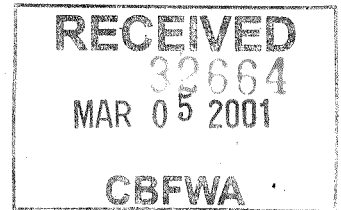




3417 Fremont Ave. N.
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March 1, 2001

Mr. Frank L. Cassidy Jr., Chair
 Northwest Power Planning Council
 851 SW 6th Avenue, Suite 1100
 Portland, OR 97204-1348



The Washington Water Trust is a private, nonprofit organization dedicated to restoring instream flows to Washington's rivers and streams.

The Water Trust acquires existing water rights from willing sellers through gift, lease, or purchase. These water rights are officially dedicated to instream flows to benefit water quality, fisheries and recreation.

RE: BPA FY 2001 High Priority Project Proposal (Project ID 23047)

We write to you in response to specific comments that have been made by CBFWA and ISRP regarding the Washington Water Trust's proposal, "Acquire Tucannon River Water Rights", requesting BPA High Priority Project funding in 2001. This Proposal deals with the acquisition and transfer of water from agricultural irrigation uses in the Tucannon basin to instream flows for the benefit of ESA listed spring chinook, steelhead, and bull trout.

I would like to respond to the following comments about the proposal:

1) From ISRP2000-1: High Priority Review

Need information on what the leased water will add to the base flows. "What are the existing summer base flows? Is the diversion high or low in the basin? It would be beneficial for WDFW to provide some monitoring."

The historical summer base flows for the Tucannon River near Pomeroy according to available USGS data averaged between 52 cfs to 62 cfs from July 15 to September 15 for the years 1924-1930. While data from the Pomeroy gauge is limited to the early 20th century, it is the closest USGS gauge to the location of the proposed project site and most accurately reflects conditions in the area. Enclosed for your consideration is a table of a sampling of summer flow values from 1924-1930 which was used to generate a graph (also enclosed) of average summer flow values.

In terms of being high or low in the basin, the proposed project site has a diversion point near Pomeroy, WA and is roughly estimated to be approximately 23 miles

upstream from the mouth. The proposal would secure a Trust Water Right from this point of diversion downstream past Starbuck to the mouth of the Tucannon River. Washington Water Trust would fully support the participation of WDFW in monitoring efforts for this project. Washington Water Trust can provide assistance in gaining access to the site for monitoring and will cooperate in providing any relevant water right and water use data.

2) *From CBFWA*

"Questions regarding the significance of the direct benefits provided. An additional 2 cfs is not enough to have much effect on the dewatering problem."

First, while the quantity cited in the proposal is approximately 2 cfs, the actual Trust Water Right quantity will be determined by the Washington State Department of Ecology once an application to put the water in trust has been submitted. The existing water right provides for an instantaneous quantity of approximately 1.39 cfs and an annual quantity of about 500 acre feet from March 15 to September 15. Washington State law requires that Department of Ecology review each application for a Trust Water Right and make a determination as to the actual quantity that is eligible for transfer without causing injury to any other user on the system. Past experience has shown that DOE will usually provide at least the value of the consumptive use of water, which would normally have been consumed by plants if the landowner had been irrigating.

CBFWA staff ask whether this project have much affect on the dewatering problem. While the actual quantity that will be transferred instream is yet to be determined, it is easy to review the existing water right quantity in relation to the summer base flows stated above. While 1.39 cfs would increase an August 15 base flow of 52 cfs by only a small portion, we would assert that it is a valuable piece in a larger restoration plan. This water acquisition project will make a measureable change in the landscape in its first year.

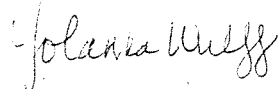
Conclusion:

We ask that the Council consider this project as a first step. This is a project that can be built upon to produce more and more environmental benefit. Water transfers are fairly new in Washington State and many landowners fear making any change in their water use. But we often see neighbors more willing to try this tool once someone else on the stream has tried it first. This project will put water back instream this year, but it will also serve to demonstrate the nature of these transactions and hopefully will encourage others in the area to also consider putting some of their water back instream in the years to come. In basins where our river water has been divided up amongst individual landowners, returning instream flows often depends on an incremental process of rebuilding flows, drop by drop, landowner by landowner.

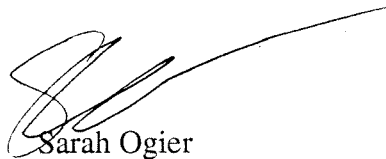
Lastly we would like to emphasize that this project is well suited to the BPA High Priority funding because of its urgency. We are eager to secure funds for this project so we can ensure this water will be protected this coming irrigation season. If the project is not funded the landowner will be able to divert water from the flow-limited Tucannon River. Especially, in light of the pending drought conditions, we feel this is an urgent and worthy project.

We hope that the Council and other reviewers will consider this letter in your final evaluation of the Washington Water Trust's High Priority Project Proposal. If you or others would like to discuss these issues further, please do not hesitate to contact us at 206-675-1585. Thank you for the opportunity to share these thoughts and to participate in this proposal process.

Sincerely,



Yolanka Wulff
Executive Director
Washington Water Trust



Sarah Ogier
Project Manager
Washington Water Trust

Cc: Catherine Hanan, BPA
Brian Walsh, NPPC
Brian Allee , c/o Trina Gerlack, CBFWA

TUCANNON RIVER SUMMER FLOWS 1924-1930 NEAR POMEROY - given in cfs

	1924	1925	1926	1927	1928	1929	1930	avg	median
15-Jun	89	128	81	320	140	150	73	140.1	128
1-Jul	60	84	54	134	103	77	58	81.4	77.0
15-Jul	54	64	46	89	75	60	49	62.4	60.0
1-Aug	49	55	43	75	61	54	42	54.1	54.0
15-Aug	46	59	46	65	58	50	41	52.1	50.0
1-Sep	51	55	56	62	56	51	42	53.3	55.0
15-Sep	51	59	56	108	63	51	52	62.9	56.0
1-Oct	58	66	59	103	656	58	61	151.6	61.0
15-Oct	58	68	65	98	73	55		69.5	66.5
1-Nov	87	71	67	89	73	60		74.5	72.0

note - Oct 1, 1939 data actually from sept 30, 1930

SUMMER FLOWS TUCANNON RIVER 1924-1930

