

Quincy-Columbia Basin Irrigation District
P.O. Box 188
Quincy, Washington 98848
Telephone (509) 787-3591
Fax (509) 787-3906

East Columbia Basin Irrigation District
55 North 8th
P.O. Box E
Othello, Washington 99344
Telephone (509) 488-9671
Fax (509) 488-6433

South Columbia Basin Irrigation District
1135 East Hillsboro, Suite A
P.O. Box 1006
Pasco, Washington 99301
Telephone (509) 547-1735
Fax (509) 547-8669

March 16, 2004

Mr. Tony Grover
Subbasin Planning Coordinator
PO Box 6386
Vancouver, WA 98668

Re: Subbasin Planning of the Columbia River Basin

Dear Mr. Grover,

The Columbia Basin Project Irrigation Districts are concerned with the subbasin planning process that is underway in response to the Northwest Power Planning Council's program to protect, mitigate and enhance fish and wildlife affected by the development of hydroelectric facilities in the Columbia River Basin.

As the Districts understand the process, "the subbasin plans will become the source of specific actions and projects recommended by the Council for Bonneville funding and implementation and will also provide the context for the review of proposals for funding by the Council and the Independent Scientific Review Panel". This statement is of great concern since the sound planning process envisioned by the Council appears to be in jeopardy due to the immediate need to compete for limited funding.

Various groups, specifically individuals classified by their agencies as natural resource scientists have been holding public meetings to rate water bodies within the Columbia Basin Project, (Project) as to their fish and wildlife habitat potential. Since the Columbia Basin Project was federally developed by the Department of Interior's Bureau of Reclamation and since many of the Project facilities have been transferred to the three Columbia Basin Project irrigation Districts to perform operation and maintenance, the Irrigation Districts question the authority of these individuals to evaluate and rate federal project waterways without a review and approval process by the Districts and the Bureau of Reclamation.

The Columbia Basin Project has been heavily involved with water quality issues and the development of a Memorandum of Agreement between the Washington State Department of Ecology, the Federal Environmental Protection Agency, the U.S. Bureau of Reclamation, East Columbia Basin Irrigation District, Quincy Columbia Basin Irrigation District, and the South Columbia Basin Irrigation District concerning water quality protection of the Columbia Basin Federal Reclamation Project waters. In addition, the three irrigation districts have for the last three years operated under the provisions of a NPDES permit, issued by the Washington State Department of Ecology for the use of herbicides to

control aquatic vegetation. Subbasin Habitat Assessments being developed by outside groups on project waterways, may not be compatible with the current operation and Project purposes of the Columbia Basin Project waterways. Any plan, hypothesis or assessment of the Project's canals, laterals, drains, wasteways, reservoirs or impoundments must be approved by the Bureau of Reclamation and the three Irrigation Districts to avoid conflict with Project operations and to assure compatibility with Project purposes before they are submitted to your office.

The Columbia Basin Project Irrigation Districts request the Northwest Power Planning Council require review and approval of any plan or assessment by the Columbia Basin Project Irrigation Districts and the Bureau of Reclamation before submittal to your office for funding purposes. This review and approval process may avoid conflict regarding future implementation of the Council's program by assuring compatibility with Project operations and Project purposes and by avoiding any impairment of Project water rights.

If you have any questions, feel free to contact any of the undersigned Columbia Basin Project Irrigation District managers.

Sincerely,

Keith E. Franklin
General Manager
Quincy-Columbia Basin Irrigation District

Richard L. Erickson
Secretary/Manager
East Columbia Basin Irrigation District

Shannon McDaniel
Secretary/Manager
South Columbia Basin Irrigation District

KEF/mb
cc: Richard Lemargie
E.C.B.I.D.
S.C.B.I.D.
John Baird
Bill Gray