



June 10, 2008

Mr. Dave McClure
Klickitat County Department of Natural Resources
228 West Main Street, MS-CH-17
Goldendale, Washington 98620

Re: Evaluation of the Adequacy of the Final Statewide Watershed Planning EIS in Meeting SEPA Requirements Associated with Adoption of the WRIA 31 Watershed Management Plan
Service Agreement No. C02404
Aspect Project No. 030009-004-01

Dear Mr. McClure:

This document provides an evaluation of the extent to which probable adverse environmental impacts associated with actions proposed under the Watershed Management Plan for Water Resource Inventory Area 31 (WRIA 31), the Rock-Glade watershed, are addressed in the Washington State Department of Ecology's (Ecology) Final Environmental Impact Statement (EIS) for Watershed Planning under Chapter 90.82 Revised Code of Washington (RCW) (Ecology, 2003).

Ecology's 2003 Environmental Impact Statement (EIS) addressed the development and approval of watershed plans under provisions of the Watershed Planning Act (Chapter 90.82 RCW) and rule making undertaken by state agencies to support implementation of such watershed plans. The EIS was intended to serve two purposes:

- To assist local planning units, lead agencies, and legislative authorities in satisfying State Environmental Policy Act (SEPA) environmental review requirements necessary for approval of individual watershed plans prepared under authority of Chapter 90.82 RCW; and
- To assist state agencies in satisfying SEPA environmental review requirements for any rule making that may be needed to implement individual watershed plans, including instream flow rules.

The EIS developed by Ecology is a statewide, non-project EIS. As a statewide document, the EIS does not contain specific information concerning individual watersheds within which watershed planning is occurring under Chapter 90.82 RCW. It does, however, provide basic information to local decision makers regarding Chapter 90.82 RCW, pertinent laws, regulations, and programs, general environmental conditions, possible recommended actions, and associated potential significant adverse environmental impacts and mitigation measures.

Ecology's statewide EIS is intended to assist local decision makers in meeting SEPA requirements, but does not eliminate the need to comply with SEPA. The SEPA rules allow for

adoption of existing environmental documents that analyze all or part of the environmental impacts of a proposed action (WAC 197-11-600). In this context, the statewide, non-project EIS can be adopted to meet part or all of the SEPA requirements associated with adoption and implementation of the WRIA 31 Watershed Management Plan.

Overview of WRIA 31 Watershed Management Plan

WRIA 31 includes portions of Benton, Klickitat, and Yakima Counties in south-central Washington State. WRIA 31 extends from Kennewick on the east to approximately the John Day Dam on the west, and is bounded by the crest of the Horse Heaven Hills on the north and the Washington/Oregon border at the midpoint of the Columbia River on the south. The majority of the watershed receives little precipitation and has limited natural water storage as snowpack.

Pursuant to RCW 90.82.060(2), Klickitat County, Benton County, Yakima County, and the City of Kennewick concurred with initiating watershed planning in WRIA 31, and designated Klickitat County to be the lead agency. While supportive of watershed planning in WRIA 31, Yakima County chose not to actively participate in the process. There is tribal trust land but no reservation lands within the management area. Consequently, in accordance with RCW 90.82.060(4), no tribe participates as an initiating government.

The final Intergovernmental Agreement for WRIA 31 watershed planning was signed in May 2003 by the participating initiating governments - Klickitat County, Benton County, and the City of Kennewick. The Intergovernmental Agreement identified that watershed planning be conducted in accordance with the process and rules provided in an Operating Procedures Manual for WRIA 31, which was developed in accordance with RCW 90.82.060 and is an attachment to the Intergovernmental Agreement.

Under RCW 90.82.060(6), the participating WRIA 31 Initiating Governments determined the composition of the WRIA 31 Planning Unit through the Intergovernmental Agreement. The Planning Unit is composed of people representing a wide range of water resource interests in WRIA 31. The WRIA 31 Watershed Management Plan was the culmination of four years of collaborative work by the WRIA 31 Planning Unit. The WRIA 31 Planning Unit's vision for watershed planning is as follows:

“Our ongoing water resource planning respects the customs and cultures in the Rock-Glade Watershed. Implementation of this plan will provide dependable and high quality water supplies for our communities, economies, and natural environment.

Our sustainable approach to water resource management meets the needs of the present generation without compromising the needs of future generations. It results in stable communities where diverse cultures and economies thrive, while allowing us to preserve and enhance the natural environment that makes this place special and a recreational attraction to residents and visitors alike.”

The WRIA 31 Watershed Management Plan addresses:

- The water quantity component under RCW 90.82.070;
- The water quality component under RCW 90.82.090; and
- The aquatic habitat component under RCW 90.82.100.

The Watershed Management Plan recommends actions to be implemented, based on the best information available at the time of its preparation and consistent with the Initiating Governments' stated goals for watershed planning and the requirements of Chapter 90.82 RCW. In general terms, such recommended actions could include studies or monitoring to reduce data gaps; working with government agencies and/or other entities to develop or revise policies, regulations, locally managed plans, and/or voluntary regional agreements; planning and constructing water storage and other water supply projects; conducting improvements to water quality and aquatic habitat; conducting public education regarding WRIA 31 issues; and pursuing funding for implementing the recommended actions.

Evaluation of WRIA 31 Watershed Management Plan Recommended Actions to Alternatives in Statewide EIS

Adoption of a Watershed Management Plan under Chapter 90.82 RCW is a non-project action subject to environmental review under SEPA. The SEPA lead agency will determine whether to adopt all or part of the statewide Watershed Planning EIS for determining SEPA compliance for this WRIA 31 Watershed Management Plan. Specifically, the SEPA lead agency will determine which of the recommended actions (projects) in the Watershed Management Plan fall within alternatives defined in the statewide EIS. Recommended actions in the WRIA 31 Watershed Management Plan that are consistent with alternatives in the statewide Watershed Planning EIS do not require supplemental information for SEPA compliance, nor do they require enumeration of alternatives and potential impacts in the standard SEPA format.

The actions recommended in the WRIA 31 Watershed Management Plan were reviewed against the alternatives specified and evaluated in Ecology's statewide EIS, to determine the applicability of the statewide EIS with respect to SEPA evaluation. Tables 1 through 4 list the various alternative actions recommended in the WRIA 31 Watershed Management Plan and identify the alternatives evaluated in the statewide EIS that are applicable to the proposed action. Table 1 addresses WRIA-wide actions applicable to all of WRIA 31. Tables 2, 3, and 4 address recommended actions for the Rock Creek, Wood-Glade, and Kennewick Planning Areas, respectively. For each recommended action in Tables 1 through 4, the following information is provided:

- Section of the Watershed Management Plan within which it is presented (for reference);
- Watershed Management Plan issue that the action addresses and its intended objective;
- Statement of the recommended action;
- Statewide EIS' general category under which the recommended action falls;
- Statewide EIS' alternatives (numbers) that are applicable to the recommended action; and
- Conclusion regarding applicability of the statewide EIS to the recommended action.

Conclusion

Based on the comparative analysis, the recommended actions in the WRIA 31 Watershed Management Plan were addressed on the non-project level in the statewide EIS, except for those actions that are categorically exempt from SEPA (data collection, review/comment on information, procedural actions). In addition, actions proposing rule making need not be addressed prior to adoption of the WRIA 31 Watershed Management Plan since, except where exempted by statute, rule making is subject to review under SEPA. For those actions, SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-704).

Based on this comparative analysis, no additional SEPA analysis of actions contained in the WRIA 31 Watershed Management Plan was determined to be necessary to allow for formal adoption of the Plan. However, adoption of the statewide EIS covers only non-project actions. Therefore, specific actions triggered by the WRIA 31 Watershed Management Plan need to be evaluated prior to implementation to determine whether additional environmental review under SEPA and possibly NEPA (National Environmental Policy Act) is needed.

Please contact us if we can provide additional information or assistance. Thank you.

Sincerely,

Aspect consulting, LLC



Timothy J. Flynn, LHG, CGWP
Principal Hydrogeologist

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Attachments:

- Table 1. Comparison of WRIA-Wide Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS
- Table 2. Comparison of Rock Creek Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS
- Table 3. Comparison of Wood-Glade Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS
- Table 4. Comparison of Kennewick Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Table 1. Comparison of WRIA-Wide Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quantity						
3.1.1	Columbia River Water Supply	Ensure that adequate water supplies are available to meet current needs, provide for long-term sustainability of irrigated agriculture, and support economic and population growth within WRIA 31. Achieve this objective through active participation in the implementation of the Columbia River Basin Water Supply Act (Engrossed Second Substitute House Bill [ESSHB] 2860) and through Ecology's processing/granting new water right permits to exercise the John Day-McNary Pools reserves appropriated in chapter 173-531A WAC.	1) Develop a process with Ecology for expediting the issuance of permits from the John Day-McNary Pools reservations to meet beneficial uses as specified under chapter 173-531A WAC. The process may include use of VRAs, rulemaking (if the need for rulemaking is determined by the PAC and approved as provided in Section 8.8 of the watershed plan), MOU with Ecology, or other legal method.	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-704).
			2) The PAC and Implementing Governments will pursue legislation to define the consultation process for processing water right applications that is consistent with the consultation process established for VRAs in RCW 90.90.030(4)(a). That is, establish a 60-day period for consultation with county legislative authorities, local watershed planning units, WDFW, affected tribal governments, and federal agencies, for applications that are not covered by an approved VRA or otherwise covered by statute.	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-704).
			3) Support implementation of the VRAs that are consistent with this watershed management plan (e.g., CSRIA VRA). The WRIA 31 Lead Agency and/or Implementing Governments should seek an agreement with Ecology regarding utilization of the WRIA 31 watershed planning process to support identification and prioritization of mitigation actions.	Effectively manage allocation and use of water resources through legal mechanisms	WP10, WP18	Adequately addressed in statewide EIS
			4) Explore developing a VRA as a mechanism for expanding water supply availability within WRIA 31 (e.g. water storage; availability of conserved water).	Effectively manage allocation and use of water resources through legal mechanisms	WP7, WP8, WP9, WP10, WP18	Adequately addressed in statewide EIS
			5) Pursue developing an intergovernmental agreement between the WRIA 31 Lead Agency or Implementing Governments with Ecology to ensure effective implementation of VRAs that would be applicable within the WRIA, and ensure harmonization of VRAs with the WRIA 31 watershed management plan as required under chapter 90.90 RCW. This may include defining a list of potential storage and conservation projects that make available new water supplies within WRIA 31. The PAC will consult with Ecology regarding any proposed VRA that would be applicable within the WRIA.	Effectively manage allocation and use of water resources through legal mechanisms	WP7, WP8, WP9, WP10	Adequately addressed in statewide EIS
			6) Pursue funding for water supply projects within WRIA 31. This can include larger projects like a Kennewick ASR pilot project and/or a regional water storage project in the Wood-Glade planning area (Section 3.1.2), and/or a source exchange project in which groundwater supply from pumping of deep wells is replaced by Columbia River supply (Section 5.1.1). It could equally include projects to meet smaller-scale water demands throughout the watershed, not limited by distance from the mainstem Columbia River.	Develop or improve water resource storage infrastructure	WP19, WP20, WP21, WP22, WP23, WP24	Adequately addressed in statewide EIS
			7) Develop a strategy in the context of the chapter 90.90 RCW to address existing interruptible Columbia River rights in WRIA 31 that are not included in the CSRIA VRA.	Effectively manage allocation and use of water resources through legal mechanisms	WP10	Adequately addressed in statewide EIS
			8) The WRIA 31 Implementing Governments will provide information and help revise future Columbia River water supply inventories and long-term water supply and demand forecasts. This will include stronger recognition of smaller-scale water demands throughout the watershed, not limited by distance from the mainstem Columbia River. It is of importance to WRIA 31 that smaller-scale water supply projects, including those at distance away from the mainstem Columbia River, be recognized and planned for within implementation of the Columbia River Basin Water Supply Act. The PAC may seek funding for this participation.	Not covered under statewide EIS	N/A	Information collection and review/comment, categorically exempt from SEPA review (WAC 197-11-800(17) and (22))

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Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quantity (continued)						
3.1.1 (continued)	Columbia River Water Supply (continued)	Ensure that adequate water supplies are available to meet current needs, provide for long-term sustainability of irrigated agriculture, and support economic and population growth within WRIA 31. Achieve this objective through active participation in the implementation of the Columbia River Basin Water Supply Act (Engrossed Second Substitute House Bill [ESSHB] 2860) and through Ecology's processing/granting new water right permits to exercise the John Day-McNary Pools reserves appropriated in chapter 173-531A WAC. (continued)	9) Pursue developing an intergovernmental agreement between the WRIA 31 Lead Agency and Ecology regarding implementation of the state trust water program within the WRIA. The intent is to ensure that, if state funding is used to acquire water rights, or parts of water rights, for placement in the state water trust program, such acquisitions are consistent with the watershed management plan and include early consultation with the Implementing Governments or PAC. It is also recommended that the PAC and Implementing Governments investigate legislative actions that may be necessary to provide clarification about the timing and consultation criteria to ensure consistency with the approved watershed management plan.	Effectively manage allocation and use of water resources through legal mechanisms	WP8, WP10	Adequately addressed in statewide EIS
			10) The PAC will serve as an advisory body for implementing the Columbia River Basin Water Supply Development Program within WRIA 31.	Not covered under statewide EIS	N/A	Review and comment, categorically exempt from SEPA review (WAC 197-11-800(22))
			11) The PAC will communicate with other planning units and local governments in the Columbia River basin in order to better develop a Columbia River basin-wide perspective of water resource issues and to identify opportunities for cooperative efforts. It is further recommended that the PAC be represented on relevant water resource policy advisory groups and forums on the state and federal level.	Not covered under statewide EIS	N/A	Procedural and review/comment, categorically exempt from SEPA review (WAC 197-11-800(19) and (22))
			12) Fill data gaps regarding factors that affect fish survival within the John Day and McNary Pools and assess fish and wildlife habitat in and adjacent to the Columbia River mainstem.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
3.1.2	Limited Water Storage	Develop new water storage facilities off of the Columbia River mainstem to help meet future demand.	The PAC or subcommittee should identify and evaluate storage needs and storage opportunities to best meet those needs throughout the watershed. Refer to Section 3.1.2 for planning area-specific recommendations.	Develop or improve water resource storage infrastructure	WP19, WP20, WP21, WP22, WP23, WP24	Adequately addressed in statewide EIS
3.1.3	Preserve Water Rights in the Watershed	Preserve existing water rights as an asset of the watershed.	Increase public education regarding water rights to avoid inadvertent relinquishment. This can include developing a flier that explains water rights and their potential for relinquishment in layman's terms, and distributing it widely throughout the watershed.	Effectively manage allocation and use of water resources through legal mechanisms	WP36	Adequately addressed in statewide EIS
			Establish a water market or "clearinghouse" that would provide a link and local point of contact for water right sellers/buyers or lessors/leasees, and municipal entities, to facilitate the transfer of, and prevent relinquishment of, existing water rights.	Effectively manage allocation and use of water resources through legal mechanisms	WP7, WP8, WP9, WP10. Also specifically addressed on page 5-6 of the EIS as follows: "The processes identified in Alternatives WP7 and WP8, and potentially Alternative WP9 and WP10, could be combined and expanded to involve use of the Trust Water Rights Program in the development of a water bank for both instream and out-of-stream uses."	Adequately addressed in statewide EIS
			Pursue legislative changes to the state water code to define changes in irrigation practices occurring over time periods longer than 5 years as sufficient cause for nonuse during that period (and preventing relinquishment if full use is achieved during the period).	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-074).

Table 1. Comparison of WRIA-Wide Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quantity (continued)						
3.1.4	Disincentives to Water Conservation	Maximize water conservation by eliminating disincentives to conserving.	1) The PAC should pursue legislation to effect changes in the water code that prevent relinquishment of rights to conserved irrigation water and provide flexibility in its future use (e.g. irrigation of expanded acreage). Removing the disincentives to water conservation from the state water code is a legislative action needed to implement the WRIA 31 watershed management plan and, as such, should be included in Ecology's annual report the appropriate standing legislative committees pursuant to RCW 90.82.043(5).	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-074).
			2) Propose and develop voluntary regional agreements as one option to make the quantity of conserved water available in the WRIA.	Effectively manage allocation and use of water resources through legal mechanisms	WP7, WP8, WP9, WP10, WP18	Adequately addressed in statewide EIS
			3) Identify conditions in conservation grants that may (unintentionally) create disincentives to implementing conservation or otherwise undermine this watershed management plan. Communicate this information with proposed solutions to responsible funding agencies.	Not covered under statewide EIS	N/A	Review and comment, categorically exempt from SEPA review (WAC 197-11-800(22))
			4) Encourage conservation as a means to make water available for irrigation of additional acreage by the water right holder.	Promote water use efficiency	WP2, WP3	Adequately addressed in statewide EIS
			5) Where deemed appropriate by the Implementing Governments in consultation with the PAC, acquire water generated through conservation from willing water right holders, put it in the state trust program and make it available to meet out-of-stream and instream water uses in accordance with this watershed management plan. The PAC will serve in an advisory capacity for implementation of the state water trust program within the WRIA to ensure continuing conformance with the watershed management plan. In its advisory role, the PAC should propose and develop agreement(s) to ensure that trust water right programs further the purposes of this watershed management plan, not undermine it.	Effectively manage allocation and use of water resources through legal mechanisms.	WP7, WP8	Adequately addressed in statewide EIS
Water Quality						
3.2	Columbia River Water Quality	Document the contribution of WRIA 31 streams to impaired water quality in the mainstem Columbia River.	Ecology will coordinate with the WRIA 31 initiating governments regarding TMDL or other water quality-related activities on the mainstem Columbia River within WRIA 31.	Not covered under statewide EIS	N/A	Review and comment, categorically exempt from SEPA review (WAC 197-11-800(22))
			Develop a WRIA-wide water quality maintenance/improvement plan for tributary streams that are designated pursuant to the ESA as critical habitat for Middle Columbia steelhead. The plan would identify appropriate locally managed activities to be undertaken to ensure that water quality in the tributaries are maintained and, where practical, enhanced.	Improve nonpoint source pollution control	WP36, WP37	Adequately addressed in statewide EIS
Aquatic Habitat						
3.3.1	Limited Aquatic Habitat Data Available	Collect quality-assured data to fill data gaps regarding aquatic habitat throughout WRIA 31, so that appropriate actions to address factors affecting fish production can be developed.	Collect quality assured data to assess current habitat conditions and limiting habitat characteristics, in accordance with the IAC's Washington Comprehensive Monitoring Strategy for Watershed Health and Salmon Recovery and other established and accepted protocols. Identify specific projects to address fish habitat issues based on the results of those studies. Specific information regarding available information and recommended approaches are outlined in watershed plan Sections 4.3, 5.3, and 6.3 for Rock Creek, Wood-Glade, and Kennewick planning areas, respectively.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))

Table 2. Comparison of Rock Creek Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quantity						
4.1.1	Natural Streamflow Condition	Evaluate options including storage to enhance Rock Creek streamflows to meet specific demands defined in the future.	As dictated by future demands in the subbasin, conduct a feasibility study of options to enhance streamflows in Rock Creek.	Not covered under statewide EIS	N/A	Information collection/study, categorically exempt from SEPA review (WAC 197-11-800(17))
4.1.2	Groundwater Development Potential	Develop baseline information to support developing additional water supply sources if future demand in the basin increases significantly.	Conduct a hydrogeologic evaluation to explore aquifer systems and better understand whether groundwater quantity and quality is sufficient to meet potential larger future demands in the Rock Creek planning area.	Not covered under statewide EIS	N/A	Information collection/study, categorically exempt from SEPA review (WAC 197-11-800(17))
Water Quality						
4.2.1	Elevated Water Temperature in Rock Creek	Bring Rock Creek into compliance with state surface water standards for temperature. This could be achieved by collecting additional data and analysis that show the elevated temperatures are a result of natural conditions and human influence is increasing water temperature by no more than 0.3°C, or by developing and implementing a water quality improvement and protection plan (Category 4A or 4B) that over time results in compliance and recategorization as Category 1 (meets standards) or Category 2 (waters of concern).	Develop a locally-managed water quality improvement plan to 1) evaluate the cause of elevated temperature (i.e. effect of natural conditions versus human activity) and 2) continue implementing BMPs to ensure that human effects on temperature are within acceptable levels. The Forests and Fish Report/Forest Practices Rules serve as a water quality improvement plan for forested headwaters in the subbasin.	Improve nonpoint source pollution control	WP35, WP36, WP37, WP56	Adequately addressed in statewide EIS
			Continue implementation of the management practices identified in the 1996 MOA between Ecology and EKCD until a water quality improvement plan is formalized.	Improve nonpoint source pollution control	WP35, WP36	Adequately addressed in statewide EIS
			Evaluate habitat enhancement projects that include riparian plantings to increase stream shade.	Improve nonpoint source pollution control	WP35, WP36, WP47	Adequately addressed in statewide EIS
			Install additional permanent streamflow gauging stations at or near locations where water temperatures have been measured since 1996. Station locations will be determined once currently planned gauges are operating and data gaps, if any, are identified.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(2)(h) and (17))
4.2.2	Water Quality Monitoring	Document long-term water quality conditions, apart from temperature, that could be attributable to land use in the watershed.	Monitor for trends in fecal coliform levels in Rock Creek by adding periodic laboratory analyses to EKCD's monitoring program.	Improve nonpoint source pollution	WP37	Adequately addressed in statewide EIS

Table 2. Comparison of Rock Creek Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Aquatic Habitat						
4.3.1	Salmonid Distribution and Use	Determine the distribution and survival of salmonids in the watershed.	Document and monitor the distribution and abundance of spawning salmonids in Rock Creek and its tributaries.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Evaluate the distribution and abundance of juveniles rearing in the subbasin.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Measure migration of juveniles and total juvenile production through installation and year-round operation of a screw trap, in cooperation with WDFW	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
4.3.2	Habitat Quality and Potential Land Use Effects	Evaluate the quality of habitat in the Rock Creek subbasin and the effects of land use on that habitat.	Implement the actions described in Section 4.2.1 to restore and protect fish habitat.	Refer to SEPA findings for Section 4.2.1 of watershed plan (above)		
			Quantify spawning habitat (e.g., document substrate size and embeddedness in potential spawning areas).	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Collect additional information on passage barriers to help refine estimates of available habitat for anadromous fish.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Develop an inventory of current rearing habitat, identifying areas of year-round flow and suitable stream temperatures and areas where these conditions may be reasonably attained.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Collect water temperature data when conducting snorkel surveys to support evaluation of the temperature tolerances of local steelhead population.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Implement a public education and communication program to inform landowners regarding the intent of habitat protection and restoration projects, educate the public regarding the influence of land use on the quality of fish habitat, and encourage participation in volunteer efforts.	Not covered under statewide EIS	N/A	Procedural action, categorically exempt from SEPA review (WAC 197-11-800(19))
4.3.3	Monitoring	Monitor the effectiveness of aquatic habitat protection and restoration efforts.	Develop and implement an aquatic habitat monitoring plan consistent with state protocols that provides for documenting long-term trends in fish population levels and habitat quality and documents effectiveness of habitat-related projects. Data collection efforts must be developed using statistically robust methods and must include a quality assurance process, and all data collected must be made publicly available.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Conduct public education/communication to inform landowners regarding the intent of habitat-related projects and to foster understanding regarding the influence of land use on the quality of fish habitat and encourage participation in volunteer efforts.	Not covered under statewide EIS	N/A	Procedural action, categorically exempt from SEPA review (WAC 197-11-800(19))

Table 3. Comparison of Wood-Glade Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quantity						
5.1.1	Groundwater Level Declines in Basalt Aquifer	For affected areas, develop alternative water supply sources to reduce (net) withdrawal from the Wanapum Aquifer and thereby maintain a sustainable groundwater supply.	Develop conceptual design of a regional water storage and supply system making use of the John Day-McNary reserve.	Develop or improve water resource storage infrastructure	WP19, WP20, WP21, WP22, WP23, WP24	Adequately addressed in statewide EIS
			Evaluate a voluntary source exchange program in which groundwater rights are replaced by surface water rights permitted from the John Day-McNary reserve.	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-074).
			Scope and conduct a drilling program to explore development potential of the Grande Ronde Basalt aquifer in this area and assess the hydraulic effect on the Wanapum Basalt aquifer caused by pumping the Grande Ronde.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Complete detailed water storage feasibility studies as warranted to address water needs not met through one of the recommended actions above.	Not covered under statewide EIS	N/A	Information collection/study, categorically exempt from SEPA review (WAC 197-11-800(17))
			Continue Ecology's program of monitoring water levels in WRIA 31 wells, and ideally expand it to include additional wells in the multiple aquifer units as allowed by land owners.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			The PAC will consider establishing all or a portion of the Wood/Glade Area as a groundwater management area under RCW 90.44.400. A local government can develop and implement a groundwater management program.	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-074).
5.1.2	Higher-Value Crops Could Allow for Water Supply Investment	Achieve policy/regulatory changes that allow for maximum flexibility to change existing water rights in ways that support growth in the agricultural economy.	Work with Ecology to further evaluate and consider developing policies/regulations, including further review of its ACQ policy, that facilitate, not restrict, shifting existing water rights to new areas that would support production of higher value crops. Communications with legislators by the Implementing Governments and/or PAC may also be an option.	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-074).
5.1.3	Expansion of Small Public Water Systems	Eliminate artificial (administrative) constraints that prevent public water systems from meeting growing demand.	DOH should work with local public water systems during approval of water system plans to allow service to the maximum number of persons/units possible within the systems' available water rights and source capacity.	Effectively manage allocation and use of water resources through legal mechanisms	WP17	Adequately addressed in statewide EIS
			Provide financial assistance, through grants or other means, to allow all public water systems in the planning area to purchase and install totalizing flow meters for sources and services.	Effectively manage allocation and use of water resources through legal mechanisms	WP18	Adequately addressed in statewide EIS
			Pursue legislative action to amend the state water code to provide for expedited processing of water right permits to small public water systems, and provide the state resources to implement it.	Not covered under statewide EIS	N/A	Not necessary for adoption of WRIA 31 watershed plan. Except where exempted by statute, rule making is subject to review under SEPA. SEPA compliance would be the responsibility of the implementing agency or legislative body (WAC 197-11-074).

Table 3. Comparison of Wood-Glade Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quality						
5.2.1	Nitrate in Shallow Groundwater and Surface Water	Ensure that all area residents have a safe source of potable water.	Local DOHs, in cooperation with conservation districts, should consider the following actions: <ul style="list-style-type: none"> • Inventory nitrate concentrations in all drinking water sources within the planning area; • Develop an integrated GIS/database to manage the available groundwater quality data; • Identify if alternative drinking water sources are available to those with unsafe drinking water; • Continue to educate the public on proper wellhead protection, groundwater quality testing, and the risks associated with drinking water with elevated nitrates. 	Improve nonpoint source pollution control	WP36, WP37	Adequately addressed in statewide EIS
Aquatic Habitat						
5.3.1	Critical Habitat Designations	Document the quality and extent of fish habitat in reaches identified as critical habitat. Based on the results of data collection efforts, identify projects to restore and protect critical fish habitat.	Survey distribution of fish and redds downstream of passage barriers, using established protocols supported by WDFW including summer snorkel surveys.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Quantify spawning habitat after the distribution and life history of the local stock is better understood. Map spawning habitat while conducting redd surveys using established protocols.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Collect additional information on passage barriers to help refine estimates of available habitat for anadromous fish.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Inventory current rearing habitat, identifying areas of year-round flow and suitable stream temperatures and areas where these conditions may be reasonably attained if actions were taken	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Collect statistically robust, quality-assured habitat data consistent with established state protocols (see Section 5.3.1); however, modifications of protocols may be required to ensure that the information needed is obtained during the assessments. Data collected will be made publicly available.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Identify opportunities for habitat protection and restoration projects based on data collected to fill data gaps.	Conduct instream modifications to fish habitat; Conduct out-of-stream modifications to riparian habitat; Modify land/shoreline use to protect, preserve, or enhance habitat; Improve forest practices	Potentially WP42 through WP54, and WP56, depending on results of data collection	Adequately addressed in statewide EIS
			Encourage participation in existing voluntary programs that provide for habitat protection.	Not covered under statewide EIS	N/A	Procedural action, categorically exempt from SEPA review (WAC 197-11-800(19))
Implement a public education program to inform landowners regarding the intent of habitat protection and restoration projects, educate the public regarding the influence of land use on the quality of fish habitat, and encourage participation in volunteer efforts.	Not covered under statewide EIS	N/A	Procedural action, categorically exempt from SEPA review (WAC 197-11-800(19))			
5.3.2	Fish Passage Barrier at Mouth of Pine Creek	Restore fish passage at the culvert.	Provide to WSDOT information from habitat surveys recommended in Section 5.3.1 regarding quality of habitat upstream of the culvert. Support WSDOT efforts to obtain funding for their replacement of the culvert.	Conduct instream modifications to fish habitat	WP45	Adequately addressed in statewide EIS

Table 4. Comparison of Kennewick Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Water Quantity						
6.1.1	Mitigation for Quad Cities Water Right	Identify sources of mitigation water to allow for Kennewick's future exercise of the Quad Cities water right without interruption.	Reassess the current assumption of 80% annual consumptive use for mitigation under the Quad Cities water right. A more accurate estimate of annual consumptive use will reduce the quantity of mitigation water required.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Identify additional sources of water for mitigation of the remaining 168 cfs of diversion under the Quad Cities water right (see watershed plan Section 6.1.1 for options).	Effectively manage allocation and use of water resources through legal mechanisms.	WP7, WP8	Adequately addressed in statewide EIS
6.1.2	Water for Urban Irrigation	Improve reliability of irrigation supplies in Kennewick area.	Support KID's proposed pump exchange program including the Planning Unit writing a letter of support to stakeholders, and then assist KID as warranted to secure funding for program implementation.	Promote water use efficiency	WP1, WP2, WP3, WP36	Adequately addressed in statewide EIS
			Assist implementers of the Tri-Cities Urban Area Irrigation Plan to pursue funding for urban irrigation conservation projects, including public education.	Promote water use efficiency	WP1, WP2, WP3, WP36	Adequately addressed in statewide EIS
			After adoption of the CSRIA VRA, determine applicability of the CSRIA VRA to conservation savings under Tri-Cities Urban Area Irrigation Plan. If necessary, work with implementers of the Tri-Cities Urban Area Irrigation Plan not covered under the CSRIA VRA to evaluate developing a separate VRA that makes the water generated from conservation practices available for other uses.	Promote water use efficiency	WP1, WP2, WP3, WP7, WP8	Adequately addressed in statewide EIS
6.1.3	Use of Reclaimed Water	Identify opportunities for cost-effective use of reclaimed municipal water.	No immediate action is recommended with respect to reclaimed water. City of Kennewick should continue to evaluate use of reclaimed water as water treatment technologies improve, potentially allowing more cost-effective production of Class A treated wastewater.	Promote water use efficiency	WP5, WP6	Adequately addressed in statewide EIS
Water Quality						
6.2.1	Vulnerability of Single Supply Source	Diversify the City of Kennewick's supply sources to reduce system vulnerability to water quality impact.	To evaluate groundwater sources of supply, conduct a detailed evaluation of ASR feasibility through pilot testing.	Not covered under statewide EIS	N/A	Information collection/study, categorically exempt from SEPA review (WAC 197-11-800(17))
6.2.2	State Antidegradation Policy as Applied to ASR	Obtain from Ecology a written policy, specific to ASR, which allows for de minimus impact to the quality of the receiving body of groundwater, as long as beneficial use of the groundwater resource is not impaired and it is not detrimental to the public interest.	Meet with Ecology water resource and water quality staff to discuss Ecology drafting a water quality policy or pursuing a statutory exemption, specific to ASR, which allows for de minimus water quality impact to the receiving body of groundwater as long as beneficial use of the groundwater resource is not impaired and it is not detrimental to the public interest.	Develop or improve water resources storage infrastructure	WP24	Adequately addressed in statewide EIS
6.2.3	Water Quality Outside Kennewick Water Service Area	Ensure that the rural population, outside Kennewick's water service area, has a safe source of potable water.	Local DOHs, in cooperation with conservation districts, should consider the following actions: <ul style="list-style-type: none"> • Inventory nitrate concentrations in all drinking water sources within the planning area; • Develop an integrated GIS/database to manage the available groundwater quality data; • Identify if alternative drinking water sources are available to those with unsafe drinking water; • Continue to educate the public on proper wellhead protection, groundwater quality testing, and the risks associated with drinking water with elevated nitrates. 	Improve nonpoint source pollution control	WP36, WP37	Adequately addressed in statewide EIS

Table 4. Comparison of Kennewick Planning Area Actions Recommended in Watershed Management Plan to Alternatives in Statewide Watershed Planning EIS

Section # in Watershed Mgt Plan	Issue	Objective	Recommended Actions	General Category in Statewide EIS	Applicable Alternatives in Statewide EIS	SEPA Review
Aquatic Habitat						
6.3	Kennewick Area Aquatic Habitat	Develop better understanding of opportunities to improve aquatic habitat which is beneficial to Columbia River salmon populations, thus assisting Kennewick in implementing its portion of the Quad Cities water right.	Seek clarification regarding the types of mitigation that would be found acceptable and the geographical range within which mitigation can be developed, under the Quad Cities water right.	Not covered under statewide EIS	N/A	Procedural action, categorically exempt from SEPA review (WAC 197-11-800(19))
			Evaluate the potential for habitat restoration and the need for supplemental information by examining existing information regarding baseline habitat conditions and talking with WDFW Tri-Cities personnel regarding potential to improve habitat.	Not covered under statewide EIS	N/A	Information collection, categorically exempt from SEPA review (WAC 197-11-800(17))
			Identify, using existing and any supplemental information, opportunities for applicable habitat improvement in WRIA 31 and/or other WRIsAs.	Conduct instream modifications to fish habitat; Conduct out-of-stream modifications to riparian habitat; Modify land/shoreline use to protect, preserve, or enhance habitat; Improve forest practices	Potentially WP42 through WP54, and WP56, depending on identified opportunities for habitat improvement	Adequately addressed in statewide EIS
			Consider contributing funds to habitat projects outside of the Quad Cities in exchange for a proportionate credit for the mitigation achieve. This approach would need to be negotiated with Ecology in advance.	Conduct instream modifications to fish habitat; Conduct out-of-stream modifications to riparian habitat; Modify land/shoreline use to protect, preserve, or enhance habitat; Improve forest practices	Potentially WP42 through WP54, and WP56, depending on identified opportunities for habitat improvement	Adequately addressed in statewide EIS