



April 2, 2010

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Office of the Inspector General
U.S. Department of the Interior
Washington, D.C.

(Via e-mail: William_Wiser@doioig.gov)

Dear Mr. Wiser,

This letter is submitted on behalf of the Center for Environmental Law & Policy, Columbia Riverkeeper, and Sierra Club, three public interest organizations dedicated to protection of the Columbia River.

Your offices are reviewing the proposed expenditure of \$50 million as authorized pursuant to the American Recovery and Reinvestment Act of 2009 (ARRA or Stimulus Act) to build an irrigation pipeline, known as the Weber Siphon Complex, near Moses Lake, Washington. We offer the following information for your consideration.

- (1) Failure to conduct NEPA analysis prior to allocation of Stimulus Act funding to the Weber Siphon project.

The Weber Siphon Project involves construction of the "second barrel" of a pipeline that moves water across the Columbia Basin Irrigation Project (CBP) in eastern Washington. The first barrel, constructed many years ago, has sufficient capacity to serve existing irrigated lands. The second barrel is proposed in order to expand irrigation to 140,000 acres located outside the current service area of the CBP, at a cost of \$4.6 billion or more. In order to expand irrigation to these acres, the Bureau is conducting environmental and feasibility studies that are not yet complete. See USBR, Odessa Subarea Special Study (www.usbr.gov/pn/programs/ucao_misc/odessa/updates).

Notwithstanding that environmental studies are not complete, in April 2009 the Department of the Interior, through the Bureau of Reclamation, allocated \$50 million in Stimulus Act funding to construct the second barrel of the Weber Siphon. In announcing the award, the Bureau explained that the Siphon will supply water to a relatively small project known as the Lake Roosevelt Incremental Storage Releases Project (aka Lake Roosevelt Drawdown). However, only a small increment (10% or less) of the Weber Siphon's capacity is required for the Lake Roosevelt Drawdown. The Weber Siphon is actually intended to supply water to the larger Odessa Subarea lands.

The Bureau's failure to acknowledge that Stimulus Act funding is being used to build a pipeline for the 140,000 acre Odessa Subarea project is a misrepresentation to the

public of the purposes of the \$50 million expenditure. More importantly, National Environmental Policy Act (NEPA) analysis is not complete for this project, as required by Section 1609 of the ARRA. As described below, the environmental impacts of the Weber Siphon project are substantial. We therefore support the OIG review of the allocation of \$50 million in Stimulus Act funds to the Weber Siphon Project, including a determination whether the allocation complies with NEPA requirements as mandated by the ARRA.

(2) The Columbia Basin Project and the Odessa Subarea Study

(a) History of the CBP & the Odessa Subarea

The Weber Siphon is part of the Columbia Basin Project, authorized in the 1930s by President Roosevelt. The costs of plumbing the Columbia Plateau for irrigation far exceeded original estimates, exceeding even the construction costs for Grand Coulee Dam, which impounds Columbia River water and provides the energy to pump water uphill for irrigation. Although the original CBP boundaries encompassed about 1.1 million acres, for several reasons only 640,000 acres are presently under irrigation. Still, the CBP is one of the largest federal irrigation projects in the U.S. See Paul Pitzer, *Grand Coulee: Harnessing a Dream*, (WSU Press, 1994).

One area originally scheduled to receive CBP water was the Odessa Subarea, located between the cities of Moses Lake and Spokane. But, Odessa-area farmers rejected federal water (and associated costs and divestment conditions), and instead drilled wells for irrigation, tapping into the Columbia Plateau's ancient (and non-recharging) basalt aquifer system. Even as early as the 1960s, it was clear that these aquifers were being mined and groundwater supply would last only 30-40 years. See Columbia Institute, *Odessa Aquifers: Crisis in Sustainability* (2006) (<http://columbia-institute.org/oa/odessa/Home.html>).

As predicted, Odessa groundwater levels have declined at dramatic rates – 10 feet per year or more in areas of intensive pumping where wells extend to depths of 2,000 feet below ground surface. Not surprisingly, Odessa irrigators are now asking the Bureau to expand the CBP and replace depleted groundwater with surface water diverted from the Columbia River – water that would be delivered via the second barrel of the Weber Siphon.

One problematic claim must be addressed. Odessa irrigators incorrectly assert that their groundwater pumping was intended to last only until the CBP expanded eastward. It is important to note that the federal government is not obligated to provide water to Odessa Subarea farmers. Moreover, times have changed. Federal laws require that the environmental and economic impacts associated with expansion of the CBP be accounted for before any expansion may occur.

(b) Economics of CBP Expansion

In the early 1990s, the Bureau shelved proposals to expand the CBP into the Odessa Subarea when independent economic analyses (including a GAO review) revealed huge losses to taxpayers and ratepayers. See GAO, *Water Resources: Issues Concerning Expanded Irrigation in the Columbia Basin Project*, (Jan. 31, 1986) (www.gao.gov/products/RCED-86-82BR); Whittlesey, N., W. Butcher, and M. Martz,

Water Project Subsidies: How They Develop and Grow (Illahee, 1994)
(www.waterplanet.ws/pdf/wpoa20061101.pdf).

These cost-benefit analyses concluded that lands irrigated by the CBP enjoy enormous subsidies in the form of (1) below market energy to pump water uphill to the CBP, and (2) lost hydropower generation at Grand Coulee and 10 downstream dams. Subsidies estimated at up to \$500 per CBP acre per year are shifted to federal taxpayers and regional power ratepayers. This public cost-shift has caused policymakers to reject past proposals to expand the CBP.

Notwithstanding the subsidies, Odessa Subarea irrigators argue that if the CBP is not expanded to replace depleted groundwater they will lose their ability to farm, thus—creating losses in local economic benefits. These losses, however, have been overstated. In support of CBP expansion, the Washington Potato Commission funded a study that is widely cited for the erroneous conclusion that loss of Odessa Subarea acreage (due to groundwater depletion) would cause a loss of \$630 million in agricultural revenues. A critique of the Potato Commission Study identified several errors and omissions in the report, including that the \$630 million figure represents a worst-case scenario that even the authors admit is unlikely to occur. See J.R. Hamilton, A Review of “The Economic Impact of a Possible Irrigation-Water Shortage in Odessa Sub- Basin: Potato Production and Processing (S. Bhattacharjee and D. Holland, WSU, 6/6/05)” (www.celp.org/pdf/HamiltonAnalysis.pdf). Importantly, Odessa Subarea lands are intermixed with successful dryland wheat farms, some of Washington’s most valuable agricultural assets.

(c) Environmental Impacts of CBP Expansion

The second barrel of the Weber Siphon is intended to divert water from the Columbia River. For several reasons, the removal of up to 2,000 cubic feet per second (cfs), the capacity of the Weber Siphon, would cause substantial adverse environmental impacts. As discussed above, these impacts have yet to be studied under NEPA, as required by Section 1609 of the ARRA.

- The National Academies of Science recommend that the Department of Ecology not authorize new water diversions from the Columbia River. See National Research Council, *Managing the Columbia River: Instream Flows, Water Withdrawals, and Salmon Survival* (2004).
- NOAA Fisheries requires “bucket for bucket” mitigation for water taken from the Columbia River in order to protect the 13 endangered and threatened salmon species that migrate through the Columbia River system.
- Washington State has imposed a moratorium on new withdrawals from the Columbia unless such withdrawals are mitigated.
- Drawdown of Lake Roosevelt exposes toxics-laden shorelines along the reservoir, now subject to a major Superfund investigation. See U.S. Environmental Protection, *Region 10 Cleanup: Upper Columbia River* (yosemite.epa.gov/R10/CLEANUP.NSF/UCR/Technical+Documents)
- Climate change is exacerbating the loss of Columbia River water as reduced snowpack and glacier melt decrease river flows during late summer. See University of Washington Climate Impacts Group, *Washington Climate Impacts Assessment (6-09)* (cses.washington.edu/db/pdf/wacciareport681.pdf)

- Finally, upcoming re-negotiation of the Columbia River Treaty between the United States and Canada may lead to changes in Columbia River water storage patterns that release substantially less water into the U.S. portion of the Columbia River. See NW Power & Conservation Council, Columbia River Treaty 2014/2024 Review (12-3-08) (www.nwcouncil.org/news/2008/12/4.pdf); R.P. Osborn, Columbia River Treaty, Past and Possible Futures (2008) (www.celp.org/pdf/columbiarivertreatyRPO2008.pdf).

Stimulus Act funding of the Weber Siphon effectively prejudices the decision whether to expand the CBP. The Bureau's denial of the connection between the Weber Siphon and the Odessa Subarea Study continues a strategy of planning and building a series of individual projects related to the CBP without revealing the connected whole. Regrettably, the public and decision makers remain uninformed about the total costs to taxpayers and ratepayers.

For the foregoing environmental and economic reasons, the allocation of federal funds to the Weber Siphon expansion reflects poorly on Stimulus Act implementation and ill-serves the public. The decision to fund the Weber Siphon without consideration of these impacts should be reconsidered.

Thank you for your consideration.

Sincerely,



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