



CLEAN, FLOWING WATERS FOR WASHINGTON

The Center for
Environmental Law & Policy

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Via E-mail to studymanager@pn.usbr.gov

Dear Ms. Berggren,

Thank you for the opportunity to comment on the preview of USBR's appraisal study of providing new surface water supply to the Odessa Subarea.

While the Bureau is clearly committing substantial resources to determining how to transport Columbia River water to the Odessa Subarea, it has yet to assess the wisdom of doing so.

The Bureau should first consider less costly alternatives, including reversion to dryland cropping, conservation reserves, utilization of water conservation measures, and/or re-construction of Odessa Subarea wells to conform to Washington state requirements (rather than the hundreds of illegal "cascading" wells currently in existence and exacerbating the groundwater problem).

The study should consider fatal flaws, particularly including impacts on endangered fish and terrestrial species and critical habitat, including what's left of the rivers and shrub-steppe. The Bureau should eliminate from consideration those options that will run afoul of the Endangered Species Act.

On a related note, it is inappropriate to examine construction estimates (discussion below), but push off the question of impacts (and costs) to the environment and communities. The environmental and private property losses associated with flooding Lower Crab Creek (by dam or re-operations) would be enormous and likely outweigh the benefits of the proposal. The impacts to Banks Lake residents and properties associated with proposed re-operations will be substantial. The energy costs and "carbon footprint" associated with pumping water to the Odessa are likely to be exorbitant. Where is consideration of any of these factors? Why is this information put off until the end, particularly given that it is likely show that bringing water to the Odessa Subarea is not economically feasible?

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The study should realistically consider overall economic benefit. Prior USBR study documents have cited inaccurate estimates of the value of crops in the Odessa. The current report fails to note that the Potato Commission study, cited in previous reports and often used as a basis for estimated \$630 million annual losses, is in fact a "worst case scenario" that even the authors admit is unlikely to occur. That report is also flawed because it is based on county-wide agricultural data that includes crop values from areas inside the existing Columbia Basin Project. The Bureau should revise and provide independent discussion of the local benefits of bringing water to the Odessa Subarea.

The study should estimate operating costs, since the substantial costs of pumping water into new reservoirs, and then to the Odessa Subarea, will put already-excessive construction estimates beyond the reach of irrigators to pay.

Who will pay for construction and operation of the various alternatives? How will these alternatives meet the Bureau's national cost-benefit equilibrium requirements? If there is limited potential for Odessa Subarea farmers to be willing and able to pay for the project, why are we studying it?

The study identifies eligible acreage, yet substantial acreage in the Odessa Subarea was withdrawn from the Project in the late 1940s. Even though within the "theoretical" project boundaries, the Bureau should analyze to what extent acreage is in fact eligible for service by USBR project water, due either to previous withdrawal or failure to comply with acreage limitations set forth in the Reclamation Reform Act.

Finally, the impacts to Lower Crab Creek – a critical wildlife and recreational area and mitigation site for the Columbia Basin Project – are simply too great to continue to keep this area on the list as a "water supply option," either as a reservoir site or for increased project drainage. Hundreds of avian species, federal and state-listed terrestrial animal and plant species, endangered steelhead and salmon, substantial recreational use by hunters, anglers, birders, paddlers, John Wayne trail users, and Othello Sandhill Crane Festival attendees, unique cultural and geologic attributes, and not least, impact to thousands of acres of private property, are all factors that militate against using this very special valley as a reservoir or enhanced drainage site. Please take it off the list immediately.

Thank you for the opportunity to comment. Please note my new contact information below.

Yours very truly,



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Executive Director

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