Columbia Institute for Water Policy

May 29, 2007

Bureau of Reclamation
Attention: Jim Blanchard
Special Projects Manager
PO Box 815
Ephrata, WA 98823-0815

Submitted via e-mail to jblanchard@pn.usbr.gov

Re: Potholes Supplemental Feed Route
Comments on Draft Environmental Assessment

Dear Mr. Blanchard,

Thank you for the opportunity to provide comments on the Potholes Supplemental Feed Route Draft Environmental Assessment (EA). These comments are submitted on behalf of the Columbia Institute and the Center for Environmental Law & Policy, public interest organizations dedicated to protecting and restoring the water resources of the Columbia watershed and throughout Washington state. As per our e-mail communication last week, because the comment deadline fell on Sunday, May 27, these comments are submitted on the first business day following the deadline.

Section I: General Comments

1. Piece-meal analysis divorced from the USBR Odessa Subarea Special Study

The Potholes EA fails to acknowledge the relationship between developing a supplemental feed route and serving Columbia Basin Project (CBP) water to the Odessa Subarea. Ongoing studies of the Odessa Subarea indicate that lack of capacity in the East Low Canal will be one constraint on proposals to provide water to that area. (USBR 2006, pp. 7-8.) In addition, the Bureau has pending a water right application to appropriate an additional 200 cfs/30,000 acre-feet of water from Lake Roosevelt for the purpose of serving supply to the Odessa Subarea. It is a specific goal of the Potholes supplemental feed route to free up capacity in the East Low Canal, yet the EA contains no mention of the utilization of that capacity for Odessa Subarea water supply purposes.

While the Potholes EA asserts that a supplemental feed route is necessary to provide reliable supply to the South Columbia Basin and East Columbia Basin Irrigation

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Districts (referred to herein as SCBID), it contains no documentation of that problem. As a result, the justification for the supplemental feed route appears is questionable. Are there irrigators in the south portion of the CBP who do not receive adequate water? Where is the discussion of that problem? If not, what is the purpose of this expensive "fix"?

2. Piece-meal analysis of new damsites

Several proposed new dam and reservoir sites are underway in and around the CBP, but no reference is made to these projects. In particular, appraisal-level studies associated with Washington's Columbia River Water Management Program are now underway and will be released in the summer of 2007, with Bureau of Reclamation participation. These studies assess the suitability of Hawk Creek, Foster Creek, Lower Crab Creek and Sand Hollow Creek as new dam/reservoirs sites. (MWH 2005).

The Bureau's Odessa Subarea Special Study also identifies a number of possible new dam/reservoir sites within or near the CBP for Odessa storage and which are hydrologically connected to the Potholes supplemental feedroute alternatives. (Bureau 2006).

The dam sites identified in the referenced studies are hydraulically connected (naturally or through CBP operations) to the CBP and Upper Crab Creek. They also represent potential to degrade or destroy habitat on the Columbia Plateau that should be cumulatively assessed with the Potholes proposal. Yet, the geographic scope of the Potholes EA is limited to impacts solely in Grant County, with a particular focus on Upper Crab Creek.

3. Columbia River Stream Flow Impacts

Because the Potholes supplemental feed route will facilitate withdrawal of water to serve the Odessa Subarea, the project has potential to impact flows in the Columbia River. In addition, it is not clear from the EA what the source of the water to the SCBID will be. The EA implies that there will be no additional water withdrawals associated with the delivery of an extra 25,000 to 87,000 acre-feet to SCBID, yet does not explain how this will be accomplished, particularly given that pumping to the feed route is contemplated throughout the season.

The significance of this omission lies in the fact that the Bureau has declared that this project will not have impacts on stream flows in the Columbia River. Presumably, by making this determination, the Bureau has exempted the project from Section 7 review under the Endangered Species Act, along with consideration in the FCRPS Biological Opinion process.

4. Cumulative Effects Indicate Significant Impacts

The cumulative effects of the multiple, inter-connected water supply projects identified above, including mainstem off-channel dam/reservoir projects and the Odessa Subarea dam/reservoir projects, lead to the conclusion that there are substantial cumulative effects on water supply, hydrology and water resources in and around the Columbia Basin Project. The EA fails to address these impacts. As a

result, a finding of no significant impact and sole reliance on the use of an environmental assessment is inappropriate for the Potholes supplemental feed route project.

Section II: Specific Potholes EA Comments

Section 1.1 (Background)

The background statement fails to discuss the issues related to Odessa Subarea Special Study. It also fails to demonstrate that there is a need for additional water supply in the SCBID.

Section 1.2 (Purpose & Need)

This section notes that unreliable deliveries "could" impact SCBID, but does not provide facts or analysis to show that SCBID is in fact impacted.

Section 1.3 (Cooperating Agencies & Related Actions)

The EA acknowledges the Bureau's relationship with the state of Washington regarding CBP projects, but fails to identify related actions such as the Odessa Subarea and mainstem off-channel dam projects. Ironically, some of these projects are identified in the very Memorandum of Understanding referenced at the beginning of this section of the EA.

Given the potential impacts of the proposal on the Columbia River stream flows, NOAA Fisheries should be included as a cooperating partner.

Section 1.7.1 (NEPA)

A finding of no significant impact is inappropriate for this project. The EA should be expanded to an environmental impact statement that includes substantial cumulative effects analysis.

Section 2 (Alternatives)

The alternatives identify substantial increases in deliveries to Potholes Reservoir and/or the SCBID. But none of the alternatives identifies from what source the additional water (72,000 AF, 87,000 AF and 25,000 AF respectively) would be diverted and the impacts to that source. Will the northern CBP irrigation districts cease using this water? Will Banks Lake be drawn down? Or will the water come from Lake Roosevelt and therefore impact Columbia River stream flows?

Section 3.1 (Resources Not Affected)

The exclusion of economic discussion is based on an incomplete definition. The economics of the proposal include the costs of construction and operation. Although the Technical Memorandum (Alternative A-Crab Creek) discusses cost estimates, neither the memo nor the EA provide cost-benefit analyses, including who pays, for how long and where the benefits accrue. Exclusion of "economics" from the EA is inappropriate.

Moreover, if SCBID irrigators are now or in the future at risk of not receiving full water supply, that presumably would be an economic impact bearing discussion. The lack of such information indicates that the stated project purpose and need is unsupported.

Section 4.7 (Water Quality)

Ecology recently discussed the Potholes supplemental feed route in its programmatic environmental impact statement (PEIS) for the Columbia River Water Management Program. (Ecology 2007). The PEIS notes that the supplemental feed route involves linking water bodies that have differing water quality and suggests that this could create water quality impacts involving fecal coliform, excess nutrients, toxics (TCDDs, PCBs), and temperature. The PEIS notes that spreading out water deliveries over the course of the irrigation season may reduce dilution capacity in certain waterways. Finally, Ecology's PEIS states that the Bureau "will evaluate potential water quality impacts of the Supplemental Feed Route in its NEPA EA on the project." (Ecology 2007, PEIS at p. 5-30).

The EA does not include adequate analysis of water quality impacts. Some of the analysis is not credible, including speculation that additional water and future riparian cover in Crab Creek will lead to cooler water temperatures. Some of the analysis is absent.

Finally, the Technical Memorandum indicates that some 4,000 to 5,000 tons of sediment could be delivered downstream as a result of increased flows in Crab Creek. Yet there is no discussion of the extent to which this sediment poses water quality problems, either as sediment loading or as the vehicle to deliver conventional and non-conventional pollutants and toxic contaminants.

Overall, the EA fails to serious describe or identify water quality impacts that would occur to Crab Creek and downstream water bodies as a result of increasing natural streamflow by up to an order of magnitude (or more). Although it may be a tradition of the CBP to convert natural stream systems to become conveyance canals and wasteways, that does not make the practice correct or legal under state water quality laws.

Full environmental impact analysis of the water quality impacts associated with the Crab Creek alternatives is needed. The EA is deficient for lack of it.

Section 4.12 (Cumulative Effects)

As discussed above, the failure to discuss ongoing water projects in and around the Columbia Basin Project renders the cumulative effects discussion inadequate. The Bureau should examine all ongoing and reasonably foreseeable projects, including the Columbia River Water Management Program and its off-channel storage projects proposal, the Odessa Subarea Special Study, the Lake Roosevelt drawdown (including the Bureau's pending water right application for 200 cfs/30,000 AF to deliver water to the Odessa Subarea) and any other projects which hold potential to impact water resources in the Columbia River as well as resources within the CBP itself.

Thank you for the opportunity to provide comments on the Potholes Supplemental Feed Route draft Environmental Assessment. Please feel free to contact me if you have any questions. Please also add us to the mailing list and any e-mail list you maintain for this project.

Yours very truly,

Rachael Paschal Osborn

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cc: NOAA Fisheries
Derek Sandison, Washington Department of Ecology
Gary Passmore, Confederated Colville Tribes
Phil Rigdon, Yakama Nation
Rudy Peone, Spokane Tribe

The following references are incorporated herein by reference:

MWH, 2005. Columbia River Mainstem Storage Options, Washington – Off-Channel Storage Assessment Pre-Appraisal Report (Dec. 2005). Available at: http://www.ecy.wa.gov/programs/wr/cwp/images/pdf/crssr_final_12062005.pdf

U.S. Bureau of Reclamation, 2006. Odessa Subarea Special Study, Initial Alternative Development and Evaluation (Sept. 2006). Available at: http://www.usbr.gov/pn/programs/ucao_misc/odessa/index.html

Washington Dept. of Ecology, 2007. Final Programmatic Environmental Impact Statement for the Columbia River Water Management Program, ECY Publ. No. 07-11-009 (Feb. 15, 2007) (Ecology 2007). Available at: http://www.ecy.wa.gov/programs/wr/cwp/eis.html