

March 28, 2012

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RE: Comments on FPEIS For Yakima River Basin Water Enhancement Project

We are writing to provide comments after reviewing the Final Programmatic Environmental Impact Statement (FPEIS) for the Integrated Water Resource Management Plan of the Yakima River Basin Water Enhancement Project (YRBWEP). Our organization is the Friends of the Teanaway (FOTT), and, as our name implies, our primary focus is on the Teanaway River valley. FOTT's mission is to encourage responsible stewardship of the Teanaway valley, conserve its forest lands, protect its waters and wildlife, and preserve its recreational opportunities, and generally protect for future generations this very special ecosystem.

1. Overview Comments on the YRBWEP. Although our focus is on the Teanaway portion of the proposed plan, several issues jump out at us. This proposed plan obviously has positive and negative elements for all parties concerned with it, but the damage to a very special and long established wilderness area resulting from the construction of a new, higher dam at Bumping Lake is a major negative. Another major negative is the huge, multi-billion dollar cost of the project, which will be passed on to all taxpayers in a time of economic belt-tightening.

In light of these and other negatives, it does not appear that other alternatives to the proposed plan have been fully considered. In particular, it does not appear that the importance and value of water conservation measures have been seriously explored. Conservation measures, in and of themselves, probably will not be enough, but they may change the mix of measures, impacts and costs of the proposed plan. It is hard to justify the cost to the environment and taxpayers' pocketbooks when one drives past fields being irrigated with overhead sprinklers in the middle of a hot, windy day. Creation of new enhanced water supplies should not be proposed without fully implementing all cost-effective measures to increase the efficient use of existing supplies.

2. National Recreation Area (NRA) Proposal. The NRA proposals for the Upper Yakima and Nanastash-Taneum areas are inappropriate and flawed for several reasons:

First, it appears that there was a total lack of public process in including this proposal. It is our understanding that this recommendation came out of a subcommittee after the close of public comment on the draft PEIS, so it has not been vetted for public scrutiny or comment.

Second, these areas are parts of existing Forest Service land which are already managed for multiple uses, which include recreational uses of all kinds, including snowmobiles and other ORVs. The Forest Service currently provides for recreation in these areas as part of its ongoing planning process. It is inappropriate to force a recreational 'bias' on these areas, which have many other values such as important riparian and forest ecosystems and fish/animal habitat.

Third, it is our understanding that the primary goals of the plan are to increase and protect better managed water resources, to enhance and protect wildlife habitat both around streams and in their headwaters, and to at least partially mitigate some of the damage to habitat caused by the proposed dams. The upper Teanaway has a great diversity of habitat and animal species, including elk, deer, cougar, other animals but also including endangered spotted owls and now a wolf pack. It is not appropriate to manage these lands from an NRA recreation-first approach.

3. Upper Teanaway Private Lands. Included as part of the plan for mitigation is the possible voluntary acquisition of about 50,000 acres of privately owned forest land in the upper Teanaway valley. Most of this land is currently owned by AFLC and managed for timber harvest. The former long-term owner of this property was Boise Cascade Corporation. We encourage the acquisition of this land to offer substantial protection to the headwaters of the Teanaway River and to enhance protection for fish and wildlife in the valley. These lands contain a wide variety of wildlife, including elk, deer, cougar, and endangered wolves and spotted owls. These lands do not appear to be included in the NRA proposal and they should NOT be included. If acquired, this land should continue to be managed for commercial forestry, thus helping to retain forest related jobs and industry in upper Kittitas County, as well as for wildlife and aquatic habitat protection. Although privately owned, this land has traditionally been used for many recreational uses, including hiking, horseback riding, mountain biking, hunting and snowmobiling. These recreational uses should be allowed to continue under responsible management. We believe that the acquisition of this land will provide MORE substantial economic benefits to the economy of upper Kittitas County without a National Recreation Area as part of the package.

Thank you for your consideration of these comments.

Charles Adams, President  
Friends of the Teanaway