

APPENDIX H

*YAKIMA RIVER WRA
CONSISTENCY CHECKLIST*

RECEIVED APR 23 2010

YAKIMA BASIN WATER RESOURCES AGENCY

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Yakima, Washington 98902

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April 21, 2010

Ms. Nancy Aldrich
Special Projects Coordinator
City of Richland, Public Works Department
505 Swift Blvd., P.O Box 190
Richland, WA 99352

RE: City of Richland, Water System Plan, December 2009-Draft

Dear Ms. Aldrich

Thank you for the opportunity to review the Richland Water System Plan you submitted.

The submitted draft document has been reviewed for consistency with the Watershed Management Plan, Yakima River Basin, January, 2003. The Watershed Management Plan was approved by Yakima County for the Yakima River basin, Water Resources Inventory Area (WRIA) 37, in September of 2005. Your plan appears to conform with the Watershed Management Plan and specifically with Chapter 4, Management of Groundwater Resources.

Specific comments on the City of Richland water plan are as follows:

- Your Plan has projected population growth and included a forecast of future demand
- Your plan appears to support economic development within the Yakima watershed with the provision for growth and the protection and conservation of water resources.
- Provision of water for growth is provided through the strategy of using permitted but undeveloped, or inchoate, municipal water rights. This strategy is in question due to court action at the state level.
- Provision is included for protecting the water supply using the state wellhead protection planning process, which the Watershed Management Plan supports.

- Provision is made for water conservation and the use of alternative water supply where feasible.

Attached is a copy of a signed Coordination and Consistency Statement required by Washington Departments of Health and Ecology.

Further Considerations

The Water Resources Advisory Committee (WRAC) for the Yakima Basin has developed a Detailed Implementation Plan (DIP) for the 2003 Watershed Plan. The City of Richland participated in part of this effort. This plan is a roadmap aimed at enhancing communication and coordination of watershed management activities throughout the Yakima River Basin.

Some entities are assessing their use of inchoate water rights and their relationship to instream flows in the Yakima River.

RCW 90.82.048

Implementation plan — Timelines and milestones.

- (1) The timelines and interim milestones in a detailed implementation plan required by RCW 90.82.043 must address the planned future use of existing water rights for municipal water supply purposes, as defined in RCW 90.03.015, that are inchoate, including how these rights will be used to meet the projected future needs identified in the watershed plan, and how the use of these rights will be addressed when implementing instream flow strategies identified in the watershed plan.

A moratorium on the issuance of groundwater rights is in place in the Yakima Basin because of the question of the continuity, or degree of connection, between ground waters and surface waters and the potential for diminishing instream flows. A major Yakima Basin groundwater study lead by the US Geological Survey is near completion. Following completion there will be the need for technical review and policy development. The potential exists for a future challenge to the pumping of inchoate water rights as being junior to, and further diminishing, water supply to senior surface water right holders and to instream flows.

The Watershed Plan recognized the potential conflict between future surface water and groundwater development and recommended Alternative II-2, Limit New Groundwater Development to Selected Uses. However, the Plan recognized that this alternative alone cannot meet the objectives of future water supply and economic prosperity. Therefore, this recommendation was made with the recognition that future domestic water supply be provided through a major new surface water source.

The City of Richland has not been actively involved in participating in the review of this important planning effort, such as is being conducted by the Yakima River Basin Water Enhancement Project, Work Group. The Work Group is working toward the development of a consensus on an integrated package for solutions to the basin's water

problems. This is critical to future municipal water supply, economic development and the enhancement / restoration of the basin's natural resources.

If there are any questions or you would like to discuss these issues, please give me a call at 509-574-2650 or e-mail at jim.milton@co.yakima.wa.us.

Sincerely,

A handwritten signature in black ink, appearing to read "S. J. Milton", with a long horizontal flourish extending to the right.

Sanffid J. (Jim) Milton, P.E., Director
Yakima Basin Water Resources Agency

Attachment: Coordination and Consistency Statement

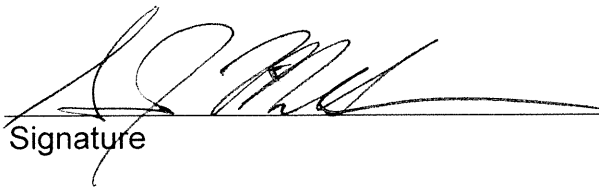
CC: James Beaver, Chair, BOCC, Benton County
Greg Schuler, Washington Department of Ecology, CRO, Yakima
Andres Cervantes, Washington Department of Health, Spokane

COORDINATION AND CONSISTENCY STATEMENT

Water System Name: City of Richland

Local Planning Jurisdiction: Yakima Basin Water Resources Agency

I have reviewed information from the draft 2009 Comprehensive Water Plan and believe it to be consistent with the goals and objectives of the Yakima River Basin Watershed Management Plan.


Signature

<u>S. J. Milton, PE</u>	<u>Director</u>	<u>Yakima Basin Water Resources Agency</u>
Printed name	Title	Jurisdiction

Date 4/22/2010