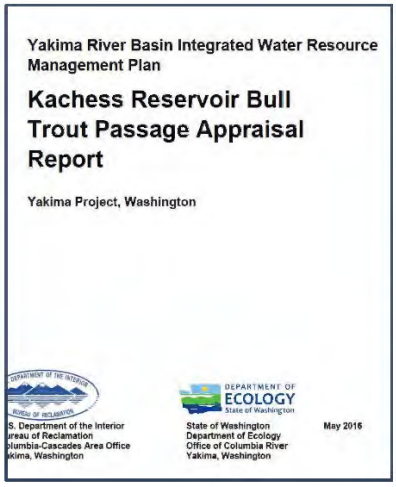
Issue 6: Hydrology analysis at water elevation 2199.5 – Previous Hydrology Technical Memorandum as well as extensive Bull Trout documents make reference to the critical water elevation of 2199.5, below which Bull Trout can no longer migrate up through the Narrows. The SDEIS fails to address this critical water level with any detailed analysis or references.

As the below references from the May 2016 Bull Trout document clearly indicate, assessing the frequency and duration of water levels below 2199.5 are essential for Bull Trout migration. The SDEIS fails to address this water level. It is such an important metric that the BuRec has not lowered the Kachess Lake below this level since 1977, even in the face of 8 droughts. And while the SDEIS addresses several other water level concerns as it relates to Bull Trout, it fails to provide any data or discussion on this most important and not recently violated critical water level.

10

Questions for the SDEIS:

- *Why was data for the 2199.5 water level not presented in detail in the SDEIS?*
- *How many days and years will the water level be below 2199.5 in all of the historic and climate change scenarios?*
- *If not already done, can the updated SDEIS data be shared with the public and with the BiOp agencies?*


Yakima River Basin Integrated Water Resource Management Plan

Kachess Reservoir Bull Trout Passage Appraisal Report

Yakima Project, Washington

S. Department of the Interior
reau of Reclamation
lumbia-Cascades Area Office
kima, Washington

State of Washington
Department of Ecology
Office of Columbia River
Yakima, Washington

May 2016

Under a Washington State declared drought, the KDRPP could withdraw up to 200,000 acre-feet of water from the Kachess Reservoir. The RiverWare model was used to estimate the number of months during an 83-year period (1926-2008) where the average monthly pool elevation was below 2,199.5 feet. At this pool elevation, fish migrating up from the lower Kachess reservoir cannot pass through the downstream end of the Narrows. During the June through October upmigration period, the Narrows would be impassible a percentage of the time: in June- 13 percent; in July- 23 percent; in August- 29 percent; in September- 37 percent, and in October- 42 percent (Table 1).

Table 1. The number and percent of months that the average monthly lower Kachess Reservoir elevation would be less than 2,199.5 feet when operated under the Integrated Plan, Kachess Drought Relief Pumping Plant scenario (IP2A) for the 1926-2008 period of record. Below this elevation, fish passage from lower Kachess Reservoir into the Narrows becomes impassable for upmigrating fish.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Percent of Months Average Water El.<2199.5 feet	29%	29%	25%	20%	19%	13%	23%	29%	37%	42%	37%	33%
Number of Months Water El. <2199.5 feet	24	24	21	17	16	11	19	24	31	35	31	27

Issue 7: Economics – Simply put, there is no meaningful economic analysis in the SDEIS. It assumes broad econometric analysis is the same as substantial Benefit-Cost or ROI analysis. And it specifically fails to address the question of how much the water will cost and how and where it will be used in a rational economic return on investment approach.

In my prior comments previously submitted for the DEIS process and in my extensive reviews and presentations with the BuRec, I have provided very detailed and specific commentary on the many economic short-comings of the KDRPP project. Those comments are now included again in these comments by reference. Further, they foster the following specific questions:

11

Questions for the SDEIS:

- *What is the life-time cost per Acre Foot of water for the KDRPP project?*
- *What is the incremental profit of an acre-foot of water per crop type in the Yakima Basin?*
- *Which crops have a positive Benefit-Cost vs a negative Benefit-Cost?*
- *For crops with a negative Benefit-Cost, how can the using KDRPP water be justified as a private or public good?*

- *Given the likely negative Benefit-Cost for a majority of Yakima Basin crops, how can the overall economics of the KDRPP provide any positive economic return? How can the water be used only on crops with a positive Benefit-Cost? How can we enable only those irrigators with a positive Benefit-Cost to pay for and use the water from KDRPP?*

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Comments on SDEIS for the Kachess Drought Relief Pumping Plant (KDRPP)

1 message

Livia Scott <livialand@gmail.com> Tue, Jul 10, 2018 at 3:10 PM
To: kkbt@usbr.gov

To Whom It May Concern,

My family has a property on the east side of Lake Kachess for over 4 generations and I am a part owner.

A newly constructed well serves our cabin and we hold a senior water right. Every summer and often year round, our family is at the cabin: my parents, aunt, uncle, brother, sister in law, cousin, cousin in law and 4 children. 1

The Kachess Drought Relief Pumping Plant proposals raise a number of concerns about how this could negatively impact our property.

1. Our well will run dry if the lake is pumped down, according to the SDEIS. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater my well which has senior water rights? 2

2. The SDEIS notes our well on the East side of Lake Kachess will be dewatered. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry, specifically? There is no money for mitigation. 3

3. Under the proposed alternative, what fraction of the resident endangered Bull Trout population in Lake Kachess will be killed? 4

4. According to pages 2-6 in the proposal "Project proponents would use the pumping plant during drought years and could possibly use it in following years as the reservoir refills to a level above the existing gravity outlet."

> Does this mean the definition of when the pumps could be used has changed from the prior definition of drought (less than 70% of prorated water expected to be available)? 5
>
> Why would the pump be used in following years "as the reservoir refills to a level above the existing gravity outlet?" wouldn't that stop or hinder refill?

5. Pages 1-4 say that the integrated plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation). 6

What is the number of kAf saved by water conservation?

What is the number saved by groundwater storage?

What is the number saved by market reallocation?

6. Table 1-2 on p 1-20 says that ecology will "issue water rights as necessary." We've been told repeatedly that no new rights will be generated from this plan.

What is the legal mechanism by which new water rights be issued? To whom?

7

7. P3-29, 3-45: both Keechelus and Kachess are now listed as "category 5" water impairment because of PCB contamination.

But in the 2015 DEIS, **only Keechelus** was marked as having PCB contamination. Please release the report **which also indicates that Kachess has a similar contamination.**

8

Wouldn't dredging and construction raise sediment containing PCBs?

What increase of PCB levels is expected on the basis of the proposed alternative construction activities?

8. P3-172 indicates Indian sites on Kachess. What is going to happen with the artifacts unearthed during the construction?

9

Thank you for your attention. I look forward to hearing your reply.

Sincerely,
Livia Newman
Cabin Owner

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess Drought Relief Pumping Plant

1 message

Doug Smith <doug@smith.net> Tue, Jul 10, 2018 at 6:27 AM
To: kkbt@usbr.gov

This project is a boondoggle of the highest order. It appropriates half a Billion dollars of taxpayer money to benefit a few private land owners, who were well aware that they bought land subject to drought, and should have no expectations of a public bailout. Even the DSEIS admits the economic benefits to the agriculture industry ARE NOT THERE (their analysis shows the benefits are less than the threshold they established for a positive impact). Not to mention the negative impact on the fish habitat, ability of fire-fighters to draw water for fighting forest fires, increased susceptibility for fires around the lake, and damage to the great recreational benefits of the lake (which generates tax revenues and tourist dollars). I could go on, but you already know that the right thing to do is to stop this project before it starts. 1

-Doug Smith

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess SDEIS

1 message

Katherine Staberow <kstaberow@yahoo.com> Tue, Jul 10, 2018 at 10:27 AM
To: kkbt@usbr.gov

Dear Ms. Candace McKinley,

I am very strongly opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative. 1

Sincerely,
Katherine Staberow
Snohomish, WA

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Lake Kachess

1 message

JOHN STARCEVICH <JSTARCEVICH@malcolmdrilling.com> Mon, Jul 9, 2018 at 10:37 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess.

Alternative #1, No Action is the only acceptable alternative. How an idea this ridiculous has gotten this far is unbelievable. Please spend some time at Lake Kachess and you will better understand the gravity of this situation. I am confident that there is another solution to this situation (other than draining Lake Kachess) that is far better for everyone involved, much less costly, and will not destroy this beautiful lake. 1

Thanks,

John

John P. Starcevich, P.E., G.E.

Vice President/Chief Engineer

Malcolm Drilling Co., Inc.

253-395-3300 Office

206-510-7224 Cell

Malcolm Drilling Company, Inc. is an Affirmative Action/Equal Opportunity Employer

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Kachess and Keechelus DEIS

1 message

Lynne Thomas <lynnebeckerthomas@gmail.com> Tue, Jul 10, 2018 at 12:02 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Candace McKinley
Environmental Program Manager
Bureau of Reclamation

Dear Ms. McKinley,

I am opposed to any of the Kachess SDEIS active alternatives (2-5), the pumping plant and/or pipeline at Lake Kachess. Only the first, No Action alternative is acceptable. Efforts should be put into more sensible alternatives. 1

Alternatives could and should include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies. 2

These Lake Kachess projects should be last resort options, if considered at all.

Sincerely,

Lynne Thomas
19917 N Wenas Road

Selah, WA 98942

Sent from Mail for Windows 10

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Comments/Question to the Kachess April 2018 SDEIS

1 message

WILLIAM VAUGHN <groverwfv@comcast.net>
Reply-To: WILLIAM VAUGHN <groverwfv@comcast.net>
To: kkbt@usbr.gov

Mon, Jul 9, 2018 at 6:49 PM

Ms. Candace McKinley,

Please find attached a document in MS Word 2013 that contains my comments and questions to the subject document. Do let me know if there are any difficulties opening this document and I will just make a copy in the body of an e-mail. 1

Thanks,

William F. Vaughn

Vaughn Family Recreational Partnership

2018 SDEIS Comments_WFV_07-09-2018.docx
16K

Submitted via e-mail to kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: Kachess and Keechelus SDEIS

Dear Ms. McKinley,

The following are just a few comments and questions that I have regarding the reference document. 2

1) I am opposed to any of the Kachess SDEIS active alternatives (2-5); a pumping plant and/or pipeline at Lake Kachess. Alternative #1, No Action is the only acceptable alternative. 3

2) With almost no exceptions people buy at Lake Kachess for easy access to the lake for recreational activities. If any of proposed active alternatives (2-5) are put in place it will significantly affect the usability of the lake in a drought year and years that follow where the level of the lake will be significantly low. With the lake rendered at times un-usable for recreation I expect the loss in value for properties and homes there to be substantial. With that in mind what plans are being made to compensate owners if the government proceeds with any of the active alternatives? 4

3) There are an extreme large number of campers (23,000 annually) and boaters (10,000 annually) (primarily water sports enthusiast) who use the lake. It is largely popular due to its easy access from Seattle and one can easily take a family outing for just a weekend. What are the plans to inform this population of the changes that may take place? What other recreational options will they have if this campground becomes un-usable? 5

4) This plan seems like a band aid solution. The water from Kachess will support one bad drought year and then we are done, left with a lake and environment that is pretty much devastated. Much of the damage is likely to be permanent. When will there be other real plans that will be acted upon to both conserve resources and utilize a variety water sources such that we will not have to devastate an environment in the process? 6

Thank you for considering answers to the questions above.

Sincerely,

William F. Vaughn

Vaughn Family Recreational Partnership
11528 SE 321st PL
Auburn, WA 98092

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Comments on SDEIS

1 message

Wenstrup, John <Wenstrup.John@bcg.com> Sat, Jul 7, 2018 at 8:08 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>
Cc: "alexis.wenstrup@gmail.com" <alexis.wenstrup@gmail.com>

Please submit the following questions on my behalf:

1. When Kachess Lake was first dammed in 1912, most believed the lake was glacial in origin. Since, geologists have concluded that Kachess Lake was not carved by glaciers, but instead is caused by seismic activity from a series of major North-South fault lines. In fact, geologists (see Lofgren et al, 1973) have concluded that Kachess Fault runs the length of the lake and is bounded by other major faults (e.g. Kachess Ridge Fault and Thomas Mountain Fault, among others) and folds (Thorp Mountain anticline and Domerie Creek syncline, among others). Of all dams in the Yakima Basin region, Kachess is likely to have the greatest risk of catastrophic failure given both its geological activity and volume of water at maximum fill. While routine periodic checks for dam integrity are currently conducted, has the risk of geologic activity to the existing dam, and thus the risk to downstream populations in Easton, Cle Elum, etc., been thoroughly and appropriately assessed? Given this risk, has a scenario in which the dam is de-commissioned and removed for safety reasons been considered in your design and benefit calculations? 1

2. The June 11, 2018 Supreme Court tie in *State of Washington vs. United States* re-affirmed a landmark 9th Circuit Court decision supporting Native American tribal fishing rights and forcing the state to spend $1.9B to improve fish passage (in this case, for salmon passage through inappropriately designed culverts). State Attorney General Bob Ferguson, arguing against the United States and the tribes, suggested that the decision would dramatically shift regulatory power in the Washington. He stated, “Plaintiffs could use the panel’s decision to demand the removal of dams and attack a host of other practices.” Has the impact of this new court precedent (e.g. on impact of required instream flows, potential for dam removal, Bull Trout spawning, potential litigation, etc.) been fully understood an incorporated into this study? 2

3. The planned pumping activity will expose lakebed surfaces (playa) which have been submerged for thousands of years. As the recent ecological disaster at the Salton Sea has shown, airborne particulates, especially PM10 (particulate matter with diameters up to 10 microns) can cause major ecological and health risks including cardiovascular disease, respiratory disease, and mortality (see Frie et al, *The Effect of a Receding Saline Lake (The Salton Sea) on Airborne Particulate Matter Composition*. Environmental Science & Technology. Has a study been done on the potentially exposed surfaces, the likelihood of airborne particulates (especially given wind and weather dynamics), and the impact on populations in the immediate and downstream areas? 3

4. Why do your documents continue to refer to Kachess Lake as Kachess Reservoir? Language matters, as does the truth. Kachess is a natural lake with thousands of years of rich history from our Native Tribes to thousands of visitors who have enjoyed its campgrounds, trails, and swimming sites. You are a public agency serving the public and, presumably, attempting to truth rather than the preferences of a small interest group. You should not allow special interest groups to white wash what is occurring here – the devastation of an alpine lake to lower costs for (predominantly) grass and hops farmers who are irrigating scrubland with likely significant ultimate cost to taxpayers. 4

5. Several irrigation districts have already withheld financial commitment to the K projects given the obviously unappealing economics of the project, risk of further litigation, and increased likelihood of renewed debate around removing the dam given recent seismic concerns and Supreme Court decisions. If only one district (e.g. Roza) were to commit to this project, how would such a narrow consumption profile and funding source impact the economics and risk associated with this project? 5

John Wenstrup

1823 285th Place NE

Carnation, WA 98014

John Wenstrup
Senior Partner and Managing Director

THE BOSTON CONSULTING GROUP
1201 3rd Avenue, Suite 5400
Seattle, Washington 98101 ▪ United States of America

Mobile +1 415 385 4514
wenstrup.john@bcg.com

Assistant: Haellie Baldwin
Tel. +1 206 858 5123 ▪ baldwin.haellie@bcg.com

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message.
We may share your contact details with other BCG entities and our third party service providers. Please see BCG privacy policy https://www.bcg.com/about/privacy-policy.aspx for further information.
Thank you.

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] Draining Lake Kachess

1 message

Dan Whitney <whitapple1@yahoo.com> Fri, Jul 6, 2018 at 10:49 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

There does not seem to be any seriously good reason for draining Lake Kachess. The only reasons I have heard are not well thought out and are more political than anything. When we start making decisions to do something as drastic as Draining the lake so we can "feel good" and turn the clock back to the days of the Indians it is time to put clear thinking people in charge . I honestly cannot believe this is something we are actually debating! 1

Dan Whitney
Cowiche Wa.

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] KDRPP and KKC SDEIS Comments

1 message

Jerry Williams <jaw.home@hotmail.com> Tue, Jul 10, 2018 at 10:13 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms, McKinley,

Attached is a pdf of a letter which I mailed today with my comments on the Supplemental Draft EIS for the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus Reservoir-to-Kachess Conveyance (KKC) Projects. Thank you in advance for your consideration of these comments. 1

Sincerely,

Jerald A Williams

JAW2018SDEISCommemts.pdf
10469K

20121 SE 248th St.
Maple Valley, WA 98038
March 9, 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

Ref: Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Conveyance (KKC) Projects

Via email to: kkbt@usbr.gov

Dear Ms. McKinley:

Please accept these comments in response to the Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018 for the proposed Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Conveyance (KKC) Projects. 2

1. **The KDRPP Pumping Plant Facilities.**

   The "Economic Analyses of the Proposed Kachess Drought Relief Pumping Plant" document published April 2015 and made available at the public meeting on May 16, 2018, Paragraph 3.2.1 on page 22 states that "The KDRPP would potentially provide agricultural water supply benefits by increasing water availability for proratable users during drought conditions. Proratable users have junior water rights that are satisfied by an equal share among all proratable users, after senior, nonproratable users have received their full allotment (Reclamation and Ecology, 2011)". The SDEIS on page 4.22, Paragraph 4.3.4.2 states that "The primary purpose of KDRPP is to improve water supply for irrigation districts with proratable entitlements during drought years….". 3

   It is not clear in the SDEIS if the KDRPP will be sized to provide water for all users (proratable and proratable) or just selected participating entities. It is also not clear who will be paying the initial construction, and operating and maintenance costs.

   Pumping water out of Lake Kachess below the natural gravity outlet of the lake would be pumping water from the lake that would normally be available in future

years without pumping. This could have some interesting consequences during the first year and following years of pumping Lake Kachess below its natural gravity outlet during a multiple year drought. Following are a couple of different possible scenarios.

A. KDRPP facility with a capacity to provide water for all users (proratable and nonproratable).

4

The first paragraph above referenced The Economic Analysis for the project that states "The KDRPP would potentially provide agricultural water supply benefits by increasing water availability for proratable users during drought conditions. Proratable users have junior water rights that are satisfied by an equal share among all proratable users, after senior, nonproratable users have received their full allotment (Reclamation and Ecology, 2011)". The second quote in the first paragraph above from the SDEIS states "The primary purpose of KDRPP is to improve water supply for irrigation districts with proratable entitlements during drought years….".

Currently, in a drought year nonproratable users get 100% of their water supplied by gravity, with no pumping required. As stated above, currently the proratabler users would be satisfied by an equal share among all proratable users, after senior, nonproratable users have received their full allotment. However, in a drought situation with the KDRPP in place, additional water would start being delivered to the proratable users during the growing season with the anticipation of pumping water from the lake when the level got below the lake's natural gravity outlet. Once that happened, it would be necessary to pump water for the nonproratable users as well as the proratable users to ensure the non-proratable users receive their full allotment for the year. To ensure that this criterion is met, the pumping faculty would have to be sized to provide water for all users.

Figure 4-3 on page 4-26 of the SDEIS indicates that when two or more drought years occur in a row; it could take two to three years before Lake Kachess could refill to its natural gravity outlet level. This means that possibly for multiple years following the first drought year, it could be necessary to pump every gallon of water (prorateable and nonprorateable) taken from Lake Kachess (for the entire irrigation season on a twenty-four-hour basis).

Comments - Please provide more detail in the FEIS on the sizing and operation of the KDRPP explaining the following:

- **Will the KDRPP be sized to support both proratable and nonproratable users?**

- **How much of the KDRPP initial cost and operating cost will be paid for by the users? If any costs are paid by the users, will**

proratable users pay for the costs of pumping water for nonproratable users in addition to the cost of pumping water for their own use? This seems only fair, since when the level of Lake Kachess is lowered below its natural gravity outlet to benefit the proratable users, it then would make it necessary for the water for the nonproratable users to be pumped also.

B. KDRPP facility with a capacity to provide water for Roza (and potentially other Proratable Entities) only.

In the SDEIS the last paragraph of Section 1.8.1 Federal, page 1-17 states that "If pending Federal legislation is enacted, it would provide statutory authority for Roza (and potentially other Proratable Entities) to fund, design, construct, operate, and maintain the proposed KDRPP facilities. Table 1-1 also states that Roza Irrigation District has the responsibility to fund, design, construct, operate, maintain the selected alternative.

If Roza were the only Entity to fund, design, construct, operate, and maintain the proposed KDRPP facility, does that mean that Roza could construct a facility that meets their needs only (to the exclusion of the nonproratable and non-participating proratable entities)? If that were the case, would it mean that, once Roza had pumped the level of Lake Kachess below the natural gravity outlet of the lake, Roza would be the only entity that would have access to water from Lake Kachess until the lake level rose above the gravity outlet of the lake? Would this mean that during multiple consecutive drought years, when every gallon of water has to be pumped out of Lake Kachess (since Roza had pumped the lake down the previous year), nonproratable and other proratable users could get zero water for the season because the lake level was below the gravity outlet? Depending on the answers to these questions, it looks like a single entity that built the KDRPP, might jump in front of nonproratable and other proratable users (priority wise), when the level of Lake Kachess is below its natural gravity outlet. 5

Comments - Please provide more detail in the FEIS on the sizing and operation of the KDRPP explaining the following:

- **Will the KDRPP be sized to support Roza's (and potentially other participating entities) requirements only, or will it be sized to support all (both proratable and nonproratable) users?**

- **If the KDRPP is sized to satisfy Roza's (and potentially other participating entities) requirements only, does that mean that when the level of the lake is below the natural gravity outlet of the lake, that Roza and the other potential entities are the only ones that will have access to water in Lake Kachess?**

- **If the KDRPP is sized to satisfy all users, the comments for Scenario A above would apply.**

- **What happens if not all entities participate in the funding and construction of the KDRPP. How are the nonproratable users guaranteed access to their senior water rights? Will non-participating proratable users forfeit their rights to some or all of their water rights that are supposed to be satisfied by an equal share among all proratable users, after senior (nonproratable) users have received their full allotment? If an entity does not participate in the funding and construction of the KDRPP, does that mean that whenever the level of Lake Kachess is below the natural gravity outlet of the lake they will get zero water from the lake? If that is the case, nonproratable and non-participating proratable entities could possibly get zero water from Lake Kachess for one or more seasons during multiple drought years.**

- **Clarify user costs for the different options discussed above. If it becomes necessary to pump water from Lake Kachess for nonproratable users to protect their senior water rights as discussed above, will the nonproratable users be asked to share in the costs for a pumping facility whose primary purpose is to improve water supply for proratable users during drought years?**

It appears that the only way to ensure that the water is distributed properly between senior (nonproratable) and junior (proratable) water rights users (as described in the first paragraph above) over multiple drought years when a KDRPP is used; is to size the capacity of the KDRPP to supply water for all proratable and nonproratable users. If this is not done, only the entities that have pumping capacity will have access to Lake Kachess water when the level is below the natural gravity outlet of the lake. For a proratable water right user to pump this water from the lake is actually taking water from senior water right users, since that water would have been available the following year by gravity for the senior users if the KDRPP did not exist. 6

Since some of the options discussed above appear to have the potential for significant legal actions over water rights, please clarify these issues in the FEIS.

2. Impact on private wells.

The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of "monitor and mitigate." The possibility of losing water, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a FEIS. Please provide this comprehensive strategy, its details, costs, and 7

operational features described in detail, and provide citizens with this information along with an appropriate comment period, prior to issuing a FEIS. Some property owners on the east side of Lake Kachess have senior water rights (purchased through the Department of Ecology's water banking system) for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that proratable water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry?

3. Misrepresentation of Lake Kachess

In Chapter 1, Section 1.2 the SDEIS indicates Kachess Reservoir was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options. Thus, every drop of water to be pumped by the KDRPP will come from Big Kachess Lake. It is a misrepresentation to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Big Kachess Lake. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. We ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by BOR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. KDRPP has nothing to do with Kachess Reservoir. We ask that this confusion and misrepresentation stop, and accurate terminology be used that informs rather than confuses the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as Page 1-7. And under what authority can BOR tap into the natural lake? Cite the federal or Washington state law which allows draining of the natural lake.

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Thank you for your consideration and I look forward to seeing these comments addressed in the EIS.

Sincerely,

Jerald A. Williams

Jerald A. Williams
425-747-8103
Email jaw.home@hotmail.com

K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov>

[EXTERNAL] public comments for KDRPP

1 message

Karen Worcester <worcester.karen@gmail.com> Tue, Jul 10, 2018 at 9:56 AM
To: kkbt@usbr.gov

Hi,

Attached please find my comments for the KDRPP DSEIS.

Respectfully submitted,
Karen Worcester

KDRPP-public-comments.docx
44K

Karen Worcester
217 239th Way SE
Sammamish, WA 98074

July 9, 2018

Bureau of Reclamation, Columbia-Cascades Area Office
Attention: Candace McKinley, Environmental Program Manager
1917 Marsh Road
Yakima, WA 98901-2058
kkbt@usbr.gov

Dear Ms. McKinley,

As a recreationist and professional environmental scientist I am opposed to the Kachess Drought Relief Pumping Plant.

The Kachess Drought Relief Pumping Plant (KDRPP) is not a public benefit and must not be enacted, either by the Bureau of Reclamation and Department of Ecology, or by the Proratable Entities interested in implementing it. It is inconsistent with adopted plans, the analysis is based on missing data and questionable assumptions, proposed mitigation is lacking, groundwater impacts could be detrimental to property owners and public recreationists, there are insignificant agricultural impacts given the negative recreation and environmental impacts, lake habitat for fish is negatively impacted, and it could potentially increase the fire susceptibility of the area while decreasing the ability of emergency responders to fight fires. It also radically changes the use of the Yakima Project, which has been managed for over 100 years as a system for all users and instead essentially earmarks one reservoir for one irrigation district. 1

Inconsistency with Mission and Adopted Plans

Comprehensive planning within the State of Washington requires that all plans and projects be consistent with adopted policies; KDRPP does not appear to meet that test in several regards, including contrasting with the mission of the proposing agencies.

The opening page of the DSEIS cites the missions of the US Department of the Interior, the Bureau of Reclamation, and the state Department of Ecology. While all agencies have mission facets that can compete with one another, making mission-project consistency a balancing act, this project does not fit with the adopted missions more than it does. 2

- Though the US Department of the Interior is directed to "supply the energy to power our future," this part of the mission is tertiary to protecting natural resources, which KDRPP does not do. Instead, it denigrates a natural environment in order to provide economic benefit to a small group.
- Reclamation is directed to "manage, develop and protect water" and clearly KDRPP fits within that purview. However, Reclamation must also do this work "in an environmentally and economically sound manner," which is not descriptive of the proposed project.
- This project is most inconsistent with the state Department of Ecology's mission to "protect, preserve and enhance Washington's environment, and promote the wise management of our air,

land and water for the benefit of current and future generations." Undertaking KDRPP has significant negative environmental and recreational impacts which are not consistent with Ecology's mission.

The DSEIS states in Section 4.3.3 that "Alternative 1 No Action does not meet the purposes of the Proposed Action because it does not address water supply for proratable irrigators or instream flow conditions in the upper Yakima River basin" (pg 4-21). Later, in Section 4.24 (pg 4-349) the DSEIS suggests that the proposed project meets several of the Integrated Plan's goals when, in fact, it does not. The noted goals include:

- Provide opportunities for comprehensive watershed protection, ecological restoration and enhancement, addressing instream flows, aquatic habitat, and fish passage

  This plan does not provide "comprehensive watershed protection" and instead increases the vulnerability of an entire watershed to wildfire risks by lowering groundwater levels and reducing access to surface water for emergency responders. No ecological restoration or enhancement is provided other than improving a minority of instream flows analyzed; negative impacts are projected for aquatic habitat in the lakes and for fish passage as well.

- Improve water supply reliability during drought years for agricultural and municipal needs

  While KDRPP does provide some benefit in drought years, it is insignificant when the adverse climate change scenario is modeled. A 3% gain in water is hardly worth the negative environmental and recreational impacts that could permanently occur.

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- Improve the ability of water managers to respond and adapt to potential climate change effects

  As noted above, potential climate change effects would severely limit the benefit provided by KDRPP.

- Contribute to the vitality of the regional economy and sustain the riverine environment

  As noted above, while there are some instream flow objectives that would be met, not all flow targets would benefit and some are projected to worsen. KDRPP does not meet the established economic indicator threshold of 1% and ignores the negative impacts to what is likely a large sector of the economy: recreation.

Further, KDRPP is inconsistent with several adopted plans at both the County and Federal levels.

- Kittitas County Shoreline Master Program (SMP): Lakes Keechelus and Kachess are designated as lakes of statewide significance under the State Shoreline Management Act. The Kittitas County SMP designates the shoreline of both lakes as "conservancy shoreline environment," which requires "maintaining the natural character of the shoreline area" (Section 3.15, pg 3-161). The development of any of the pumping facilities would be in conflict with this requirement as they would significantly alter the character of Lake Kachess.

  Section 3.15 further goes on to state: "Under the draft SMP, the majority of both lakes would be designated as rural conservancy. The purpose of the rural conservancy environment is to protect ecological functions, natural resources, and valuable historic and cultural areas in order to provide

for sustained resource use, natural flood plain processes, and recreational activities." All of these elements of the Lake to be protected would be negatively impacted by KDRPP.

- Ecology Upper Kittitas County Groundwater Rule (WAC 173-529A): Section 3.5.1 notes that Ecology in 2011 placed a moratorium on the development of new unmitigated groundwater withdrawals in upper areas of Kittitas County (pg 3-53). On its face, it does not seem that a project that could further deplete groundwater resources in this area could be consistent with this rule. How is KDRPP compatible with this rule? 2

- Forest Service Criteria, 1990 Wenatchee National Land and Resource Management Plan for Lake Kachess: The USFS has designated Lake Kachess as land allocation Developed Recreation (RE-1) Retention VQO, Scenic Travel 1 and 2 Retention VQO, and Partial Retention VQO. As stated in section 3.10.4, "The USFS considers visual quality to be one of the most important resources to be protected under this land allocation" (pg 3-127). Due to the changes in pool levels that would make the lake a less dominant element on the landscape, the proposed project is not consistent with these Forest Service criteria.

Modeling/Data Analysis Questions

A number of admissions within the DSEIS cast doubt on the accuracy and usefulness of the modeling used in the analysis and even note aspects of the project that were not included in modeling or evaluation. Data and analysis that are outright missing from this document include: 3

- Section 3.7: no formal wetland delineations or plant surveys were conducted for this analysis. 4
- Section 4.4.2 (pg 4-81): "Lake Keechelus was not included in drought operations surface temperature modeling completed by PSU" and "Extended or multi-year drought, or refill conditions were not included in the PSU water temperature model and potential effects of these conditions are not quantified." 5
- Section 4.4.7.2 (pg 4-98): water temperature effects and their impacts on the Little Kachess basin from the inflow from Keechelus (through KKC) are unknown, indicating that this aspect of the project was also not modeled. 6
- Section 4.6.4 (Pg 4-129): "Additional hydrodynamic modeling is needed to precisely estimate reductions in zooplankton abundance…" 7
- Section 4.10: SketchUp (or similar) renderings of all proposed facilities to aid in adequate visual quality analyses are absent. Enough details are provided regarding building mass and location, and amount and location of vegetation to be cleared to provide these basic models as evidence in this document. 8
- Section 4.21: The socioeconomic analysis does not analyze the No Action alternative for economic impacts. This glaring lack of data makes it impossible to compare the predicted economic impacts of the alternatives. 9
- Section 4.21: The socioeconomic analysis also does not describe the impacts of the project to the recreation economy of the four-county region. Despite noting in Section 3.14 that "visitors to the lakes are an important part of the economy of upper Kittitas County" (pg 3-147), the economic analysis does not account for the recreation industry or even describe it as a piece of the whole 4-county regional economy. 10

One of the fish habitat "benefits" noted in the DSEIS is reduced water temperature in Lake Kachess due to reduced shallow water areas that would be warmed along the shoreline. The acknowledgement that modeling of prolonged droughts that could result in multiyear drawdowns of the Lake raises questions about the accuracy of this identified "benefit" and is among other questions raised by admissions within the DSEIS: 11

- Section 4.3.7 (pg 4-60) discusses differences that are "likely due to reservoir balancing in the modeling that may not occur during actual operation" but no explanation is given about how actual operation may differ from what is reflected in the modeling. Are these differences based on assumptions built into the model that are not accurate or is "reservoir balancing" too complex to accurately capture in a model? This statement should be better explained to either acknowledge deficiencies in the model or the highly variable nature of reservoir operation. 12
- Water temperature in Lake Kachess is predicted to decrease with drawdowns, but Section 4.6.4 notes "there is uncertainty around whether prolonged droughts… could cause warming." Is this uncertainty related to the fact that multi-year and prolonged droughts were not modeled? What is the level of uncertainty? Why were prolonged droughts not included in the modeling? 13
- A discrepancy is found in Section 4.7.4 (pg 4-156) which states that it could take 2-8 years for Lake Kachess to return to normal operating levels, as opposed to all other sections of the document which refer to a 2-5 year refill period. With the predicted increase in frequency of droughts, how was the refill period determined? 14

In addition, there are some aspects of the analysis which are not explained adequately, such as:

- How is target pool elevation determined? If Keechelus does not meet its "target pool elevation" in some years following drought pumping of Kachess, how much longer would it take for Kachess to refill, assuming KKC is implemented? 15
- Construction methods and plans are fairly detailed for all aspects of the proposed project except for the Volitional Bull Trout Passage Improvements. Why is there no detailed construction data for this element of the project? 16
- KDRPP was originally proposed to allow pumping of 50,000 acre-feet of water from Lake Kachess but this number has increased to 200,000 acre-feet. What instigated this significant change in the amount of water to be pumped? 17
- Section 4.13.4.2 notes that noise from operation of the pumping plant is "anticipated" to fall within a certain range. The construction noise analysis is relatively detailed compared to the analysis of operations. Why is noise data from similar projects not cited or used as a proxy for this analysis? Additionally, the noise analysis notes that the closest noise sensitive receptors would not be affected but does not detail what these receptors are. What are the closest noise sensitive receptors, and where are they located? 18
- Section 4.15 notes that KDRPP would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." What regulatory guarantees are in place to ensure that no additional agricultural uses or intensifications are allowed after this project is constructed? This is a relevant question given the fact that the original 1902 legislation authorized the Tieton and Sunnyside divisions of the Yakima Basin (Section 1.8.1), but others have been added over time. How will Reclamation prevent other new agricultural uses from demanding additional water from this project which were not originally intended? 19

Further, it is not even clear that limiting agriculture to existing uses is even intended. Section 4.21 notes that the model allows for identification of agricultural activity that "could" occur (pg 4-319), which seems to allow the door to be open for more or intensified agricultural uses. 19

- Section 4.21 suggests that the Volitional Bull Trout Passage Improvements are expected to have positive economic benefits (pg 4-324). In what way would these improvements have economic impacts? What additional detail is needed about these improvements to estimate their economic impact? 20

Completely missing from the SDEIS (perhaps best located in Section 4.23 Health and Safety) is an analysis of the impact of the project on the fire susceptibility of the surrounding area and the ability of emergency responders to utilize water from Lake Kachess to fight fires that occur. Local fire departments make use of water from Lake Kachess to fight fires in the area; how have these organizations been involved in this process and what mitigation is proposed to address this potential issue? 21

Mitigation

Mitigation measures proposed in the SDEIS are severely lacking. While detailed mitigation methods are proposed related to the construction of the proposed facilities, few definitive mitigation methods are proposed for the negative impacts stemming from the operation of the proposed facilities. Those sections missing proposed operational mitigation methods include: 22

- 4.2.5.2: (pg. 4-9) Erosion control measures would be implemented prior to implementation of the project "if erosion is identified as a problem." Isn't an EIS the opportunity to identify erosion as a problem? If not identified as a problem at this stage, when would it be identified prior to implementation of the project? What types of erosion control measures would be implemented?
- 4.5.4: (pg 4-106) A well monitoring program is proposed to be implemented to analyze groundwater levels associated with drawdown but no "appropriate mitigation strategies" are identified for implementation. 23
- 4.6.10: (pg 4-148) A water quality monitoring program is proposed to be implemented to document changes in water temperature but no subsequent mitigation is proposed to address water quality impacts to fish. 24
- 4.13: Noise mitigation only addresses construction, not operation of the project. 25
- 4.14: A myriad of negative impacts on recreation are identified but no mitigation is proposed, other than a boat launch on the opposite end of the lake from the campground. Will alternative recreation sites for activities other than boating or fishing be provided elsewhere? 26

At the very least, mitigation strategies utilized by other agencies on similar projects with similar effects could be listed as examples of what Reclamation and Ecology might implement, should any future negative effects occur. 27

As detailed above, Section 4.15 notes that the project would "not increase the amount of irrigated land, but would help to maintain current levels of production while not ensuring them." Specific regulatory restrictions should be put in place as mitigation for this project to ensure that no additional agricultural

uses or intensifications are allowed after this project is constructed. Without these measures, Reclamation could not prevent other new, or intensifications of existing, agricultural uses from demanding additional water from this project.

Section 4.23 notes steep slopes would be a potential safety hazard to the public and proposes a communication strategy with the public and lake users regarding the hazards and safety measures. Who is liable for injuries sustained by users due to the steep slopes caused by Roza's (or Reclamation's, in the event Roza cannot pay for construction and continued operation of the facility) operation of KDRPP? Further, Section 4.2.4.2 notes that slope instability could result "where relatively steep or unstable areas are exposed" (pg 4-7) and that instability could be caused by "rapid drawdown, heavy or steady rain, a rain-on-snow event, and earthquake shaking." While Reclamation proposes to refrain from rapid drawdowns, it is noted that rain-on-snow events could become more common in the future thus increasing the risk of exposed slope stability. How will this negative impact be mitigated? 27

Groundwater Impacts

Impacts to groundwater in the area could be severe to private property owners, public recreation sites, and wildlife and vegetation. Only 6 of the approximately 107 wells in the area were monitored; is this number and their location representative? The fact that the only 2 privately owned wells to be monitored were added after the 2015 EIS was published suggests that groundwater analysis is lacking. 28

Both sections 3.5 and 4.5 indicate that "groundwater levels near the lake are influenced by lake elevations, especially during the dry time of the year when very little recharge is occurring and groundwater elevations are dropping because of discharge from the aquifer" (pg 3-57). Section 4.5.2 notes that well operations could be interrupted due to additional drawdowns, including the well supporting the USFS Kachess Campground (pg. 4-105/6). What the document does not indicate is the effect of lowered groundwater levels on vegetation in the area. Lowered groundwater levels would presumably dry out significant amounts of vegetation, further increasing wildfire risks in the area. Wildfire risks have increased significantly in all Western states over the last decade, and the costs—both to fight the fires and the economic costs incurred by those damaged by fires—have significantly increased as well. To undertake a public works project that increases those risks is negligent. 29

Insignificant Agricultural Benefits

For the overall cost of the project and the number and degree of negative impacts to the environment, wildlife and recreation, KDRPP does not even appear to address the need of Roza district water users to a significant degree. Under Alternative 1: No Action, proration occurs in 15 out of 90 years; under any of the action alternatives, proration occurs in 13 out of 90 years, a benefit of only 2 years. The document suggests that completing multiple additional projects would necessary to provide a meaningful improvement to proratable water users (Section 4.3.2, pg 4-19). The likelihood of securing permits and funding for the full list of projects needed to provide meaningful improvement is extremely low given the state of state and federal budgets. Undertaking KDRPP, and risking permanent drawdown of this lake, is not in the public's best interest or the best use of taxpayer money. 30

At best, under the historical modeling, the action alternatives would "improve water supply to proratable water users by up to 22 percentage points in the worst single-drought years" (Section 4.3.2, pg 4-19). However, agricultural demand for irrigation water is projected to increase due to climate change, at the same time that "natural runoff and streamflow in the system would decrease by 50% or more in some months when compared with the historic scenario; therefore irrigation demands and instream flow targets would have to be met by releasing larger amounts of water from the existing lakes. Currently, there are many years when the lakes are not capable of meeting these demands" (Section 3.12.3.4 Climate Change, Changes in Water Supply, pg. 3-138). Additionally, prolonged or multi-year droughts are expected to occur more frequently in the future (odds of a drought increase from 17% to 49% in any given year, according to Section 4.21.4, pg 4-329), and modeling under the adverse climate change scenario shows only a 3% improvement in proratable water delivery (pg 4-251). Further, the analysis finds that "the improvement under (the Action Alternatives) would be less in the third year of a multiyear drought because some of the inactive storage in Lake Kachess would be used in the first one or two years of drought, leaving less for a third year of drought" (Section 4.3.2, pg 4-19).

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Section 3.21 notes that "agriculture is the third largest sector at the four-county scale" and accounts for approximately 11% of the four-county economy. No analysis is provided of the economic impact of the No Action alternative, only the conjecture that the impact of reduced prorationed water supplies "could be greater than 1 percent of the agricultural sector output" (pg 4-323). Without this information, it is difficult to make a meaningful comparison between the economic impacts of the No Action and action alternatives. However, a comparison is not necessarily valuable given that Section 4.21.4 states that "the average annual impacts during operation on output, personal income, and employment are well below the 1 percent threshold for the impact indicators at the four-county regional level" (pg 4-325). If the economic benefit is projected to not meet the identified threshold of significance, why are Reclamation and Ecology considering implementing a project that could cost over $225M to construct (including interest, for the preferred alternative, though costs increase to $675M should another alternative be chosen) and $25M a year to operate, not accounting for potential cost increases of 30-50 percent? Clearly, the public benefit is not obvious, nor is the benefit to farmers who would receive water, as in 2015, farmers in the Roza district refused to pay for a similar proposal estimated to cost $85M.

In addition to providing only a negligible improvement in water deliveries under the adverse scenario (3% improvement), permanent risks to the lake and the surrounding wildlife and vegetation significantly worsen: "The predicted changes in snowpack and runoff associated with climate change would alter KDRPP operations by producing larger and more frequent drawdowns, and would more frequently result in years when Lake Kachess fails to refill" (Section 4.12.3, pg 4-238). "Compared with Alternative 1 under the adverse scenario, the mean lake level would be approximately 42' lower over the period of record, and 20-90' lower in drought years" (Section 4.12.5, pg 4-248). This is a significant difference that could lead to long-term impacts to groundwater levels, recreation opportunities, fish and wildlife habitat, and fire susceptibility of the region.

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Recreation Impacts

Recreation was specifically authorized as an additional purpose of the Yakima Project in Section 1205 of YRBWEP in 1994, but it does not appear that any recreation organizations have been involved in the

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development of this plan, other than USFS. What outreach was made to recreation organizations, or users (such as the estimated 23,000 annual users of the Lake Kachess Campground), to provide notice of this proprosal? The DSEIS notes that a communication strategy related to the project is called for in the future, but why has one not been undertaken to educate and seek input on the project during the development stage? 32

Due to its proximity to the greater Seattle area, Lake Kachess is an invaluable recreation location; 3.61 million people in the Seattle-Tacoma-Bellevue Metropolitan Statistical Area are within a roughly one-to-two hour drive of the camping, hiking, boating, fishing and other general opportunities to appreciate nature offered at this lake. Section 3.14 notes that "population increases have increased demand for recreation and the campground is routinely full… Kachess has a higher number of recreational visitors than Keechelus or Cle Elum Lakes… (pg 3-147) The Cle Elum Ranger District is the busiest in the area and its campgrounds tend to be completely booked on summer weekends… The Kachess Campground is the most popular in the district… (pg 3-149)." In addition, this section notes that dispersed recreation at informal camp locations along the lake is common in the summer when the campground is full.

Despite this increasing need, and the positive economic benefit it has for Kittitas County, this project could reduce recreation opportunities in the area by: 33

- Potentially impacting well operations at the campground and privately owned residences along the lake to a degree that these sites are unusable;
- Increasing the distance from the campground and residential areas along the west shore to the water line from 400' at the current maximum drawdown to 1,500' (over ¼ mile) at the proposed maximum drawdown. Section 4.10.4.2 (pg 4-215) notes that "In most areas, the reservoir pool would recede approximately 200 additional feet under the maximum drawdown condition…";
- In addition to increasing the distance between users and the shoreline, the slope of the shoreline near some recreation areas would be hazardous to humans (and presumably animals attempting to access the lake for water) at 20-30 degrees near the campground and private development on the west side of the lake, and 20-40 or 40-60 degrees on the east side. These steep slopes also pose risks to boaters using the lake (Section 4.23, pg 4-343); and
- These reductions in recreation opportunities would then increase pressure at other nearby recreation sites such as Lake Cle Elum or Lake Easton.

Section 4.14 Recreation identifies two impact indicators for recreation: "loss of fishing access or reduction of fishing opportunities that exceeds current seasonal loss of use due to existing drawdown conditions; reduction of usability of recreation due to construction activities or the receding of the shoreline more than 100' from the recreation site or with a slope greater than 20 degrees" (pg 4-275). The action alternatives have "major impacts on recreation" (pg 4-277) when evaluated by these indicators. Mitigation proposed for the first impact indicator is a new boat launch on the East shore, which could be usable at all lake levels; no mitigation is proposed for the second impact indicator. This boat launch would be on the opposite shore (east vs. west) and lake end (south vs. north) of the lake from the campground: what is the drive distance and time from the campground to the proposed boat launch? How is this acceptable mitigation for campers? Would it really even be usable by them, or only by day visitors intending solely on boating? Due to the steep slopes, how would any boaters access developed recreation sites? 34

Assuming that recreation (including camping, hiking, fishing, boating, day trips and the presence of secondary homeowners who conduct personal business in the area) is as negatively impacted as noted in the DSEIS, what are the economic impacts to Kittitas County and the four-county region as a whole? Section 3.21 notes that "the service industry is responsible for the most employment at the state and four-county scales and is roughly double the next largest sector" (pg 3-178); is recreation included as part of the service industry or does it stand on its own? State wide, outdoor recreation is a $26.2B industry, which provides for 201,000 jobs, generates $7.6B in wages and salaries, and produces $2.3B annually in state and local tax revenue; surely a fair share of that is going to this four-county region. This part of the economy is ignored in Section 4.21 Socioeconomics but deserves consideration or, at the very least, acknowledgement. 35

Negative Fish Impacts

While there are some positive benefits to KDRPP and KKC related to meeting desirable stream flows on certain river reaches during some parts of the year, the overall impact to stream flow does not seem positive. Further, the DSEIS notes that fish would need ten consecutive years of positive conditions in these reaches in order to boost their numbers to those projected in Section 4.6.7 (pg 4-147); given the climate predictions for the future, achieving ten consecutive years of positive conditions seems highly unlikely, especially given that winter and spring flows are unlikely to meet targets, so the benefits of KDRPP for stream flows are even less significant. Section 4.6.2 notes that under all Action Alternatives, "increases in annual instream flows, and in July-August instream flows during drought years in the Easton Reach, would decrease the quantity of rearing habitat available to spring Chinook and rainbow trout subyearlings, resulting in a negative impact to these species during drought years" (pg 4-117). So although the same section notes that instream flows would be benefited in the spring, flows later in the year would be negatively impacted, which may negate the earlier benefits. The same situation is described for the Keechelus Reach: that instream summer flows are projected to be met more often, but winter and spring flows are negatively impacted; without meeting instream flows throughout the year, what benefit is it to these fish populations to meet flow targets only occasionally, and particularly when so many additional negative impacts would occur for these species in Lake Kachess? 36

Fish, including Bull Trout and salmon in Lake Kachess would be negatively impacted by all Action Alternatives in several ways, including increased turbidity (pg 4-117), decreased hydraulic residence time, lower minimum lake levels, reduction of shoreline vegetation, degraded thermal refugia for predator and prey species (pg 4-116), disturbances to fish near the pumps, and increased risk of entrainment in the facility (Table 4-79, pg 4-115). As noted above, the water temperature modeling is inadequate, so the potential benefit of lowered water temperature is questionable, as the DSEIS notes in several sections that water temperatures may increase due to prolonged or multi-year droughts. Taken together, these impacts result in a reduction of available prey within the lake, more overlap between predator and prey species, reduced feeding efficiency of predators that visually locate prey, and reduction in habitat complexity. Section 3.6.2.1 notes that "Kokanee in Lake Kachess exhibit slow growth and small size at age compared to other lake populations and the population is at risk of a feed and growth bottleneck in summer" (pg 3-74); KDRPP puts this population at further risk. Prior to the construction of the Kachess Dam, Lake Kachess supported a variety of anadromous species that no 37

longer have access to the lake (pg 3-66); KDRPP would put those species left in the lake at further risk of survival. 37

The only negative impact that is proposed to be mitigated by this project is the loss of connection between Little and Big Kachess Basins: the Volitional Bull Trout Passage Improvement would be constructed. Purporting that this "improves surface water connectivity" is a misstatement – it replaces a naturally functioning connection that this project completely destroys. Section 3.2.3 notes that "around the rim of Lake Kachess, 31 creeks flow into the lake from the uplands. Twenty-two creeks flow into the Little Kachess basin" (pg 3-7). Section 4.3.10 (pg 4-77) specifically notes that bull trout would be adversely affected by the loss of access to upstream tributaries. How will connectivity to these creeks be mitigated when the lake is 80' lower and up to 1,500' farther away from their current connection points? 38

Yakima Project is a System

The Yakima Project includes five major storage reservoirs that provide irrigation water to six districts, as well as flood control, instream flow requirements, and municipal uses. As is clearly stated in Section 1.2.1 Yakima Project (emphasis added): "Reclamation manages these storage reservoirs as a system, and does not designate any one reservoir or storage space to a specific irrigation district." How does allowing one particular district to build and operate this project on one particular reservoir meet the objective of managing these reservoirs as a system? To a taxpaying, recreating citizen, it appears to be a taking of a public good for the economic development of private entities, which undertook a risky business venture attempting to start or maintain a farm in a district without Senior, or even Junior, water rights. 39

Besides not providing a significant amount of water in drought years, this water is likely to be wasted due to the condition of the irrigation canals used by Roza. The district's canal system is 97 miles long, and 67 miles of these canals are unlined, open air, earthen ditches built in the Yakima desert. In a 2016 Capital Press article, Roza representatives state that water seepage in these earthen ditches "is lessened by fast flowing water creating a hard pan of silt on the canal bottom." However, during drought, when the water has slowed considerably, this layer of silt is broken up and dispersed, causing the canals to leak. Before undertaking any projects that would take additional water from reservoirs, all of these canals must be improved with concrete or plastic liners to prevent water waste. 40

The fact that only one of the six irrigation districts has expressed genuine interest in this project suggests that it is for the benefit of the few and not the whole. Rather than implement a costly public works project with significant negative environmental and public impacts, perhaps a more systemic solution could be found that creates appropriate incentives for all water users to use water sustainably. Section 1.2.3 notes that a Market Reallocation effort is a part of the Integrated Plan. This would reallocate "water resources through a 'water market' or 'water bank' where water rights would be bought, sold or leased on a temporary or permanent basis to improve water supply and instream flow conditions." Such a solution would create incentives for all water districts, not just those that are proratable users, to invest in water conservation methods that allow water to be used more wisely. Given the fact that KDRPP cannot meet the projected need (and falls far short of meeting that need given climate change assumptions), implementing a water market reallocation first makes much more 41

sense. If such a reallocation were highly successful, it might negate the "need" for KDRPP or any of the other public works projects proposed as part of the Integrated Plan. 41

Additional storage for water that is currently "wasted" could also be effective in meeting some of the need without causing permanent, or long-term, negative environmental and recreational impacts. Section 4.3.7 notes that "in most years, Reclamation spills water from Lake Keechelus because it cannot store all of the runoff from its watershed" (pg 4-49). Section 3.12.2.1 notes that "snowpack is considered the 'sixth reservoir' in the Yakima River basin… (but that) only about 30% of the average annual total natural runoff above the Parker stream gage can be stored in the current Yakima River basin reservoirs" (pg 3-134). Winter flows in the Yakima River area high and are projected to increase. Are there alternative storage options for this water that is currently not put to use later in the season when demand is high? Aside from an additional reservoir, could water be stored on farms in cisterns for use on demand? Are there other out of the box ideas that could be considered that might offer greater flexibility with less cost? 42

Cumulative Impacts

After reading the entirety of this DSEIS, it is extremely difficult to understand how the document can assert that there would be "ongoing beneficial effect" for vegetation, and "no cumulative impacts" to surface water, reservoir elevation, ESA-listed fish, or land use. The following are excerpts from the DSEIS describing the level of Lake Kachess under Alternative 2 as compared to Alternative 1, emphasis added (Section 4.3.4, pg 4-23 and 4-25):

- ...levels would be lower than those under Alternative 1 in 44 years out of 90 years modeled. In 31 of the 44 years, Alternative 2 had a lower Lake Kachess level than Alternative 1 for every day of the year… both when Reclamation operates KDRPP in drought years and in years following droughts when the lake is refilling to its normal operating levels.
- Lake Kachess would be below the level at which the two lake basins become separated (elevation 2,220) in 76 out of 90 years modeled, and increase of 3 years from Alternative 1. The mean duration would be 154 days per year, an increase of 76 days per year compared with Alternative 1. … The duration would increase during all months under Alternative 2; under Alternative 1, the separation of the lake basins occurs from Sept to March. 43

The DSEIS claims, almost consistently, that Lake Kachess would refill in 2-5 years following a drought, however, this is based on "the historical record of droughts." Even without accounting for the adverse climate change scenario, more recent historical records suggest that it is unlikely the lake would refill within 2-5 years (emphasis added):

> During multiyear drought conditions such as those in 1992-1994, Reclamation would draw the lake down as much as 80' below the existing outlet elevation. Following a multiyear drought comparable to that of 1992-1994, lake levels would recover to normal operating levels 2 years later when followed by a wet year such as 1996. In a single-year drought, such as occurred in 2001, the lake would be drawn down to 50' below the existing outlet elevation. Full recovery would not have been achieved until 2008, because of a series of dry years (2003 & 2004) and a subsequent drought (in 2005). During the 2005 drought year, the lake level would be 40' below the existing outlet elevation. (pg 4-25)

Given that the adverse climate change scenario predicts that droughts are nearly three times more likely in any given year, it is reasonable to conclude that following a significant drawdown, Lake Kachess might never refill completely. This is most certainly a "cumulative impact," not only to surface water, reservoir elevation, fish, and land use, but more generally to the recreating public or those that value the environment in its own right.

Beyond the environmental and recreational impacts of concern above, the construction, maintenance and operating costs are also a significant cumulative impact to the public. Although the Proratable Entities claim to intend to undertake and pay for the project themselves, there is dissention among their ranks with some members foreseeing an inability to pay for the water resulting from the project, and presumably all of the associated project costs. As disclosed in the DSEIS, construction costs could range from $225M-$675M (depending on the selected alternative) and operating costs could be as high as $25M annually. Construction cost estimates for the project alternatives could increase by 30-50% (depending on project alternative), and inflation is not accounted for in the annual maintenance and operation estimates. This is an unacceptable cost to add to taxpayer burden at the same time that recreation opportunities are taken from the public. 43

Overall, the benefits associated with the small amount of water provided do not outweigh the significant negative environmental and recreational impacts. This project must not be implemented. 44

Respectfully Submitted,

Karen Worcester

10 July 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation Columbia-Cascades Area Office
1917 Marsh Road Yakima, WA 98901-2058

Dear Ms McKinley:

Subject: comments on the "Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance" project proposal

I am writing to you with comments on the proposal to withdraw more water from the Yakima River under the guise of the "Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance" project. I don't believe that this project is necessary or that the alternatives have been adequately explored or explained, that it benefits a modest number of irrigators while depriving the general public of greater benefits if the resources (money and property) were used in other ways, and that expanding irrigated agriculture in the Yakima Basin provides little benefit to the general citizen and taxpayer. Irrigation projects in the Yakima River system have degraded habitat and water quality, and extirpated important native fish species. A century ago this was generally accepted as standard practice, since then public opinion has shifted toward protecting and restoring the environment as the extent and impact of previous degradation has become painfully obvious (e.g. severely reduced salmon fisheries across the Pacific Northwest), unfortunately the Bureau of Reclamation's priorities seem to be more nineteenth century than twenty first. I believe that remediation of the damage resulting from irrigation should be well under way before any increase in water withdrawal is considered (there is insufficient discussion of whether the existing water rights cover such an increase). 1

I will also suggest ways to accomplish the goal of more reliable water availability for junior water rights holders and projects which would be precluded by this project which would be of greater benefit to the residents of Washington State.

Necessity: there is no discussion of the continuing waste of water withdrawn from the Yakima River for irrigation. I have included a note on how waste should be defined, identified some of the worst forms of waste in the basin and improvements which could be made. Until the amount of water which could be saved if wasteful practices were significantly reduced and a determination made of whether the water saved would be sufficient to eliminate the need for extra storage before the decision to proceed is made. 2 Ecology's guidance on water rights is clear that when there is not sufficient water to meet everyone's water rights the junior water right holders have no claim for additional water beyond their allocation. How does the decision to take extra water from the river (in the following year(s)) conform with this policy? 3

Remediation: The damage to the fisheries in the Yakima River was gratuitous and disregarded existing legal requirements to provide fish passage at dams. The major reservoirs still lack fish passages, several opportunities to combine fish passage structures with other major construction activities at the dams were not taken. Major projects for irrigation should be put on hold until fish passage facilities have been put in place. There are ongoing efforts to reintroduce species which had been extirpated in the basin, but flow manipulations (aka the FlipFlop) continue to be used to suppress salmon spawning. The use of the river channel in lieu of a canal or pipeline degrades the value of the river channel for rearing of fish and the return of tailwater to the river degrades water quality. Installing a pipeline to convey water from the reservoirs to the irrigation districts, as was proposed for using Columbia River water in the BlackRock project, would allow more natural, although reduced, river flows and create the conditions to eliminate or sharply reduce waste of water and discharge of wastewater containing sediment, nutrients and pesticides into the river. Such a pipeline system would also 4

provide (seasonal) hydropower and eliminate the need for pumps for advanced irrigation systems. Water delivered to the irrigation districts would be of higher quality (none of the pollutants in the wastewater currently returned to the river) and require less effort to screen out fish and debris (just at the intake at the reservoir). The potential for restoring a healthy river system by removing the irrigation water from the river needs to be seriously evaluated before additional flow modifications are implemented. 4

Financing: The current irrigation conveyance system has been largely financed by loans from the Federal government, starting over a century ago. Most of the loans have not been repaid, despite (because of?) the very favorable terms, additional loans should not be made until the outstanding loans have been repaid. A general truism is that if you don't value something you won't worry about wasting it. The cost of water to irrigators does not include a charge for the value of the water, just the costs of delivering the water (to the extent that those costs are not subsidized by unpaid loans and direct subsidies). The continued waste of water through faulty or improper design of the distribution system and use of inefficient (in terms of delivering water to the crop) irrigation systems is an outrage. At some price, requiring payment for the water withdrawn will result in better practices, there should be a charge for water with the price increasing until the needed reforms have been achieved. The fees for use of water owned by the public should go to the public (government) for public projects; charging for water is little different from selling timber harvested from public lands. The costs of a pipeline to replace the inefficient system of canals, ditches and misuse of the river channel should be paid by the irrigators, but ownership of the pipeline and the hydropower plants be public with profits going to the general fund and local government. 5

Public Benefit/Expense of irrigated agriculture: The water for irrigation was taken without respect for the existing (indirect but very much essential) users such as those fishing for salmon spawned in the Yakima basin. There appears to have been no reparations (and the descendants of many of those harmed would be hard to identify now a century later but there are some obvious claimants) or restoration of the fisheries directly (and indirectly) extirpated by construction of the irrigation supply system, notably the reservoirs over existing spawning and early rearing lakes for Sockeye Salmon. Shouldn't there be acknowledgement of the extirpation of Sockeye (there are mentions of the extirpation of Coho, Gray Wolves and Bull Trout) as a result of construction of the dams (and efforts by the Yakama Nation to reintroduce them) in this report? 6

In recent decades those working in orchards, etc., are no longer citizens, but instead immigrants. The immigrants are reported to include legal (green card holders and H2-A authorized workers) and undocumented (or those using fraudulent documentation – a recent article in the Seattle Times (28 June 2018) reports that orchardists do not use the official site for establishing the immigration status of workers and many are likely are not properly authorized to work in the United States). There are also reports of abuse of immigrant workers (failure to pay for work done, unsafe working conditions, sexual abuse) that continues because the workers are so desperate for the money and afraid of being deported that they fail to report these problems. The irrigators claim that they Americans won't work in agriculture, this includes the American born children of immigrant farm laborers. My observation of workers on highway construction, roofing, etc. lead me to believe that people are willing to work under challenging conditions (hot, fumes from asphalt) and the issue is one of pay – why work in the fields if the pay at WalMart or the local fast food establishment is comparable, especially if conditions are less onerous, employment is more predictable and there are benefits such as health care. Hiring immigrant labor has a similar impact to sending work overseas to where labor is less expensive – the wages (or in the case of immigrants, a portion of the wages) are not spent in the United States and so aren't part of the chain of money passing from one worker through a local business (or local outlet) and on to the next worker. The shipment of agricultural products overseas is equivalent to shipping water out of the water short Yakima Basin, where it could otherwise be used by the native fishery or crops consumed in the United States. 7

Alternative Investments: I have already described how the existing system of canals and using the river channel for conveying water from the reservoirs to the irrigation districts is wasteful of water (leakage and tailwater when withdrawals and flows don't balance) and the wastage of the gravitational potential energy between the reservoirs and irrigation districts can both be corrected by use of pipelines and distributed hydropower plants. 8

Kachess and Keechelus Reservoirs appear to be well-placed for use as pumped hydropower storage, using connections similar to those proposed but probably of a different size. This would benefit the general public by evening out the short term fluctuations in solar and wind power as well as accommodating the fluctuations in daily demand from industries which don't operate 24 hours a day and the peak usage periods of households. These two options should be evaluated before committing to using Kachess Reservoir for increased storage capacity and further impacting flows in the upper river.

Future Concerns: As proposed the project would be used only in official drought years (the available water would be less than 70% of the water rights of the junior water rights holders) and in the year(s) following while Kachess Reservoir is refilled, leaving the infrastructure idle for potentially years. With the facilities available I expect that there will be considerable pressure to use the system to supplement irrigation supplies in years when there is less than a full allotment available but above the 70% threshold. Using these reservoirs for pumped hydropower storage would involve daily usage all year, that is a more efficient use of the investment with little or no impact on flows in the river.

For all of the above reasons I believe the proposal should not move forward until the issues I have raised have been satisfactorily addressed: installation of fish passage at the reservoirs, restoration of channel geometry and more natural flows in the river, reducing the waste of water withdrawn and the amount of polluted water returned to the river. The alternative use of the reservoirs for pumped hydropower storage also deserves to be evaluated before the project moves forward.

Thank you for the opportunity to submit these comments.

Sincerely,

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3409 Taylor Way
Yakima, Washington 98902
(509) 454-0871

Water Rights and Beneficial Uses – definitions and a discussion

I have included the sources I cite in the following from informational pages from Ecology and WSU Extension plus a definition in the water rights code on the following pages. All emphasize using water for growing a crop (there are other allowable uses but commercial agriculture is the primary user of water from the reservoirs in the headwaters of the Yakima River system). I did not find the specific agreement between Washington State and the Bureau of Reclamation, which addresses irrigation districts rather than water rights issued to a specific parcel.

From conversations with friends who worked for the Water Rights program within Ecology and farmers with water rights, I believe the following statements are true for individual rights and would have to be modified for irrigation districts, but still the broad principles would apply:

- A water right is approved for growing a specific crop (especially applicable to perennial crops such orchards) or suite of crops which may be grown in rotation (typically annual crops)
- The amount of water allowed per acre of a particular crop is defined by studies published by WSU, see Appendix B in sources cited. In the users manual for scheduling irrigation, the use of drip irrigation and the smaller volume of soil wetted is noted; what is not noted is that broadcast irrigation of a crop such as apples will apply water to areas between the root zones of the crop.

A strict definition of beneficial use (which is implicit in the WSU irrigation scheduling program) is that only water which is taken up (typically by the roots) by the target crop is put to beneficial use. Water applied outside of the root zones of the individual plants forming the crop is not beneficially used – it is either taken up by different plants or percolates below the field and out of reach of the crop. Water applied to grass between trees in an orchard can be useful for controlling dust and mud, but this is not beneficial use by the basic definition and this function can be served by applying a mulch.

11

Each irrigation system has the potential to apply water in areas or amounts beyond the needs of the crop, that is wasted and if returned to the river is also usually polluting:

- Water carried in earthen ditches saturates the soil beneath the ditch, which then percolates toward the groundwater below, again not a beneficial use and avoidable by using lined ditches or pipes;
- Flood and rill irrigation require saturating the soil in the area nearest the start of irrigation in order to satisfy the needs of the plants at the far end of the area irrigated. Unless the lower end of the field is diked to retain water long enough to infiltrate, water will flow past the crop, that is tailwater. Water is being applied in excess of plant needs at the top of the row and as tailwater.
- Sprinkler irrigation applies water to the entire area of a field or orchard, including over areas without roots from the crop (this is especially true for annual crops before reaching maturity), resulting in wasting water. Aerial application (sprinkling) of water results in evaporation which never reaches the field and is also wasted.
- Drip irrigation applies water near the base of the plant, i.e. at the start of the roots, and if properly placed results in less water escaping the crop's roots (the roots don't grow beyond the wetted zone). The use of a plastic mulch to control weeds will also reduce the potential for evaporation from the soil surface.

Driving through the Yakima Basin over the past two decades I have seen more sprinkler systems installed and fewer rill or flood irrigation systems in use. In the Toppenish Valley it appears that the vegetable growers use the combination of drip irrigation and plastic mulch, hopyards also appear to use drip irrigation extensively (the coils of black hose at the ends of rows during the winter), but the orchards use sprinklers and grass cover. Progress in replacing inefficient (especially rill and flood) irrigation has been slow and there are just three references to irrigation efficiency in the proposal, on pages 1-2, 2-2, and 4-352, which are more aspirational than actual progress. There is a challenge in promoting efficiency, irrigators are expected to 'return' the water saved by improved application methods to Ecology, which they interpret as taking away their water right, which is a misunderstanding: the water right is only for the amount of water needed to grow the crop on the land to which the water right applies and amount needed is (in principal, but apparently not in practice) defined by the current best practices. Water saved by improved application methods is not allowed to be used to irrigate additional land, this is called water spreading. My understanding is that irrigation districts have the area which may be irrigated (acres not specific fields) as part of their water right. I don't know the law so that using 'saved' water to make up for reduced water availability due to low precipitation seems allowable within an irrigation district.

A water right is the right to withdraw water for private use, within constraints due to water reserved for more senior water rights holders (including Native Americans who hold the most senior rights) and any other restrictions on diversions, such a minimum flows in the river. Replacing the water withdrawn from the 'dead pool' of Kachess Reservoir is only effective if it is replaced subsequently. What guarantee is there that water withdrawals when refilling the reservoir (or filling it to capacity, since it does not regularly fill to capacity), will not exceed the existing water right for that year? 11

Water Rights and Beneficial Uses – Sources

The following are selected quotations from the web page at the head of the quotation (sources cited). Most of these apply specifically to individual water rights rather than for an irrigation district or Bureau of Reclamation, but the general principles of not wasting water still apply to the proposal and projects.

http://apps.leg.wa.gov/WAC/default.aspx?cite=173-517-030 copied 7 July 2018

WAC 173-517-030

Definitions.

For the purposes of this chapter, the following definitions apply. If these definitions differ from those in related rules, the definitions presented here shall apply for this chapter:

(3) "Commercial agriculture" means the production of crops for sale, crops intended for widespread distribution (e.g., markets), and nonfood crops such as hay and lavender. Commercial agriculture includes livestock production and livestock grazing. Commercial agriculture does not include crops grown for household consumption (e.g., household vegetable gardens or fruit trees).

https://fortress.wa.gov/ecy/publications/documents/961804swr.pdf copied 7 July 2018

11

Water Rights in Washington

The Department of Ecology (Ecology) manages the state's water resources, working to meet all the varied demands on Washington's public waters.

Q: What is a water right?

A: A water right is a legal authorization to use a certain amount of public water for a beneficial purpose. The water must be applied without waste to uses such as irrigation, domestic water supply and power generation, to name a few.

Q: Does my water right protect me during a drought?

A: No. A water right does not guarantee the availability of water. The degree of reliability depends on your water source and the relative seniority of your water right.

Publication Number: 96-1804-S&WR

https://ecology.wa.gov/Water-Shorelines/Water-supply/Water-rights copied 7 July 2018

Water: A public resource

We are responsible for managing the water resources of the state, including issuing the right to use water as well as protecting the instream resources for the benefit of the public. We manage a portfolio of over 230,000 active water right certificates, permits, applications, and claims to help meet the state's many water supply needs. Many of these permits have been in existence since the late 1800s. Before we can issue a water right permit, the proposed use must meet a four-part test:

1. Water must be available (both physically **and** legally)
2. Water must be used beneficially
3. Water use must be in the public's interest
4. Water use must not impair another existing use

http://irrigation.wsu.edu/Content/Fact-Sheets/FSWR001-WA-Water-Rights-v3.pdf copied 7 July 2018

Washington State University Extension Fact Sheet • FSWR001

How much money are my water rights worth? Water rights can increase property values 5–10 times. Water can enable the production of agricultural crops worth up to thousands of dollars per acre on land where nothing at all could be profitably grown without it. This production stimulates local economies and industries, produces jobs, and increases the state's tax revenue. Water not only makes life possible, it makes it enjoyable. Although it is difficult to put a direct dollar/ gallon value on it, water is extremely valuable. Please don't waste it.

http://weather.wsu.edu/is/ISMManual.pdf copied 7 July 2018

irrigation scheduler mobile

User's Manual and Documentation

R. Troy Peters, P.E., Ph.D.

Water is held in the empty spaces between soil particles. When these empty spaces are completely filled, the soil is said to be saturated (Figure 5). Excess water will drain out over time until a point where the soil can hold a certain amount of water indefinitely against the downward pull of gravity. This soil water content is the soil's *full* point called ***field capacity (FC)*** and in this application is measured in inches of water per foot of soil depth. The excess water that drains will move down to lower soil layers. Applying more water than a soil can retain in the plant's managed root zone results in water loss to ***deep percolation (DP)*** or "deep water loss". Water loss to deep percolation wastes water, pumping energy, and vital plant nutrients that are held in the soil water solution.

11

How Much Water is the Plant Using?

The amount of water required to grow a crop consists of the water lost to evaporation from a wet soil surface and leaves, and transpiration of water by the plant. Together these are called ***evapotranspiration (ET)*** and are also referred to as crop water use. ET is measured in inches of water used per day. The crop evapotranspiration (*ETc*) is calculated as:

where *ETr* is the estimated evapotranspiration of a reference surface of full grown alfalfa that is calculated from measured weather data. The weather data used to calculate *ETr* include solar radiation, air temperatures, humidity, and wind speed data.

Other Model Assumptions

The following additional assumptions are made by this soil water balance model.

- All water entered as an irrigation amount infiltrates into the soil.
- Water in the plant's root zone is equally available to the plant regardless of depth.
- The season begins with a full soil profile (at field capacity). This can be modified by using the "Reset/ Correct Soil Water Availability" option on the first day in the Daily Budget table. Plant roots grow into soil at field capacity.
- Water moves quickly into the soil and excess water is lost quickly to deep percolation.
- All rainfall goes towards satisfying the calculated ET demand.

For Drip/Micro, % of Soil Wetted: In many perennial cropping systems under drip or micro irrigation, the entire soil volume is not used. For example a drip irrigation system in a wine grape vineyard may wet a 4 ft width of soil in an 8 ft row spacing. In this case only 50% of the soil is used to store water since the inter-rows remain dry. The soil's water holding capacity can be reduced by multiplying by this percentage to reflect this.

Appendix B: Crop Defaults Used in the Model. Alternative crops and defaults can be set up for different states or climatic regions. **Crop Development Dates for Crop Coefficient Curve (DOY)**
[I could not align the headers exactly, 'Root Depths' applies to the last two columns; this is only the first portion of the table]

Crop Development dates for crop coefficient curve						**Crop Coefficients**		**Root Depths**	
Crop Name	Planting / Emergence	> 10% of Field	Full Cover/ > 70%	Initial Maturation	End of Season	Initial	Full Cover	Final	Starting	Max.
Alfalfa	91	100	122	139	278	0.33	1.07	0.95	4.0	5.0
Apples	110	112	149	244	278	0.39	1.05	0.50	3.5	3.5
Apricots	110	112	149	220	278	0.39	1.10	0.50	3.5	3.5
Asparagus	120	130	214	260	278	0.36	1.00	0.87	3.5	5.0
Beets (table)	117	135	195	239	276	0.40	0.88	0.79	0.2	2.5
Blackberries	90	95	145	190	280	0.25	1.05	0.70	3.5	4.0
Blueberries	85	90	111	195	225	0.25	1.03	0.90	3.0	4.0
Cantaloupe	136	153	195	229	243	0.42	0.71	0.50	0.5	3.0
Carrots	91	119	160	220	243	0.70	0.85	0.75	0.2	2.0
Cauliflower	91	119	160	218	243	0.58	0.87	0.79	0.2	2.0
Celery	127	140	186	220	253	0.65	0.80	0.80	0.2	1.5
Cherries	110	112	141	220	278	0.39	1.12	0.50	3.5	3.5

[The smaller the numbers in the coefficient columns, the less water that crop requires compared to the reference standard of Alfalfa, I tried to remove rows from the table, but only created empty rows]

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess, Comments re: SDEIS for KDRPP and KKC

1 message

Steve Fury <steve@furyduarte.com> Wed, Jul 11, 2018 at 4:50 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

Please see attached letter with comments and questions.

Please note that I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, “No Action” is acceptable. 1

--
C. Steven Fury
steve@FuryDuarte.com

4 attachments

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2018 SDEIS Comments.pdf
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Submitted via email to ***kkbt@usbr.gov***

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

I own property on Lake Kachess. These are comments to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018 and also those comments by The Alpine Lakes Protection Society, The Sierra Club, The Wise Use Movement and The North Cascades Conservation Council which were made about the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) Draft Environmental Impact Statement (DEIS), dated January 9, 2015. All comments are submitted under both NEPA and SEPA.

Comments

I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 1

Consideration of all reasonable alternatives. Only the Yakima Basin Integrated Water Management Plan (YBIP) and No Action are considered. How will this be rectified? Why conservation efforts and purchase of water rights and other alternatives considered? The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of "reasonable alternatives" means all state-of-the-art alternatives must be rigorously explored and properly evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party. 2

The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 Supplemental EIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-

to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS. The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS makes an effort to have these appear to be several different alternatives, they are in fact one alternative…extracting water from a natural lake to benefit downstream special interests.

Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies. Why were these not considered? What would a true analysis show if they were?

Others have repeatedly noted this deficiency in the 2015 DEIS, and repeated it for the 2018 SDEIS. Both the DEIS and the SDEIS fail to comply with the NEPA requirement of considering all reasonable alternatives to achieve the stated purpose. In fact, this fatal flaw originates from the Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Programmatic Yakima Plan EIS not only failed to consider a range of alternatives, as required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Programmatic Yakima Plan EIS and do it correctly. We ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose. 2

Water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies should be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of special interest groups". The NEPA process must be followed as required so that all alternatives not considered be listed and a full explanation be given…including data, references, and review procedures…for excluding each alternative. Page 1-4 notes that the Yakima Basin Integrated Plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation). Define the number of acre-feet saved by water conservation and market reallocation in the whole Yakima watershed.

The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and we therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

Involvement of Native American tribes. The SDEIS notes the Yakama Nation has historical ties to the Lake Kachess area, and documents historical and cultural heritage connections. The Snoqualmie Tribe also has roots in the Lake Kachess area, and artifacts from that federally recognized tribe have been found along the shoreline of Lake Kachess. How will the Snoqualmie Tribe's historical and cultural standing be recognized in regard to this project, and they be brought into the discussion? How will the Snoqualmie Tribe be

contacted, the potential impact of this project on their culture be explained, and will they be given an opportunity to provide comment prior to a Final DEIS and/or ROD? Also, please describe what happens with Native American artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level. When I built a logging road on my property adjacent to Lake Kachess, it required inspection by

Lack of communication to the affected public, including campers at Lake Kachess (Page ES-xiii) The DEIS states the project will implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to understand the potential impact on individuals and families, and to participate meaningfully in the deliberative process. Given the SDEIS documentation of negative impact on recreational activity, and the acknowledgement most affected individuals come from the Seattle area, it is clear NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area. 4

The impact on the thousands of annual visitors and boaters at USFS Lake Kachess Campground will be enormous. The SDEIS indicates the lake could be drawn down 80 feet "as early as June in severe drought years," the very weekend that the campground typically opens. This means that the campground could not open. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. Why has there been such inadequacy of a post hoc communication strategy to inform recreational users of the impact of KDRPP-FPP. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users will be contacted and the timeline for this process.

Funding ambiguity. The SDEIS states the Bureau of Reclamation will "fund…some or all, or authorize Roza to fund" the KDRPP-FPP. This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FP. Who will, in fact pay for the project and how? Please provide the legal, legislative, and/or other basis for stating Bureau of Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how "all or some" will be determined, and by whom, and the time frame for securing financing. How much will who pay? What is the proposed source of the funds? Will I have to pay for a project that I oppose and that will damage my property? The statement that the Record of Decision (ROD) will determine which entity (BoR, Dept. Ecol., Roza, etc.) will be responsible for what action (fund, design, construct, operate, etc.) further confuses the financing issue. These are not details to be clarified at a later time, but substantively important issues of signal concern to the citizens of the State of Washington and Roza farmers that we all must know in order to provide informed comment. Please

provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period.

Change in Scope (Page ES-viii) The SDEIS states that the KDRPP-FPP is the "proposed action" and BoR/Dept. Ecology have not identified a "preferred alternative." This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner, would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are "acceptable" in 2018. This explanation should also serve to inform citizens as to why no "preferred alternative" is provided. This explanation is critical to citizens' understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. BoR must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS.

This SDEIS Table indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) "Fund, design, construct, operate…etc….the selected alternative." This can only refer to the KDRPP-FPP. This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public's mind, largely due to conflicting public comments by Roza representatives and BoR representatives. It is imperative that this confusion be removed before any Final DEIS and/or ROD be issued. Please provide a complete and unambiguous statement of financial obligation of KDRPP-FPP. Who will be responsible for 100% of the costs of implementing KDRPP-FPP, including all mitigation, litigation, and other assigned costs? The SDEIS does not say. That is a gross inadequacy and misrepresentation.

P2-76 notes that the parcels north of the existing beach road on the East side are indeed private and may need to be purchased from their current owners for the boat ramp and parking lot. There is no money in the SDEIS for property purchase. How many lots and at what expected price will be purchased? These additional costs should be included in the SDEIS Alternatives. A revised SDEIS is warranted.

The mitigation costs must be included when identifying how and by whom funding will be accomplished. The required Bull Trout Volitional Passage is stated in the text to cost $23,000,000 but is not included. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and thus, apparently, ignored. It is thus likely that the financial obligation will exceed $500,000,000.

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. Please provide accurate cost estimates and funding mechanisms for review and comment before a Final DEIS and/or ROD is released.

Impact on private wells (Page ES-xi) The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." I own water rights to connected with my property that will be severely and negatively affected. It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of "monitor and mitigate." How will mitigation be accomplished? Well failures will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and

access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. We ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD. How are these costs calculated and included in the overall financing plan? 10

Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry? 11 12

Misrepresentation of Lake Kachess (Chapter 1, Section 1.2) The SDEIS indicates Kachess Reservoir was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. All the water to be pumped by the KDRPP will come from Lake Kachess. It is an intentional misrepresentation to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Lake Kachess. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. This representation must be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by BoR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. 13

Bull Trout The Bull Trout Volitional Passage project is described on Page 2-67, Table 2.9. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed, this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage.

In some years (e.g., conditions such as occurred between 2001 – 2008) the pump…and therefore the channel…will be in continuous operation. Eight years of steep slope conditions, requiring 8 years of Bull Trout dependence on the volitional passage, represents 2-3 spawning cycles. The entire population of Lake Kachess Bull Trout will be destroyed if the volitional passage is not effective. No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not included in the budget costs, it cannot be assumed to be part of the project going forward. Another concern is the lack of water flowing into tributaries of Little Kachess Lake, which will be the water needed to charge the volitional passage. The SDEIS states the tributary water disappears at the end of the year…when the water will be needed in the passage. There is no description of the length of the passage (the length and Southern outlet are never described in text, numeric, or schematic terms). 14

Mitigation of the effect on bull trout must be described in ways that make sure sufficient water will be available to charge the passage, the length, slope, and other characteristics of the passage will not deter Bull Trout passage, the returning redds will be able to find the entry point of the volitional passage, and the

passageway to Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population.

The volitional passage design and operation must be updated to address all of these concerns, and that the revised design be available for review and comment in a subsequent SDEIS, prior to any Final DEIS or ROD. What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the proposed alternative and all the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives and the proposed alternative meet these legal requirements? 14

I personally require more than a "conceptual design" of the volitional passage. My property on Lake Kachess is very ear to the passage between Little and Big lake Kachess. It will be severely affected by any volitional passage. How will this impact to my property be mitigated?

Increased forest vulnerability and Fire Hazard. The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. As part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities must engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. A plan must be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. 15

Impact to my property The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected, but a better description would be "substantial numbers of private residences…etc." Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. I own 5 lots on the east side of Lake Kachess on the waterfront that are among the unaffiliated. This easily numbers in excess of 300 homesites, far more than would be inferred from the term "several." The SDEIS must include an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline. 16

BoR commissioned a study by Dean Potter LLC, a real estate appraisal firm, to determine the negative impact on private properties resulting from the pumping drawdown. This study showed a negative impact of 5-10%, but even this was an under-estimate. The Potter study imposed a primary screening criterion that the only value a lake had, was the view it provided to a homesite. This eliminated 85% of the homesites in the immediate area of the lake, even though the residents had chosen their homes because of access to the lake. The Potter LLC study claimed that even though the lake could become inaccessible for years at a time, people who lived there to enjoy boating, fishing, hiking, picnicking, and other water-related activities, would not notice the lake had disappeared. The only ones who would be adversely affected would be those people with a view…but not just any view, an "unfiltered view." The study actually claimed that a view of a full lake 17

within 0.1 miles, and a view of the drawn down lake more than 0.1 miles away, would be equivalent. There is no precedent for such exclusionary criteria, and there is no justification using standard methods of appraisal. The entire exercise is a transparent effort to minimize any negative impact. Even so, a 5-10% negative on impacted properties was reported.

Even though the BoR commissioned this study, and even though the study went to extraordinary lengths to minimize impact, the BoR declared in the SDEIS there was "no way to reliably assign or assess impacts..." The only analysis reported was that conducted by Dean Potter LLC, it used flawed methods that were biased to under-reporting of negative impacts on private property values, but it still reported significant (5-10%) negative impacts. 17

Lake Kachess homeowners have repeatedly requested to be involved in designing a valid and reliable study of the negative impacts on property values of proposed alternatives. BoR has ignored and rejected all requests, and instead contracted for a study that (although flawed by its obvious intent to minimize findings of damage) still showed significant damage to private property caused by the 80 ft. drawdown.

The implications of negative impact on private property values go beyond the affected citizens. A reduction in property values affects the tax base of the county and fire departments, and will reduce available resources to provide essential services. This is acknowledged in SDEIS Page 4-326 as follows: "*while effects on property values would most directly affect property owners, the wider community would also experience effects.*" In other words, private property owners, fire departments, city and county governments, and others would also be negatively impacted.

18

It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. How will and has BoR engaged the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued.

Further, how will the effect on private property and property values be mitigated? Who will pay for it? How will it affect the final overall cost of the project? 19

Impact on Senior Water Rights How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? Further studies concerning the effect on senior water rights and communication to those senior water rights holders of possible impacts to them by the SDEIS active alternatives needs to be undertaken and another public comment period be opened for their comments. 20

New Water Rights **Table** 1-2 on p 1-20 notes that ecology will "issue water rights as necessary." How will new water rights be issued? To whom? 21

KKC tunnel material 115,000 cubic yards of KKC tunnel excavated material comes out on Kachess Lake Road with no mention of where it will be trucked to or the impact of over 5000 truckloads of material being hauled off. Where will the 115,000 cubic yards of KKC tunnel material be deposited? What safety measures and scheduling of hauling equipment will be made during the tunnel construction to insure the safe and customary use of Lake Kachess County Road by campground users and local property owners and guests? 22

I own property to the outlet of the tunnel. How will the effect of the outlet on my property be mitigated>? Who will pay? 23

How will the water from Keechelus be moved to Kachess? What kind of filtration system will be installed to prevent any I-90 pollutants in Lake Keechelus from being transferred to Lake Kachess? If any hydraulic equipment is used, how will any PAH be kept from entering Lake Kachess? 24

Lake Drainage during construction the description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff). Describe the mechanics of draining the lake to allow construction. What happens to the excess water, and how is the "flip-flop" flow pattern maintained if the lake is drained early in the season? What is the effect on the Easton reach of the Yakima river spawning?

Because both the NEPA and SEPA process must be followed, the Bureau of Reclamation and WA Department of Ecology must each provide separate personal responses to the above comments to me and the public.

Please send me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

C. Steven Fury

Questions regarding Lake Kachess Pumping Plan ESI

1. Did Lake Kachess have a Salmon run prior to building the Dam?

2. How many years will be until lake Kachess gets salmon passage? 1

3. Why are salmon passage plans not addressed in the pumping plan?

4. Have the courts ruled that fish passage should be restored to Lake Cle Elum, Lake Kachess , Lake Cle Elum, Lake Keechelus?

5. How many times is the word" Salmon" used in The Kachess Pumping Plant EIS document. It appears to have been deleted. (out of sight out of mind) 2

6. It appears that "salmon and chinook" has been carefully deleted. Is this true? I do see the word Bull Trout several times in the Document.

7. Why is there not information about the effect of the Kachess pumping Plant would have on a future fish passage over or around Lake Kachess Dam? Lower lake levels might not work with a fish ladder. This question concerns salmon or chinook, not bull trout. 3

8. Did the Yakima Nation cut a deal to get a fish ladder at Lake Cle Elum and abandon plans for a fish ladder at Lake Kachess? 4

9. How many times in the last 10 years has Kittitas County declared a drought?

10. In declared drought years, what was the percentage of water allocations for each drought year? (example, 2004 did they get 65% of their allocated water?) 5

11. During a declared drought assuming for example irrigators only were getting 65% of their allocation, the proposed pump would only pump 5% more water. Limiting the allocations to 70%?

12. What would the yearly cost be for that 5% water that is pumped, include also the cost for the operating the pump. 6

13. 5% of the irrigators water allocation is how many acre feet of water. 7

14. Since the Pumping Plant would only operate in a drought year, could it pump more then 70% of the water allocations? 8

15. Would it be cheaper to build a new reservoir somewhere else, where there are not historic fish runs? 9

16. ATV's and trucks and jeeps drive all over the south end of the Lake when the water level is low. But they are not stopped. If the lake is lowered, the problem will be worse. The south end of the lake will turn into a dust pit and when it rains a mud pit for 4x4 vehicles. Nesting areas for birds will be destroyed. 10

17. Will the forest service install a sign limiting camping to 14 days.

18. Several camp sites exist where campers stay for months and leave garbage and crap all over the place, nothing is done to stop this. What will the forest service to prevent this? 11

19. A unimproved boat launch is at the southeast end of the lake, but the forest service will not work with land owners to share the cost of maintaining FS Road 4818. The land owners maintain it at their own expense.

20. Is Washington State spending millions of Tax Payers money researching this pumping plan that is doomed to failure. Over costly and Unpractical. 12

21. What is the cost to build a new reservoir? At a location where it would not have so much a effect on a recreational lake and it's community and the environment? 13

22. When will Lake Kachess get salmon passage? 14

23. When will Lake Keechelus get Salmon passage?

Alan Kirlin 

Seattle WA

Questions or comments on the SDEIS will be accepted until July 11, 2018. Comments may be submitted to kkbt@usbr.gov , by mail to the Bureau of Reclamation, Attn: Ms. Candace McKinley, Environmental Program Manager, 1917 Marsh Road, Yakima, WA, 98901; by telephone at (509) 575-5848, ext. 603; or by facsimile to (509) 454-5650.

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess Floating Pump Plant

1 message

Larry .Steele@wellsfargo.com <Larry.Steele@wellsfargo.com> Wed, Jul 11, 2018 at 2:10 PM
To: kkbt@usbr.gov

Ms. McKinley – Please see attached letter regarding the Lake Kachess Floating Pump Plant.

Thank you,

Larry Steele

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Lake Kachess Doc 7-1 1-18.pdf
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July 11, 2018

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

Dear Ms. McKinley

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kachess within the Okanogan-Wenatchee National Forest should not be built now or at any time in the future. These funds should be allocated on more uneconomical and environmentally damaging water projects in the Yakima River Basin, the Bureau of Reclamation and the Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. Please reconsider the proposition for the sake of all involved.

Thank you.

Larry and Stasia Steele
9801 111th Ave NE
Kirkland, Washington 98033

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess Proposal - Reject!!!

1 message

Jeremy .Vanbeek@wellsfargo.com <Jeremy.Vanbeek@wellsfargo.com> Wed, Jul 11, 2018 at 2:33 PM
To: kkbt@usbr.gov

Dear Ms. McKinley,

The proposed floating pumping plant for Lake Kachess and proposed tunnel project between Lake Keechelus and Lake Kechess within the Okanogan-Wenatchee National Forest should NOT be built now or at any time in the future. I love summers at Lake Kachess, and these proposals would be devastating. These funds should be allocated on less economically and environmentally damaging water projects in the Yakima River Basin, the bureau of Reclamation and Washington State Department of Ecology should promote water conservation, water efficiencies and water markets during drought years. Please reconsider the proposition for the sake of ALL involved.

1

Thank you for your consideration in this matter.

Sincerely,

JEREMY VANBEEK

Mortgage Associate
NMLSR ID 1501185

Wells Fargo Home Mortgage | 10210 NE POINTS DR, suite 110 | KIRKLAND, WA 98033
MAC P6440-010
Tel 425-828-2204 | Cell 425-466-5058

Jeremy.Vanbeek@wellsfargo.com

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[EXTERNAL] Resonse to Supplemental Draft Environmental Impact Statement. Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance

1 message

Campbell, W illiam H <bill_campbell@unc.edu> Wed, Jul 11, 2018 at 9:22 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

To: (via e-mail) Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
191 7 Marsh Road
Yakima, WA 98901-2058 P
hone: 509-575-5848, ext. 603 Fax: 509-454-5650 Email: kkbt@usbr.gov

Ms. McKinley:

The attached document has been submitted by Jay Scwartz, describing in detail the numerous errors and omissions of the hydrology analysis embedded in the SDEIS for the Kachess Drought Relief Pumping Plant. On behalf of myself, my family, and the organization I represent, Friends of Lake Kachess, I want to submit and support the Schwartz analysis. Please accept this as a request to address all of the questions raised by Mr. Schwartz in the attached analysis. 1

Thank you,

Bill Campbell
Friends of Lake Kachess
P.O. Box 613
Easton, WA 98925

YBIP.SDEIS Comments - Jay Schwartz 2018071 1 (3).pdf
415K

To: (via e-mail)
Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
191 7 Marsh Road
Yakima, WA 98901-2058
Phone: 509-575-5848, ext. 603
Fax: 509-454-5650
Email: kkbt@usbr.gov

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental DRAFT Environmental Impact Statement

Dear Ms. McKinley,

On behalf of myself, my family, and the many people committed to preserving Kachess Lake, I respectfully submit the following public comments regarding the **Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement**.

Thank you for your attention addressing these critical issues.

Respectfully,

Jay Schwartz

781 26th Ave E
Seattle, Washington 98112

Land and home-owner in Section 29 above Kachess Lake

Introduction

For over three years I have been the dog who would not let go of the ankle of those trying to move the YBIP forward without objective and unbiased analysis and transparent and balanced process. I have reviewed literally thousands of pages of data and performed extensive external analysis in an effort to bring fair and trustworthy data and analysis forward.

My approach has focused on three critical issues:

1. How much additional water will the project deliver?
2. How much will the water cost and is this a good economic decision?
3. What impact will it have on Kachess Lake?

Unfortunately, rather than being a willing partner in providing simple answers to these simple questions, BuRec has steadfastly evaded and forestalled accountability to engage thoughtfully and transparently in providing these answers. I have played a game of "cat and mouse" with them now for over three years. Often, I had to find data on my own, force BuRec to review my analysis, and then receive little to no feedback as to how BuRec planned to respond to the significant data integrity and analytic concerns.

Perhaps a few examples would be helpful:

I. **Hydrology Data:** For three years I have had to force BuRec to provide the Riverware model output data needed to review the "projected" benefits presented in BuRec documents. In 2015, I literally downloaded 90-years of daily Hydromet data to provide my first set of outputs. Eventually, BuRec published the 2016 Phase II Hydrology Technical Memorandum and I used this extensive data set to present a number of meaningful concerns. BuRec then created a Phase III TM and failed to provide the report and left critical data out of the Phase III version that were included in the Phase II report. Then for the SDEIS, BuRec created unpublished hydrology data that were only fully released to me two weeks prior to the due date for SDEIS comments. Given the fact that I have had 4 in-person meetings to review in-depth hydrology data, one would think BuRec would inform me when new data is available. Accordingly, evaluating how much water the project will deliver and assessing the impact on Kachess Lake have consistently been compromised.

II. **Conservation Projects:** For some reason, BuRec included unplanned, unfunded and unknown conservation projects in all hydrology scenarios in the Phase II TM. While these projects had no tangible concepts or plans, BuRec insisted on including them with the results associated with KDRPP. I complained bitterly about the distortion created by this poor analytical decision. Nonetheless, BuRec proceeded to repeat the same approach in 2017 with the Phase III TM and the scope of the unplanned, unfunded and unknown conservation project increased significantly. They added over 1 million acre-feet of water to the project results. Surprisingly (and for unexplained reasons), the

unpublished SDEIS hydrology data appropriately removed the conservation projects and the ability to more accurately assess the impact of KDRPP is thus enabled.

III. **Comparisons to Actual Results:** The entire Riverware approach is built on a single model view of history and then re-runs this history assuming specific projects, like the KDRPP, are in place to provide updated alternative results. Unfortunately, no one-model set of assumptions can replicate history across the board. It invariably changes history as human decisions include error and adjustments over time. So while this reliance on a single-model is unavoidable, it needs to be tempered by comparison to actual results to keep the modeled expectations and projections in check with real-world experience. BuRec has consistently refused to compare hydrology projections to the actual real-world yearly results. Sadly, this continues to be a challenge with the data presented in the SDEIS. Fortunately, historical data is available to help address this issue.

As I have extensive analytic experience (Notre Dame Finance degree, Stanford MBA, 15 years of strategy consulting experience with McKinsey, Bain and Lake Partners) and meaningful exposure now after 3+ years of in-depth review of the KDRPP project, the purpose of these comments is to identify and call into question a number of material hydrological and economic deficiencies of the SDEIS. Specifically, I call into question the following:

1. Kachess Outflows vs Actual History
2. TWSA Proration Data
3. Kachess Outflows vs Total ID Diversions
4. Roza Diversions vs Actual
5. KRD Diversions vs Actual
6. Hydrology analysis at water elevation 2199.5
7. Economics

Please note BuRec provided me the detailed Kachess Outflow, Kachess Storage, TWSA details, and ID Delivery data from the SDEIS Riverware model. This data has yet to be released publicly and BuRec reports they are in the process of preparing this data for public access. All of the analysis in these comments is from this BuRec SDEIS data set or from the BuRec Hydromet data for station KAC – Kachess Lake.

Issue 1: Kachess Outflows vs Actual History – the "No-Change" scenario incorrectly reduces Kachess Outflows in drought years, creating a significant error of projected additional water for irrigators with the "KDRPP" scenario.

Without explanation, the Historical SDEIS hydrology analysis artificially reduces Kachess Lake outflows in drought years in the "No Change" scenario. This creates a significant error of the projected additional water for irrigators in the "KDRPP" scenario. As BuRec has widely reported, the average total water year Kachess Outflows are ~213 kAF. As can be seen below and focusing on the 1977-2015 water years, when you break out the historical Kachess

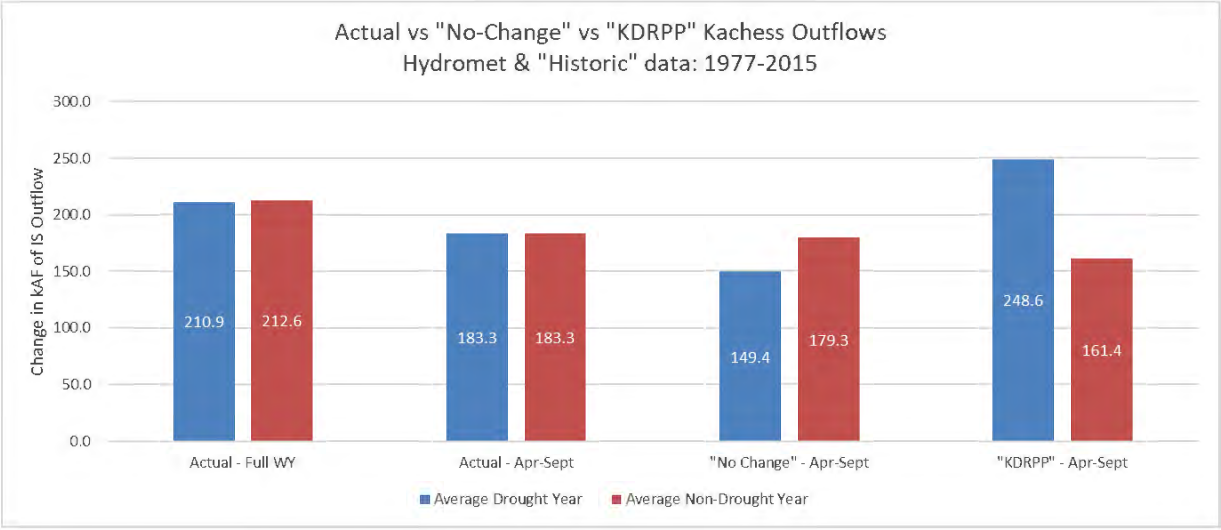
Outflows to drought years and non-drought years, the actual average Kachess Outflow history is for 210.9 kAF in drought years and 212.6 kAF in non-drought years. When focusing on the core irrigation season of April-Sept Kachess Outflows, the actual data shows 183.3 kAF for drought and non-drought years.

When reviewing the SDEIS hydrology data for Kachess Outflows, the model for some reason drops the drought year "No Change" Apr-Sept Kachess Outflows to 149.4 kAF. This removal of 33.4 kAF (18.5%) is unexplained and serves to reduce the baseline for which to compare the benefits of the KDRPP scenario. Interestingly, the non-drought year outflows remain relatively consistent with actual history at 179.3 vs 183.3 kAF (an acceptable 2.2% variance from actual).

The SDEIS then represents the "KDRPP" scenario as a significant increase from the "No Change" scenario of 248.6 vs 149.4 kAF (an increase of 99.3 kAF on average). This is factually incorrect as the irrigators received 183.3 kAF in drought years and the correct increase is 65.4 kAF on average. This is a 51.8% overstatement of benefits to irrigators. Sadly, this data is not presented for review but the claimed benefits are broadly stated in the SDEIS.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Kachess Outflow data? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model?*



	Actual Hydromet Data		Historic SDEIS Projections			
	Actual - Full WY	Actual - Apr-Sept	"No Change" - Apr-Sept	"No-Change" to Actual Variance	"KDRPP" - Apr-Sept	"KDRPP" to Actual Variance
Average Drought Year	210.9	183.3	149.4	-33.9	248.6	65.4
Average Non-Drought Year	212.6	183.3	179.3	-3.9	161.4	-21.8

	Actual Hydromet Data		Historic SDEIS Projections			
Water Year	Actual - Full WY	Actual - Apr-Sept	No Change - Apr-Sept	No-Change to Actual Variance	KDRPP - Apr-Sept	KDRPP to Actual Variance
1977	226.3	193.5	150.4	-43.1	299.0	105.5
1978	143.5	142.0	154.2	12.2	106.7	-35.3
1979	293.8	271.9	180.4	-91.5	112.3	-159.6
1980	103.6	92.8	152.5	59.7	135.1	42.3
1981	200.3	188.4	169.8	-18.6	144.3	-44.1
1982	209.9	199.4	173.1	-26.3	164.4	-35.0
1983	212.2	191.6	165.7	-25.9	165.7	-25.9
1984	235.1	212.8	180.3	-32.5	180.3	-32.5
1985	243.7	230.1	182.7	-47.4	182.7	-47.4
1986	230.8	221.4	181.9	-39.5	181.9	-39.5
1987	172.3	163.3	169.8	6.5	222.4	59.1
1988	161.0	155.0	153.0	-2.0	166.7	11.7
1989	144.8	139.3	159.7	20.4	125.9	-13.4
1990	194.3	160.6	182.4	21.8	154.3	-6.3
1991	301.9	190.5	199.9	9.4	199.9	9.4
1992	271.0	226.1	190.7	-35.4	252.8	26.7
1993	170.2	165.5	152.4	-13.1	242.2	76.7
1994	140.4	134.6	116.7	-17.9	197.5	62.9
1995	142.1	138.9	148.2	9.3	101.1	-37.8
1996	398.1	301.6	207.2	-94.4	142.4	-159.2
1997	212.5	211.8	246.3	34.5	231.1	19.3
1998	219.5	178.7	196.6	17.9	196.6	17.9
1999	241.6	197.7	185.1	-12.6	185.1	-12.6
2000	234.6	188.4	214.3	25.9	214.3	25.9
2001	247.9	202.6	127.1	-75.5	279.8	77.2
2002	138.2	134.5	159.4	24.9	104.2	-30.3
2003	248.1	206.6	170.2	-36.4	123.8	-82.8
2004	183.1	158.4	188.0	29.6	175.0	16.6
2005	203.5	167.5	111.1	-56.4	264.8	97.3
2006	119.9	112.5	163.2	50.7	107.8	-4.7
2007	213.8	177.2	183.3	6.1	133.6	-43.6
2008	182.8	145.6	142.7	-2.9	148.1	2.5
2009	247.2	207.6	177.3	-30.3	179.5	-28.1
2010	170.3	131.9	163.6	31.7	163.6	31.7
2011	260.5	218.7	192.9	-25.8	192.9	-25.8
2012	226.1	175.7	200.3	24.6	200.3	24.6
2013	237.9	189.8	185.4	-4.4	185.4	-4.4
2014	240.6	210.8	199.9	-10.9	199.9	-10.9
2015	255.4	212.9	176.7	-36.2	230.5	17.6
Total	8,279.0	7,148.0	6,754.4	-393.6	6,993.9	-154.1
Average	212.3	183.3	173.2	-10.1	179.3	-4.0

Issue 2: TWSA Proration Data – Due to the above reduction in the "No-Change" scenario, the baseline TWSA data is artificially lowered and the presented Proration data is also incorrectly reduced. This again creates a significant error in the projected TWSA and Proration benefits of the "KDRPP" scenario.

In addition to the above errors in Kachess Lake Outflows, the artificial reduction of the No-Change drought year water supply also distorts the TWSA and Proration projections presented in the SDEIS. As shown below, the Historic No-Change TWSA data significantly reduces the baseline Proration levels to an average of 45.4%. The "KDRPP" scenario then increases the Proration levels up to an average of 59.3% with SDEIS proclaiming increases of nearly 22% when referring to the 21.3% change in 2005.

When compared to the actual Sept 30 Proration levels published by the BuRec (but not provided in detail in the SDEIS), we see the actual baseline average Proration level of 53.3% and thus the overall benefit of "KDRPP" drops to 6.0% on average (a 56% reduction in benefits) with the SDEIS example of 2005 now showing only an 11.5% improvement.

The net effect of this error is like when a retailer increases the price of an item and then puts it "on-sale" back down to a price similar to the original price. The SDEIS artificially reduces the baseline "No-Change" scenario to imply to the public and irrigators a much more significant benefit of KDRPP than is factually true.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Proration data? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model?*
- *Given the artificial reduction in the "no-change" baseline scenario, should irrigators and the public be informed of the modeled benefits as well as the change from actual benefits? If not, please explain why?*

	Historic SDEIS Projections			Actual Hydromet Data	
Drought Year	Historic No-Change Proration	Historic KDRPP Proration	KDRPP vs No-Change	Actual BuRec Proration Data	KDRPP vs Actual
1977	42.8%	60.4%	17.6%	70.0%	-9.6%
1987	62.8%	70.0%	7.2%	68.0%	2.0%
1992	64.3%	64.1%	-0.2%	58.0%	6.1%
1993	52.5%	70.0%	17.5%	67.0%	3.0%
1994	24.0%	33.4%	9.4%	37.0%	-3.6%
2001	32.7%	52.7%	20.0%	37.0%	15.7%
2005	32.2%	53.5%	21.3%	42.0%	11.5%
2015	51.9%	70.0%	18.1%	47.0%	23.0%
Average	45.4%	59.3%	13.9%	53.3%	6.0%

Issue 3: Kachess Outflows vs Total ID Diversions – While the SDEIS presents a scenario as "KDRPP Only", there are clearly other operational changes occurring at the same time. This is made clear by comparing actual Kachess Outflows to the total Irrigation District Diversions whereby the ID Diversion increases are far in excess of the Kachess Outflow increases. Accordingly, there should be an additional alternative scenario that allows for operational changes without any other projects (like KDRPP) and in-excess of the "No Change" scenario. Further, the SDEIS should be more upfront in stating the benefits due to operational changes vs those from KDRPP.

The SDEIS goes to great lengths to model the benefits of multiple participating "Proratable Entities" and formally includes KRD, RID and WIP Irrigation Districts in the SDEIS Irrigation District Diversion analysis. However, under the "KDRPP-only" scenario, the modeled irrigation water benefits far exceed the amount of additional Kachess Outflow water. As shown below, in drought years, Kachess Outflows under "KDRPP" increase by 522.5 kAF of water (above historical actuals) but the projected ID Diversions increase by 966.9 kAF, (84.9% more than Kachess Outflows). Clearly there are other operational parameters at work here but no meaningful data is provided with which to assess these operational changes.

This concern is further compounded when assessing all years from 1977-2015. For the full period, the KDRPP scenario actually reduces total Kachess Outflows (from Actual) by 154.1 kAF yet ID Deliveries increase over this same time frame by 624.4 kAF. The resulting and unexplained variance of 778.5 kAF above and beyond Kachess Outflows represents an important alternative in and of itself and needs much further explanation.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Irrigation District Deliveries data? Why was it not presented in the SDEIS?*

- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model?*
- *Given the significant variance in water delivered outside of KDRPP, why are the operational changes not explained more fully? Why are they not run as an independent alternative in the SDEIS?*

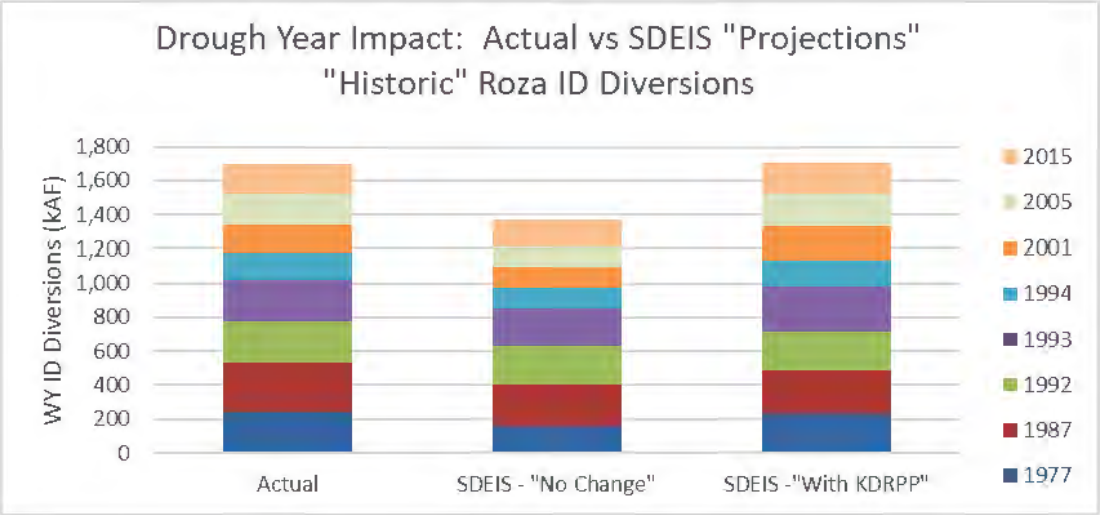
Water Year	Historical KDRPP Change from Actual Hydromet	Historical KDRPP - KRD Impact	Historical KDRPP - Roza Impact	Historical KDRPP - WIP Impact	Historical - Total ID Impact	Variance kAF	Variance %
1977	105,456	58,752	70,838	66,055	195,645	90,189	85.5%
1987	59,103	9,006	16,546	15,737	41,289	-17,814	-30.1%
1992	26,708	-301	-482	-457	-1,240	-27,948	-104.6%
1993	76,747	28,077	42,504	40,209	110,790	34,043	44.4%
1994	62,939	38,118	34,259	34,328	106,705	43,766	69.5%
2001	77,151	72,513	73,053	66,461	212,027	134,876	174.8%
2005	97,270	74,767	75,314	71,559	221,640	124,370	127.9%
2015	17,551	26,685	28,614	24,763	80,062	62,511	356.2%
Drought Years	522,924	307,617	340,646	318,655	966,918	443,994	84.9%
Non-Drought Years	-677,032	-97,688	-87,502	-157,358	-342,548	334,484	-49.4%
Total	-154,107	209,929	253,144	161,297	624,370	778,477	-505.2%

Issue 4: Roza Diversions vs Actual – The SDEIS itself only speaks to irrigation water increases in terms of changes in Proration levels. With the non-public BuRec SDEIS irrigation district diversion data and the historical actual diversion data (also provided by BuRec), an analysis of SDEIS projections vs actual irrigation district diversions is possible. In the case of Roza, the projected KDRPP diversions are scarcely more than the actual water delivered in drought years. This represents a glaring and material misstatement of benefits to irrigators and needs to be addressed.

As shown below, actual Roza diversions in drought years total 1,697 kAF. The SDEIS "No-Change" baseline scenario suggests Roza water deliveries in the same years would be 1,368 kAF, a decrease from the actual water deliveries of 329 kAF. Diversions under the "KDRPP" SDEIS scenario then increase to 1,709 kAF in drought years and are presented as a material improvement from the "No Change" scenario (an increase of 341 kAF). In fact, the "KDRPP" scenario only delivers a net increase of 12 kAF from the actual deliveries and in many years delivers less water. The failure to provide a comparison to actuals and to present this level of detail to the Roza irrigators is an egregious error.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS Roza Irrigation District Deliveries data? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model as it relates to Roza deliveries?*
- *As Roza is the current and only committed ID, why should they fund a project that does not deliver any meaningful benefit to them?*



Roza

Drought Years - 1977-2015 (8 Years)

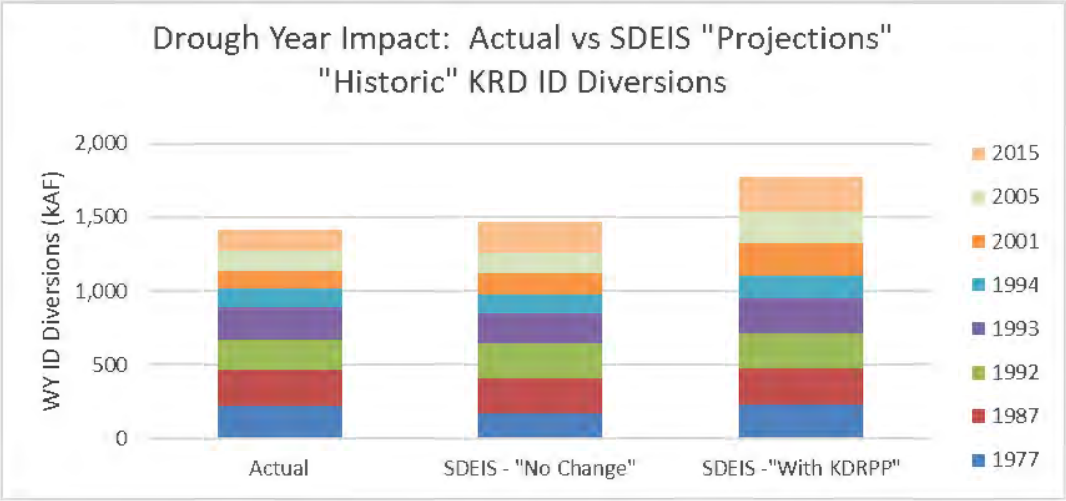
	Actual	SDEIS - "No Change"	SDEIS - "With KDRPP"	Variance: KDRPP vs Actual
1977	238	155	226	-12
1987	292	246	262	-29
1992	246	231	231	-15
1993	244	220	263	19
1994	159	119	154	-5
2001	160	127	200	40
2005	182	115	190	8
2015	176	154	183	7
Total	1,697	1,368	1,709	12
kAF		-329	341	

Issue 5: KRD Diversions vs Actual – The SDEIS itself only speaks to irrigation water increases in terms of changes in Proration levels. With the non-public BuRec SDEIS irrigation district diversion data and the historical actual diversion data (also provided by BuRec), an analysis of SDEIS projections vs actual irrigation district diversions is possible. In the case of KRD, the projected KDRPP diversions are significantly more than the actual water delivered in drought years. In fact, they are greater than the amounts delivered to Roza, who has 57 kAF more annual water rights than KRD. This seems to be both ill-advised and illegal, with significant litigation risk as well.

As shown below, actual KRD diversions in drought years total 1,419 kAF. The SDEIS "No-Change" baseline scenario suggests KRD water deliveries in the same years would be 1,465 kAF, roughly the same. However, diversions under the "KDRPP" SDEIS scenario increase to 1,773 kAF, a material improvement of over 300 kAF from both actual and "no-change" data. Unfortunately, the diversions for the same years are 74 kAF greater than Roza (1,709 kAF) who has 57 kAF more annual water rights. Further, Roza's increase over actual deliveries of only 12 kAF will call into significant legal question KRD's increase of over 300 kAF. The failure to address the KRD vs Roza delivery levels as well as a comparison to actuals and to present this level of detail to the Roza and KRD irrigators is unconscionable.

Questions for the SDEIS:

- *Why was this data not presented in detail in the SDEIS?*
- *What calibration analysis was done to ensure the accuracy of the SDEIS KRD Irrigation District Deliveries data in comparison to the Roza deliveries? Why was it not presented in the SDEIS?*
- *Why does the SDEIS not present actual historical results as well as results from the SDEIS hydrology model as it relates to KRD deliveries?*
- *As Roza is the current and only committed ID, why should they fund a project that does not deliver any meaningful benefit to them yet provides significant benefits to a currently non-participating ID?*



KRD

Drought Years - 1977-2015 (8 Years)

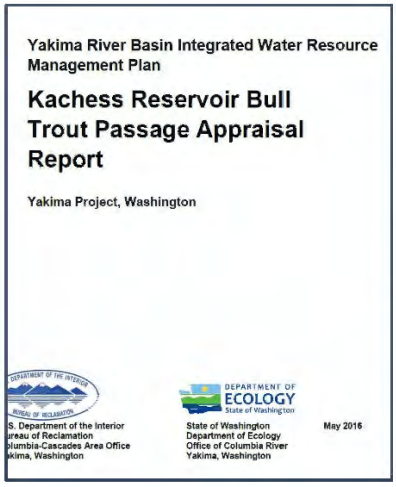
	Actual	SDEIS - "No Change"	SDEIS - "With KDRPP"	Variance: KDRPP vs Actual
1977	219	175	234	15
1987	247	235	244	-3
1992	207	233	232	26
1993	220	209	237	18
1994	124	119	157	33
2001	122	146	218	96
2005	130	134	208	79
2015	150	215	242	92
Total	1,419	1,465	1,773	354
kAF		46	308	

Issue 6: Hydrology analysis at water elevation 2199.5 – Previous Hydrology Technical Memorandum as well as extensive Bull Trout documents make reference to the critical water elevation of 2199.5, below which Bull Trout can no longer migrate up through the Narrows. The SDEIS fails to address this critical water level with any detailed analysis or references.

As the below references from the May 2016 Bull Trout document clearly indicate, assessing the frequency and duration of water levels below 2199.5 are essential for Bull Trout migration. The SDEIS fails to address this water level. It is such an important metric that the BuRec has not lowered the Kachess Lake below this level since 1977, even in the face of 8 droughts. And while the SDEIS addresses several other water level concerns as it relates to Bull Trout, it fails to provide any data or discussion on this most important and not recently violated critical water level.

Questions for the SDEIS:

- *Why was data for the 2199.5 water level not presented in detail in the SDEIS?*
- *How many days and years will the water level be below 2199.5 in all of the historic and climate change scenarios?*
- *If not already done, can the updated SDEIS data be shared with the public and with the BiOp agencies?*


Yakima River Basin Integrated Water Resource Management Plan

Kachess Reservoir Bull Trout Passage Appraisal Report

Yakima Project, Washington

S. Department of the Interior
reau of Reclamation
lumbia-Cascades Area Office
kima, Washington

State of Washington
Department of Ecology
Office of Columbia River
Yakima, Washington

May 2016

Under a Washington State declared drought, the KDRPP could withdraw up to 200,000 acre-feet of water from the Kachess Reservoir. The RiverWare model was used to estimate the number of months during an 83-year period (1926-2008) where the average monthly pool elevation was below 2,199.5 feet. At this pool elevation, fish migrating up from the lower Kachess reservoir cannot pass through the downstream end of the Narrows. During the June through October upmigration period, the Narrows would be impassible a percentage of the time: in June- 13 percent; in July- 23 percent; in August- 29 percent; in September- 37 percent, and in October- 42 percent (Table 1).

Table 1. The number and percent of months that the average monthly lower Kachess Reservoir elevation would be less than 2,199.5 feet when operated under the Integrated Plan, Kachess Drought Relief Pumping Plant scenario (IP2A) for the 1926-2008 period of record. Below this elevation, fish passage from lower Kachess Reservoir into the Narrows becomes impassable for upmigrating fish.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Percent of Months Average Water El.<2199.5 feet	29%	29%	25%	20%	19%	13%	23%	29%	37%	42%	37%	33%
Number of Months Water El. <2199.5 feet	24	24	21	17	16	11	19	24	31	35	31	27

Issue 7: Economics – Simply put, there is no meaningful economic analysis in the SDEIS. It assumes broad econometric analysis is the same as substantial Benefit-Cost or ROI analysis. And it specifically fails to address the question of how much the water will cost and how and where it will be used in a rational economic return on investment approach.

In my prior comments previously submitted for the DEIS process and in my extensive reviews and presentations with the BuRec, I have provided very detailed and specific commentary on the many economic short-comings of the KDRPP project. Those comments are now included again in these comments by reference. Further, they foster the following specific questions:

Questions for the SDEIS:

- *What is the life-time cost per Acre Foot of water for the KDRPP project?*
- *What is the incremental profit of an acre-foot of water per crop type in the Yakima Basin?*
- *Which crops have a positive Benefit-Cost vs a negative Benefit-Cost?*
- *For crops with a negative Benefit-Cost, how can the using KDRPP water be justified as a private or public good?*

- *Given the likely negative Benefit-Cost for a majority of Yakima Basin crops, how can the overall economics of the KDRPP provide any positive economic return? How can the water be used only on crops with a positive Benefit-Cost? How can we enable only those irrigators with a positive Benefit-Cost to pay for and use the water from KDRPP?*

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Response to KDRPP/KKC SDEIS

1 message

Campbell, W illiam H <bill_campbell@unc.edu> Wed, Jul 11, 2018 at 9:34 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia-Cascades Area Office
191 7 Marsh Road Yakima, WA 98901-2058
Phone: 509-575-5848, ext. 603 Fax: 509-454-5650 Email: kkbt@usbr.gov

Ms. McKinley:

On behalf of myself, my family, and the organization I represent...Friends of Lake Kachess...I submit and support the attached statement from David Dicks of Tatoosh Law Firm. While the document is some 16 pages long, it succinctly summarizes the Floating Pumping Plant in Lake Kachess: "It is a terrible idea, and it is illegal." 2

Thank you,

Bill Campbell
Friends of Lake Kachess
P.O. Box 613
Easton, WA 98925

YBIP.SDEIS. Dicks Letter .7.11.2018.pdf
546K

To: (via e-mail)
Ms. Candace McKinley
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Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement

Dear Ms. McKinley,

On behalf of the Kachess Community Association I respectfully submit the following public comments regarding the **Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement**.

Thank you for your attention to this important matter,

David Dicks – JD

Tatoosh Law and Policy Group
318 1st Ave S, Suite 310
Seattle, Washington 98104

On behalf of:

The Kachess Community Association

You can fool all the people some of the time, and some of the people all the time, but you cannot fool all the people all the time. - Abraham Lincoln

Introduction

Although the new SDEIS is a staggering 906 pages it is hopelessly confused and fails conclusively to comply with the procedural and substantive requirements of NEPA and SEPA. It also proposes a project that indisputably violates the Endangered Species Act.

Specifically, the SDEIS has 8 fatal flaws that will be explained in this comment letter:

1. **Reclamation and Ecology Should Have Published all Comments and Responses to the 2015 DEIS Before Releasing the 2018 SDEIS**

2. **The Purpose and Need Section is Internally Contradictory and illegally limits the number of alternatives that are analyzed in the draft. It also inappropriately takes a "public" SDEIS and converts it into "private" proposal by the Roza Irrigation District**

3. **The Proposed Action is The Only Alternative Other Than the No Action Alternative**

4. **The Project is Unauthorized by Congress and Ecology Does Not Have Funding to Implement the Project**

5. **The Alternatives Analysis Is Far Too Limited To Comply With NEPA and SEPA**

6. **All of the Alternatives Except the No Action Alternative Violate the Endangered Species Act**

7. **Reclamation's Failure to Consult under The Endangered Species Act is Illegal**

8. **The Project Violates Water Law Generally and the Yakima Allocation Specifically**

For these reasons - and many others articulated in our prior comments and the comments of others - the SDEIS must be rejected in its current form to comply with NEPA, SEPA, and the Endangered Species Act. We believe that is an impossible task and therefore recommend that the "No Action" alternative be selected.

Introduction

This SDEIS is required under both the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). Under both laws agencies considering "actions significantly affecting the quality of the human environment" must prepare and issue

an Environmental Impact Statement (EIS). 42 U.S.C. § 4332(2)(C); *Nw. Envtl. Advocates v. NMFS*, 460 F.3d 1125, 1133 (9th Cir.2006). An EIS:

"Shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. § 1502.1; *Nw. Envtl. Advocates*, 460 F.3d at 1134.

Thus, the EIS is more than a mere "disclosure document." 40 C.F.R. § 1502.1. Agencies must take a 'hard look' at the potential environmental consequences of the proposed action." *Klamath–Siskiyou Wildlands Ctr. v. BLM*, 387 F.3d 989, 993 (9th Cir.2004) (citing *Churchill County v. Norton*, 276 F.3d 1060, 1072 (9th Cir.2001)). By focusing on the environmental effects of the proposed agency action, "NEPA ensures that the agency will not act on incomplete information, only to regret its decision after it is too late to correct." *Marsh*, 490 U.S. at 371, 109 S.Ct. 1851 (1989). Reclamation and Ecology are the agencies charged with the meeting these duties and they have failed to meet this burden in this DEIS.[1]

In the 2015 DEIS Reclamation and Ecology prepared the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Draft Environmental Impact Statement (DEIS) as a single document. It includes environmental analyses for the both the KKC and KDRPP projects. The DEIS was released to the public in January 2015 and described the no-action alternative and five action alternatives. The public comment period ended June 15, 2015.

As we noted in our comments regarding the 2015 DEIS there are were at least seven fatal flaws with that DEIS that rendered it insufficient under NEPA and SEPA. This SDEIS does nothing to resolve these insufficiencies and, in fact, creates many new problems that make the current NEPA/SEPA process even worse. This comment letter explains a series of major substantive and procedural flaws in the SDEIS and poses a series of questions that should have been addressed in the SDEIS. As required by both NEPA and SEPA, and their implementing regulations, we expect both Reclamation and Ecology to provide responses to each of the questions posed in this letter. Importantly, Reclamation and Ecology have still not satisfied this obligation with regard to the 2015 DEIS

While we agree that the Bureau of Reclamation and the Washington State Department of Ecology needed to draft a Supplemental Draft Environmental Impact Statement (SDEIS) this supplement fails to meet even the most basic requirements of NEPA, SEPA, and all of the alternatives proposed in the document (except the "no action" alternative) blatantly violates the Endangered Species Act (ESA) because of their impact on listed Bull Trout and Spotted Owls.

The New SDEIS

[1] Washington State's Environmental Protection Act (SEPA) mirrors NEPA and places the same burden upon Washington State agency actions.

To understand this SDEIS one needs to understand a complex web of related processes and projects. Mr. David Ortman's comment letter to this SDEIS does an excellent job of articulating the many problems with the historical situation and the multiple conflicting mandates that burden this entire situation. (This letter incorporates his comments by reference). As the SDEIS itself explains:

Following development of the Integrated Plan, Reclamation and Ecology prepared the Integrated Plan FPEIS to assess the environmental effects of implementing the Integrated Plan (Reclamation and Ecology, 20124). The Integrated Plan FPEIS was issued in March 2012. In July 2013, Reclamation published the Record of Decision (2013 Integrated Plan ROD) to implement the Integrated Plan in cooperation with Ecology and other Federal, State, local, and Tribal partners. The selected alternative in the 2013 Integrated Plan ROD implements the Integrated Plan. Projects associated with the seven elements will be implemented in a phased and balanced approach. The Integrated Plan three-phase strategy (10-year increments over 30 years) may combine or implement actions simultaneously. Additional project-level environmental compliance will be completed prior to implementation of specific projects and actions.

The action alternatives examine constructing and operating a pumping plant to access up to 200,000 acre-feet of water in Kachess Reservoir during drought years. Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) is evaluated as a component of the KDRPP alternatives. The KKC involves constructing and operating a gravity flow tunnel from Keechelus Reservoir to Kachess Reservoir and is also a component of the Integrated Plan, but is not being pursued as a standalone project at this time. These projects are part of the Yakima Basin Integrated Water Resources Management Plan (Integrated Plan)." (SEPA Fact Sheet p. 11 of SDEIS)

It is important to distinguish between the Integrated Plan as a political compromise document, and the Supplemental Draft Environmental Impact Statement as an environmental compliance and disclosure document. The Integrated Plan was determined as a politically appropriate synthesis of programs, taking into account the political positions of the state and federal agencies, counties and tribal representatives in the planning process organized by Ecology and Reclamation. There is no legal requirement that all viable alternatives be considered in a political planning process. There is, however, a legal requirement that all viable alternatives be considered in an environmental compliance and disclosure document required by the National Environmental Policy Act.

Previously referred to as the Kachess Reservoir Inactive Storage Project, the proposed Kachess Drought Relief Pumping Plant (KDRPP) could withdraw up to 200,000 acre-feet of lake storage water up to 80 feet below the reservoir's existing outlet works, which were designed to allow storage and supply of water equal to the average annual watershed precipitation. In other words, the lake was increased in size to store the maximum amount of water available in the watershed. The current "storage" is all the water above the natural level of the lake prior to dam construction. The current proposal would remove water below the natural level of the

lake by up to 80 feet. This means that the proposal would drain much of the original Alpine Lake.

Supposedly, the KDRPP would operate only during a Washington State-declared drought with the goal of providing, when feasible, up to 70 percent water rights to proratable users. The SDEIS now includes a new variation of the KDRPP known as the "KDRPP Floating Pumping Plant" (KDRPP FPP) which was not analyzed or even proposed in the 2015 DEIS. This was proposed by the Roza Irrigation District. Apparently, it was the addition of this new KDRPP FFP (the new Proposed Action) which convinced Reclamation and Ecology that they needed to supplement the 2015 DEIS.

All of the Pumping Plant proposals also could include the addition of Keechelus Reservoir-to-Kachess Reservoir Conveyance project (KKC), which is intended to help refill Lake Kachess in the years following a drought by sending water from Lake Keechelus via tunnel to Lake Kachess. In addition, each of the Pumping Plant alternatives could operate without the KKC (although that would greatly increase the amount of time needed to refill the lake and significantly increase environmental damage). Finally, Reclamation and Ecology have abandoned the formerly proposed South Tunnel Alignment of the KKC because it was impractical and too expensive.

Fatal Flaw # 1 – Reclamation and Ecology Should Have Published all Comments and Responses to the 2015 DEIS Before Releasing the 2018 SDEIS

According to the 2018 SDEIS:

Reclamation and Ecology have reviewed all comments on the DEIS, developed a new floating pumping plant alternative, collected additional scientific data as necessary, and evaluated new findings. The new alternative and new findings have been documented in the Kachess Drought Relief Pumping Plant and Keechelus Reservoir to Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS) released to the public April 13, 2018. The SDEIS will not contain comment letters received on the DEIS; instead, letters and response to comments from both the DEIS and SDEIS will be in a final environmental impact statement." ES-xvii

If Reclamation and Ecology have already reviewed all the comments from the previous DEIS why did they fail to release the comments and responses in the almost 3 years since the DEIS comment period closed? This puts the public at a substantial disadvantage to understand the need for and reasoning behind the publication of the SDEIS. The required comment period for this SDIES is, therefore, flawed because Reclamation and Ecology have vast amounts of information that are not in the public domain. To make matters worse the SDEIS acknowledges that the comments raised issues that led in part to the decision to issue the SDEIS. (ES-xv) At a minimum the agencies should extend the current public comment period and publish the 2015 public comments and responses. This would put the public on semi-equal footing with the decision maker in terms of understanding the implications of the project, the changed

circumstances, and new information (stemming from public comments on the 2015 DEIS) that led to the decision to publish a SDEIS.

How do the agencies justify their decision not to publish the comments and responses to the 2015 DEIS in this SDEIS?

Fatal Flaw # 2 - The Purpose and Need Section is Internally Contradictory

The Purpose and Need section of an EIS is critical because it frames the entire discussion about the proposed project and leads to potential project alternatives. In this situation there are three Purpose and Need sections for three different "project proponents" and there is only one way to meet all of their goals: Selecting the "Proposed Action" as the "Preferred Alternative".

Reclamation's Purpose and Need

According to the SDEIS:

Reclamation's purpose and need for action is to provide more sustainable water resources for agricultural, municipal, and domestic needs, while also helping to restore ecological functions and the health of the riverine environment in the Yakima River basin.

Specifically, Reclamation needs to analyze, implement, and fund as authorized, the site- specific projects identified here in accordance with the 2013 Integrated Plan ROD. Reclamation may fund, design, construct, operate, and maintain some or all of the Proposed Action, if authorized to do so pursuant to Section 4007 of the Water Infrastructure Improvements for the Nation Act or other law which provides similar authorization.

How can reclamation participate financially in the project is not authorized by Congress? The statement above confirms that Reclamation may only "fund, design, construct, operate, and maintain some or all of the Proposed Action, if authorized to do so pursuant to Section 4007 of the Water Infrastructure Improvements for the Nation Act or other law which provides similar authorization." How can Reclamation make financial commitments when the necessary authorization does not exist under Federal Law?

How can Reclamation wear both the project proponent hat and the regulatory hat if Congress does not authorize them to act as a project proponent?

The SDEIS further states: "Alternatively, any other project proponent may choose to fund the project independently; in which case, Reclamation then needs to respond to them as applicant and to determine whether to authorize, as necessary, any such entity to design, construct, operate and maintain certain projects, as necessary, related to the two objectives set forth in the Integrated Plan: (1) access water that is currently not accessible in the Kachess Reservoir to improve the water supply and reduce prorationing, and (2) improve water supply flexibility and storage between Kachess and Keechelus reservoirs."

Ecology's Purpose and Need

Ecology's purpose for the action is to participate in the Integrated Plan and fund (not more than 50 percent) of the plan, and promote timely and effective implementation of associated projects in an aggressive pursuit of water supply solutions for instream and out-of-stream uses in the Yakima River basin [Revised Code of Washington (RCW) 90.38.005].

So, Ecology is in a slightly more legitimate position because they do have a State authorization to fund up to 50% of the Integrated Plan. Unfortunately, they do not have not ability to promise funds on their own without acts of both the Governor and the Legislature.

How does Ecology intend to fund the plan?

Why would Ecology fund a project that has no benefit to the ecology of Washington State destroys an alpine lake and violates SEPA, NEPA, and the Endangered Species Act by extirpating listed Bull Trout?

Roza and Proratable Entities' Purpose and Need

Roza and the Proratable Entities' purpose for the action is to access up to 200,000 acre-feet of water from Kachess Reservoir during drought years, as they need to improve water supply and reduce prorationing, whenever feasible, and improve flexibility to respond to the uncertainties of climate change. To participate in the Proposed Action, Roza and/or the Proratable Entities would need to seek all necessary authorizations. This document was prepared by Reclamation and Ecology, but Roza and/or other Proratable Entities may adopt this document for their own purposes.

At least this section of the Purpose and Need section is honest. Roza wants the water and they are willing to pay for it. This, however, takes this entire process in a very different direction as apparently this has pivoted from a "public project" led by Reclamation and Ecology to a Roza Irrigation District project hidden behind the veil of public agencies and the Integrated Plan. Reclamation and Ecology participating in a Project Action that is in effect a proposal from Roza to take 200,000 acre-feet of water from an Alpine Lake, draining the lake by 80 feet, causing untold hardships, ruining a major Federal camp ground, extirpating a Threatened species listed under the ESA, etc? How can this be justified?

- We understand why Roza wants this outcome but please explain how that result can possibly be in the public interest?

- It is obvious that the Purpose and Need section is internally contradictory. Ecology has one goal, Reclamation a different goal, and Roza a third. How can they be reconciled?

Legally, this proposal is dead on arrival as an analogous case decided by the 9th Circuit is on point here. In *National Parks & Conservation Association v. Bureau of Land Management, 606 F.3d 1058 (9th Cir. 2010)* Landowners and conservation group brought suit against the Bureau of Land Management (BLM) over a proposed public-private land swap adjacent to Joshua Tree National Park to allow a private company to build and operate a landfill. The court determined that the BLM's considerations leading to the land swap were deficient, disallowing the exchange. The case upheld the necessity of a transparent process. The court looked to whether the BLM considered reasonable alternatives to the accepted landfill project. An agency has some discretion in selecting alternatives. However, the alternatives considered cannot be unduly narrow. In this case, the court looked to whether the goals were those of the BLM or those of Kaiser (the landfill developer). The court determined that alternatives other than Kaiser's landfill should have been reasonably considered in the BLM's purpose and need statement; however, the statement was so narrowly written it excluded any option other than a landfill. The court affirmed the district court's decision, stating that the BLM put Kaiser's needs before the public's in the determination of purpose and need and failure to consider a reasonable range of alternatives.

This SDEIS is even worse than the situation with BLM above. In this situation there are three Purpose and Need sections for three different "project proponents" and there is only one way to meet all of their goals: Selecting the "Proposed Action" as the "Preferred Alternative".

As the 9th Circuit wrote this is a clear violation of NEPA:

The BLM's definition of the project's purpose will necessarily affect the range of alternatives considered, because when "the purpose is to accomplish one thing, it makes no sense to consider the alternative ways by which another thing might be achieved… Our holdings in Friends and Carmel–By–The–Sea forbid the BLM to define its objectives in unreasonably narrow terms. The BLM may not circumvent this proscription by adopting private interests to draft a narrow purpose and need statement that excludes alternatives that fail to meet specific private objectives, yet that was the result of the process here. The BLM adopted Kaiser's interests as its own to craft a purpose and need statement so narrowly drawn as to foreordain approval of the land exchange. (P. 1070)

Here Reclamation and Ecology have adopted Roza's interests in just the same way that the BLM adopted Kaiser's interest. This was deemed improper by the 9th Circuit and just like in the case above by crafting the purpose and need section so narrowly Reclamation and Ecology "forordain" the selection of the Floating Pumping Plant. This will also be deemed illegal.

Fatal Flaw #3 - The Proposed Action is The Only Alternative Other Than the No Action Alternative

Although the SDEIS claims to evaluate true alternatives it is evident that the only real alternative to no action is the new Floating Pumping Plant which not surprisingly is defined as the "Proposed Action". This Proposed Action is a new term that was not included in the DEIS.

Although, legally there is a potential distinction between the Proposed Action and what may be selected as the Preferred Alternative, this SDEIS seems to conflate the two terms and reveals that the agencies have already made up their mind that the Floating Pumping Plant is in fact the Preferred Alternative.

According to the SDEIS:

"The Proposed Action for this SDEIS is to fund, design, construct, operate, and maintain a floating pumping plant on Kachess Reservoir in order to recover up to 200,000 acre-feet of inactive water storage from Kachess Reservoir during drought years when prorationing is less than 70 percent supply. This water would otherwise remain in Kachess Reservoir at an elevation below the existing gravity outlet works. The Proposed Action would also include volitional fish passage at the downstream end of the Narrows which is located between the upper and lower Kachess reservoirs. Reclamation and Ecology each propose to fund, design, construct, operate, and maintain some or all of the Proposed Action or to authorize Roza to fund, design, construct, operate, and maintain some or all of the Proposed Action.

The Proposed Action implements the Kachess Inactive Storage project identified in the 2012 Integrated Plan FPEIS to provide additional water supply from the Kachess Reservoir during a State-declared drought. Since 2012, the KDRPP has undergone additional refinement and design.

In the DEIS, the KDRPP proposal focused on a shoreline pumping plant with deep tunnel intake. Since then, Roza identified an additional design for the KDRPP proposal. Based upon this, the agencies have decided to include a floating pumping plant as the Proposed Action, and to analyze the shoreline pumping plant design alternatives considered in the DEIS as alternatives. The alternatives considered also include KKC, which was identified in the Integrated Plan FPEIS as the Keechelus-to-Kachess Pipeline. Although the floating pumping plant is the Proposed Action, Reclamation and Ecology have not yet identified a Preferred Alternative. Reclamation would need to issue a ROD documenting the selected alternative and approving the construction of the pumping plant on Kachess Reservoir, over which the agency has jurisdiction. The agency would provide any necessary permits, agreements, or other approvals, review design, oversee construction, coordinate and manage water releases from Kachess Dam and deliveries to downstream users, and possibly enter into water, power, and transmission contracts.

Ecology may need to take actions implementing regulations, participating financially, and issuing permits as required for implementation of the selected alternatives. The changes described above require additional SEPA review in this SDEIS."(ES-viii)

This is an embarrassing attempt to finesse a superficial distinction. There is no reason that Reclamation and Ecology would have spent three years, vast amounts of money, and added a new Project Proponent (Roza) to study a Proposed Action (proposed by Roza) that they are not going to select as the Preferred Alternative. The Floating Pumping Plant is both the Proposed

Action and the illegally predetermined Preferred Alternative. This is flatly banned by both NEPA and SEPA.

More evidence of the pre-determination can be found in the Purpose and Need section discussed above. This section suddenly includes a new player and a new "Propose and Need for the Action" that was not in the 2015 DEIS and is apparently the basis for this new SDEIS. In this instance the SDEIS does not even attempt to distinguish between the Proposed Action and Preferred Alternative:

Reclamation and Ecology each propose to fund, design, construct, operate, and maintain some or all of the Proposed Action or to authorize Roza to fund, design, construct, operate, and maintain some or all of the Proposed Action. Reclamation expects that the ROD would determine which entity would carry out each of these functions. Reclamation, Ecology, and Roza are each referred to herein as a "project proponent" and, collectively, as "project proponents." ES – viii (Emphasis added)

This is a remarkable paragraph. One the one hand, the Bureau and Ecology claim that they have not selected a Preferred Alternative and on the other they say they each propose to "*fund, design, construct, operate, and maintain some or all of the Proposed Action or to authorize Roza to fund, design, construct, operate, and maintain some or all of the Proposed Action."* They continue by stating that the ROD will determine which entity would carry out each of these functions. Finally, they state that *Reclamation, Ecology, and Roza are each referred to herein as a "project proponent" and, collectively, as "project proponents.*" ES – viii (Emphasis added).

This is clearly predecisional and is a blatant NEPA and SEPA process violation.

Worse still, at a practical level how is it possible to generate and opinion on the project if we do not even know who would "fund, design, construct, operate, and maintain some or all of the Proposed Action"?

Knowing who is in charge of implementing the project is a threshold piece of information and even this is not clarified in the SDEIS. The sheer number of actors, combinations of actions and combinations of a potential funding mosaic make the number of potential results virtually infinite. The point of the SDEIS, and NEPA and SEPA in general, is to define what the environmental consequences from a project are. It is antithetical to the letter and spirit of NEPA and SEPA to provide a hypothetical scenario with a virtually infinite number of possibilities from which the public can only guess at.

Fatal Flaw #4 – Reclamation does not have Authorization from Congress to Implement or Fund The Project and Ecology Does Not Have Funding to Implement the Project

The SDEIS says the ROD will "determine which entity would carry out each function" but Reclamation does not currently have authorization from Congress to fund this project and by

definition has not developed an appropriations strategy? Either their potential commitment is illegal or it simply designed to confuse the public.

Similarly, how can Ecology commit to any of the functions without the funding necessary to carry them out. At best, Ecology would need to request and receive funding from the legislature and governor next year during the 2019 legislative session to receive the necessary funding. Does that mean the FEIS and ROD will not be finalized until Spring of 2019, after the legislative session, assuming Ecology gets funding from the Legislature?

The Bureau and Ecology are not known for making such bold and unauthorized statements. It seems, therefore, far more likely that the real story here is that Roza has agreed in non-public meetings to fund and operate the new floating pumping plant. If this is the case this entire SDEIS should be shelved and a new "private proponent" led Draft EIS should be prepared by Roza.

In effect the SDEIS is simply an entirely new DEIS, poorly disguised as a SDEIS in order to avoid compliance with statutory requirements and deny the public necessary information to evaluate the "new alternative" not previously contemplated. The SDEIS proposes an entirely new alternative not contemplated or researched in the DEIS. The public has no way of evaluating this alternative relative to the prior DEIS as Reclamation and Ecology have intentionally refused to publish or respond to prior comments that led to the issuance of the SDEIS.

The Major Conclusions Section

The major conclusions section of the Executive Summary validates this theory about what this proposal really is: a backdoor effort to build the Floating Pumping Plant. As the SDEIS states:

"Based upon the analysis of impacts to these resources in Chapter 4, major conclusions of the SDEIS are as follows:

- *Change in Water Supply: Action alternatives would improve water supply to proratable water users by up to 22 percentage points in the worst single-drought years, raising the proration percentage to about 53 percent of entitlement. This would be a substantial benefit to water supply because it would offer substantial progress toward the Integrated Plan's 70 percent proration goal.*

- *Change in Reservoir Levels: Under all the action alternatives, Reclamation would operate Keechelus Reservoir to help Kachess Reservoir refill following a drought. This action would result in slightly lower mean Keechelus Reservoir pool levels, with a maximum incremental reservoir drawdown of 18 feet in late summer (in 1996) compared to No Action. Under all action alternatives, Kachess Reservoir would be drawn down by as much as 80 feet below existing minimum pool conditions.*

  Listed Species:

- *Based on modeled water surface elevations, under Alternatives 2, 3 and 4, there would be an increase in days where Kachess Reservoir water surface elevation would drop below 2,200 feet (the evaluation at which Big and Little Kachess reservoirs separate and begin to affect fish passage, particularly for Bull Trout). These impacts to passage of bull trout would be mitigated by the Volitional Bull Trout Passage Improvements. Alternatives 5A, 5B, and 5C would result in an increase in days of flows in Keechelus Reach of the Yakima River that are suitable for Middle Columbia River steelhead outmigration. All alternatives would result in noise impacts to northern spotted owls, but are not expected to harm or injure northern spotted owls, or impact their habitat.*

- *Regional Economic Impacts and Benefits: The socioeconomic effects of the action alternatives arising from changes in water supply available for agriculture would be beneficial, resulting in a net gain in regional economic activity relative to No Action."*

So Roza gets the water and the supposed economic benefits and the environment, the community, and the public at large lose. It's that simple. It is also a terrible idea and illegal.

Fatal Flaw # 5 – The Alternatives Analysis is Far Too Limited to Comply with NEPA and SEPA

It gets worse. Under National Environmental Policy Act (NEPA) agencies considering "major Federal actions significantly affecting the quality of the human environment" must prepare and issue an Environmental Impact Statement (EIS). 42 U.S.C. § 4332(2)(C); *Nw. Envtl. Advocates v. NMFS,* 460 F.3d 1125, 1133 (9th Cir.2006). The EIS:

"shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. § 1502.1; *Nw. Envtl. Advocates,* 460 F.3d at 1134.

Thus, the EIS is more than a mere "disclosure document." 40 C.F.R. § 1502.1. Agencies must take a 'hard look' at the potential environmental consequences of the proposed action." *Klamath–Siskiyou Wildlands Ctr. v. BLM,* 387 F.3d 989, 993 (9th Cir.2004) (citing *Churchill County v. Norton,* 276 F.3d 1060, 1072 (9th Cir.2001)). By focusing on the environmental effects of the proposed agency action, "NEPA ensures that the agency will not act on incomplete information, only to regret its decision after it is too late to correct." *Marsh,* 490 U.S. at 371, 109 S.Ct. 1851 (1989). Reclamation and Ecology fail to meet this burden in this DEIS.[2]

In the first landmark NEPA case, *Calvert Cliffs' Coordinating Committee, Inc. v. Atomic Energy Commission*, the U.S. Court of Appeals for the D.C. Circuit highlighted the importance of these requirements and noted that they seek:

[2] Washington State's Environmental Protection Act (SEPA) mirrors NEPA and places the same burden upon Washington State agency actions.

[*T]o ensure that each agency decision maker has before him and takes into proper account all possible approaches to a particular project (including total abandonment of the project) which would alter the environmental impact and the cost benefit analysis. Only in that fashion is it likely that the most intelligent, optimally beneficial decision will ultimately be made.* 449 F.2d 1109 (D.C Cir 1971).

The SDEIS purports to evaluate:

Alternative 1 - No Action Alternative

Alternative 2 – KDRPP East Shore Pumping Plant;

Alternative 3 – KDRPP South Pumping Plant;

Alternative 4 - (Proposed Action) – KDRPP Floating Pumping Plant;

Alternative 5A – KDRPP East Shore Pumping Plant with KKC North Tunnel Alignment;

Alternative 5B – KDRPP South Pumping Plant with KKC North Tunnel Alignment;

Alternative 5C – KDRPP Floating Pumping Plant with KKC North Tunnel Alignment.

In reality it only really evaluates the Proposed Action and No Action. In doing so it doesn't even attempt to meet the legal requirements for an alternatives analysis.

NEPA section 102(2)(C) requires an EIS to discuss "alternatives to the proposed action."-The CEQ, in its implementing regulations, emphasizes alternatives as the "heart" of the EIS.- CEQ's regulations provide detailed directions on the contents of the alternatives discussion in an EIS. Specifically, agencies shall:

(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.

(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

(d) Include the alternative of no action.

(e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.

(f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

Another important principle outlined in the CEQ regulations is that all reasonable alternatives must be discussed.- This comports with NEPA's central purpose of fostering informed decision-making. Thus, it is not surprising that many NEPA challenges revolve around whether the agency considered a reasonable range of alternatives, with courts holding that the existence of reasonable but unexamined alternatives renders an EIS inadequate.

Courts also look to the goals, needs, and purposes defined for the project in determining whether the alternatives discussion is reasonable. While giving deference to the agencies, courts are wary when agencies narrowly define the purpose or scope of an action. For example, when considering the scope of reasonable alternatives in an EIS, the Seventh Circuit stated that "[o]ne obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing 'reasonable alternatives' out of consideration (and even out of existence)."

Courts also look to the complexity of the action in considering whether the amount of detail in the alternatives section is sufficient.- Agencies are directed to "present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." "The touchstone for [a court's] inquiry is whether an EIS's selection and discussion of alternatives fosters informed decision-making and informed public participation."-This SDEIS conclusively fails to meet this standard

SEPA has similar requirements to evaluate alternatives WAC 197-11-442(2) requires Ecology to:

Discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3). Alternatives including the proposed action should be analyzed at roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative). [underline added]

The Washington Supreme Court has found that "The environmental significance of the nonproject action creates the obligation to examine alternatives to the nonproject action. . . SEPA requires an examination of reasonable alternatives to the nonproject action." *Citizens Alliance to Protect Our Wetlands v. City of Auburn,* 126 Wn.2d 356, 366 (1995). In *Blair et. al. v. City of Monroe,* CPSMHB 14-3-0006c, Final Decision and Order (Sept. 19, 2014), the Central

Puget Sound Regional Growth Management Hearings Board considered the scope of review under WAC 197-11-442(4). There the Board found that the City of Monroe had failed to adequately comply with SEPA review requirements (SEPA is to function "as an environmental full disclosure law," *Blair* at 22. "[t]he range of alternatives considered in an EIS must be sufficient to permit a reasoned choice." *SWAP v. Okanogan County,* 66 Wn. App. 439, 444 (1992).

Thus, both NEPA and the Washington State Environmental Policy Act (SEPA) require consideration of all reasonable alternatives. Under both laws an EIS must include a detailed statement and analysis of all "reasonable alternatives" to the proposed action. This SDEIS fails this test.

Finally, it should be noted that the severely restricted alternatives analysis in both the 2015 DEIS and the 2018 SDEIS stem from the fact that the proposed projects are part of a broader political compromise solution known as the Yakima Basin Integrated Plan (YBIP) developed by the YRBWEP Workgroup (Workgroup). Because of this, it is not surprising that the Reclamation and Ecology did not want to consider other ways to achieve the desired fish enhancements and increases in water storage and flows – those options were not part of the mandate of the YBIP.

Whatever one thinks of the YBIP it is clear that it includes the KKC and KDRPP and does not include other alternatives that could meet the same underlying objectives but were not agreed upon by the Workgroup in the YBIP. Reclamation and Ecology's inclusion of other public officials and stakeholders interested in and affected by Yakima Basin water shortage problems is perhaps laudable. It does not, however, relieve either agency from complying with the statutory requirements of state and federal law.

They SDEIS takes this predetermination even further by inviting a new proposal by Roza (the floating pumping plant) and names it the "Proposed Action" and includes Roza as a "Project Proponent". This means that in effect there are only two alternatives the floating pumping plant or no action.

Key Questions for Reclamation and Ecology

Why were more alternatives not considered?

Are the alternatives considered actually real alternatives or are Alternative 4 and the no action alternative really the only alternatives?

Why wasn't water conservation explicitly considered as an alternative?

Why was Kecheelus not evaluated for a drought relief pumping plant with a canal or pipeline diversion directly from Kecheelus to Easton? This alternative would accomplish the same objectives in a significantly less environmentally harmful and dramatically less costly manner.

Why were alternative storage locations not considered?

Fatal Flaw #6 - All of the Alternatives Except the No Action Alternative Violate the Endangered Species Act

All alternatives except, no action, violate the Endangered Species Act (ESA). As the Supreme Court articulated in the landmark ESA case TVA v. Hill:

It may seem curious to some that the survival of a relatively small number of three-inch fish among all the countless millions of species extant would require the permanent halting of a virtually completed dam for which Congress has expended more than $100 million. . . . We conclude, however, that ***the explicit provisions of the Endangered Species Act require precisely that result****." "One would be hard pressed to find a statutory provision whose terms were any plainer than those in § 7 of the Endangered Species Act. . . .* ***The language admits of no exceptions****. TVA v. Hill*

The DEIS admits in multiple locations that the draining of Lake Kachess will lead to the killing of listed Bull Trout. Killing of listed Bull Trout is illegal without an incidental take permit (ITP) which requires a Habitat Conservation Plan (HCP). There has been no discussion of a HCP or ITP in this setting.

As the SDEIS states:

Based on modeled water surface elevations, under Alternatives 2, 3 and 4, there would be an increase in days where Kachess Reservoir water surface elevation would drop below 2,200 feet (the evaluation at which Big and Little Kachess reservoirs separate and begin to affect fish passage, particularly for Bull Trout). These impacts to passage of bull trout would be mitigated by the Volitional Bull Trout Passage Improvements. Alternatives 5A, 5B, and 5C would result in an increase in days of flows in Keechelus Reach of the Yakima River that are suitable for Middle Columbia River steelhead outmigration. All alternatives would result in noise impacts to northern spotted owls, but are not expected to harm or injure northern spotted owls, or impact their habitat.

This means that the Bull Trout cannot migrate to their spawning grounds which is obviously "take" under the ESA and jeopardizes the species continued existence.

The plan attempts to mitigate for this damage to Bull Trout by proposing an untested and speculative Volitional Fish Passage Project. The Bull Trout Volitional Passage project is described on Page 2-67, Table 2.9. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed, this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage.

In some years (e.g., conditions such as occurred between 2001 – 2008) the pump…and therefore the channel…will be in continuous operation. Eight years of steep slope conditions, requiring 8 years of Bull Trout dependence on the volitional passage, represents 2-3 spawning cycles. ***In other words, the entire population of Lake Kachess Bull Trout will be destroyed if the volitional passage is not effective.*** No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population.

Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo and geo receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

To make matters worse, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS."

What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the Proposed Alternative and all the action alternatives?

This is simply not how the ESA works. Here we have a known major impact on listed species and an unproven, speculative, and at best limited technological proposal minimize some unknown percentage of the negative impact.

The No Action Alternative is the only legal alternative and should be selected.

Fatal Flaw # 7 Failure to Consult under The Endangered Species Act

In addition to the massive substantive impacts that will undeniably impact Bull Trout and Spotted Owls, Reclamation has inexplicably disregarded the Federal Agency process mandated under the ESA. Section 7 of the ESA requires federal agencies to consult with either the United States Fish and Wildlife Service or National Marine Fisheries Service to ensure that any action authorized or carried out by the agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of critical habitat of the species. ESA § 7, 16 U.S.C. § 1536. This process requires the Services to prepare a biological opinion that includes a finding as to whether the proposed action is likely to jeopardize the continued existence of an endangered or threatened species or its habitat. 50 C.F.R. § 402.14.

Although the current SDEIS acknowledges repeatedly that there will be substantial negative impacts to ESA listed species including Bull Trout and the Northern Spotted Owl (among others) and the habitat of these species, it fails to quantify those impacts adequately. This failure stems from the fact that the Reclamation has not initiated a Section 7 Consultation under the ESA. The SDEIS does state that such a Consultation will occur in the future but the lack of a concrete understanding of the impacts on listed species makes the selection of a preferred alternative arbitrary and capricious. It is exactly of this reason that both the NEPA and ESA regulations encourage simultaneous NEPA review and ESA Section 7 consultations.

In fact, Reclamation's own NEPA regulations state:

NEPA activities should be coordinated with other environmental requirements so that their requirements are, when possible, met *concurrently rather than consecutively*. This specifically includes FWCA, CWA, NHPA, ESA, and other environmental review laws and Executive orders. P 3-10, 3-11. (emphasis added).

The NEPA Guidelines state further:

To the fullest extent possible, agencies shall prepare draft environmental impact statements *concurrently with and integrated with environmental impact analyses* and related surveys and studies required by...the Endangered Species Act...." 40 C.F.R. § 1502.25. (emphasis added).

The "studies" required by section 7 are those needed for consultation on any federal action that may affect ESA-listed species. 16 U.S.C. § 1536(b), (c).

ESA section 7(c) states that the action agency's biological assessment, a precursor to a biological opinion, "may be undertaken as part of a Federal agency's compliance with the requirements of Section 102 of the [NEPA]." 16 U.S.C § 1536(c)(1). Again, what is plainly intended is that the action agency's consultation duties regarding its proposed action may be coordinated with its NEPA review of that action. Similarly, FWS's regulations regarding section 7 state: "consultation ...procedures under section 7 may be consolidated with interagency cooperation procedures required by other statutes, such as [NEPA]." 50 C.F.R. § 402.06.

Again, Reclamation's own NEPA regulations state:

Special attention should be given to the integration of NEPA and the ESA. Section 7(a)(2) of the ESA requires consultation with the Service and/or NOAA-NMFS for any Reclamation action which may affect a species federally listed as threatened or endangered (listed species). This consultation process may result in the Service and/or NOAA-NMFS issuing a biological opinion containing actions to be undertaken to avoid jeopardizing a species or to reduce the level of take associated with the proposed action. Reclamation shall, to the fullest extent possible, integrate ESA and NEPA analyses and schedules." (Bureau of Reclamation's NEPA Handbook Section 3.15.1) (emphasis added).

The failure to consult is especially troubling because this is the second time that Reclamation has failed to conduct an ESA consultation. The first time came in the Programmatic EIS for the entire YRBIP process. In that document Reclamation stated:

Reclamation has concluded that consultation under Section 7 of the Endangered Species Act is not required at this time because preparation of the PEIS and selection of a preferred alternative would have no effect on listed species in the action area. Reclamation has discussed this conclusion with both the Service and NMFS, and neither agency found any fault with Reclamation's reasoning which led to the no effect determination. See Appendix G for a summary of the correspondence. Consultation would be conducted for individual projects that may affect listed species or critical habitat and that Reclamation would fund, authorize, and/or carry out under the Integrated Plan in the future." PEIS 6.2.2.

Reclamation's failure to consult with USFWS and NOAA is inexcusable and has led to an incomplete evaluation of the true impacts on endangered species and potential mitigation for these impacts.

Key Questions for Reclamation and Ecology

Why wasn't a Section 7 consultation completed before the DEIS was published?

Why wasn't a Section 7 Consultation completed before the SDEIS was published?

How does Reclamation believe it meets its own NEPA regulations or the CEQ regulations regarding threatened and endangered species?

How can the NEPA decision maker or the public fully understand the impacts on listed species without input from the ESA expert agencies USFWS and NOAA?

Given that Reclamation and the USFWS are both part of the Department of Interior how can the lack of a Section 7 consultation be justified?

How can Reclamation contend that there is "no effect on listed species" in the PEIS and then acknowledge there will be significant effects upon listed species and habitat in the SDEIS.

Fatal Flaw # 7 – The DEIS repeatedly relies on vague and hypothetical mitigation measures

One essential ingredient of an EIS is to identify adverse environmental impacts and then discuss the steps that will be taken to mitigate unavoidable adverse environmental consequences. The projects evaluated in the DEIS have numerous environmental consequences that will require extensive mitigation. The requirement that an EIS contain a detailed discussion of possible

mitigation measures flows both from the language of the NEPA and, more expressly, from CEQ's implementing regulations for NEPA.

Implicit in NEPA's demand that an agency prepare a detailed statement on "any adverse environmental effects which cannot be avoided should the proposal be implemented," 42 U.S.C. § 4332(C)(ii), is an understanding that the EIS will discuss the extent to which adverse effects can be avoided and mitigated for. See D. Mandelker, NEPA Law and Litigation § 10:38 (1984).

The Supreme Court considered the duty to mitigate under NEPA in *Robertson v. Methow Valley Citizens Council* (109 S.Ct. 1835). In that case the plaintiffs challenged a Forest Service permit for a ski resort in a national forest. The Court held that the requirement that an agency discuss mitigation measures is implicit in "NEPA's demand" and CEQ regulations. The omission of a "reasonably complete discussion" of mitigation measures would undermine NEPA's action-forcing functions. Without such a discussion, the Court added, neither the agency nor other interested groups or individuals, could properly evaluate the severity of the adverse effects of the action. That is exactly the problem with this SDEIS.

On January 14, 2011, the White House Council on Environmental Quality ("CEQ") finalized guidance entitled "Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact." The guidance is intended to make federal agencies more accountable for mitigation measures that they identify in conducting National Environmental Policy Act ("NEPA") reviews of proposed actions.

CEQ seeks better implementation of mitigation commitments by making them express, measurable, and viable. According to CEQ, NEPA and decision documents should "carefully specif[y]" any relied-upon mitigation "in terms of measurable performance standards or expected results, so as to establish clear performance expectations." CEQ also asks agencies to disclose and assess potential funding shortfalls upfront in the NEPA analysis and explore adaptive management or specific mitigation alternatives if the selected mitigation does not succeed.

The proposed mitigation in the SDEIS doesn't even come close to meeting this standard. The mitigation proposed in the current SDEIS is far too general and hypothetical, and even undermines the mitigation already being implemented by WSDOT under the Interstate 90 FEIS. Therefore, it fails to meet the NEPA/SEPA threshold to provide the decision maker or the public with a full understanding of the environmental consequences of any of the alternatives under consideration and to

As noted above one glaring example centers around Bull Trout, a threatened species in Lake Kachess. The plan calls for reducing the level of the lake by an additional 82.75 vertical feet. This draw down will prevent the fish from spawning in Box Canyon by creating an 82 ft high cliff impediment. Yet, there is no plan to mitigate this loss of habitat and reduction in population of the threatened species. The Gold Creek bull trout are distinct from Lake Kachess Bull Trout.

Over 5 miles, 2 dam structures, and Kecheelus Ridge separate the populations. Therefore, the Gold Creek bull trout mitigation plan cannot affect the Lake Kachess bull trout population.

Therefore, the proposed mitigation plan, which only affects Lake Kecheelus, cannot mitigate this loss. The DEIS alludes to vague considerations for mitigation of bull trout habitat destruction and population decline, but does not provide definitive or even viable proposals with cost estimates, which is particularly important in this case because the harmful effects are so dramatic and potentially impossible to mitigate such as 82' cliffs in spawning gateways.

In another example, the SDEIS accurately states the Kachess Lake aquifer will be depleted and private wells may be compromised or fail entirely (DEIS 1-19). The only accommodation will be for "…Reclamation to develop appropriate mitigation strategies" if water levels and wells are adversely impacted. This *we will figure it out later* approach which permeates much of the SDEIS is simply inadequate under NEPA and SEPA and supporting regualtions. The DEIS does not provide any indication of what mitigation efforts would be considered or appropriate. It is essential that these mitigation efforts be identified in advance, the likelihood of their need to be implemented also identified in advance, and that these estimates be quantitative, based upon scientific evidence.

Forest and Wetlands Will Be Impacted

The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, Reclamation has ignored and rejected these requests. This is a clear violation of the NEPA and SEPA process and renders the current SDEIS incomplete and unacceptable.

Private Wells Will Be Dewatered

The negative impact of lowering the water level of Lake Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of "monitor and mitigate." Well failures ("dewatering") will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time,

without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required in this SDEIS. We ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD.

Federal Campground Will Be Ruined

The impact on 23,000 annual visitors and 11,000 annual boaters at USFS Lake Kachess Campground will be devastating. Page 2-6 indicates the lake could be drawn down 80 feet "as early as June in severe drought years." [NOTE: The campground typically opens on Memorial Day Weekend…June 1.] In other words, the campground would not open, possibly for a number of years. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. We ask that the past users of USFS Lake Kachess Campground be pro-actively contacted and informed of the potential impact on Lake Kachess, and that they be provided an opportunity for public comment. It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS correct this failure.

The current SDEIS precludes public comment on specific mitigation measures and by extension does not allow the public or the NEPA/SEPA decision maker to truly understand the implications of the proposed action. That is a violation of SEPA and NEPA.
How can the SDEIS propose to "take" a Federal camp ground to begin with?

How can the USFS allow this without a thorough mitigation plan?

Why is the USFS a "cooperating agency" when the action will ruin their own campground.

Fatal Flaw # 8 – The Alternatives Violate Water Law Generally and the Yakima Allocation Specifically

Although the SDEIS acknowledges the proper law regarding rights to water in the Yakima basin it proposes to violate that law directly.

The following water entitlements in the Yakima River basin include senior water rights, proratable water rights, and junior water rights:

• Senior water rights (referred to as nonproratable) existed prior to the development of the Yakima Project, and are served in the order of their priority dates; they have precedence over proratable and junior rights.

• *Proratable water rights share the priority date that the United States obtained for the Yakima Project. Proratable entitlements share equal priority, as they have a common priority date, and their water deliveries are subject to proration (reduced proportionately) in years when the water supply is insufficient to meet demand based on the court doctrine of Total Water Supply Available (TWSA). TWSA is estimated by Reclamation annually based on forecasted runoff, forecasted return flows, and storage contents.*

• *Junior water rights were established after the Yakima Project, and have priority dates after May 10, 1905. When there is insufficient water, the first deliveries to be curtailed are those with junior water rights in the order of their priority dates.* (Section 1.2.1)

Many property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down.

How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? The answer: it is not possible as it is flatly illegal.

How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam?

Who will pay to provide senior water rights holders with the water they have a right to?

How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property?

How can the Bureau and Ecology allow a taking of private rights where:

1) the recipient of the taking is a private, not public entity,
2) no condemnation has occurred,
3) no compensation is contemplated
4) owners of the rights have been denied due process?

Conclusion

This project should not happen because it is a bad idea and has massive negative impacts on natural resources and the local community. This project will not happen because it is flatly illegal. As was noted earlier, the draining lake Kachess by 80 feet to supply water to proratable irrigators is a component if the Integrated Plan. The problem is that as part of the Integrated Plan it simply cannot survive the NEPA and SEPA requirements to evaluate a reasonable range of alternatives (not to mention the direct impact on ESA listed species). Essentially, Reclamation and Ecology are caught on the horns of a dilemma. If they do not implement the

Kachess Pumping Plant project they are not implementing the Integrated Plan and if they do attempt to implement the Kachess Pumping Plant project they are violating NEPA, SEPA, and the ESA and are not acting in the public interest.

As was noted earlier, it is important to distinguish between the Integrated Plan as a political compromise document, and the Supplemental Draft Environmental Impact Statement as an environmental compliance and disclosure document. The Integrated Plan was determined as a politically appropriate synthesis of programs, taking into account the political positions of the state and federal agencies, counties and tribal representatives in the planning process organized by Ecology and Reclamation. There is no legal requirement that all viable alternatives be considered in a political planning process. There is, however, a legal requirement that all viable alternatives be considered in an environmental compliance and disclosure document required by the National Environmental Policy Act and Washington State's Environmental Policy Act.

The advice provided to Reclamation and Ecology by the YRBWEP Workgroup does not supplant the requirement that Reclamation and Ecology themselves consider environmental alternatives when making decisions about major actions significantly affecting the quality of the environment. Reclamation and Ecology may not delegate that decision-making authority to others, or accept a workgroup recommendation without comparing that recommendation against other alternative courses of action. That delegation, however, is exactly what Reclamation and Ecology did in the 2015 DEIS and have done again in this 2018 SDEIS. This level of "predetermination" and failure to independently evaluate reasonable alternatives to the Kachess Pumping Plant Project contained in the Integrated Plan leads to a "black letter law" violation of NEPA and SEPA is fatal to both 2015 DEIS and the 2018 SDEIS.

Ultimately the Kachess Pumping Plant project is doomed because there is no way for it to comply with the most basic provisions of Federal and State environmental laws.

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[EXTERNAL] Questions regarding Lake Kachess Pumping Plan ESI

1 message

alN <flyfreebird@comcast.net>
To: kkbt@usbr.gov

Fri, Jul 13, 2018 at 6:15 PM

Questions or comments on the SDEIS will be accepted until July 11, 2018. Comments may be submitted to kkbt@usbr.gov , by mail to the Bureau of Reclamation, Attn: Ms. Candace McKinley, Environmental Program Manager, 1917 Marsh Road, Yakima, WA, 98901; by telephone at (509) 575-5848, ext. 603; or by facsimile to (509) 454-5650.

Questions regarding Lake Kachess Pumping Plan ESI

1. Did Lake Kachess have a Salmon run prior to building the Dam? 1

2. How many years will be until lake Kachess gets salmon passage? 2

3. Why are salmon passage plans not addressed in the pumping plan? 3

4. Have the courts ruled that fish passage should be restored to Lake Cle Elum, Lake Kachess , Lake Cle Elum, Lake Keechelus? 4

5. How many times is the word" Salmon" used in The Kachess Pumping Plant EIS document. It appears to have been deleted. (out of sight out of mind) 5

6. It appears that "salmon and chinook" has been carefully deleted. Is this true? I do see the word Bull Trout several times in the Document. 6

7. Why is there not information about the effect of the Kachess pumping Plant would have on a future fish passage over or around Lake Kachess Dam? Lower lake levels might not work with a fish ladder. This question concerns salmon or chinook, not bull trout. 7

8. Did the Yakima Nation cut a deal to get a fish ladder at Lake Cle Elum and abandon plans for a fish ladder at Lake Kachess? 8

9. How many times in the last 10 years has Kittitas County declared a drought? 9

10. In declared drought years, what was the percentage of water allocations for each drought year? (example, 2004 did they get 65% of their allocated water?)

11. During a declared drought assuming for example irrigators only were getting 65% of their allocation, the proposed pump would only pump 5% more water. Limiting the allocations to 70%? 10

12. What would the yearly cost be for that 5% water that is pumped, include also the cost for the operating the pump. 11

13. 5% of the irrigators water allocation is how many acre feet of water. 12

14. Since the Pumping Plant would only operate in a drought year, could it pump more then 70% of the water allocations? 13

15. Would it be cheaper to build a new reservoir somewhere else, where there are not historic fish runs? 14

16. ATV's and trucks and jeeps drive all over the south end of the Lake when the water level is low. But they are not stopped. If the lake is lowered, the problem will be worse. The south end of the lake will turn into a dust pit and when it rains a mud pit for 4x4 vehicles. Nesting areas for birds will be destroyed. 15

17. Will the forest service install a sign limiting camping to 14 days. 16

18. Several camp sites exist where campers stay for months and leave garbage and crap all over the place, nothing is done to stop this. What will the forest service to prevent this? 17

19. A unimproved boat launch is at the southeast end of the lake, but the forest service will not work with land owners to share the cost of maintaining FS Road 4818. The land owners maintain it at their own expense. 18

20. Is Washington State spending millions of Tax Payers money researching this pumping plan that is doomed to failure. Over costly and Unpractical. 19

21. What is the cost to build a new reservoir? At a location where it would not have so much a effect on a recreational lake and it's community and the environment? 20

22. When will Lake Kachess get salmon passage? 21

23. When will Lake Keechelus get Salmon passage? 22

Alan Kirlin

Seattle WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] LAKE Kachess

1 message

Linnet Botkin <Linnet98@hotmail.com> Mon, Jul 16, 2018 at 10:59 AM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

You have tried a fast one, Lake Kachess is a LAKE not a reservoir leave the lake alone.

1

Sent from Mail for Windows 10

Linnet Botkin

Ellensburg, WA

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Fwd: SDEIS Comments

1 message

Mark B <burkepostoffice@gmail.com> Thu, Jul 19, 2018 at 6:37 AM
To: Uca K2KConvey Bor <sha-uca-k2kconvey@usbr.gov>

Dear K2KConvey, BOR UCA,

I would like to ask if your below email (specifically listing all individual email addresses & names) is a violation of the Department of the Interior's Privacy Policy as well as the mandate of the Privacy Act of 1974, which requires that such records be safeguarded in accordance with Privacy Act procedures, and explain why or why not. 1

If so, this breach should be publicly disclosed and parties who were contacted in this manner should be contacted and told of the error and informed of the measures being taken to prevent this from occurring again.

Kind regards,
Mark

Begin forwarded message:

From: "K2KConvey, BOR UCA" <sha-uca-k2kconvey@usbr.gov>
Subject: SDEIS Comments
Date: July 13, 2018 at 9:57:47 AM PDT
To: <dicklanden@aol.com>, <733lee@fairpoint.net>, <dougda1959@hotmail.com>, <Lindap@fvbmt.com>, <kachess99@gmail.com>, <paigecryan@gmail.com>, <jpowens99@yahoo.com>, <mnesiakdotcom@gmail.com>, <Roba@harsch.com>, <wendejc@comcast.net>, <eamodery@earthlink.net>, <gernor@comcast.net>, <djdiener@comcast.ne>, <rcernick@gmail.com>, <jimbarbelder@gmail.com>, <rrosen326@gmail.com>, Austin Burke <austinmarkburke@gmail.com>, <tpappas@tarragon.com>, <tbocek@comcast.net>, <DMcIntyre@tarragon.com>, <shenoh@icloud.com>, <JSTARCEVICH@malcolmdrilling.com>, <andy.dulin.b7wc@statefarm.com>, <chris.black@wellsfargoadvisors.com>, <rdietrich@hnw.law>, <kathykearny@comcast.net>, <camfitzpatrick@gmail.com>, <aarondressler@gmail.com>, <groverwfv@comcast.net>, <gkengberg@msn.com>, <smbocek@gmail.com>, <kcemail@prodigy.net>, <keimar@comcast.net>, <doug@smith.net>, Jerry Watts <jerrygwatts@gmail.com>, <pkim481@gmail.com>, <mob201@gmail.com>, <brandyjahn@gmail.com>, <alysesnelson@gmail.com>, <Patty@jordanfour.com>, <angie.armstrong.jt7w@statefarm.com>, <worcester.karen@gmail.com>, Mark B <burkepostoffice@gmail.com>, <Wenstrup.John@bcg.com>, <David.Brown@yakimawa.gov>, <cjguilfoyle@gmail.com>, <whitapple1@yahoo.com>, Jerry Williams <jaw.home@hotmail.com>

Thank you for your comments and questions on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Supplemental Environmental Impact Statement (SDEIS).

Your comments and questions have been recorded for consideration and attention. We will be collecting comments throughout the 90-day comment period (April 13 through July 11, 2018). After July 11, all comments and questions will be categorized, considered, and responded to in the Final Environmental Impact Statement.

Many of your questions and concerns may already be addressed in the SDEIS. You can access this document at
https://www .usbr .gov/pn/programs/eis/kkc/kprojectsdeis2018.pdf

We appreciate your participation in the comment period. We have recorded your email address, and you will be notified when the Final Environmental Impact Statement is released.

Thank you

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Re: SDEIS Comments Received by July 1 1

1 message

Mark B <burkepostoffice@gmail.com> Sun, Jul 15, 2018 at 6:35 AM
To: "K2KConvey, BOR UCA" <sha-uca-k2kconvey@usbr.gov>

Dear K2KConvey,

Unfortunately None of our questions have been answered by the SDEIS. We look forward to your answers.
Kind regards,
Mark Burke

1

On Jul 14, 2018, at 2:04 PM, K2KConvey, BOR UCA <sha-uca-k2kconvey@usbr.gov> wrote:

> Thank you for your comments and questions on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Supplemental Environmental Impact Statement (SDEIS).
>
> Your comments and questions have been recorded for consideration and attention. We will be collecting comments throughout the 90-day comment period (April 13 through July 11, 2018). After July 11, all comments and questions will be categorized, considered, and responded to in the Final Environmental Impact Statement.
>
> Many of your questions and concerns may have already be addressed in the SDEIS. You can access this document at
> https://www .usbr .gov/pn/programs/eis/kkc/kprojectsdeis2018.pdf
>
> We appreciate your participation in the comment period. We have recorded your email address, and you will be notified when the Final Environmental Impact Statement is released.
>
> Thank you

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Draining Lake Kachess

1 message

william chan <mychevy85@yahoo.com> Thu, Jul 19, 2018 at 1:28 PM
To: kkbt@usbr.gov

Love camping at Lake Kachess and draining it will destroy the setting and landscape for fishing and hiking 1

Sent from my iPad

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Lyndsey Jarvis <lyndsjarvis@gmail.com> Fri, Jul 27, 2018 at 12:27 PM
To: kkbt@usbr.gov

I'm writing to oppose the project at Lake Kachess. Thank you 1

Sincerely,
Lyndsey Jarvis

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Comments on the Kachess Drought Relief Pumping Plant

1 message

Ann Marchand <marchand.ann@gmail.com> Thu, Jul 12, 2018 at 10:43 AM
To: Kkbt@usbr.gov

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation
Columbia- Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

The following are comments on the draft supplemental EIS on the Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance. Please include these comments with responses in any final EIS. 1

Section 3.21 is a very short section on Socioeconomics. However, there is no information on how Yakima farm workers would benefit from the projects described in the SDEIS? How many documented non-U.S. citizens worked on harvesting crops in each Yakima irrigation district from 2015 through 2017? How many un-documented non-U.S. citizens worked on harvesting crops in each Yakima irrigation district from 2015 through 2017? 2

How much does a documented non-U.S. citizen farm worker make per hour for each type of harvested crop? How much does an un-documented non-U.S. citizen farm worker maker per hour for each type of harvested crop? 3

How much hourly wage increase would a documented non-U.S. citizen farm work receive for each type of harvested crop with the proposed floating pumping plant? How much hourly wage increase would an un-documented non-U.S. citizen farm worker received for each type of harvested crop with the proposed floating pumping plant? 4

What percentage of additional income from the proposed floating pumping plant would go to Yakima irrigation farmers vs. Yakima farm workers? 5

In addition to the concerns outlined above, due to the adverse environmental impacts from the proposed projects the no-action alternative should be selected. 6

Thank you.

Ann Marchand
7043 22nd Avenue Northwest
Seattle, WA 98117

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Lake Kachess

1 message

Anna McDermott <hrsnround@yahoo.com> Tue, Jul 17, 2018 at 9:32 AM
Reply-To: "hrsnround@yahoo.com" <hrsnround@yahoo.com>
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Can you please explain to me how increasing the "bucket" will help when the KRD can't even deliver the water that is available today? This is the second year we have been on a restriction due to them being unable to deliver our full allotment. 1

Sent from Yahoo Mail on Android

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Save Lake Kachess

1 message

Carolyn <wolfster1@hotmail.com> Fri, Aug 3, 2018 at 10:48 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

I hope it's not too late! Please save Lake Kachess from being drained and causing unintended consequences of further destroying the salmon and ruining the ecosystem. Our federal and state parks are under attack. Once changed, we will never get back the beauty and enjoyment we experience now. Humanity can't only be about money. We need beauty, green space, connection to our forests and other plants and animals. 1

Please don't drain Kachess Lake!
Carolyn Stalter
(206) 782-8008
98107

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] W ater conservation/Lake Kachess

1 message

Alexis W enstrup <alexis.wenstrup@gmail.com> Thu, Jul 12, 2018 at 7:23 AM
To: bocc@co.kittitas.wa.us, kkbt@usbr.gov, srevell@roza.org

To whom it may concern,

Water is a huge issue in the arid West. I do believe that water conservation is the most logical and inexpensive way to provide water for agricultural needs. I lived in Northern California in an area with a climate and farming issues similar to Yakima; except no hope of governmental assistance for water. The farmers have concrete irrigation ditches that get inspected regularly by the local water district and not only do they have smart water and crop use related to the weather patterns, they also create storage ponds on their land. Why on earth are you not forcing farmers and landowners to practice water conservation???? Please think about it. You cannot be serious about needing and using lots of water in a desert when you don't practice water conservation. 1

Below are some tips provided by the Center for Urban Education about Sustainable Agriculture - easy place to start! I am not sure if you are aware that people work with nature to deal with difficult growing situations. Please don't waste money on a very very expensive pump station and pipe that would hurt the environment surrounding Lake Kachess and attend your focus to smarter solutions to embolden the farmers in the Roza Irrigation District. 2

Alexis Wenstrup Carnation, WA

1. Drip Irrigation

Drip irrigation systems deliver water directly to a plant's roots, reducing the evaporation that happens with spray watering systems. Timers can be used to schedule watering for the cooler parts of the day, further reducing water loss. Properly installed drip irrigation can save up to 80 percent more water than conventional irrigation, and can even contribute to increased crop yields. 3

2. Capturing and Storing Water

Many farms rely on municipal water or wells (groundwater), while some have built their own ponds to capture and store rainfall for use throughout the year. Properly managed ponds can also create habitat for local wildlife. Marin Roots Farm relies on two ponds

for all of their water needs, helping to minimize their impact on the surrounding watershed.

3. Irrigation Scheduling

Smart water management is not just about how water is delivered but also when, how often, and how much. To avoid under- or overwatering their crops, farmers carefully monitor the weather forecast, as well as soil and plant moisture, and adapt their irrigation schedule to the current conditions. Tory Farms, which uses flood irrigation in their orchards, waters at night to slow down evaporation, allowing water to seep down into the soil and replenish the water table.

4. Drought-Tolerant Crops

Growing crops that are appropriate to the region's climate is another way that farmers are getting more crop per drop. Crop species that are native to arid regions are naturally drought-tolerant, while other crop varieties have been selected over time for their low water needs. Olives, Armenian cucumbers, tepary beans, and orach are a few of the more drought-tolerant crops you can find in the Ferry Plaza Farmers Market.

5. Dry Farming

California dry farmers don't irrigate, relying on soil moisture to produce their crops during the dry season. Special tilling practices and careful attention to microclimates are essential. Dry farming tends to enhance flavors, but produces lower yields than irrigated crops. Dirty Girl Produce is known for their dry-farmed Early Girl tomatoes. Wine grapes, olives, potatoes, and apple trees can also be successfully dry farmed in California.

6. Rotational Grazing

Rotational grazing is a process in which livestock are moved between fields to help promote pasture regrowth. Good grazing management increases the fields' water absorption and decreases water runoff, making pastures more drought-resistant. Increased soil organic matter and better forage cover are also water-saving benefits of rotational grazing.

7. Compost and Mulch

Compost, or decomposed organic matter used as fertilizer, has been found to improve soil structure, increasing its water-holding capacity. Mulch is a material spread on top of the soil to conserve moisture. Mulch made from organic materials such as straw or wood chips will break down into compost, further increasing the soil's ability to retain water. Farmers may also use black plastic mulch as a soil cover to suppress weeds and reduce evaporation.

8. Cover Crops

Planted to protect soil that would otherwise go bare, cover crops reduce weeds, increase soil fertility and organic matter, and help prevent erosion and compaction. This allows water to more easily penetrate the soil and improves its water-holding capacity. A 2012 survey of 750 farmers conducted by North Central Sustainable Agriculture Research and Education found that fields planted with cover crops were 11 to 14 percent more productive than conventional fields during years of drought. Al Courchesne swears by his use of cover crops for building healthy soil.

9. Conservation Tillage

The Dust Bowl of the 1930s was created by a perfect storm of deep plowing and loss of perennial grasses followed by extreme drought and wind erosion. Conservation tillage uses specialized plows or other implements that partially till the soil but leave at least 30 percent of vegetative crop residue on the surface. Like the use of cover crops, such practices help increase water absorption and reduce evaporation, erosion, and compaction. Date grower Flying Disc Ranch makes the most of their water use in the Coachella desert by using a mix of mulch, compost, and cover crop with no tillage.

10. Going Organic

In a 30-year farm systems trial, the Rodale Institute found that corn grown in organic fields had 30 percent greater yields than conventional fields in years of drought. In addition to keeping many of the more toxic pesticides out of our waterways, organic methods help retain soil moisture. Healthy soil that is rich in organic matter and microbial life serves as a sponge that delivers moisture to plants. The trial also found that organic fields can recharge groundwater supplies up to 20 percent.

3

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Attn:n Ms. Candace McKinley ~Attached PDF Comments Re: Kachess and Keeechelus DEIS

1 message

Kolea Snow <koleasnow@hotmail.com> Wed, Jul 11, 2018 at 4:16 PM
To: "kkbt@usbr.gov" <kkbt@usbr.gov>

Dear Ms. McKinley:

1 Please find attached my specific comments regarding Kachess and Keechelus DEIS that was released on April 13, 2018. Thank you for your time.

Sincerely,

Kolea Snow
3500 Via Kachess Road
Easton, WA 98925

SDEIS comment letter (Kolea Snow) FINAL.pdf
105K

Submitted via email to ***kkbt@usbr.gov***

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

2 I am submitting both comments specific to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018. All comments are submitted under both NEPA and SEPA.

Comments

3 **Alternative 1 No Action** -- I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable.

4 **Impact to private property** -- Comments provided by myself and others to the prior DEIS expressed serious concerns regarding the likely impact of the proposed project on our property values. I was very disappointed to see that those concerns were not substantively addressed in the updated SDEIS, which expressly states its intent to respond to these concerns. The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected. "Several" seems to be a purposeful misrepresentation to understate the extent of the number of properties that would be impacted and is indeed misleading to any reader of this study when trying to evaluate the impact of the proposed project. Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This amounts to approximately 300 homesites – nobody would equate this to "several." The systematic bias in the presentation of the impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. I ask for an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam Road and eastern shoreline road, and private residences within 5.0 miles of the shoreline.

5 **Quantification of the impact to private property values** -- The SDEIS makes an unsupported reference to a study that showed a negative impact of 5-10% on private properties. However, the document does not include the study, and therefore does not allow a reader to understand the key assumptions, scope or methods. This is unacceptable and completely inconsistent with the

5 cont purpose of this analysis. To minimize the expected impact without support is again a clear bias in the preparation of this document.

6 Even this unsupported number appears to be a gross understatement of the expected impact on valuation. The homes and communities around Lake Kachess are not built there arbitrarily – they were built there because of the lake. This is reflected in higher current values, as noted in this SDEIS. While lake views (which will be severely impacted by this proposal) certainly impact home values, proximity to the lake (even for those properties without view) also significantly enhances home values as such proximity provides access to boating, fishing, hiking, picnicking, and other water-related activities – all of which will be significantly curtailed or eliminated for years after a draw down. All proposed pumping alternatives are expected to severely impact lake access for all uses, and therefore will have significant negative impact on the values of all properties in proximity to the lake – with or without a view. Additionally, the lake serves as a water source for firefighting, which results in lower insurance rates than would otherwise apply without such proximity. It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. I demand that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued.

7 Despite the unsupported reference in the SDEIS to the negative impact of property values, the document states that the impact on property values can't be determined. Not only is this contradictory, but the notion is absurd. An entire profession exists for the express purpose of making such estimates. Every county assessor in the country performs such exercises on a daily basis. The omission of a comprehensive, supported and reviewed analysis is a glaring omission of one of the most obvious impacts of the proposed project and requires rectification. Please execute such a study, performed under the accepted standards of the valuation profession, and provide in an updated SDEIS for comment and response prior to a Final EIS or ROD.

8 Finally, while acknowledging the negative impact of the proposed project on property values, the SDEIS includes no plan for mitigation of impact. What is the mitigation plan? Given that all of the additional water that is proposed to be pumped by the proposed project would come from the naturally occurring lake (Big Kachess) it is not reasonable that a property owner would have an expectation that they would bear the cost of such a proposal. I demand that you update your analysis to identify, in detail, the mitigation plan for the negative impact on property values including planned funding for such mitigation and provide in an updated SDEIS for comment and response prior to a Final EIS or ROD.

9 **Erosion** -- The SDEIS includes numerous references to the expectation of increased erosion as a result of the various pumping alternatives. However, the SDEIS includes no analysis of the specifics of such erosion, particularly private property within the created zone of instability

9 cont

expected after the proposed maximum drawdown. The study also does not evaluate the impact on erosion in proximity to streams, where newly exposed slope below the current minimum lake level would be subject to continuous undercutting and enhanced erosion - my home is in such an area. The newly exposed slope after a drawdown below the historic minimum would be highly vulnerable to erosion as the proximate material is lightly compacted – even more so with a stream running through it the newly exposed embankment. The current embankment is stable, but would seek a new stable slope in response to the proposed draw down. A comprehensive analysis could establish the likely area of impact and thus frame the scope of required mitigation. If mitigation is not undertaken prior to occurrence of the expected increased erosion, property will be damaged despite the advanced expectation of such damage occurring as a direct result of the pumping plan (as noted in this SDEIS). I demand that an updated SDEIS include a comprehensive strategy, its details, costs and operational features, be described in detail and citizens be provided with this information along with an appropriate comment period, prior to a Final DEIS or ROD.

10

Impact on private wells -- The SDEIS states that wells in proximity of Lake Kachess may be "dewatered" as a result of the various pumping alternatives and the resulting lowered lake levels. The included data from a small number of monitoring wells in proximity to Lake Kachess supports this expectation as the well levels clearly demonstrate correlation with the rise and fall with the lake level – including those wells where the water level is typically above the lake level. However, the SDEIS does not include any advance mitigation plan for this expected impact on residential wells. Prediction of a significant negative impact to wells as a direct result of the pumping alternatives while not addressing planned mitigation to prevent such impact is not consistent with the purpose of this SDEIS. The notion that residents would lose their residential water supply for an indefinite period of time with no mitigation plan in place is unconscionable. "Monitor and mitigate" is not acceptable for residents that will find their home without potable water.

A comprehensive strategy composed of proven techniques that can be implemented immediately upon need, is required prior to a Final DEIS and/or ROD. What is the mitigation plan? I demand that a comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD

11

Fire Suppression -- As has been noted in comments to the prior DEIS, the proposed pumping alternatives present significant negative impacts on both fire risk and fire suppression.

The SDEIS notes that the surrounding shoreline will be dewatered as a result of the proposed pumping alternatives. This significantly reduced lake level will result in this dewatering persisting for years, while the lake refills. This will subject the shoreline trees and vegetation to a reduced ground water condition never experienced in the history of the lake, and likely result in significant die-off. Such dead vegetation will ultimately present an increase in fire risk (as well as an increase in erosion as this slope stabilizing vegetation is eliminated). I demand that an updated SDEIS include a comprehensive strategy, its details, costs and operational features, be

11 cont described in detail and citizens be provided with this information along with an appropriate comment period, prior to a Final DEIS or ROD.

Additionally, the BoR has been made aware that the lake is the designated second source for firefighting within the Lake Kachess Village HOA. The proposed additional 80 foot reduction in lake level would render the lake inaccessible for firefighting purposes due to the topography of the shoreline as well as the muddy composition of the newly exposed shoreline (e.g. fire equipment could not get there). The SDEIS provides no mitigation for elimination of firefighting water, including the economic impact to homeowners due to resulting decrease in home values and increase in home insuranc - ates as a result. Increasing the risk to homeowners without mitigation is unacceptable and a glaring omission for the SDEIS. I demand that an updated SDEIS include a comprehensive strategy, its details, costs and operational features, be described in detail and citizens be provided with this information along with an appropriate comment period, prior to a Final DEIS or ROD. Such plan should address not only the mitigation of the fire suppression impact of the lake, but mitigation of any financial impact impacted residents would be expected to incur as a result of an implemented pumping plan.

12 **The Yakima Plan programmatic FEIS failed to provide a range of alternatives** —just the Yakima Basin Integrated Water Management Plan (YBIP) and No Action. How will this be rectified?

Because both the NEPA and SEPA process must be followed, we request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments.

13

Please send us/me a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

Kolea R. Snow
3500 Via Kachess Rd
Easton, WA 98925
(NO MAIL DELIVERY AT THIS ADDRESS)

MAILING ADDRESS
Kolea R. Snow
10625 NE 16th Street
Bellevue, WA 98004

May 16, 2018

Ms. Candace McKinney
Environmental Program Manager
Bureau of Reclamation

Lake Kachess Drought Relief DEIS,

After reviewing the Kachess Drought relief pumping plant and Keechelus Reservoir to Kachess Reservoir conveyance a number of questions still have to be answered before a record of decision can be made. 1

Annually the stored water in Lake Kachess Reservoir is part of the TWA for instream flow for fish and irrigation districts who receive their water from the Yakima River. Once the reservoir has been pumped below the normal gravity flow to the Yakima River and the reservoir doesn't refill, how much of the water pumped from below the normal gravity flow will be required to provide for the TWA? 2

Who will pay for the operation and maintenance of the Keechelus-to-Kachess conveyance? 3

Who will be responsible for the fish passage facility that will allow the bull trout movement from Big Kachess to Little Kachess and back when the lake does not refill? 4

Who will be responsible for the maintenance of the floating pump in the Lake Kachess during nonuse? 5

The EIS for Kachess drought relief provides little information on what has to be done before the project will be determined feasible. 6

How and when will the BOR develop written contract for those entities who will be required to address the environmental requirements? 7

Has a contract with the U.S. Forest Service been agreed to for the route of the conveyance project between Keechelus and Kachess? 8

The proposed Kachess pumping plant can only be approved when all affected participants have signed and agreed to operate and pay their share. 9

Sincerely,

Chuck Klarich
Zillah, WA

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): LAURA LINK	
Organization: KACHESS COMMUNITY	
Mailing Address: 6901 OAKMONT AVE SE	
City, State, and Zip Code: SNOQUALMIE WA 98065	
Telephone: 360-520-0288	E-mail: Linkatthelake@gmail.com

☑ Please put me on the mailing list and notify me when the KDRPP/KKC FINAL EIS is released.

I prefer notification by (please check one):
- ☑ Email with information on how to reference the document online
- ☐ Postal Mail with information on how to reference the document online
- ☐ Send full printed copy of document in binder by postal mail
- ☐ Send electronic copy of document on a CD ROM
- ☐ Send printed copy of the Executive Summary (includes CD ROM of full document).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and home addresses, but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

Please consider my comments on the KDRPP/KKC SDEIS below: ALL BULLSHIT!

THIS PROJECT IS NOT CONCERNED WITH THE PROPERTY OWNERS RIGHTS. OUR SENIOR WATER RIGHTS ARE BEING DISMISSED

THE ECOSYSTEM IN AND AROUND THIS WILDERNESS AREA IS BEING TOTALLY DISMISSED

ARE YOU GOING TO PAY 162 RESIDENTS FULL PROPERTY PRICE AMOUNTING TO 162 MILLION PLUS. ACCORDING TO ONE OF → 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

U.S. Department of the Interior
Bureau of Reclamation

DEPARTMENT OF ECOLOGY
State of Washington

Comments (continued)

YOUR STAFF SHE WOULD THEN BE ABLE TO AFFORD THE PROPERTY UP THERE AND SHE WOULD PUT A TRAILER ON IT. SERIOUSLY ?!!!

SO WE ALL NEED TO PUT TRAILERS ON OUR PROPERTY NEXT TO OUR HOMES THAT HAVE NO WATER.

HERE'S A THOUGHT ADD MORE GATES ON THE EAST SIDE AND COLLECT THE FREEDA FEE OFF AND MAKE EVERYONE USE WATER WISE METHODS.

THE PROJECT IS PURELY GREED FROM THE IRRIGATION COMPANIES.

THEY DON'T CARE ABOUT OUR RIGHTS OR OUR HOMES THAT HAVE BEEN THERE FOR YEARS SOME PROPERTIES HAS BEEN IN FAMILIES FOR GENERATIONS

YOU ARE STEALING FROM US!!!

1

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Jim Honeyford
Organization:	
Mailing Address:	100 Flagstone Lane
City, State, and Zip Code:	Sunnyside WA 98944
Telephone: 509 839 7527	E-mail: Jim.honeyford100@Gmail.com

☐ **Please put me on the mailing list and notify me when the KDRPP/KKC FINAL EIS is released.**

I prefer notification by (please check one):
- ☐ Email with information on how to reference the document online
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Please consider my comments on the KDRPP/KKC SDEIS below:

This project is an essential part of the integrated plan. Don't delay- get it built 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Joel Martin
Organization:	Home owner on Lake Kachess
Mailing Address:	237 Terrace Place
City, State, and Zip Code:	Bellingham, WA 98225
Telephone: 360-733-5859	**E-mail:** MARTINJLA@comcast.net

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Please consider my comments on the KDRPP/KKC SDEIS below:

This feasability study needs to continue longer in order to have greater information gathering. Property value declines for the Lake Kachess home owners has not been addressed. Will we have to sue to recover what has been taken? Will new home water pick ups ~~have~~ be in place before the pumping 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

starts?

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Dan Ryynanen
Organization:	
Mailing Address:	PO Box 173
City, State, and Zip Code:	Hobart, WA 98025
Telephone: 206-683-5902	E-mail: ryynaman222@gmail.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

How can you justify draining a natural lake & disrupting the balance of the top 64 Feet of reservoir water? Leave our amazing lake alone. Look for another solution such as pipelines to the farmers to reduce water loss. 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

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COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Brianna Busby Felix
Organization:	Cabin Owner on Baker Lane (Whitham)
Mailing Address:	42983 SE 170th CT
City, State, and Zip Code:	North Bend, WA 98045
Telephone: 425 445 0954	**E-mail:** busbyb@spu.edu

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Please consider my comments on the KDRPP/KKC SDEIS below:

I do not approve of the pump plant for Lake Kachess. It would completely take away the lake from the public as well as property owners. The lake holds special meaning to me. My late Grandpa and his dad built our family cabin at Lake Kachess in the 1950's. It is more

1

(Use backside or additional sheets as necessary)

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Comments (continued)

than just a lake to me. Lake Kachess is a part of who I am and it would be devastating to see it disappear. Destroying Lake Kachess would not solve the long term problem of the Roza Irrigation District. The cost of this project does not out weigh the benefit. I personally do not see a benefit of this project. Please do not approve this project!!

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Judith Windsor-Newman
Organization:	Lake Kachess home owner
Mailing Address:	23020 SE 248th PL
City, State, and Zip Code:	Maple Valley, WA 98038
Telephone: (206) 406-7566	E-mail: heabry@comcast.net

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Please consider my comments on the KDRPP/KKC SDEIS below:

Spring fed water system to Lake Kachess community is based upon water levels & all homes will loose water to their homes. Proposed boat launch is too narrow & needs to be wider to support the length. I suggest checking out bullfrog marina at Lake Powell, Utah. also need paved road to boat launch! Property values will lower, will there be compensation?

1

(Use backside or additional sheets as necessary)

back

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Comments (continued)

Our property values are being sacrificed, without controls being placed on those in The Yakima Valley. I forsee more water needed because farmers will grow Their farms ~~by~~ increasing acreage They farm. Once a pump goes ~~[redacted]~~ in it will always be used.

Want community boat launch paved & lengthened. Want park at The intersection of Little Kachess & Lake Kachess paved & Lengthened. Having These two boat launches paved & lengthen will help ~~[redacted]~~ because The proposed plan is reducing our property Value & Rds may compensate some of That.

Want proposed boat launch paved & wider (at least 50' — not just 20'). backing up 600' is ridiculous, People may roll off The launch. Want paved road & plenty of parking at The proposed boat launch.

2

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

May 16, 2017

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	LAICA ZAIDI POSSANI
Organization:	LAKE KACHESS
Mailing Address:	P.O. Box 775
City, State, and Zip Code:	Easton, WA 98925
Telephone: (509) 656-3031	E-mail: LPossani@comcast.net

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Please consider my comments on the KDRPP/KKC SDEIS below:

I would like to know how I will protect myself and other people ~~from the~~ and the forest after I have done everything to keep the areas clear = and there is not ~~a~~ much water left in the lake to pump the water out which ~~fire can continue to~~ fire can continue for days and

1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

night for days to weeks? Will homeowners and the forest will have enough water supply?

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http://www.usbr.gov/pn/programs/eis/kkc/index.html
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COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): Randy Aliment	
Organization: Lake Kachess Home Owner	
Mailing Address: 14511 SE Fairwood Blvd	
City, State, and Zip Code: Renton WA 98058	
Telephone: 206.799.8311	E-mail: randyaliment@comcast.net

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Please consider my comments on the KDRPP/KKC SDEIS below:

The cost is alleged to now be aproximately $650M with no clear guaranty that it will be paid for exclusively by Roza Irrigation District. In addition, the current study does not account for the signifi 1
loss of property value to those who live in the vicinity of the lake. Nor does it account for the loss suffered by public who use lake Kachess campgrounds, one of the most popular public campgrounds

(Use backside or additional sheets as necessary)

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Comments (continued)

in our State. In addition, I do not see any mitigation cost factored in to the project for dewatered Private and community wells. Fact is that the lake ~~[illegible]~~ is at risk if they take it down the way they plan to. As a resident since 1981 of the Lake Kacless community, I have seen the lake go down before to levels such that it takes many years to recover. This is a huge concern. Also, what about fire safety. Fires have been a significant concern not only in eastern WA but throughout the West. Our fire district will be at a loss to deal with a fire if there is inadequate water in the lake. Another issue is the terminology used in diagrams. "Inactive pool" "Reservoir" - Please. The managed part of the lake is not the issue. The LAKE however is. What this project needs is honestly and transparency. Both are lacking here.

1

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	MIKE BURNS
Organization:	HOME OWNER
Mailing Address:	6901 OAKMONT AVE SE
City, State, and Zip Code:	SACO WA 98065
Telephone: 425-643-6111	E-mail: MBURNS@DIRECTORS MORTGAGE.NET

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Please consider my comments on the KDRPP/KKC SDEIS below:

THIS PROJECT IS NOT THOUGHT OUT TO PROTECT ALL PARTIES. IT MAKES NO FISCAL SENSE. W.S.U. UNIVERSITY PROJECTED A RETURN OF .30¢ ON THE DOLLAR. AS HOMEOWNERS WE WILL FIGHT THIS EVERY STEP OF THE WAY!

1

(Use backside or additional sheets as necessary)

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John Daugherty
420 24th Ave E
Seattle 98112 JTDabbler@comcast.net

5/15/2018

My name is John Daugherty and I have owned and enjoyed property on Lake Kachess for more than 30 years. I have many problems with the proposed Lake Kachess pumping project, but will limit this statement to three concerns about the latest DEIS report. 1

The first has to do with conservation of currently available water. Conservation of water can be achieved in different ways. One way is to use available technology to reduce demand for water. By doing this, many farmers have shown across this state and this country that they can produce substantially more crops using substantially less water. However, the purpose of this project includes helping Yakima to meet "increased crop and municipal demand", (see p 1-4 of new DEIS). So in a time of climate change where farmers are worried about the availability of water, this proposal addresses their requests for more water instead of helping them make more efficient use of the water they already get.

Another way to conserve water is to do everything one can to avoid losing what one already has. In this vein, it is edifying to visit the Rosa web page, which today shows a number of current projects designed to shore up a leaky irrigation management system. This substandard management of a valuable resource has continued for years after similar problems were first identified. I found no analysis in the DEIS of the water lost each year because of this, nor any major funding to help the district attain reasonable standards for the management of their water. 2

If we are thinking about spending hundreds of millions and ruining a natural lake to bring new water into a system, shouldn't we fix the leaks first? How about getting rid of open canals and using pipes where feasible to ensure that there is little if any loss? Or giving matching grants to farmers to help them make use of latest irrigation technology?

At other meetings about this project proposal I have been both inspired and troubled to learn about what farmers do with the water that they get. Once, I heard a farmer testify that by using reasonably available conservation technology, he was able to grow a bumper crop with less than 55% of his normal allocation. After the hearing, I spoke with another farmer who confirmed that he had similar results. So, the question here is, how did we get to the number 70% of normal to justify drought conditions? Although the DEIS purports to explain this, the explanation is insufficient. 3

Also on p 1-4, I found the following sentence: "In recent years (2001, 2005, and 2015), proratable irrigation entities received 37 percent, 42 percent, and 47 percent respectively of their water supply (Lynch, 2015)." When I read this I thought, if we compare these numbers to 70 percent the deficit is almost shocking. But if we compare them to 55%, the problem appears to be much more manageable.

My second concern has to do with your analysis of the availability of water for this project, or what you refer to as surface water resources.

According to this report, the current Kachess dam system has the capacity to store 239,000 acre feet of water, which can be delivered to the Yakima River on demand. When this water is fully distributed, the water level falls 70 vertical feet from its highest to lowest levels. At its lowest level, the current system cannot deliver any more water to the Yakima River. Of course, pumps could change all that.

In section 3 of chapter 4, this DEIS discusses fluctuations in this water level in various pump/no pump scenarios.

My first concern regarding this analysis addresses your choice of time periods used to draw conclusions about available water. For the most part you use the period from 1926 to 2015, even though the supposed purpose of this integrated plan is to stabilize water availability with the increasing threat of climate change. In the past few years we have already experienced historical highs in days without rain; fish have already died because river water was too warm, and the effects of climate change are predicted to intensify in future years. So why pick what happened 100 years ago to help you model for the future?

I believe the answer is that it makes your data look better. Your model allows you to predict that you can replace the extra water taken in drought years almost all the time. 4

Figure 4-3 on page 26 provides an interesting case in point. It shows Kachess water levels for the more recent period from 1991 to 2009. Describing what you could do with pumps, you wrote:

"During multiyear drought conditions such as those in 1992 to 1994, Reclamation would draw the reservoir down as much as 80 feet below the existing outlet elevation. Following a multiyear drought comparable to that of 1992 to 1994, reservoir levels would recover to normal operating levels 2 years later when followed by a wet year such as 1996. In a single-year drought, such as occurred in 2001, the reservoir would be drawn down to 50 feet below the existing outlet elevation. Full recovery would not have been achieved until 2008, because of a series of dry years (2003 and 2004) and a subsequent drought (in 2005). During the 2005 drought year, the reservoir level would be 40 feet below the existing outlet elevation. The historical record of droughts indicates Kachess Reservoir would refill in 2 to 5 years following a drought."

What that paragraph says is that after drawdown in one multi and one single year drought, the system would not have been able to deliver its normal 239,000 acre feet in at least 8 of the following years. For at least 11 of the 19 years in this period, normal drawdown would be impossible.

This paragraph also uses 90-year-old data to estimate that the lake would refill in 2 to 5 years after a drought. My request to you is to defend your use of the 1926-2015 data set. By your own admission in the above paragraph, it would have taken seven years after the drought of 2001.

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): (anonymous)	
Organization:	
Mailing Address:	
City, State, and Zip Code:	
Telephone:	E-mail:

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Please consider my comments on the KDRPP/KKC SDEIS below:

I strongly object to the proposed Kachess "drought relief" pumping plant. Once drained, the lakes would never recover. Draing and/or Lowering the lakes doesn't Solve any problem long term. I'd prefer the estimated $500 million go to researching

1

(Use backside or additional sheets as necessary)

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Comments (continued)

lower well water levels
lower property values
jeopardize fire department's water availability

a long term solution that would keep both Keechelus and Kachess lakes "natural state" as they exist today.
The farmers won't be able to afford the water and will put them out of business. The proposed plan would have the smaller farms subsidizing the largest land owners for 10 years. This isn't right or fair!

Our states population is growing. Kittitas County's population is booming. People move here for quality of life. People for generations have gone to these lakes. My grandkids are seventh (7) generations to spend summers at both lakes, hiking, fishing, camping & boating. It's a crime to close these glacial lakes for this proposed plan that destroys much and profits a few.

Please DO NOT Consider

DO NOT Kill these two Lakes.

My heart is at Lake Kachess - Please save it. What is the real plan for our water??

thankyou.

1

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
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COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Marci Dawn Whitham Busby
Organization:	Lake Kachess Cabin owner
Mailing Address:	42983 S.E. 170th Court
City, State, and Zip Code:	North Bend, WA 98045
Telephone: (425) 888-3675	E-mail: mbusby2831@aol.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

I am strongly opposed to the Lake Kachess Drought Relief pumping plant. My Dad, Art Whitham, and my Grandpa, Harold Whitham, built our family cabin when my dad was a teenager. The cabin is still in our family, and we have many special memories there. Lake Kachess is a special place for many people from many different

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(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

Communities. If Lake Kachess is drained, it will never be restored. The thought that rain and snowfall will replenish the lake is B.S. The community will lose a beautiful recreational area. People who own property or live on the lake will lose their property value. Draining / lowering the lake does not solve the water irrigation issue long term. I would rather see the cost of the project, estimated to be ~ 500 million be applied to research to come up with a long term, permanent water irrigation solution. The cost of the project would put many farmers out of business. The proposed plan would have the smaller farms subsidizing the largest land owners for 10 years. This is not fair, nor is it the right thing to do. This project has been a shit show from the beginning. Please consider stopping this project. 1

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): H. Colwell Reed	
Organization: Lake Easton Estates - HOA President	
Mailing Address: PO Box 652 Easton, WA (Physical Address: 221 Kachess River Rd.)	
City, State, and Zip Code: 98925	
Telephone:	E-mail: reeders2@centurylink.net

☒ **Please put me on the mailing list and notify me when the KDRPP/KKC FINAL EIS is released.**

I prefer notification by (please check one):

☒ Email with information on how to reference the document online
☐ Postal Mail with information on how to reference the document online
☐ Send full printed copy of document in binder by postal mail
☐ Send electronic copy of document on a CD ROM
☐ Send printed copy of the Executive Summary (includes CD ROM of full document).

Please note: Our practice is to make comments, including names, home addresses, home phone numbers and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and home addresses, but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, available for public disclosure in their entirety.

Please consider my comments on the KDRPP/KKC SDEIS below:

Our neighborhood of Lake Easton Estates has 9 wells that provide water to all the properties within it. (Approx. 50 lots) The concern is that when water from Lake Kachess is pumped down to the proposed additional 80 feet, the well water levels will be adversely affected or go completely dry. 1

over →

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

I HAVE HEARD THE PRESENTATION MADE BY JAY SCHWARTZ FROM THE FRIENDS OF LAKE KACHESS ORGANIZATION. TO SUM IT UP, HIS FINDINGS DON'T AGREE WITH THE REPORT FROM THE DEPT. OF ECOLOGY. SO WHO IS TELLING THE TRUTH? 2

IF THE PROJECT DOES GO FORWARD, (I HOPE IT DOESN'T) I AS A PROPERT OWNER I WOULD LIKE A WRITTEN GUARANTEE THAT SOMEONE (DEPT. OF ECOLOGY) BE RESPONSIBLE FOR COST IMPACTS ASSOCIATED WITH LOSS OF DRINKABLE WELL WATER, 3

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

KACHESS DROUGHT RELIEF PUMPING PLANT AND

KEECHELUS RESERVOIR-TO-KACHESS RESERVOIR CONVEYANCE

Taken on Wednesday, May 16, 2018
at the United States Forest Service
803 West Second Street
Cle Elum, Washington 98922

STATEMENTS ON RECORD

COPY

REPORTED BY: MARILYNN S. McMARTIN, RMR, CRR
CCR NO. 2515

STATEMENTS ON RECORD OF: PAGE

STATEMENT ON RECORD NO. 1 - 5/16/18

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MRS. KNAUFT: One of my concerns -- I'll start with an easy one first -- how come there was no restitution for the homeowners considered in this plan, the 150 homeowners in this particular plan --

MR. KNAUFT: There was more than that.

MRS. KNAUFT: -- in the village of Lake Kachess?

MR. KNAUFT: There's 250.

MRS. KNAUFT: The second concern is the Lake Kachess Campgrounds is one of the most popular in the state. I did my research, and it brings in $250,000 every year for the state. When the drawdown of the lake happens, which from what I looked at the drawing over there is going to affect the campgrounds, that's a loss of $250,000 a year.

And then the third one, probably the most important -- let's see, how am I going to say this? -- it's my understanding that the large farmers are willing to put up $500,000 to pay for this pumping station. The small farmers, have they been advised that once this is put in place, they are expected to pay annually whether or not they receive water or not right along with the big farmers?

In my opinion, this is nothing but a ploy for the big farmers to phase out the little farmers in the Yakima

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Valley, and also the small farmers I do not believe have been informed that they will have to pay every single year whether or not they receive the water.

So it's unfair to the people around the lake, it's unfair to the small farmers, and it's unfair to the people that use the campgrounds, which will cause a loss in value of our homes, causes farmers to go out of business, the small farmers, and the loss of $250,000 to the state every year. 3

Those are my primary concerns. I'm not a technical person, so I don't know a lot about this other pumping stuff.

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STATEMENT ON RECORD NO. 2 - 5/16/18

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MRS. AIKEN: We have lived on the lake, on the water for 40 years, and we have seen it go all the way down to its original lake, and it takes five years to fill it up. Now they want to go down another 80 feet, and we really don't think it will ever fill up. It wouldn't be worth it. It's just a one-time shot to irrigate something. 1

MR. AIKEN: If they take it down another 80 feet, it will never fill up. There's not enough water up there to fill it up. We've lived there for 40 years. We know how much it snows. It snows sometimes more or less, but that's -- in my mind, that's farming, sometimes it rains, sometimes it doesn't, but just pump it out of the lake as a backup.

What they'll do is -- if you want my comments, what they'll do is, about the last 15 years they've only taken it down to the original level once, so that means they've got a lot of reserve.

If they've got that extra 80 feet, they'll take it down all the way, more water, more land, more irrigation, more money for the people -- the companies, not people, in Roza District that raise mostly grapes and hops. We know that 80 percent of the Yakima Valley is grapes and hops. I think they want to put in orchards, but they take water 2

every year; so . . .

MRS. AIKEN: I don't think that the farmers can pay for this.

MR. AIKEN: No. Water's expensive now.

MRS. AIKEN: They said, "Who's going to pay for it because who's going to use it?" Well, it's a half a billion dollars. How could the farmers pay for that?

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STATEMENT ON RECORD NO. 3 - 5/16/18

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MR. POULIN: My concern is I've only seen analysis on average flows. I haven't seen a worst case 5-year analysis. And from what I've seen, I'm worried that a worst case 5-year analysis would make the project nonfinanceable, i.e., there would not be water, and the water that was there would cost way too much to grow crops with. Has a 5-year worst case analysis been completed?

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STATEMENT ON RECORD NO. 4 - 5/16/18

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MS. ALBULET: So I have a place there and we absolutely love it, love it, but my biggest concern is about the ecological implications. I mean, I don't feel like any of the material that I've seen tells us what's going to happen long term on this.

And then, I understand it kind of solves the technical problem on short term, right, but for long term, I mean, at least for potential implications that I've seen, I mean, each one taken individually seems to be bad, but when you look at the whole list, you say: Oh, my God. This is going to be, I mean, the fish, the wells. 1

So that part is still unclear for me. I mean, I don't feel like whoever put together the project really gave a good thought to it. No, it didn't, I mean, for the ecological implications. I feel like, I mean, most of the concerns have not been addressed, right.

So I think my question -- I would like to understand more. So after that initial, you know, when they took that much water from the lake, you know, the level goes down and there is a drought, I mean, right, and we have no water left in the lake, right, and that pump, whatever, cannot function anymore, I'm curious what's happening with the project, what's the plan there. 2

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STATEMENT ON RECORD NO. 5 - 5/16/18

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MR. LEARNED SR.: So I guess what my comment, or whatever you want to call it, is that I have a question on how good a job they did looking at the cost-benefit analysis, because the cost far outweighs the benefit. And I don't think they've looked at that seriously enough, and that's all I have to say for now. 1

And that pumping plant idea is so off the books, it's unreal. It will ruin Lake Kachess, cost a fortune, and benefit will not be there.

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STATEMENT ON RECORD NO. 6 - 5/16/18

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MS. PREST: I am against it because I don't believe that it's -- it's hard to say.

Do you want to say something?

MR. NICHOLSON: I'll go.

It seems to me to be a short-term solution to a long-term problem. When they drain the lake down below the natural level of the lake, then they have to pump water up and over the existing dam to provide water for the Yakima River.

Now, in my experience, to do that you either require electric pump or a diesel pump or a diesel generator. And if it takes two, maybe three years to get that water level up to where it can free flow over the dam level, you are talking about running 24/7 one of these pumps, and it's not going to happen. Eventually the pump will fail, and then the water level in the Yakima River is going to drop significantly, depending on the time of year.

Now, they have not addressed property values along the lake or, for that matter, behind the lake, people that use the lake on a daily basis for recreation, fishing, water-skiing, what have you.

They haven't addressed the federal park at the north end of the lake and the numerous people that utilize

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that throughout the summer for their summer enjoyment. There have been families going there for generations literally. Now you're talking about dropping that lake 80 additional feet. They won't be able to get to the water from the park.

They have not mentioned one word about the freshwater clams that exist in the south end of the lake at the natural level of the lake. Drop it 80 feet, the freshwater clams will expire, and they are a protected species. Look that up. 4

There's a lot of -- there's just so many things, let alone the budget, that they have not addressed adequately. They tell you one thing on how much they're projecting this project will cost, and the reality is probably a 200 to 300 percent increase. 5

I don't believe they've honestly confided in the farmers -- with the farmers in the amount of money it's going to actually cost per acre-foot of water for these farmers, and I really think it's a ploy for large corporations to take over the smaller farms, existing farms, through taxation and charging for this project.

If you have a small farmer with 100 acres and they want to charge you $100 an acre -- or, excuse me, $1,000 per acre, $100,000 is a lot of money for a small farmer.

So it's just so many things that they have not

adequately addressed that it seems like we're being spoon-fed this and then rammed down our throats. I'd like to know how my tax money is going for all of this presentation. I'm totally against the project. It just doesn't add up.

And then if they've looked at the crops that are grown that will benefit from the water, the short-term water this will give, they're barely making a profit now. And if they charge more for the water, any existing profits these farmers are making now are going to go into the red ink.

I don't know what we can do to stop this. The bottom line: See you in court. It's going to be a long-drawn-out court battle if they want to pursue this project.

MS. PREST: It seems to me that there is -- they're focused on the one project, which is Lake Kachess, and they're saying: Well, we're not going to take all of the water from Lake Kachess because we have all these other reservoirs that we're going to be getting water from.

So we're not just taking it from Lake Kachess, but it seems like the only project that they're actually concentrating on is the Lake Kachess, and I can just see it happening that they get this done and they don't do the other project, so what they end up doing is taking all of our water from the lake and just forgetting about all these

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other projects.

I think she said there was like four other projects that they are doing in conjunction with this, but they just seem focused on this. Part of it is the conveyance between Keechelus and Kachess, and I know in the initial research that they were doing, they were told that this doesn't work if you don't have that conveyance from Keechelus; that it's just a nonstarter if you don't have the conveyance from Keechelus.

Well, the DOT has said, "You're not cutting across our freeway," so how are they going to do the conveyance from Keechelus? It just seems like a boondoggle, a very expensive boondoggle. 7

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STATEMENT ON RECORD NO. 7 - 5/16/18

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MS. FRANKLIN: My concerns that I don't feel they've addressed properly include the habitat of Lake Kachess; that we have fish, we have bullhead trout, and when they go to draw the water down, my understanding is it will basically dry out the river between upper Kachess and lower Kachess, and I don't think that's been adequately addressed yet. 1

Oftentimes I hear that one of the reasons besides irrigation is fish habitat, and it seems to me they're just trading one area for another, and I really have to question that.

Another concern I have is our water system. We have a water system that supports our entire community. They've addressed certain wells but they focus only on the wells, and our water system is a water table accumulation system, and there's no conversation about what to do when the water is drawn down to that level. 2

Again, they claim that they have addressed the wells, but we have hired our own expert who has submitted documents to them showing that that drawdown will affect our water and our water availability, and there's nothing in the proposal that addresses that.

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STATEMENT ON RECORD NO. 8 - 5/16/18

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MR. HANAN: My objectives or concerns emanate from I used to work at Washington Public Power Supply System, used to be called WPPSS, and I see a lot of similarities. And I don't know why the Roza Irrigation District -- I don't know how they got the Bureau of Reclamation to put forth such a great effort to get this process so far down the road. I think there must be a lot of money flowing from Roza to someone in the reclamation district to get them to be a proponent of this. 1

But it smacks much like when Washington Public Power and the PUD commissioners got together and decided that they needed much more power than they generated, so they spent at least 5 to 7 billion dollars on these power plants, only one of which was finished, and, in fact, their revenue -- their energy projections were way out of whack. We never needed that much energy.

So I don't know why the interests of Roza Irrigation District should supersede everybody's interests, the people on the east side and west side of Washington to have a nice place to recreate; the people who live here whose property values will be impacted.

It just seems nothing -- it doesn't add up to me, and I think if we look into it, there might be people at the

Bureau that have been -- that have an interest in this project over and above what's good for the state as a whole.

This seems to emanate from the Roza Irrigation District. They're the beneficiaries, and somehow they got the Department of Reclamation to act like this is a big plan for the benefit of wildlife, and so forth and so on.

So I'm not buying it. It's just not the case, and I think the light of day, when it shines on the powers that be, we'll find out why this has gotten so far.

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STATEMENT ON RECORD NO. 9 - 5/16/18

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MR. KLARICH: Two questions, just two basic questions: First of all, when will the Bureau of Reclamation sign contracts or agreements with all the entities who are being affected by the Lake Kachess drought project, which includes the conveyance from Keechelus to Kachess? 1

The second one is what happens, how long before -- how much longer will the Bureau of Reclamation take to come up with a record of decision on this project? 2

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STATEMENT ON RECORD NO. 10 - 5/16/18

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MR. JOHNSON: I have property near Alternative No. 3 pump plant. Any loss in property value will be the responsibility of the State, and I'll make sure of it. 1

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STATEMENT ON RECORD NO. 11 - 5/16/18

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MR. AIGNER: I'm wondering if all of the homework has truly been done, if all of the constituencies that are affected by this decision have been contacted, which will be affected have been contacted.

Have the campers at the state park been contacted? Are they aware of what will happen to the lake?

What do the fire districts have to say about this decision?

What I'm not seeing is total consensus from all of the constituents around this decision that appears to be moving forward. 1

Next thing is as a businessperson, I look at the pluses and minuses, and I'm wondering if the costs involved over a long period of time, including operational costs, are actually profitable in relation to what's being delivered. 2

I love apples. I drink wine. I want that to continue, but I just do not have the feeling that there has been a complete effort to contact everyone with a decision of this magnitude, and we don't have an ability to reverse it.

It feels like a good idea. However, I don't think the long-term ramifications have truly been studied.

That's it.

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STATEMENT ON RECORD NO. 12 - 5/16/18

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MS. LEWIS: The two projects at Lake Kachess, the pumping plant and the tunnel between Lake Keechelus and Lake Kachess, make no sense. Once the water is pumped, it won't come back in any reasonable amount of time. Roza District wouldn't pay for a 20-foot drop with a pumping plant in December of 2015 which cost 100 million dollars, so there's no way they would pay for this one that's going to cost several hundred million dollars. 1

The information has been sadly lacking to the rest of the residents of our state of Washington. It is unjust that we residents of the state of Washington will likely foot the bill through the Bureau of Reclamation or Department of Ecology to pay for something that is devastating our own natural glacially created Lake Kachess, so who's really going to pay for it?

If the K-to-K conveyance, KKC is built, how many dump trucks are going to be going up and down the county road? How is it going to interfere with people trying to use the campground? What is the real cost of everything? 2

How are you going to protect the endangered bull trout, which are already endangered and will be even further endangered by these projects? 3

How are you going to keep the pollution of Lake 4

Keechelus from entering Lake Kachess? What is your filtration system? Is that included in the proposed cost estimate? So much more. Sorry.

How are the irrigators and downstream users going to get their water allocation, the 239,000 acre-feet currently stored by the dam at Kachess? How are they going to get any water once that is totally gone and you're pumping out of the original glacier lake? I'm going to stop so I make sure you understand. 5

So how are the proponents of the Kachess pumping station going to mitigate those downstream users that are currently allocated the 239,000 acre-feet stored by the existing Kachess Dam? And I want explicit details of how that's going to happen.

In the cost estimates of the two projects, the pumping station and the K-to-K conveyance, the estimates do not include the 23 million dollars -- that may or may not get built -- to help the endangered bull trout. Who's going to pay for that 23 million? Is that conveyance going to get built? Is it going to actually help the endangered bull trout which are already threatened? 6

I'm repeating myself. Sorry.

I would like a copy of all the statements of records being taken with respect to these two projects, the Kachess Drought Relief Pumping Plant and Keechelus 7

Reservoir-to-Kachess Reservoir Conveyance.

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STATEMENT ON RECORD NO. 13 - 5/16/18

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MR. O'CONNELL: So all I wanted to say is I think before any taxpayer money is used on the project it should pass a voter referendum just because we're talking upwards of 500 million dollars estimated total cost from what I've seen, so I think a project of this size should pass a voter referendum.

That's it.

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STATEMENT ON RECORD NO. 14 - 5/16/18

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MRS. GIENGER: So if this were to pass, I would like to see it on a ballot for the public to vote on because, honestly, up until this point, like this is the first time that I've heard about all of this. 1

And they were saying that there have been multiple, throughout the last few years multiple times for the public to comment, but it wasn't until maybe like a week and-a-half, two weeks ago that I actually heard that there were actually public hearings that we could come and voice our opinion. So I think that it should go to vote for the counties that it will involve. 2

And I'd like to see like the financials. I haven't seen any of the financials, and I've asked around for the financials of who's going to pay it and how much and where that's going to be all divided, and I haven't seen anything. No one's given any information as to how it will be paid for; so . . . 3

And I'm opposed. For the record, I am opposed. 4

MR. GIENGER: I mean, I am not incredibly educated on what's going on -- this is what I was saying over there, trying to learn -- but, I mean, the biggest questions that come to my mind are obviously a large cost. And so who's going to pay for that, and right now it seems 5

like nobody really wants to.

It seems like the majority of farmers that would use this water for irrigation aren't, are not for the project. And for us, as individuals that live up there, my first concern is our property value and the impact on our well as well; so . . .

I mean, those are the questions I have that I'm over there trying to getting answered eventually.

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STATEMENT ON RECORD NO. 15 - 5/16/18

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MS. WINDSOR-NEWMAN: Basically, in a nutshell, I'm concerned about my property value, and I'm also concerned about -- the reason why we bought the house is to use the lake. And if we're not able to put the boat in the lake in our community, which is one of the reasons why we bought into that community -- and we just bought in October. So we bought and now, boom, our value is going down with this whole discussion. 1

I'm concerned. You know, I just lost a major investment and -- I mean, I didn't lose it but, you know, a lot of my money I put into this property is gone. That's been wasted.

I am also concerned about we have a spring fed well, and I heard that when the water -- it's based on water levels. Will we have water to our homes? And we're already spending a lot of money on that hot water system because it was pretty new in the community, so if we lose water, who's going to pay for us to have to conserve, for us conserving? 2

If we have to conserve, why -- you know, we're put in a position where we bought in an area that had plenty of water. We should never have a problem with running out of water, and so I don't want to have to be in a position where we're not going to have running water in our home.

The other thing is the amount of time it will take to refill the lake by natural means. It's just not going to fill up quickly as it's being portrayed. It will take multiple years to drain. 3

And I call it a lake. It's not a reservoir; it's a lake. It always has been called a lake. Yeah, there's a dam at one end, but it's been a lake for a long time, and it should be considered to be called a lake, not a reservoir. 4

I want to talk about the proposed boat launch that's on the opposite side of the lake that's next to the highway. Apparently it's on a forest road. I haven't seen anything about it being paved. The boat launch itself is 600 feet, 20 feet wide. Now, if you ever back a boat down a 600 feet, only 20 feet wide, you're going to fall off the edge. I really feel that if that's going to be where we're going to have a boat launch, it needs to be widened. 5

We go to Lake Powell quite a bit. Probably about every couple years we go to Lake Powell, and in Bullfrog Marina in Lake Powell, Utah, they have a boat launch. And I'm not sure how long it is, but it's probably at least 600 feet, because it's by a dam as well. And, actually, it's a true, a true -- they call it Lake Powell, but that is a true lake that was built by a dam. It was a river before. But their boat launch is like at least 100 feet wide.

Now, I'm not talking that we have a 100-feet-wide

boat launch into Lake Kachess but something where you're not going to fall over, go over the edge of it when you're backing up 600 feet, so maybe at least 50 feet wide. And then I expect to have lots of parking for boats and trailers in that area. 5

Recapping, my main concern is the rate -- how long it will take for the lake to refill after it's been drained; the boat launch, the plan is inadequate; concerned about our water level of our spring fed water system that we have in our community. 6

And I think the last one that I didn't mention earlier is our value of our homes. The value of our homes will greatly depreciate -- oh, no. I mentioned that, because I was saying we just bought and I lost a lot of my value. I feel I will lose a lot of my value.

And with all of this we're sacrificing but yet there's no constraints, from my understanding there's no constraints been put on the farmers in the Yakima Valley. If they say we're going to get you water, then they get plenty of water. Naturally, a tendency for anybody to think is, "Oh, we've got plenty of water. Let's build, make more acreage of farmland." They need constraints to control it and then it is not a perpetual problem, and so constraints need to be placed. So that's it.

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STATEMENT ON RECORD NO. 16 - 5/16/18

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MS. MISOCKY: My name is Jill Misocky. I am here in opposition to the water plan, the proposed water plan, for several reasons. We are new to the community -- is it okay if I just talk to you?

We're new to the community, just moved in two Decembers ago, so we just got dropped into -- in the middle of this. Our neighbors have seen this coming for years, and so we're trying, my husband and I are trying to get up to speed about what's going to happen. 1

We live on the ridge. We don't have lakeside, lakefront property. We don't have a view of the lake, but we're a community that feels really strongly about this.

I feel that this plan to draw down -- the most extreme part of this plan is to draw down this lake to unrecoverable levels. This kind of lake will not recover from this kind of drawdown. I favor, A, the "don't do anything" plan.

The second option would be to draw down responsibly a smaller amount, a small percentage more of what's already drawn down rather than draining the lake, and bank that water for conservation for the future; so during feast years, when it's raining, when we have a high snowpack, draw down water to a reasonable level and bank the water 2

elsewhere, bank it in Yakima, bank it in other reservoirs, because this is going to be a short-term gain. The lake will get drawn down within five, six years, and it will never recover.

I also oppose the plan because it's sacrificing so much for so few. When we moved in here, all of our friends and even my dental hygienist tells me: We've been camping at Lake Kachess for years, generations. We take our kids there.

And my dental hygienist from Burien during the summertime comes out and water-skis every weekend. For years they've been doing that, and with the lake drawn down they won't have camping, there won't be any water-skiing, no fish, no fishing, no water boat activities, no hiking.

I'm told that Kachess Lake is -- the campground there is one of the most popular in the state. It's constantly busy. Our first summer after we moved in, we saw starting Thursdays and Fridays camper after camper after camper driving past our house to get to the campsite, and Sunday was the same, everybody leaving, Monday. And so it's constantly busy. It's constantly booked.

So camping, fishing, recreation, there's quite a few homes along the lake that have -- they're lakefront and also lake views. Those properties, the value of those properties will be irreparably damaged.

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Even though we don't have a view of the lake -- I think our property is going to be maybe not affected as much as the lakefront or lake view home, but still a lot of people will see our house -- see the area as a value because we do have lake access, so our property values are going to go down.

The water rights of the residents down on the lake are first water rights, if I understand that correctly, and the entity or entities that are proposing this drawdown are secondary water rights. And based on the law, if you have primary water rights that preempts any secondary water rights. 5

So that's something I just learned this evening, that it seems like this drawdown or the proposal to draw down is illegal, so I'm not sure if that's even been looked into by the board -- by this plan, so that might be something that they'd have to contend with.

So my feeling is that this is a short-term gain sacrificing too much for just a small entity in the Yakima Basin, so I believe a compromise can be reached without sacrificing the lake. 6

Conservation, maybe rotating crops, having a different second crop instead of a second crop of hay in the summer, which is very water intensive. My family on my mother's side were all farmers and nurserymen so I know a 7

little bit about it, not a lot; but my uncle used to grow nothing but corn, and when that market fell he adapted to soybeans and so he went corn and soybeans, so he embraced it and adapted and so he was able to thrive.

So I think, and I hope, that the farmers downriver will take another hard look at conservation and maybe rotating in and out different types of crops that aren't so water intensive so they don't need to use so much water in order to make a living. I understand everybody needs water, but you can't sacrifice so much for so few. 7

I think that's it.

* * * * *

STATEMENT ON RECORD NO. 17 - 5/16/18

* * *

MRS. REED: So we purchased our property three years ago?

MR. REED: Four.

MRS. REED: Four years ago?

MR. REED: We're working on our fourth year.

MRS. REED: Fourth year, from another lady, very nice lady, and we have wells. There are nine wells in our neighborhood.

MR. REED: A neighborhood of about 50 lots.

MRS. REED: About 50 lots.

MR. REED: Yeah.

MRS. REED: So we share the wells. So my concern is with this project going into effect, that's going to drain our wells.

In talking with -- is it Teresa over there? The one in the white shirt and gray pants. I can't think of her name. I was talking with her, and I said: So if our wells go dry, what's going to happen?

She said: Well, if it's a cause of draining of the water, then they would be replacing them. They would be fixing it to where we would be able to get water.

So what I asked for is if this project goes through -- and I hope it doesn't, because I think that

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they're already getting enough water as it is and they don't need to go down 80 more feet -- that as a homeowner, I would appreciate a guaranteed letter in the mail from whatever organization is doing this stating that if our wells go dry due to this project that they will be covering all costs and expenses because --

MR. REED: To replace the water.

MRS. REED: To replace the water, because this project is going to affect a lot of people.

Not only that, my grandson goes across to Lake -- it's a state park, isn't it?

MR. REED: Easton.

MRS. REED: Easton, and swims there. And draining that, you know, they're taking away all the fun recreation for a lot of people, the boating.

People that live on Lake Easton that have waterfront property, a lot of them do here, they get up in the morning and they enjoy going out, sitting on their deck and looking at the water. Who wants to get up and look at --

MR. REED: Rocks.

MRS. REED: -- rocks?

MR. REED: River, lake bottom.

MRS. REED: Yeah. So I don't think -- I know that they want to do this project so that they can get more water to the people that have agriculture and, you know,

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growing stuff and that. And I get that totally, but they're not taking into consideration the neighbors and the families and the people that they're affecting on the other side.

Some people grow their own vegetables here. Some people have their own gardens. Some people have swimming pools that they fill up with water. I just think that they're not taking anybody else into consideration and they're just thinking about the people that have the big crops that are making the money. And not only that, they're bringing our property values down which is hurting a lot of people here.

MR. REED: I have another point of view. I listened to a presentation by Jay Schwartz from the Friends of Lake Kachess. He was here in attendance tonight. He's got a published report; that he read the 800-page document that is put out for this project and has a background in consulting and finance and all that kind of stuff, and he put together a presentation and worked the numbers because he's good with numbers. He works numbers. And the numbers from the report and everything don't quite add up to what he got, his answer.

So what we have is two different perspectives and study that come up with two different answers, and what is the real truth? If you've got two that don't agree from the same subject, something needs to be done to find out what

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the real truth is for the cost, the amount of water provided, the impact to everybody.

What he found was that some of the numbers in the official report, some of the things that were calculated were based on some things that aren't quite what everybody believes they should be.

So conflicting reports should suggest that it's not -- the truth has not been figured out and we need to drill down to where we get to the real truth, the real cost, the real impact, and what really is going to come out for those farmers down in Yakima should this project go through.

His prediction is the water will cost so much that only the very large agricultural companies could be able to afford it and the small farmer will not.

MRS. REED: They'll go belly up because of it.

MR. REED: That's a rough summarization. We can get a link to that report or a copy of it. I can talk to somebody here to find the link to it. It's on a web page, I know, and I have a copy of it at home. It is out there.

MRS. REED: I guess the long picture for me is they're not taking into consideration the effect that it's going to have on the people. It's going to have a lot of effect. And Cle Elum is a booming town right now, and as soon as all of this stuff, if it goes through -- and I hope

4

it doesn't -- it's going to go back into the tank again just when it's booming.

MR. REED: Would you like me to try and get you that website?

(PAUSE IN STATEMENT)

MR. REED: The link is *www.usbr.gov/pn/programs/eis/kdrpp/20170621 kachesshomeownerseco.pdf* [YBIP Hydrology & Economic Analysis: Supply, Costs & Impact Insights].

MRS. REED: Also, with the area that we live in, we have no fire hydrants, so if we have fires in our area, they have to come with water trucks. And the water trucks get the water from those lakes, so if they drain them too low and there's not enough water to put those fires out, we've all lost everything.

* * * * *

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STATEMENT ON RECORD NO. 18 - 5/16/18

* * *

MS. WANECHEK: My name is Connie Wanechek. My maiden name is Owens. I am fifth generation to this area. I'm fifth generation to the people that have visited and loved Lake Kachess and Lake Keechelus.

As a family for fifth generation, we have hunted, fished, snowmobiled, skied, snowshoed, swam, boated, hiked, camped, and I have brought my grandchildren to the lakes as my great-great-grandfathers have brought their families. I know the Indian trails. I know where the blazes are on the trees that surround the lakes that showed the Indians how to get where to go. Some of those blazes have been cut down because the mountains were cut down up above Lake Keechelus to accommodate the freeways, the roads to be expanded up by the dam by Keechelus. Our hearts are there. My heart is at Kachess. I can't fathom it being killed. There has to be a better way. 1

Lake Kachess and Lake Keechelus are places that people go to to recreate. There's hundreds and hundreds of people that come over from Seattle. They come from the east side, the west side. Our communities, Kittitas County, Cle Elum in particular, is in a boom stage. We are a bedroom community of Seattle where people are priced out. They come over here. People for generations like myself

come over here.

And if you drain that lake, it will never ever be filled again. Home values will go down. Fire departments, water accessibility for fire departments will be nil. They can't qualify to stay. We have forest fires all over the dang place. Last year was a perfect example of that. Property values would go down.

But most of all, these lakes need to be saved. Take some water out, but leave some in. So what do you expect people to do? They're beautiful pristine glacial lakes. I know that they're reservoirs, but there has to be a better way than to kill and drain these lakes for monetary profit somehow. There has to be a better way to do this. 1

The lake is the place that I go to. It's not even five minutes from my home. I pray there. That's a place that I heal. That's a place I have memories of spending with my family, my children, my grandchildren.

We have family ashes buried and sprinkled in the lakes, both of them. I've seen families going up to the dam end of Keechelus, and I saw the families. I didn't realize at the time what the ashes was, but there they are. I saw them in the water with 23 single yellow roses. This is silly.

Anyway, there's got to be a better way. You've got to save those lakes for the people that are coming to the

area to go up there to recreate. You don't want to close it off. You don't want the noise from the pumping stations. You don't want the liability of people. You want people to be able to keep using the lakes. 1

I don't know what else to say.

* * * * *

CERTIFICATE

STATE OF WASHINGTON)
) ss.
COUNTY OF YAKIMA)

I, Marilynn S. McMartin, Washington State Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, hereby certify I reported the foregoing proceedings; said statements being taken before me on the date herein set forth; that said statements were taken by me in shorthand and thereafter under my direction transcribed, and that same is a full, true and correct record of the statements to the best of my ability, prepared pursuant to WAC 308-14-135.

I further certify that I am in no way related to any party or counsel to this matter; nor am I financially interested in the said action or outcome thereof.

Transcribed notes will be destroyed three years from the affixed date unless requested by any party or counsel to retain them.

IN WITNESS WHEREOF, I have hereunto set my hand this 31st day of May, 2018.

Marilynn S. McMartin, RDR, CRR
CCR NO. 2515

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	JUDITH A. MALLON
Organization:	
Mailing Address:	2020-223rd PL NE
City, State, and Zip Code:	SAMMAMISH, WA 98074
Telephone: 425-417-6985	**E-mail:** jamaffe@hotmail.com

☒ **Please put me on the mailing list and notify me when the KDRPP/KKC FINAL EIS is released.**

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Please consider my comments on the KDRPP/KKC SDEIS below:

1

I am a homeowner on the East Side of the Lake. We have senior water rights and a well. How can junior water rights supercede mine? If our well runs dry what is the mitigation plan? What is the precedent for taking the 80 feet from the lake that has existed prior to the resevoir? I

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

understand the right to drain the first 60 feet, that is the resevoir portion. However, where is this ever been done before? Where has an existing lake been drained for water needs? Is this setting an environmentally dangerous precident? Will you be thinking of draining Lake Washington or Lake Sammamish next? 2

Has anyone looked at fixing the irrigation canals so that 30% of the water isn't wasted? Would this 30% be enough to cover the additional needs of the Roza district? 3

Is any mitigation for propertyowners being considered for decreased property values? Will property taxes be decreased due to the decreased property values? What will the mitigation be for lost tax revenue to Kittitas County? 4 5

Environmentally - There are red headed wood ducks that live in the lake by our property. Has any one looked at the impact to these ducks? How will the deer & elk get down to the lake to drink? 6

Will the Bureau of Reclamation or some one be taking care of Road 4818 - I would suspect that the road will need extra care due to the equipment being used on it? 7

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): Judith Mallon - Continued.	
Organization:	
Mailing Address:	
City, State, and Zip Code:	
Telephone:	E-mail:

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Please consider my comments on the KDRPP/KKC SDEIS below: Regarding the pumping plants?

The cost is estimated to be $195,000,000, that works out to $150,000 for each Roza district farmer. When has any other taxpayer received that kind of benefit - huge cost financially + environmentally to benefit so few. 8

What about the noise? We currently can hear 9

(Use backside or additional sheets as necessary)

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Comments (continued)

a dog barking from across the lake. 9

We have been a homeowner on Lake Kachess since 1991. We have seen the lake drained clear down to the 60 foot level we were in a drought period for about 5 years sometime in the 1990's – THE LAKE NEVER REFILLED COMPLETELY DURING THAT TIME PERIOD – what makes you think you could fill up an additional 80 feet? 10

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Lynn Ahlers
Organization:	Save Lake Kachess
Mailing Address:	2111 Hidden Valley Road
City, State, and Zip Code:	Cle Elum WA 98922
Telephone: 509-857-2023	**E-mail:** issygreeneyes@yahoo.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

I have owned a cabin at Lake Kachess for 25 years. I am shocked & disappointed in our elected officials that feel it is ~~[illegible]~~ appropriate to drain Lake Kachess. My husband & I worked hard to buy our lake property. What will happen when our well runs dry? Will you buy our property from us? The farmers who are taking our water ... what are they having to do to use water more

1

(Use backside or additional sheets as necessary)

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Comments (continued)

efficiently so that our water isn't wasted? Will their wells run dry? Will their property values be decreased? What about the fish & wildlife? What will happen to them when the lake is drained? To say I am disappointed in Dept of Ecology is an understatement. I hope you can sleep at night knowing what you are doing to people who live and recreate at Lake Kachess and the financial loss we will all take because of this ridiculous plan. 1

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): Taylor Hazard	
Organization:	
Mailing Address: 24222 88th Place West	
City, State, and Zip Code: Edmonds, WA 98026	
Telephone: 303.493.1552	**E-mail:** thazard1@gmail.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

I am writing in opposition of the KDRPP/KKC in the strongest terms. It will be nothing short of colore sque theft of a public resource that is very clearly not in the benefit of all stakeholders. The SDEIS has not properly accounted for the impact on the local moose population, which will not be able to get into the lake to spawn. Furthermore 1

(Use backside or additional sheets as necessary)

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Comments (continued)

The costs of the Project have not been sufficiently accounted for. At the estimated costs of $250-$500 Million will ultimately be so expensive to make the additional water affordable for the farmers

Outside of the blatant disregard for the effect on human costs the KDRRP gives preference to those holding junior water rights over those who hold senior water rights. Tragic.

There ~~are~~ also appears to be a disregard for the fact that the lake will likely never ~~draw down~~ recover after a major draw down and this permanently harming the usability of the lake and access.

1

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Jeff Parry
Organization:	
Mailing Address:	4535 - 44th Ave SW
City, State, and Zip Code:	Seattle WA 98116
Telephone: 206-280-4398	E-mail: jeff@parryadvertising.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

Do not pump the lake.
It will ruin the lake, Bull trout habitat and isn't financially feasible. Seems like a ~~foolhardy~~ foolish one and done loss.

1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Paul and Koleen Cook
Organization:	
Mailing Address:	450 Bellevue Way NE #2301
City, State, and Zip Code:	Bellevue, WA 98004
Telephone: 425-233-5500	**E-mail:** koleenc@gmail.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

It is an absolute shame that these lakes will be drawn down for the reasons that are being discussed. If residents all over the state that use these lake for fishing and recreation there would be a complete uproar. ALL WA residents should be informed of this plan. 1

(Use backside or additional sheets as necessary) Also - drilling for water in the →

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Comments (continued)

residential areas for replacement wells should be done PRIOR to this plan being implemented so that the residences have water ALWAYS.

2

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	MARIA BURKE
Organization:	Kachess home owner
Mailing Address:	34116 259th Ct SE
City, State, and Zip Code:	Sammamish, WA 98075
Telephone:	E-mail: burkepostoffice@gmail.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

I am strongly opposed to draining a beautiful alpine lake in order to give water to farmers in the Columbia Basin. They shouldn't be growing crops that require water that needs to come from so far away. This is a huge, expensive project that will affect our property values for years to come. The lake and the entire 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

ecosystem will suffer long-lasting effects and will never recover! This project is misguided and we homeowners have been left out of the discussion. Our wells will run dry while the Yakima farmers water their crops and enjoy our water. 1

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly): Andrew Burke	
Organization: NA	
Mailing Address: 3416 259th Ct. SE	
City, State, and Zip Code: Sammamish, WA	
Telephone: (425) 577-9216	E-mail: andrewalannburke@gmail.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

Those in favor of this project seem to think that Lake Kachess is a mere bucket of water they can take from, once their own water mismanagement and the patterns of weather leave them with less than they need. This is a terrible solution to an unfortunate problem. People must learn to live with the resources their region 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

provides. It is not right to disrupt and destroy a lake ecosystem, ~~with~~ all for the profit of those who have claimed a right to someone else's water. Most importantly, the water belongs to the fish and other forms of life in the surrounding area. To disturb this ecosystem is to invite unexpected misfortune

1

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Charles Jung
Organization:	
Mailing Address:	6745 W. Mercer Way
City, State, and Zip Code:	Mercer Island, WA 98040
Telephone: 206-236-1959	E-mail: jungct@comcast.net

☒ **Please put me on the mailing list and notify me when the KDRPP/KKC FINAL EIS is released.**

I prefer notification by (please check one):

- ☐ Email with information on how to reference the document online
- ☒ Postal Mail with information on how to reference the document online
- ☐ Send full printed copy of document in binder by postal mail
- ☐ Send electronic copy of document on a CD ROM
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Please consider my comments on the KDRPP/KKC SDEIS below:

- Costs to recreational users of Kachess not considered [1]
- Economics of water pricing does not reflect true cost [1]
- Ecology of this lake would be compromised in ways not knowable [2]
- In light of reduction in snowfall on average compared to historical norms (global warming), Kachess not likely to recover in prolonged drought [3]

(Use backside or additional sheets as necessary)

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Comments (continued)

- Reduction of property values in vicinity of Kachess Lake not considered. 4

- Conserration measures for agricultural water use economically makes more sense, more "bang for buck" 5

- Endangered bull trout face more jeopardy if lake drawn down as proposed. It is not known if fish ladders will mitigate the risk 6

- Draining a native lake below reservoir levels should never be considered for such a short time benefit. 7

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Lance Newman
Organization:	Kachess Village Home Owner
Mailing Address:	23020 SE 248th PL
City, State, and Zip Code:	Maple Valley Wa 98038
Telephone: 206 419 1591	E-mail: newmla0000@icloud.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

Reasons to Vote No on SDEIS Pump Plan

1) Roza Irrigation cant possibly afford the 500 million dollar proposed Pump Station and Conveyance tunnel [1]

2) Wadot will never allow the I90 shutdowns required for the conveyance tunnel project and blasting

(next Page)

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

Comments (continued)

3) Without total Roza funding, Kittitas County Tax payers will have to bear the costs with no benefit to them for lost water. 1

4) Roza farmers have historically shown they will not bear the costs either

5) Any of the possible options requiring pumping will result in a massive alteration of the Lake Kachess delicate eco system. This will negatively effect fish runs, water table, community wells, recreation opportunities, forest fire prevention, the forest, home values for Lake Kachess residents. 2

The proposed SDEIS will be a disaster for Kittitas County residents stripping them of one of their most precious resources that can't be replaced so that a small group of rich Yakima Growers can expand an agricultural business that ships a large portion of its crops out of country!

Vote No

Tom Mennis
5/17/18

http://www.usbr.gov/pn/programs/eis/kdrpp/index.html
http://www.usbr.gov/pn/programs/eis/kkc/index.html
http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/index.html

COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Billie R. MARQUISS
Organization:	—
Mailing Address:	608 E. TACOMA
City, State, and Zip Code:	Ellensburg WA. 98926
Telephone: 509-929 3054	**E-mail:** billies@KUALEY.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

we have senior water rights - if wells are effected how will this effect our senior water rights. - ALSO NOise will be an issue - what is going to be done about that? - who gets the benefit from this, and who will be paying? 1 2 3

(Use backside or additional sheets as necessary)

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COMMENT FORM

Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance Supplemental Draft Environmental Impact Statement (SDEIS)

Name (please print legibly):	Shawn McQuiston
Organization:	Friends of Lk Kachess
Mailing Address:	27714 Maple Ridge Way SE
City, State, and Zip Code:	Maple Valley
Telephone: 360 547 9067	E-mail: McQ1966@Gmail.com

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Please consider my comments on the KDRPP/KKC SDEIS below:

How will the fire dept at Lk Kachess get water to fight fire when the lake is depleted in a DRY season? 1

(Use backside or additional sheets as necessary)

You may leave your comments in the box provided, mail, fax, or email comments to: Candace McKinley, Environmental Program Manager, Bureau of Reclamation, 1917 Marsh Road, Yakima WA 98901-2058; fax (509-454-5650), email (kkbt@usbr.gov), or leave voicemail message (509-575-5848, ext. 603). **The 90-day comment period ends July 11, 2018.**

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

KACHESS DROUGHT RELIEF PUMPING PLANT AND

KEECHELUS RESERVOIR-TO-KACHESS RESERVOIR CONVEYANCE

Taken on Thursday, May 17, 2018
at the Kittitas Valley Event Center
901 East Seventh Avenue
Ellensburg, Washington 98926

STATEMENTS ON RECORD

COPY

REPORTED BY: MARILYNN S. McMARTIN, RMR, CRR
CCR NO. 2515

STATEMENTS ON RECORD OF: PAGE

STATEMENT ON RECORD NO. 1 - 5/17/18

* * *

MR. MALLON: So I have three or four main points. Just the general overall, we've been residents and we've been living on the lake for 30 years. We've enjoyed it from a recreational point of view.

We, you know, absolutely love the lake, but at times -- and they would still use the lake as a reservoir, drain it down 60 feet, so it would be quite low occasionally. Every other summer it would be drained quite low. 1

And then upon hearing this and the whole plan around it to drain it another 80 feet will literally create cliffs in front of our property. It would make it effectively unusable to even get to the lake.

So just in general overall, I guess I view the holding on to the alpine lakes -- and I view Lake Kachess, even though the Bureau of Land Management or Reclamation view it as a reservoir, we view it as an alpine lake that wildlife visit all the time. And they're not making any more alpine lakes, right?

The state of Washington over the last 20 years has grown from 3 1/2 million to 7 million residents. We need more places to recreate and to enjoy the wilderness and to enjoy nature. And when you literally drain it an additional

80 feet, you make it a big mudhole which causes it not to be used as recreation anymore. It is going to be a stain on the Cascades, and, frankly, that just doesn't go over very well with us. So that generally, the first put is: Oh, my gosh. They're going to destroy a piece of what Washington is known for, right? 1

Now, I understand from a farmer's perspective and the irrigators that they're looking to grow more crops, and whether it's -- I don't know whether it's going to be for hay or wheat or the fruit areas, but there's also, I would be irate if I found out that that was really supporting the farmers so that they would be able to grow more so that they could then sell more to foreign countries. Whether it's Japan or whether it's Saudi Arabia or whether it's Russia or wherever, they would sell more and more of their crops outside the country, so effectively we are destroying our land and our lakes so that certain folks, certain groups, farmers, could sell their produce globally. And so we're paying the price for a certain group being more economically successful, I would say, so just overall. 2

The second concern: We live on the lake. We have a well. The Department of Ecology came forward and they tested our well, and in testing our well they said, "Yep, you're going to run dry. If they pull the water out and it drops an additional 80 feet, your well is going to be 3

unusable." So right there, that's an immediate concern, and we would like to know who's going to pay for that.

We're not going to -- we have a cabin on the side of the lake, and we're looking to say: Okay. Our value is going to be -- the value of our cabins are going to be taken away, and how are we going to be compensated? 3

Our well, our water, we have a senior water right; not a junior water right, a senior water right to that water, and if people reduce, you know, draining the water down, all of a sudden now we're not going to be able to utilize our senior water right.

We lose our water, potentially the value of our cabin goes way down, and so far I have not seen any discussion about how they would compensate the homeowners for that that would lose their water. So that's a second concern.

Then when we heard that as they drain the water down or even prior to that they would have a pumping station at the end of the lake, that is going to create -- and that pumping station is going to run 24 by 7 by 365 days a year. And as a result, from my perspective, not only, you know, is there going to be some kind of pollution, even electrical -- maybe they're going to run electrical up there -- but somewhere it's going to create a significant amount of noise day in and day out all year long. And being on a lake, that 4

noise is going to travel all the way up the lake. You just cannot get away from that.

So in addition to our well issues, we're going to have noise issues, and there is no -- I have not seen any discussion about how they would mitigate any kind of noise that would travel up the lake. 4

So, you know, this -- and then last but not least, access to the lake. We have had access to the lake. It's still a climb down when the lake is drained down 60 feet, but if they drain it an additional 80 feet, 140 feet, it will be literally untenable to reach the lake, not only for ourselves but for wildlife and animals that use that lake. It will be impossible to utilize it. And so from my perspective, our ability to recreate like we have been able to do over the last 30 years will be eliminated. 5

So overall, we're very upset about this. We find it very sad that this is happening, especially right in the middle of the Cascades that more and more people are using to recreate given the population increases in the state.

I think those are my main points.

* * * * *

STATEMENT ON RECORD NO. 2 - 5/17/18

* * *

MR. PARRY: I am just here to oppose the pumping of Lake Kachess. Just financially it doesn't make sense. I've seen it when the water levels are low, and it takes years and years and years to fill back up to usable levels. I think it's dangerous when it gets low like that. I've hiked out there when the water levels have been very low, and the lake becomes very difficult to use. 1

And I'm concerned about the bull trout, just the loss of their habitat as an endangered species. I don't think enough thought has been put into actually handling the loss of that fish in that environment. 2

I don't think I've learned enough about the aspects of mitigating the damage to the environment and the fish and wildlife and the enjoyment of the lake by people like me and state park visitors. 3

I think it's an awful waste for something that cannot be replenished quickly enough to do it again. I think there's much better solutions. Like, I haven't seen any exploration of other conservatory measures being done instead of a one-time dump the lake water in Eastern Washington and see what happens. I just don't think it's well thought out, and I don't think it's cost-effective. 4

Thank you.

* * * * *

STATEMENT ON RECORD NO. 3 - 5/17/18

* * *

MS. WINDSOR-NEWMAN: I came back with some additional comments so that's why I'm here today.

The reason to vote no on the SDEIS pump plan, Roza Irrigation can't possibly afford the 500 million dollar proposed pump station and conveyance tunnel. That's one.

Number 2, Washington DOT will never allow the I-90 shutdowns required for the conveyance tunnel project and blasting. 1

Number 3: Without total Roza funding, Kittitas County taxpayers will have to bear the cost with no benefit to them for lost water.

Number 4: Roza farmers have historically shown they will not bear the cost either.

Five: Any of the possible options requiring pumping will result in a massive alteration of the Lake Kachess delicate ecosystem. This will negatively affect fish runs, water table, community wells, recreation opportunities, forest fire prevention, the forest, home values for Lake Kachess residents. 2

And then, the proposed SDEIS will be a disaster for Kittitas County residents, stripping them of one of their most precious resources that can't be replaced so that a small group of rich Yakima growers can expand an

agricultural business that ships a large portion of its crops out of the country. 2

Exclamation point, vote no.

* * * * *

C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF YAKIMA)

I, Marilynn S. McMartin, Washington State Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, hereby certify I reported the foregoing proceedings; said statements being taken before me on the date herein set forth; that said statements were taken by me in shorthand and thereafter under my direction transcribed, and that same is a full, true and correct record of the statements to the best of my ability, prepared pursuant to WAC 308-14-135.

I further certify that I am in no way related to any party or counsel to this matter; nor am I financially interested in the said action or outcome thereof.

Transcribed notes will be destroyed three years from the affixed date unless requested by any party or counsel to retain them.

IN WITNESS WHEREOF, I have hereunto set my hand this 31st day of May, 2018.

Marilynn S. McMartin, RDR, CRR
CCR NO. 2515

K2KConvey , BOR UCA <sha-uca-k2kconvey@usbr .gov>

[EXTERNAL] Proposed KDRPP and KKC Projects

1 message

Save Lake Kachess <contact@savelakekachess.org> Fri, May 25, 2018 at 10:01 PM
To: kkbt@usbr.gov, bocc@co.kittitas.wa.us

Greetings,

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used.

--
Ms Christina Orcutt
Skittles.colorful@gmail.com

Submitted via email to ***kkbt@usbr.gov***

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess and Keechelus SDEIS**

Dear Ms. McKinley:

Please accept these comments/questions regarding the KDRPP SDEIS.

Comments

1. Alternative 1 No Action I oppose all active alternatives of the KDRPP and KKC projects. Only Alternative 1, "No Action" is acceptable. 1

2. Failure to meet stated objectives. The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 Supplemental EIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document. My questions related to this topic are as follows: 2
   a. How does the proposed floating pump on Lake Kachess improve the health of the riverine environment?
   b. How does the proposed floating pump on Lake Kachess provide more sustainable water resources for municipal needs?
   c. How does the proposed floating pump on Lake Kachess provide more sustainable water for domestic needs?
   d. This entire statement is misleading to the public. The SDEIS puts forward a plan to drain additional water from Lake Kachess to benefit one singular irrigation district. Any future reports on this matter should accurately describe the purpose. 3

3. Failure to consider alternatives The DEIS and the SDEIS really only consider two alternatives: drain a natural lake to benefit downstream irrigators with no senior water rights or don't drain the lake. No other alternatives are considered to meet the irrigation security needs of the Roza Irrigation District farmers. My questions related to this topic are as follows: 4
   a. Why was water conservation, including repairs to the Roza open trenches not considered or at least integrated into the plan to reduce the additional water needs?
   b. Why was taking water from the Columbia River not considered?
   c. Why wasn't appropriate crop selection on lands without senior water rights considered?
   d. Why wasn't advanced water conservation methods considered?
   e. How does this DEIS and SDEIS meet the requirement to consider a range of reasonable alternatives which is required by NEPA?

I ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of special interest groups". We ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given…including data, references, and review procedures…for excluding each alternative.

The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and I therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

4. Conflicts of interest and lack of impartiality It would appear that this entire process to date – from the PEIS, to the DEIS and now the SDEIS have been crafted to push ahead the agenda of the YBIP workgroup rather than take an objective look at the problem and seek out solutions. Many members of this workgroup stand to profit personally from the YBIP and the KDRPP portion of the YBIP. My questions related to this topic are as follows:
   a. Why does the SDEIS only include 2 alternatives – drain Lake Kachess or don't?
   b. Are there truly no other alternatives that can give farmers without senior water rights any added water security?
   c. Is there NO opportunity to improve the delivery systems or to conserve or to use the water more effectively?

4

5. Failure to accurately disclose costs The statement of budget (Page 2-59) for KDRPP-FPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for KDRPP-FPP. Because the estimate is not a measure of central tendency (i.e., neither mean, median, or mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; e.g.

Low Estimate	Projected Estimate	High Estimate
197,400,000	282,000,000	423,000,000

5

as opposed to showing a single estimate of 282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a "low" or "high" correction, each will be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates.

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show KDRPP-FPP the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the KDRPP-FPP budget should present a $423,000,000 base. In all cases, the mitigation costs must be included. For some reason the required Bull Trout Volitional Passage is stated in the text (Page 2-60) to cost $23,000,000 (preliminary estimate) but is not included. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for the KDRPP-FPP.

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. We request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget,

and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

5

6. Failure to adequately estimate costs Table 2-5 of the SDEIS quotes a "Field cost" for construction of option 4, the KDRPP-FPP at $150,000,000. This seems like an oddly round number to represent any detailed research into the actual costs of construction. In fact, below table 2-5 please see comment b which states "Alternative 4 costs listed here are based on preliminary engineering and professional judgement". Please:
    a. Provide any/all detail on how this figure was established
    b. Explain the term "professional judgement"
        i. Whose judgement?
    c. Given that 2.5 years have passed since the DEIS, why was the SDEIS published without more detailed cost information on the Proposed Action alternative?
    d. Why is option 4 being put forward as the Proposed Action when little seems to be known about the actual cost of this plan?
    e. How can the public be expected to adequately comment on things such as "based on professional judgement"?
    f. How can the public adequately comment on a plan for which there seems to be little/no factual support for the purposed financial costs of the plan?
    g. Was option 4 identified as the Proposed Action based, at least in part, by table 2-5's claim that it is the least expensive active option?

    The same table estimates the power cost over 100 years at $5,000,000, which equals a mere $5,000 per year. I was personally told by BofR staff at both the Cle Elum and Ellensburg meetings that "Roza farmers will be reluctant to run the pumps any more than absolutely necessary as they aren't going to get any discounts on the electricity needed and running those pumps is going to be very, very expensive." These statements seem incongruent with the details of table 2-5, putting both into question and furthering my position that both the SDEIS and the verbal representations by BofR staff are slanted in favor of pushing this project forward rather than honestly evaluating the project on its merits. Regarding the cost of electricity in Table 2-5, please provide:
    a. Complete details on how this estimate of $5,000 per year for electricity was established, including estimates for the frequency and length of pump operations and the electrical demands for each pump while in operation.

6

7. Mitigation for reduced property values. I own and live full time in a home located at 40 Mountain View Lane, Easton, WA 98925. My home sits within 30 feet of the usual high water mark of Lake Kachess. Should the KDRPP be approved and implemented, there is no question that the value of my property will be significantly reduced. My questions related to this topic are as follows:
    a. Why does the SDEIS not address any mitigation for reductions in private property values effected by this proposed action?
    b. Will mitigation be provided for property owners whose property values are reduced by this action?
    c. How will any mitigation be calculated?
    d. If the parties do not agree on the mitigation amount, how will any disputes be resolved?
    e. Who will pay any mitigation?
    f. What timeframe will be involved in the mitigation process?
    g. Because the SDEIS does not address any mitigation for reductions in private property values, what assurances would private property owners have that mitigation would be available?

7

8. Impact on Campers and recreational users at Lake Kachess Despite having the information and ability to do so, the DEIS and SDEIS process failed to notify a large segment of the public who would be effected by this plan. The over 23,000 annual campground visitors and 11,000 annual boaters are entirely unaware of this plan. We have been visiting the campground weekly in an effort to notify these users and have been met with a complete lack of awareness of the proposal. In fact, we have been told we cannot distribute information within the campground to raise awareness on the issue. My questions related to this subject are as follows:

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a. Why has no effort been made to communicate with this segment of the public who should have been given an opportunity to participate in the process?
b. When will this group receive communication on the KDRPP proposal?
c. Will they be provided any opportunity to comment or participate in the process?
d. Simply telling them about it after it's a done deal fails to meet the SDEIS's public information obligation.
e. Why were no SDEIS public information sessions held West of the Cascades, when it is well known that a large population of the public who live on the West side of the Cascades regularly use Lake Kachess, many for decades or generations.
f. On page ES-Xii, the following suggestions are given to address recreational use of the lake "Extend boat ramps at Kachess Reservoir…if feasible, and construct new east shore ramp that would be available at all reservoir levels. My questions related to this topic are as follows:
   i) Would extending boat ramps at Kachess Reservoir include both public and private ramps?
   ii) Under what conditions would extending those ramps be feasible or not feasible?
   iii) What analysis of the lake geography has been done to suggest is extending any of the ramps for use during a KDRPP-FPP drawdown is truly feasible or not?
   iv) Describe the geography of the East shore ramp location and what the slope of the ramp will be during a drawdown. Will it be physically possible to use the ramp or will the slope simply be too steep for practical use as a boat launch?

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8. Increased forest vulnerability and Fire Hazard. The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility for fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. We demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. We ask this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. Under the guise of addressing the potential of global warming, this proposal fails to adequately address another element of global warming – that of added fire risk. In fact, this plan exacerbates that fire risk. My questions related to this topic are as follows:
   a. Given that the SDEIS identifies damage to the natural environment will be caused by the proposed action, what responsibility will those who approve and execute on this plan have for those ongoing damages?
   b. If there is a significant wildfire in the area that it exacerbated by a KDRPP-FPP draw down and cannot be adequately battled due to the unavailability of Kachess water for firefighting, who will be responsible for the damage and certain public outrage to follow?
   c. If, as a result of a KDRPP draw down, trees die on my property or on the property of the homeowners association to which I belong, who will pay for the cost of removal of those dead trees?

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9. Change in scope. The SDEIS states that the KDRPP-FPP is the "proposed action" and BoR/Dept. Ecology have not identified a "preferred alternative." This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner, would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been superseded by new policy. The

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SDEIS continues to show substantial impact with long term and irreversible damage. My questions related to this topic are as follows:

a. Summarize the negative impacts of KDRPP which led to the position in the DEIS that the "KDRPP and KKC projects must be considered as a single action and cannot be separated."
b. Summarize what the specific factors were which caused the change in direction in the SDEIS to now allow for only the KDRPP-FPP to be the proposed action without the inclusion of the KKC refill mechanism.
c. Please cite within what regulation or rules of operation the BofR is permitted to now issues a SDEIS which appears to be a complete departure from a foundational issue identified within the PDEIS and DEIS.
d. Please provide comparative hydrology that clarifies how and why the KDRPP-FPP can now stand alone as a solo project without the KKC refill mechanism. In other words, why was KKC required in 2012 and 2015 but now it's perfectly acceptable and "proposed" to proceed without KKC, beyond the fact that KKC appears to be far too expensive for the minimal refill water it can produce. The fact the KKC appears to be a failure does not automatically mean that KDRPP-FFP can stand on its own.

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10. Refill timing How long the lake will take to refill is paramount to my concerns about the proposed action. While it may be difficult to precisely predict the refill timing after a KDRPP-FPP draw down, the variations between the DEIS and the SDEIS raise questions as to the accuracy of the hydrology in both reports. The DEIS stated that without the KKC, Lake Kachess would likely not refill for 20 years. Now the SDEIS as much as throws out the KKC and states that after a KDRPP drowdown, Lake Kachess will take two to five years for refill without the benefit of KKC water (although a chart within the SDEIS shows a maximum of eight years to refill vs. five). My questions related to this topic are as follows:

a. Please provide the detailed hydrology that the 2015 DEIS was based on that purposed that the KKC was required as a refill mechanism without which Lake Kachess would like not refill for 20 years.
b. Please explain in detail what changed between 2015 and 2018 that now allows a refill prediction of 2-8 years when the 2015 prediction was 20 years or more.
c. Which report should be relied on? 2015 KKC is required as a part of KDRPP, or 2018 KDRPP doesn't need KKC and will refill 2-4 times faster than previously predicted?
d. How can the public be expected to make informed comments with such seemingly inconsistent hydrology predictions? Can either report be relied upon?

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11. Funding ambiguity requires another SDEIS Page ES-viii The SDEIS states the Bureau of Reclamation will "fund…some or all, or authorize Roza to fund" the KDRPP-FPP. This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FPP. At both the Cle Elum and Ellensburg meetings, I was told firmly and directly by BofR staff that "this project will NOT happen unless Roza pays for it." I was also told that "Roza will pay the costs of all mitigation required." These statements appears to misrepresent the content of the SDEIS that does not put forward any specifics on how the project will be funded or by whom. Had I relied on that verbal representation, my comments would be based on misinformation being perpetrated, whether intentionally or not, by BofR staff. My questions related to this topic are as follows:

a. Given that the SDEIS does not identify any specific funding source, why are BofR staff making affirmative verbal statements that Roza will pay 100% of the cost of the project.
b. Has the Roza board made any formal commitment to fund the project
c. When will the ultimate source of funding be determined and by whom?
d. If public funds are utilized to benefit a handful of private businesses in a singular water district, will that district be required to repay those funds?
e. If public funds are used for the project, will the public be offered another comment period or another process by which voters can express if they approve of spending half a billion dollars on a water project that benefits only a select group of private interests?
f. How can the public be expected to adequately comment on the SDEIS without knowledge of whether or not public funds will be utilized. This should be among the topics of an addition

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SDEIS, with an appropriate comment period, so that Washington citizens can determine whether or not they want to spend a half a billion dollars to enhance the profits of a few private businesses. 13

12. Execution ambiguity The SDEIS states that it is possible that Roza Irrigation District may be authorized to "fund, design, construct, operate, and maintain some or all of the Proposed Action." This is another important detail that cannot be pushed to some future, unknown time. In order to provide informed comments, the public needs to understand WHO will be designing, constructing, operating and maintaining such a complicated, untested, dangerous project and what the expertise is of that entity. My questions related to this topic are as follows:
    a. What specific expertise does Roza Irrigation District have that qualifies it to design such a project?
    b. What specific expertise does Roza Irrigation District have that qualifies it to construct such a project? 14
    c. What specific expertise does Roza Irrigation District have that qualifies it to operate such a project?
    d. What specific expertise does Roza Irrigation District have that qualifies it to maintain such a project?
    e. Specifically, what means will be used to oversee the efforts of the Roza Irrigation district in each of these regards?
    f. Who will fund that cost of such oversight?

13. Untested engineering? Page ES-v states "Initially a design for a floating pumping plant….was rejected as a feasible alternative because it was determined at that time that a floating pumping plant could not accommodate the large pumps, motors, power demands, and pipeline sizes needed for the KDRPP capacity requirements." It would appear from this comment that this may be the first floating pumping plant of its size in existence. It also suggests a significant shift in the understanding of the engineering abilities required for this project to operate successfully. My questions related to this topic are as follows: 15
    a. Are there any similar floating pumping plants currently in operation in the United States?
        1. If so, are they functioning as intended?
    b. Is KDRPP a "guinnea pig" for floating pump projects?
    c. Specifically, what research, reports, investigation, etc. was assembled that led to this dramatic shift in direction?
    d. What would say the likelihood is that the KDRPP-FPP would succeed from an engineering standpoint? Can this thing actually be built and will it float and work as intended?
    e. How can the public be expected to adequately comment on what appears to be un-proven engineering. It's one thing to go along with spending a half a billion dollars on a project that is assured of success and quite a different thing to support a half a billion dollars on an unproven technology.

14. Objectivity vs "Suggestion" Executive Summary, page ES-v The SDEIS asserts the presence of a "value analysis study that suggested the feasibility of a floating pumping plant". The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion", brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. My questions related to this topic are as follows: 16
    a. Please provide full descriptions of the "suggestions,' including the methods, data, and conclusions.
    b. Please explain what additional engineering evaluation was conducted in conjunction with the SDEIS that led to the KDRPP-FPP shifting from being "rejected" in 2015 to being "Proposed" in 2018.

15. Use beyond currently intended/stated purpose. It is difficult to believe that, once a half a billion dollars are spent (by someone, yet to be determined) on the KDRPP-FPP, that it will sit idle and only 17

be used as stated in the SDEIS. Page ES-x states "they (Roza) need to improve water supply and reduce prorationing whenever feasible." My questions related to this subject are as follows:

a. What, specifically, are the criteria that determine the meaning of "whenever feasible"?
b. What assurances does the public have that use of the KDRPP-FPP pumps will be limited to only years with proratable water below 70%?
c. If the plant is paid for and operated by Roza, will Roza make the decisions on when to operate the pumps?

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16. Impact on private wells My home is served by a public "group A" water system located a few hundred feet from the Lake Kachess shoreline with senior water rights dating back to Pre-May 10, 1905. This water system serves water to 162 homes in our community, to our fire hydrants and for fire-fighting. Our community provided comments to the DEIS which included a request for specifics regarding mitigation in the probable event that our well goes dry due to a draw down and subsequent refill period. The SDEIS states clearly that wells in the area are in danger of being "de-watered". In the 2.5 years since the DEIS, the best the SDEIS can offer in regards to drying up private wells is to "monitor and mitigate" without any specificity as to how a dried up well can be mitigated. My questions related to this topic are as follows:

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a. By what right does any entity, whether BofR, Roza or any other "participating entity" usurp the senior water rights of 162 homeowners (plus others in other communities around Lake Kachess) and take an action that they know will dry up senior water rights wells. Please state specifically what gives the BofR, Roza or any other entity the right to usurp senior water rights.
b. How can I, or my neighbors, make informed comments on this SDEIS when have no idea what "monitor and mitigate" might mean?
c. Why does the SDEIS not provide or even discuss any funding for well-dewatering mitigation?
d. Who will pay for mitigation?
e. Please provide a detailed action plan for well-dewatering mitigation in a supplemental SDEIS with appropriate comment period.

17. Volitional Bull Trout Passage Improvements From ES-xi, "Volitional Bull Trout Passage Improvements are proposed as a part of the KDRPP…" This statement and others give the impression that the proposed action will improve passage for Bull Trout and perhaps even "enhance" the bull trout population. This is an inaccurate depiction of what will certainly be a significant negative impact on the Lake Kachess bull trout population.

The Bull Trout Volitional Passage project is described on Page 2-67, Table 2.9. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed, this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage.

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In some years (e.g., conditions such as occurred between 2001 – 2008) the pump…and therefore the channel…will be in continuous operation. Eight years of steep slope conditions, requiring 8 years of Bull Trout dependence on the volitional passage, represents 2-3 spawning cycles. *In other words, the entire population of Lake Kachess Bull Trout will be destroyed if the volitional passage is not effective.* No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not included in the budget costs, it cannot be assumed to be part of the project going forward. Another concern is the lack of water flowing into tributaries of Little Kachess Lake, which will be the water needed to charge the volitional passage. The SDEIS states the tributary water disappears at the end of the year…when the water will be needed in the passage. There is no description of the length of the passage (the length and Southern outlet are never described in text, numeric, or schematic terms).

Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo and geo receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

For all of these reasons, the public demands more than a "conceptual design" of the volitional passage. This mitigation must be described in ways that make sure sufficient water will be available to charge the passage, the length, slope, and other characteristics of the passage will not deter Bull Trout passage, the returning redds will be able to find the entry point of the volitional passage, and the passageway to Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population. 19

We ask that the volitional passage design and operation be updated to address all of these concerns, and that the revised design be available to citizens for review and comment in a subsequent SDEIS, prior to any Final DEIS or ROD.

Also, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS." What fraction of the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the proposed alternative and all the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives and the proposed alternative meet these legal requirements?

18. <u>USFWS Biological Opinion</u> It is known that the USFWS is conducting a Biological Opinion on the existing Yakima watershed with respect to the current operation of existing dams and irrigation districts. That BiOp is not expected to be published until sometime in the fall of 2018. We request that another SDEIS be produced after said BiOp is published as it could impact the entire watershed including the necessity for the projects named in the current SDEIS for Kachess. My questions related to this topic are as follows<u>:</u> 20
    a. Why was the SDEIS prepared and released PRIOR to the USFWS Biological Opinion?
    b. If a true understanding of the impacts of the proposed plan was the intended purpose, would it not have been prudent to wait for the biological opinion of the current system before a true understanding of the impacts of the proposed action can be evaluated?

19. <u>Geology & Stability</u> The existing dam at Lake Kachess is an earthen structure. As such, I have concerns about the stability of that structure due to the added stress on the system caused by long periods of drawdown and refill. Additionally, the SDEIS discusses the steep terrain under the current water line in some areas and suggests that landslides may occur. My questions related to these topics are as follows: 21
    a. What studies have been done to determine what impact years of low water and drying of the earthen dam will have on its structural integrity.
    b. What topography is available of Lake Kachess below the current low water line?
    c. What studies have been done to determine areas within the lake that are most susseptable to landslides?
    d. How will these potential landslides be mitigated and what impact will they have on the operations of the KDRPP?

20. <u>Accurate view of exposed shoreline Chapter 2, Section 2.10</u> Regarding depiction of Lake Kachess after drawdown of 80 ft. The SDEIS (Page 2-66) indicates the 80 ft. drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An "imposed line" on the water conceals the true impact of 628 acres of exposure. We ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as "thatched", "outlined water" or other 22

techniques, but as mud or silt consistent with aerial pictures. An additional note; residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation. 22

21. <u>"Wants" are misrepresented as "needs"</u> Page ES-x of the SDEIS states "Roza and the Proratable Entities' purpose for the action is to access up to 200,000 acre-feet of water from Kachess Reservoir during drought years, as they NEED to improve water supply and reduce prorationing. Farmers in the Roza water district (and other proratable entities should any others decide to participate in the plan) purchased their land knowing full well that it came with only proratable water rights, and that would mean that there would be drought years where they would receive far less water. The price they paid for these lands reflected this water-constrained condition. These same farmers opted to plant crops such as wine grapes and tree fruit, where the financial impact of a drought year is far greater than it would be on annual crops such as vegetables. These are all business decisions made by these farmers with full knowledge of the water limitations in place. Now they want public policy to be amended to better fit with their own business decisions and enhance their profitability without placing any additional restrictions or requirements on them to conserve water or plant crops appropriate in a proratable district. 23
    a. If implemented would the KDRPP ROD also place any restrictions on farmers in the Roza Irrigation district to stop them from planting thirstier crops?
    b. If implemented would the KDRPP ROD place any restrictions on the trend of replacing annual crops with long term crops such as tree fruit and wine grapes?
    c. If implemented would the KDRPP ROD place any requirements for the repair of the 60+ miles of open, earthen irrigation distribution trenches?
    d. If implemented would the KDRPP ROD place any requirements on farmers for improved water conservation?

22. <u>Misrepresentation of Lake Kachess</u> Kachess Reservoir includes only the top 239,000 acre feet which is currently managed by the BofR and available for downstream users under the existing system. This SDEIS has NOTHING to do with the Kachess Reservoir. It has everything to do with withdrawing a significant amount of water from Lake Kachess, a naturally formed lake. Throughout the SDEIS words such as Kachess Reservoir, Dead Storage, Inactive Pool and the like blatantly misrepresent the intention and potential impacts of the Proposed Action. I demand that all future reports and communications accurately describe this project as an attempt to withdraw 200,000 acre feet of water from Lake Kachess as this is a more factual and less confusing depiction of the project. 24

23. <u>Impacts on private property Impact to private property</u> The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to "several private parcels and homes or cabins" that will be affected, but a better description would be "a substantial numbers of private residences…etc." Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This easily number 300 homesites, far more than would be inferred from the term "several." Please provide: 25
    a. An accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline

    BoR commissioned a study by Dean Potter LLC, a real estate appraisal firm, to determine the negative impact on private properties resulting from the pumping drawdown. This study showed a negative impact of 5-10%, but even this was an under-estimate. The Potter study imposed a primary screening criterion that the only value a lake had, was the view it provided to a homesite. This eliminated 85% of the homesites in the immediate area of the lake, even though the residents had chosen their homes because of access to the lake. The Potter LLC study claimed that even though the lake could become inaccessible for years at a time, people who lived there to enjoy boating, fishing, hiking, picnicking, and other water-related activities, wouldn't notice the lake had disappeared. The only ones who would be adversely affected would be those people with a

view…but not just any view, an "unfiltered view" (no description of what this might mean). Even this was perverted, to say only people with unfiltered views within 0.1 mile of the lake would be affected. The study actually claimed that a view of a full lake within 0.1 miles, and a view of the drawn down lake more than 0.1 miles away, would be equivalent. There is no precedent for such exclusionary criteria, and there is no justification using standard methods of appraisal. The entire exercise is a transparent effort to minimize any negative impact. Even so, a 5-10% negative on impacted properties was reported.

Even though the BoR commissioned this study, and even though the study went to extraordinary lengths to minimize impact, the BoR declared in the SDEIS there was "no way to reliably assign or assess impacts…" The only analysis reported was that conducted by Dean Potter LLC, it used flawed methods that were biased to under-reporting of negative impacts on private property values, but it still reported significant (5-10%) negative impacts. Yet strangely, even these were rejected, without providing any data to support the rejection.

Lake Kachess homeowners have repeatedly requested to be involved in designing a valid and reliable study of the negative impacts on property values of proposed alternatives. BoR has ignored and rejected all requests, and instead contracted for a study that (although flawed by its obvious intent to minimize findings of damage) still showed significant damage to private property caused by the 80 ft. drawdown. Despite overwhelming evidence to the contrary…and their own analysis…BoR now claims the study they just completed, in fact can't be done!

.It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. We demand that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued.

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24. Negative financial impacts to Kittitas County The implications of negative impact on private property values go beyond the directly affected citizens. A reduction in property values affects the tax base of the county, including schools and fire departments, and will reduce available resources to provide essential services. This is acknowledged in SDEIS Page 4-326 as follows: *"while effects on property values would most directly affect property owners, the wider community would also experience effects."* In other words, private property owners, fire departments, schools, city and county governments, and others would also be negatively impacted.

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25. Lawsuits and/or other impacts caused by usurping senior water rights A KDRPP draw down has the probability of resulting in the existing 239,000 acre-ft of water NOT being available in subsequent years for those holding senior water rights.
    a. How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam?
    b. Who will pay to provide senior water rights holders with the water they have a right to?
    c. How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property?
    d. Who will pay to defend the lawsuits that are likely to result from proratable water rights usurping senior rights holders?
    e. Whether or not public funds are used to fund the project, public funds and a public process is being used to put forward the Proposed Action – how can citizens of Washington State expect state agencies NOT to be named in those resulting suits?
    f. We request further studies about this and communication to those senior water rights holders of possible impacts to them by the SDEIS active alternatives. Then another public comment period be opened for their comments.

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I was told verbally by BofR staff at the Cle Elum meeting and told by a lawyer representing the Roza Irrigation District that, if necessary, Roza would forgo ALL Kachess water in order that senior water rights holders receive their water after a draw down.

a. Given that the SDEIS's own data shows a refill period of up to 8 years, what assurances do senior water rights holders have that, even if Roza accepts zero water in a post draw-down year that the water they have a legal right to will exist and be available for them?
b. How does a plan that could potentially result in Roza farmers receiving ZERO water in a given year or years in favor of senior water rights holders benefit Roza farmers when compared to the existing proratable system?
c. Are Roza farmers aware that this plan may result in years when they receive ZERO Kachess water? Without this knowledge or understanding, how can Roza farmers be expected to make informed comments on the Proposed Action. This VITAL information should be clearly stated in an additional SDEIS and Roza farmers and others provided an opportunity to comment given this important information.

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26. Water Conservation and Market Reallocation Page 1-4 notes that the Yakima Basin Integrated Plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation). Define the number of acre-feet saved by water conservation and market reallocation in the whole Yakima watershed.

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27. Noise Only the Proposed Alternative has pumps at lake level, exposed to the environment (all others have pumps at the bottom of a shaft). P2-75 notes the maximum permissible environmental noise is 55 dBA.

a. What is the expected noise level in dBA at 100 feet from the pumps?
b. At 1000 feet?
c. Will the pumps be running 24/7 once they start running?
d. What additional action will be taking if the pump operations exceed the maximum permissible environmental noise of 55dBA?
e. How does the noise produced by Alternative 4 compare to the noise produced in alternatives 2 or 3?

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28. Permanent Habitat Loss P2-71 notes permanent habitat loss with the preferred alternative. Define the effect of permanent habitat loss on the spotted owl, bull trout, and other endangered / listed species.

31

29. Decreased Recreation Desirability P2-73 notes decreased recreation desirability and conflict with "established SIL/VOQ" Quantify the economic impact of the decreased recreation desirability. Under what authority are established SIL/VOQ permitted to be violated?

32

30. Water Impairment P3-29, 3-45: both Keechelus and Kachess are listed as "category 5" water impairment because of PCB contamination. In the 2015 DEIS, only Keechelus was noted to have PCB contamination.

a. Please release the report which also indicates that Kachess has a similar contamination.
b. Would dredging and construction activities not stir up sediment containing PCBs?
c. What increase of PCB levels is expected on the basis of the proposed alternative construction activities?

33

31. Lake Drainage during construction The description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff). How can this be accomplished minus the pumping plant? Please:

a. Describe the mechanics of draining the lake to allow construction.
b. What happens to the excess water, and how is the "flip-flop" flow pattern maintained if the lake is drained early in the season?
c. What is the effect on the Easton reach of the Yakima river spawning?

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32. <u>The taking of a vital public resource to benefit only a few private businesses</u> Fresh water is quickly becoming one of the most vital and valuable resources on the planet. Allowing this vital public resource to be commandeered to serve, support and enhance the profits of a limited number of private businesses, businesses who had full knowledge of their lands water constraints, is wrong. The BofR and the Department of Ecology, and our elected officials should be looking for ways to preserve and protect this limited natural resource rather than pushing forward an unproven, un-financially justified plan that could destroy the source of this life-giving water. The tens of millions of dollars of public funds that have already been used to push this project ahead is wrong and not in the interest of the public good. 35

Because both the NEPA and SEPA process must be followed, I request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments. 36

Please send us me copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

Christine Johnson

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[EXTERNAL] 2018 SDEIS comments

1 message

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Tue, Jul 10, 2018 at 8:17 AM

Submitted via email to ***kkbt@usbr.gov***

Ms. Candace McKinley

Environmental Program Manager

Bureau of Reclamation / Columbia-Cascades Area Office

1917 March Road

Yakima, WA 98901-2058

RE: **Kachess and Keechelus DEIS**

Dear Ms. McKinley:

I am submitting these comments to the Kachess Drought Relief Pumping Plant (KDRPP) and Keechelus Reservoir-to-Kachess Reservoir Conveyance (KKC) 2018 Supplemental Draft Environmental Impact Statement (SDEIS) released on April 13th, 2018. All comments are submitted under both NEPA and SEPA.

Comments

1) **Alternative 1 No Action** We oppose all active alternatives of the KDRPP and KKC projects. Only

Alternative 1, “No Action” is acceptable. 1

2) **The Yakima Plan programmatic FEIS failed to provide a range of alternatives**—just the Yakima Basin 2

Integrated Water Management Plan (YBIP) and No Action. How will this be rectified? 2

3) **Failure to comply with NEPA requirement for consideration of alternatives.** The National Environmental Protection Act (NEPA) requires consideration of a reasonable range of alternatives that can accomplish the purpose of the proposed action [40 CFR 1508.18]. Consideration of "reasonable alternatives" means all state-of-the-art alternatives must be rigorously explored and properly evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them [Section 1502.14]. Of particular concern with regard to the KDRPP-KKC SDEIS, and its predecessor the KDRPP-KKC DEIS, the alternatives must not be slanted to favor the interests of a particular party.

The stated purpose of the DEIS was to "provide more reliable and sustainable water resources for the health of the riverine environmental and for agricultural, municipal, and domestic needs. (Page ES-I, January 2015). The 2018 Supplemental EIS failed to offer a stated purpose and one must presume the 2015 DEIS statement of purpose applies to the 2018 document.

The 2015 DEIS and the 2018 SDEIS fail to meet the explicit NEPA requirement of considering a reasonable range of alternatives that can accomplish the purpose of the proposed action. The 2015 DEIS considered only two alternatives: the Kachess Drought Relief Pumping Plant (KDRPP) with two locations, and the Keechelus-to-Kachess Conveyance (KKC) with two locations. In fact, the DEIS stated these should all be considered part of a single action because they could not be separated. (That is, Lake Kachess could not be drained without a refill mechanism from Lake Keechelus.) In reality, therefore, only one action alternative was considered (pumping plant plus conveyance) vs. no action in the 2015 DEIS. 3

The 2018 SDEIS continued and compounded this failure. A conveyance tunnel with two locations was considered, and a pumping plant with three locations. While the SDEIS goes to great contortions to try to make these appear to be several different alternatives, they are in fact one alternative…extracting water from a natural lake to benefit downstream special interests.

Compliance with NEPA would require consideration of true alternatives to accomplish the stated purpose of providing more reliable and sustainable water resources. Any reasonable list of alternatives would include serious consideration of water conservation methods, water market strategies, crop mix management (e.g., fallowing), use of technology (ditch lining, micro-irrigation systems, electronic monitoring systems, increased security from water theft), and advanced technology (underground drip systems). In fact, subsequent analysis of YBIP by the Water Research Center of Washington State University has shown that the purpose of YBIP can be achieved at lower cost and with greater effect (i.e., greater net increase in available water) by application of conservation and water market strategies.

We have previously noted this deficiency in the 2015 DEIS, and repeat it for the 2018 SDEIS. Both the DEIS and the SDEIS fail to comply with the NEPA requirement of considering all reasonable alternatives to achieve the stated purpose. In fact, this fatal flaw originates from the

Programmatic EIS released in 2012, which failed to consider all reasonable alternatives and entrenched the problem which was carried forward in the 2015 DEIS and 2018 SDEIS. The 2012 Programmatic Yakima Plan EIS not only failed to consider a range of alternatives, as required by NEPA, it failed to follow federal Program Principals and Guidelines (PPG) in accurately assigning costs and benefits to the arbitrarily narrow list of alternatives. All subsequent NEPA processes and documents have therefore been legally inadequate and the SDEIS cannot be "tiered" to an inadequate PEIS. The only way to rectify this problem is to return to the original Programmatic Yakima Plan EIS and do it correctly. We ask that the NEPA legal requirements be met by re-issuing a NEPA compliant Programmatic EIS, follow that with a NEPA compliant Draft EIS, and proceed in a manner that considers a range of alternatives to the YBIP's stated purpose. 3

We ask that water conservation methods, water market strategies, state-of-the-art water management technologies, and crop management strategies be considered separately and in combination to achieve the purpose(s) of YBIP, and, as alternatives to the proposed Kachess Lake pumping plant. It is clear the PEIS, DEIS and SDEIS have been prepared (in violation of NEPA guidance) "slanted to the interest of special interest groups". We ask, as required in the NEPA process, that all alternatives not considered be listed and a full explanation be given… including data, references, and review procedures…for excluding each alternative.

The process that generated the DEIS and SDEIS of record cannot be relied upon to produce a NEPA compliant document that objectively represents all reasonable alternatives, and we therefore request that an independent, non-biased, non-government, academic entity be engaged to conduct these analyses.

4) **Involve all affected native tribes** The SDEIS notes the Yakama Nation has historical ties to the Lake

Kachess area, and documents historical and cultural heritage connections. The Snoqualmie Tribe also has roots in the Lake Kachess area, and artifacts from that federally recognized tribe have been found along the shoreline of Lake Kachess. How will the Snoqualmie Tribe's historical and cultural standing be recognized in regard to this project, and they be brought into the discussion? How will the Snoqualmie Tribe be contacted, the potential impact of this project on their culture be explained, and will they be given an opportunity to provide comment prior to a Final DEIS and/or ROD? Also please describe what happens with Native American artifacts unearthed during construction or following activation of pumps and draining to / below the natural lake level. 4

5) **Impact on Campers at Lake Kachess** The impact on 23,000 annual visitors and 11,000 annual boaters at

USFS Lake Kachess Campground will be devastating. Page 2-6 indicates the lake could be drawn down 80 feet "as early as June in severe drought years." [NOTE: The campground typically opens on Memorial Day Weekend…June 1st.] In other words, the campground would not open, possibly for a number of years. To date there has been no effort at communicating with the individuals, families, and organizations that use this campground, some with decades of continuous annual use. The possibility of drastically reduced access to this treasured 5

recreational facility has never been communicated to its users, let alone the possibility that it would close and not re-open for a year or more. As noted below with respect to ES-xii, we noted the inadequacy of a post hoc communication strategy to inform recreational users of the impact of KDRPP-FPP. The impact on USFS Lake Kachess Campground is but one, but a very important example of the need for a different and better approach. How will the past users of USFS Lake Kachess Campground be contacted and informed of the potential impact on Lake Kachess, and will they be provided an opportunity for public comment? It is clear the current SDEIS has failed to accomplish this essential public information obligation, and that a subsequent SDEIS and full public disclosure are needed to correct this failure. Please provide a written plan as to how the past campground users will be contacted and the timeline for this process. 5

6) **Objectivity vs "Suggestion" Executive Summary, page ES-v** The SDEIS asserts the presence of a

"value analysis study that suggested the feasibility of a floating pumping plant". The assertion that a redirection of the previous DEIS, leading to a comprehensive shift in emphasis and removal of conveyance as practical options, would be driven by a "suggestion", brings into question the objectivity and rigor of either previous or subsequent, or both, analytic methodologies. Please provide full descriptions of the "suggestions,' including the methods, data, and conclusions implied by the inadequate and confusing term "suggestions." 6

7) **Funding ambiguity requires another SDEIS Page ES-viii** The SDEIS states the Bureau of

Reclamation will "fund…some or all, or authorize Roza to fund" the KDRPP-FPP. This statement inadequately informs Washington citizens…as well as Roza farmers…of their likely obligations for financial support of the KDRPP-FP. Please provide the legal, legislative, and/or other basis for stating Bureau of Reclamation will fund some or all of the project, the conditions under which that funding would occur, the criteria for obligating Washington citizens to finance this project, how "all or some" will be determined, and by whom, and the time frame for securing financing. The issue is further confused in the same page which states the Record of Decision (ROD) will determine which entity (BoR, Dept. Ecol., Roza, etc.) will be responsible for what action (fund, design, construct, operate, etc.). These are not "details" to be clarified at a later time, but substantively important facts that citizens must know in order to provide informed comment. Please provide all the information that is promised for a future ROD, but in a subsequent SDEIS that will be made available to citizens with an appropriate comment period. 7

8) **Change in Scope Page ES-viii** The SDEIS states that the KDRPP-FPP is the "proposed action" and

BoR/Dept. Ecology have not identified a "preferred alternative." This represents a major departure from the previous DEIS, which indicate a KKC conveyance project and a KDRPP project must be considered as a "single action and cannot be separated." The logic of that position was that emptying Lake Kachess in an artificial and unprecedented manner, would require a refill mechanism (e.g., KKC). Apparently that logic was incorrect and has been 8

superseded by new policy. The SDEIS continues to show substantial impact with long term and irreversible damage. Please summarize the negative impacts of KDRPP known in 2012, any differences (positive or negative) in impacts based upon the SDEIS, and explain why the differences are "acceptable" in 2018. This explanation should also serve to inform citizens as to why no "preferred alternative" is provided. This explanation is critical to citizens' understanding of the project and their potential financial obligations. It appears, under the meaning of the law, this action essentially removes KKC options, and thereby changes the scope of the original Programmatic DEIS to a different Program. BoR must explain how this change in scope of the program can be accomplished within a no-longer-accurate description of the PDEIS. 8

9) **Impact on private wells** **Page ES-xi** The negative impact of lowering the water level of Lake

Kachess on private wells (ES-xi) is documented, with the conclusion that significant numbers of wells will be "dewatered." It is unacceptable to tell citizens that their water supply will likely disappear, and then offer a remedy of "monitor and mitigate." Well failures ("dewatering") will likely occur in October/November when Lake Kachess is at its lowest level, this is also shortly before snow arrives and access to homesites becomes difficult. The possibility of losing water at this time, without an in-place action plan for making homeowners whole, is unacceptable. A comprehensive strategy composed of proven techniques that can be implemented immediately upon need is required prior to a Final DEIS and/or ROD. We ask that this comprehensive strategy, its details, costs, and operational features, be described in detail, and citizens be provided with this information along with an appropriate comment period, prior to issuing a FDEIS or ROD. 9

Some property owners on the east side of Lake Kachess have senior water rights for their wells. According to the SDEIS, these wells will run dry if the lake is pumped down. How is it possible that prorated junior water rights holders of the Roza irrigation district can dewater those Kachess wells which have senior water rights? State specific statutes and other justifications. Also, there is no money for mitigation for the loss of well water. What is the process for getting a well drilled deeper, and what is the timeline for getting a well repaired which has run dry? 10

The hydrology data in the SDEIS does not describe effects on the aquifer below the lake and into the town of Easton. How will draining the lake affect wells downstream of the lake? By what criteria, will these effects be calculated.

10) **Lack of communication to the affected public** **Page ES-xiii** The DEIS states the project will

implement a "public communication strategy" to inform recreationists and others of the impacts of the proposed action(s) on USFS campgrounds, fishing, boating, hiking and other activities, and to mitigate the impact. Given that a single USFS campground (Lake Kachess Campground) registers 23,000 people and 11,000 boat launches annually, it should be obvious that this communication strategy should be pro-active, and communicated now, not at an unknown time in the future. Citizens must be informed prior to experiencing impact, in order to 11

understand the potential impact on individuals and families, and to participate meaningfully in the deliberative process. Given the SDEIS documentation of negative impact on recreational activity, and the acknowledgement most affected individuals come from the Seattle area, it is clear NEPA/SEPA process represented by the SDEIS has failed to involve and inform affected citizens and organizations as required by law. Please develop, describe, distribute for comment, and implement a "public communications strategy" immediately, to reach the thousands of affected parties who have not been recognized or adequately served by the SDEIS. This strategy should include mass communications, well-publicized meetings, and other techniques throughout the Seattle and Puget Sound area. 11

11) **Misrepresentation of Lake Kachess** **Chapter 1, Section 1.2** The SDEIS indicates Kachess Reservoir

was constructed over a naturally occurring glacial lake…[joining]…Big Kachess Lake and Little Kachess Lake. These two lakes, acknowledged to be lakes in the SDEIS, represent the entirety of all KDRPP options, including the proposed action KDRPP-FPP. Thus, every drop of water to be pumped by the KDRPP will come from Big Kachess Lake. It is a misrepresentation, no doubt intentional, to assert this project involves Kachess Reservoir. The KDRPP has nothing to do with the reservoir (stated in page 1-1 to be the water over the natural lake) and exclusively affects the natural lake, Big Kachess Lake. This attempt to misrepresent a natural, glacial-created lake as a reservoir has only one purpose, to mislead and confuse the public. We ask that all representations of this project be corrected, and that inaccurate and confusing euphemisms such as "dead storage" and "inactive pool" be eliminated. The correct term should be either "Lake Kachess" or "Big Kachess Lake". There is a Kachess Reservoir, the approximately 65 ft. of water currently managed by BoR. Below that is the natural Lake Kachess, and it is this body of water that is exclusively the target of, and impacted by, KDRPP. KDRPP has nothing to do with Kachess Reservoir. We ask that this confusion and misrepresentation stop, and accurate terminology be used that informs rather than confuses the public. This requires modification of language used in the SDEIS and all public communications, including correction of schematics such as Page 1-7. 12

12) **Who will be responsible for costs, implementation and operation?** **Chapter 1, Table 1-11 on page**

1-11 This SDEIS Table indicates roles and responsibilities of participating entities. Roza Irrigation District will (according to Table 1-1) "Fund, design, construct, operate…etc.…the selected alternative." This can only refer to the KDRPP-FPP. This statement of financial obligation also appears on Page 1-17. Unfortunately, there is confusion in the public's mind, largely due to conflicting public comments by Roza representatives and BoR representatives. It is imperative that this confusion be removed before any Final DEIS and/or ROD be issued. We ask, therefore, that a complete and unambiguous statement of financial obligation of KDRPP-FPP be issued. The statement should make clear that 100% of the costs of implementing KDRPP-FPP, including all mitigation, litigation, and other assigned costs, will be borne by Roza Irrigation District or if not Roza, then by which entity/entities. 13

13) **Teanaway Community Forest** **Chapter 1, Section 1.8.2 on Page 1-18** The terms and conditions of the purchase of the Teanaway Property (TCF) is misrepresented with regard to its relationship to KDRPP-FPP and does so in a way that introduces extreme bias in favor of the project proponents. Page 1-18 indicates 214,000 acre-feet of additional water supply must be 14

in place by 2025, and if not the Board of Natural Resources is authorized to transfer the TCF to the common school trust and manage it for the beneficiaries of the trust.

The proponents of KDRPP-FPP make public representations that this means, unless their project is implemented, the TCF will be sold, clear-cut for timber revenue, and the property lost forever for recreation purposes. Simply stated, that is not true. The terms of the TCF do not require the property be reverted to the educational trust; that is only one alternative provided among many. (*See RCW 90.38.130 Authorization to purchase land---management and disposal of land*) Other options include continued management of the property for recreation, maintaining wildlife habitat, implementing conservation projects, and other beneficial purposes.

In fact, the only obligation is that a report be submitted indicating what progress has been achieved toward the milestone and requiring submission of a new plan if the milestone is not achieved. This can continue until the year 2045. It further states the milestone can be achieved through any of a combination of methods: conservation, improved management techniques, water marketing strategies, storage, and others. In fact, the report is required to state how much "net increase in available water" (the correct term, not "additional water supply" as stated in the SDEIS which implies all milestone water must be from storage). To date, the SDEIS claims 124,131 acre-feet of net increase in water due to conservation, and in the past has claimed as much as 300,000 acre-feet in future conservation savings. This would more than fulfill the 214,000 acre-feet milestone, were the planned conservation projects fully implemented. 14

Finally, **if** the very unlikely possibility of a reversion to trust fund management and clearcutting is selectively highlighted in the SDEIS, **then** the far more likely alternatives should be given equal space. After a decade of public recreation use, with untold thousands of new citizen-recreationists advocating for the Teanaway as a new resource, and an army of volunteer citizens and organizations upgrading the Teanaway, the public backlash against clearcutting would be overwhelming. With its misrepresentation of the Teanaway Purchase, the SDEIS has veered into a political speculation that is both inappropriate and inaccurate. However, given that SDEIS has now opened the door, in a subsequent SDEIS it must clarify, correct, and accurately inform the public of what is, and is not, required and implied by the Teanaway Purchase. We ask that this be done not only in a future SDEIS, but in all communication about the relationship between Teanaway and KDRPP-FPP, or any other element of YBIP. In addition, we asked that a notification of clarification be immediately issued stating that based on current and future water conservation savings, it is anticipated that the obligations under RCW 90.38.130 will be met with no additional water needed from the YBIP projects.

14) **<u>Accurate Cost Estimate</u> <u>Chapter 2, Sections 2.7</u>** The statement of budget (Page 2-59) for KDRPP-FPP is incomplete and under-valued. The "estimated costs" for Alternatives 2, 3, and 4 are shown, but since Alternative 4 is the "proposed option" it will be the focus of this comment (however these comments apply equally to the other alternatives). An "estimate" that has a variance of -30% to +50% is difficult to interpret, as in the case of the $282,000,000 estimate for KDRPP-FPP. Because the estimate is not a measure of central tendency (i.e., neither mean, median, or mode) it appears to be affected by non-measurement bias. Given the uncertainty surrounding the estimate, it would be far preferable to show the actual estimates in numerical terms; e.g. 15

Low Estimate	Projected Estimate	High Estimate
197,400,000	282,000,000	423,000,000

as opposed to showing a single estimate of 282,000,000, without assigning a probability for variance ranges. That is, without knowing the likelihood of a “low” or “high” correction, each will be assumed to have equal probability, but clearly, they have different implications in terms of outcome. Under those circumstances, each estimate must be assumed to have an equal probability, and the actual numbers become more important. That would, or at least should, cause the SDEIS to state numerical estimates in each of the three (low, presented, high) estimates.

Taking that approach and understanding that taxpayers and farmers will be primarily concerned with their maximum obligation (especially in view of the fact that each option seems to be approximately equally likely), SDEIS should show KDRPP-FPP the high budget estimate. Readers can decide which one is the most likely and relevant to them. Following the approach of most readers, the KDRPP-FPP budget should present a $423,000,000 base. In all cases, the mitigation costs must be included. For some reason the required Bull Trout Volitional Passage is stated in the text (Page 2-60) to cost $23,000,000 (preliminary estimate) but is not included. That would bring the cost to $444,000,000. This does not include the large mitigation costs of private well failure mitigation, campground restoration and mitigation, negative impact on private property values, fire risk hazard increase, fire suppression cost increase, and many others mentioned in the SDEIS but not budgeted, and/or raised by citizens but ignored. It is likely the public should anticipate a financial obligation of closer to $500,000,000 than $282,000,000 for the KDRPP-FPP. 15

In summary, the budget presentation is inadequate, misleading, incomplete, and systematically biased to undervaluation. We request that all budget materials be revised to provide numerical values for all estimates and high/low ranges, that all mitigation costs be calculated and included in the budget, and that this be presented in a subsequent SDEIS that will allow people to review and comment before a Final DEIS and/or ROD is released.

15) **Accurate view of exposed shoreline Chapter 2, Section 2.10** Regarding depiction of Lake Kachess after drawdown of 80 ft. The SDEIS (Page 2-66) indicates the 80 ft. drawdown will expose 628 acres of shoreline. In no place is this accurately depicted. What profiles are shown continue to show water in the areas that would become mud or silt. An “imposed line” on the water conceals the true impact of 628 acres of exposure. We ask that an accurately scaled map be provided that depicts exposed shoreline in an accurate fashion, neither as “thatched”, “outlined water” or other techniques, but as mud or silt consistent with aerial pictures. An additional note; residents know the current drawdown exposes several large islands, and the drawdown will expand and increase the number of such exposures. It is inaccurate and deceptive to portray the drawdown without the exposure of the mud and silt islands. Please correct this misrepresentation. 16

16) **Bull Trout Chapter 2, Section 2.10 and elsewhere in the SDEIS** The Bull Trout Volitional Passage project is described on Page 2-67, Table 2.9. The "steep slope conditions" between Big Kachess Lake and Little Kachess Lake will occur when the water level is approximately 2,208 elevation and the pumping operation begins. These "steep slope" conditions will occur an additional 6,225 days if KDRPP-FPP is installed, this will mean 34 additional years (out of 90 modeled), and an average of 183 days a year, when Bull Trout Passage will be completely dependent on the Volitional Passage.

In some years (e.g., conditions such as occurred between 2001 – 2008) the pump…and therefore the channel…will be in continuous operation. Eight years of steep slope conditions, requiring 8 years of Bull Trout dependence on the volitional passage, represents 2-3 spawning cycles. ***In other words, the entire population of Lake Kachess Bull Trout will be destroyed if the volitional passage is not effective.*** No evidence is provided that the volitional passage is effective, has been demonstrated in other Bull Trout population support activities, has completed a "proof of concept" test, or is in any way assured to be successful to preventing destruction of the Lake Kachess Bull Trout population. Also, because the volitional passage is not included in the budget costs, it cannot be assumed to be part of the project going forward. Another concern is the lack of water flowing into tributaries of Little Kachess Lake, which will be the water needed to charge the volitional passage. The SDEIS states the tributary water disappears at the end of the year…when the water will be needed in the passage. There is no description of the length of the passage (the length and Southern outlet are never described in text, numeric, or schematic terms). 17

Finally, the Bull Trout find their way to spawning tributary by a complex but not-well-understood physiology of chemo and geo receptors. This returns them to the spawning tributary, and eventually spawning bed, where they started life. Creating a volitional passage means the Bull Trout will have to find an artificial tributary that did not exist when they were young and locate it several miles from where the "narrows" and "steep shelf" originated their life cycle.

For all of these reasons, the public demands more than a "conceptual design" of the volitional passage. This mitigation must be described in ways that make sure sufficient water will be available to charge the passage, the length, slope, and other characteristics of the passage will not deter Bull Trout passage, the returning redds will be able to find the entry point of the volitional passage, and the passageway to Box Creek will be maintained. The current plastic and straw bale approach is inadequate and has led to further declines of the population.

We ask that the volitional passage design and operation be updated to address all of these concerns, and that the revised design be available to citizens for review and comment in a subsequent SDEIS, prior to any Final DEIS or ROD.

Also, the Bull Trout Enhancement plan seems to allow killing the population in Kachess (dredging a channel between big and little Kachess but ignoring the side stream Box Creek where the trout actually are) but mitigating with improved populations elsewhere. P1-13 notes "While bull trout enhancement was included in the DEIS, specific BTE projects are not included in the Proposed Action, therefore not carried forward as part of this SDEIS." What fraction of

the resident endangered Bull Trout population in Lake Kachess is estimated will be killed under the proposed alternative and all the active alternatives? What fraction of loss is allowable under law and the EPA? How will the active alternatives and the proposed alternative meet these legal requirements? 17

17) **USFWS BiOp** It is known that the USFWS is conducting a Biological Opinion on the existing Yakima watershed with respect to the current operation of existing dams and irrigation districts. That BiOp is not expected to be published until sometime in the fall of 2018. We request that another SDEIS be produced after said BiOp is published as it could impact the entire watershed including the necessity for the projects named in the current SDEIS for Kachess. 18

18) **Increased forest vulnerability and Fire Hazard**. The vegetation and wetlands (Page 2-70) and densely forested watershed (Page 3-98) will, according to the SDEIS suffer with reduced water levels in Lake Kachess. This will mean stressed trees and other foliage in a single drought year, and in multiple years of pump operation dead trees due to lack of water and insect vulnerability. The Snoqualmie Pass Fire and Rescue agency has the primary responsibility fire and emergency medical services in the Lake Kachess and Lake Keechelus areas. This state agency has repeatedly raised concerns about increased risk due to wildfires, reduced capacity to suppress fires (due to lowering of the lake and removal of a source of water for firefighting), the increased incidence of accidents and injuries due to construction activity, and need for public education and communication strategies necessitated by KDRPP and KKC projects. Despite numerous and repeated expressions of concern and requests to meet with the responsible Fire Departments, the BoR has ignored and rejected these requests. This is a clear violation of the NEPA/SEPA process and renders the current SDEIS incomplete and unacceptable. We demand that as part of the NEPA/SEPA process for Lake Keechelus/Lake Kachess project proposals, BoR and other affiliated entities engage leadership of the Snoqualmie Pass Fire and Rescue agency and work together to develop a mutually acceptable plan for mitigating the previously stated concerns. We ask this plan be developed and included in a subsequent SDEIS, distributed to all stakeholders, and submitted for public comment prior to any Final DEIS or ROD. 19

19) **Impact to private property** The SDEIS consistently under-represents the impact on private residences and property owners. Page 3-155 refers to “several private parcels and homes or cabins” that will be affected, but a better description would be “substantial numbers of private residences…etc.” Lake Kachess Village HOA has 162 homesites, East Kachess HOA has 70 homesites, Kachess Ridge has approximately 80 homesites, and East Kachess Ride another 20-30, plus numerous unaffiliated residences in the area. This easily number 300 homesites, far more than would be inferred from the term “several.” The systematic bias against representing impact on private citizens is displayed on page 4-23, when it excludes any homesite farther than 0.1 mile from shoreline from negative impact by drawdown of the lake. We ask for an accurate description, in numerical terms, of individuals and homesites affected by the Lake Kachess drawdown. As a minimum, this would include all homesites on Kachess Lake Road, Via Kachess Road, the Kachess Dam and eastern shoreline road, and private residences within 5.0 miles of the shoreline. 20

20) **Impact to private property** BoR commissioned a study by Dean Potter LLC, a real estate appraisal firm, to determine the negative impact on private properties resulting from the pumping drawdown. This study showed a negative impact of 5-10%, but even this was an under-estimate. The Potter study imposed a primary screening criterion that the only value a lake had, was the view it provided to a homesite. This eliminated 85% of the homesites in the immediate area of the lake, even though the residents had chosen their homes because of access to the lake. The Potter LLC study claimed that even though the lake could become inaccessible for years at a time, people who lived there to enjoy boating, fishing, hiking, picnicking, and other water-related activities, wouldn't notice the lake had disappeared. The only ones who would be adversely affected would be those people with a view…but not just any view, an "unfiltered view" (no description of what this might mean). Even this was perverted, to say only people with unfiltered views within 0.1 mile of the lake would be affected. The study actually claimed that a view of a full lake within 0.1 miles, and a view of the drawn down lake more than 0.1 miles away, would be equivalent. There is no precedent for such exclusionary criteria, and there is no justification using standard methods of appraisal. The entire exercise is a transparent effort to minimize any negative impact. Even so, a 5-10% negative on impacted properties was reported.

Even though the BoR commissioned this study, and even though the study went to extraordinary lengths to minimize impact, the BoR declared in the SDEIS there was "no way to reliably assign or assess impacts…" The only analysis reported was that conducted by Dean Potter LLC, it used flawed methods that were biased to under-reporting of negative impacts on private property values, but it still reported significant (5-10%) negative impacts. Yet strangely, even these were rejected, without providing any data to support the rejection.

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Lake Kachess homeowners have repeatedly requested to be involved in designing a valid and reliable study of the negative impacts on property values of proposed alternatives. BoR has ignored and rejected all requests, and instead contracted for a study that (although flawed by its obvious intent to minimize findings of damage) still showed significant damage to private property caused by the 80 ft. drawdown. Despite overwhelming evidence to the contrary…and their own analysis…BoR now claims the study they just completed, in fact can't be done!

The implications of negative impact on private property values go beyond the affected citizens. A reduction in property values affects the tax base of the county and fire departments, and will reduce available resources to provide essential services. This is acknowledged in SDEIS Page 4-326 as follows: "*while effects on property values would most directly affect property owners, the wider community would also experience effects."* In other words, private property owners, fire departments, city and county governments, and others would also be negatively impacted.

It is unacceptable to ignore and misrepresent the obvious reality that drawdown of Lake Kachess will have substantial negative impact on property owners and the wider community. We demand that the BoR engage the Lake Kachess community in designing and conducting a valid and reliable study of negative impact on private property values. This study should be conducted by an independent and non-conflicted expert with the results peer-reviewed according to standard practice. This study must be conducted and distributed in a subsequent SDEIS, with the public provided an opportunity to comment before a Final DEIS or ROD is issued.

21) **Impact on Senior Water Rights** How will those with senior water rights to the existing 239,000 acre-ft of water currently stored by Kachess Dam be mitigated when that water is no longer available once Lake Kachess water level is lowered below the outlet to its dam? Who will pay to provide senior water rights holders with the water they have a right to? How will it affect the senior water rights holders' own farming operations and/or enjoyment of their property? We request further studies about this and communication to those senior water rights holders of possible impacts to them by the SDEIS active alternatives. Then another public comment period be opened for their comments. 21

22) **Drought Definition** Who will define the 70% of prorated water? What unbiased, non-irrigation district, party will make that determination? Page 2-6 of the SDEIS says, "Project proponents would use the pumping plant during drought years and could possibly use it in following years as the reservoir refills to a level above the existing gravity outlet." Does this mean the definition of when the pumps could be used has changed from the prior definition of drought (less than 70% of prorated water expected to be available)? Why would the pump be used in following years "as the reservoir refills to a level above the existing gravity outlet?" Would that not prevent or delay refill? 22

23) **New Water Rights** Table 1-2 on p 1-20 notes that ecology will "issue water rights as necessary." We've been told over and over that no new rights will be generated from this plan. How will new water rights be issued? To whom? 23

24) **Water Conservation and Market Reallocation** Page 1-4 notes that the Yakima Basin Integrated Plan has 7 components, but several are not included in the KDRPP EIS (groundwater storage, water conservation, market reallocation). Define the number of acre-feet saved by water conservation and market reallocation in the whole Yakima watershed. 24

25) **Noise** Only the preferred alternative has pumps at lake level, exposed to the environment (all others have pumps at the bottom of a shaft). P2-75 notes the maximum permissible environmental noise is 55 dBA. What is the expected noise level in dBA at 100 feet from the pumps? At 1000 feet? Will the pumps be running 24/7 once they start running? 25

26) **KKC tunnel material** 115,000 cubic yards of KKC tunnel excavated material comes out on Kachess Lake Road with no mention of where it will be trucked to or the impact of over 5000 truckloads of material being hauled off. Where will the 115,000 cubic yards of KKC tunnel material be deposited? What safety measures and scheduling of hauling equipment will be made during the tunnel construction to insure the safe and customary use of Lake Kachess County Road by campground users and local property owners and guests? 26

27) **Turbidity** P2-68 notes all action alternatives will result in localized short-term exceedance of turbidity standard. Define the degree of turbidity exceedance and the effect it will have on native fish populations

27

28) **Permanent Habitat Loss** P2-71 notes permanent habitat loss with the preferred alternative. Define the effect of permanent habitat loss on the spotted owl, bull trout, and other endangered / listed species.

28

29) **Decreased Recreation Desirability** P2-73 notes decreased recreation desirability and conflict with "established SIL/VOQ" Quantify the economic impact of the decreased recreation desirability. Under what authority are established SIL/VOQ permitted to be violated?

29

30) **Purchase of private property** P2-76 notes that the parcels north of the existing beach road on the East side are indeed private and may need to be purchased from their current owners for the boat ramp and parking lot. There is no money in the SDEIS for property purchase. How many lots and at what expected price will be purchased? These additional costs should be included in the SDEIS Alternatives. A revised SDEIS is warranted.

30

31) **Water Impairment** P3-29, 3-45: both Keechelus and Kachess are listed as "category 5" water impairment because of PCB contamination. In the 2015 DEIS, only Keechelus was noted to have PCB contamination. Please release the report which also indicates that Kachess has a similar contamination. Would dredging and construction activities not stir up sediment containing PCBs? What increase of PCB levels is expected on the basis of the proposed alternative construction activities?

31

32) **Water Filtering** How will the water from Keechelus be moved to Kachess? What kind of filtration system will be installed to prevent any I-90 pollutants in Lake Keechelus from being transferred to Lake Kachess? If any hydraulic equipment is used, how will any PAH be kept from entering Lake Kachess?

32

33) **Lake Drainage during construction** The description of the preferred alternative notes that the lake would need to be drained to allow construction (p2-41ff). Describe the mechanics of draining the lake to allow construction. What happens to the excess water, and how is the "flip-flop" flow pattern maintained if the lake is drained early in the season? What is the effect on the Easton reach of the Yakima river spawning?

33

Because both the NEPA and SEPA process must be followed, we request that the Bureau of Reclamation and WA Department of Ecology each provide separate responses to the above comments.

34

Please send us a copy of any additional SDEIS, FEIS or Record of Decision that is released.

Thank you for considering and acting on these comments.

Sincerely,

Submitted via email to **kkbt@usbr.gov**

Ms. Candace McKinley
Environmental Program Manager
Bureau of Reclamation / Columbia-Cascades Area Office
1917 March Road
Yakima, WA 98901-2058

RE: **Kachess and Keechelus SDEIS**

Dear Ms. McKinley:

Please accept these comments/questions regarding the KDRPP SDEIS.

Please find attached 600 signatures on a petition opposing KDRPP.

Thank you for including these opposition statements in the official SDEIS comments.

Sincerely,

Christine Johnson

Christine Johnson
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(NO MAIL DELIVERY AT THIS ADDRESS)

MAILING ADDRESS
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c/o Raymond Johnson
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I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

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SAVE LAKE KACHESS

I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin. 1

Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kachess Lake and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin each year and future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used. 2

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I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

I am writing to express my concern and disapproval of the proposed Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance within Kittitas County. The environmental risks/impact and estimated financial cost greatly outweigh any potential benefits to the Yakima Basin.

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I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

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SAVE LAKE KACHESS

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I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

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9/9/17 Friends of Lake Kachess Event – sign in sheet

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9/9/17 Friends of Lake Kachess Event – sign in sheet

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I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

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Colton moore	98922	Colton no 62@ [illegible] 9 mai	

I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

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Name	Residence Zip Code	Email Address	Signature
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Claudette Maybo	98922	" "	

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Capr.com Eagles. 700 people

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SAVE LAKE KACHESS

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Dylan King	98038	kingdylan860@gmail.com	[signature]

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I am opposed to the Kachess Drought Relief Pumping Plant (KDRPP) and the Keechelus to Kachess Conveyance (KKC)

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JEAN FOUNTAIN	98059	KACHESS538@gmail.com	
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John Braly	98925	shwilofu@msn.com	
Rita Braly	98925	rita jhanson@yahoo	
Alexis Adams	98922	alexisnadams83@gmail.com	
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Jen Bod	98940	jen_bod@yahoo.com	

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George C Delegans	98704		George C. Delegans

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Additionally, I staunchly oppose these proposed projects in the interest of preservation of ancient Kach[illegible]ke and the ecosystem within the Wenatchee National Forest. This land should be preserved for the thousands of visitors to the Kachess Lake basin e[illegible]ve[illegible]d future generations. It is inappropriate to move forward with projects that have unknown risks to wilderness watershed areas within Kittitas County.

I would also like to petition that these proposed projects (Kachess Drought Relief Pumping Plant and Keechelus Reservoir-to-Kachess Reservoir Conveyance) pass a voter referendum before any tax payer money is used.

No.	Name	Residence Zip Code	Email Address	Signature
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