

Response to Public Comments

Walla Walla Watershed Management Partnership

Report: [Gardena Farms Irrigation District #13 Local Water Plan Proposal \(LWP 10-01\)](#)

Comment Period: [February 22, 2010 – March 24, 2010](#)

Response Issued: [April 6, 2010, Amended April 5, 2011](#)

Response to Comments

Date: March 24, 2010

Name: Yancey Reser

Address: 2073 Last Chance Road, Walla Walla, WA 99362

Comment: 1) Proposal does not mention all tributaries to the Walla Walla River, specifically the West Little Walla Walla River and the East Little Walla Walla River.

Response: A list of tributaries is not included in the final LWP.

Comment: 2) Oregon "bypass" water has had negative impacts on the West Little Walla Walla River, including impacts to water rights.

Response: The protection of water rights and instream flows on the the East and West Little Walla Walla Rivers are beyond the scope of the review for the GFID Plan. Nothing in the Plan precludes a senior water right holder from calling for Ecology regulation of other junior water rights, nor does the Plan foreclose these tributary water rights from requesting a change of point of diversion.

Comment: 3) GFID is currently diverting water that are "molecules of the West Little Walla Walla River" and diversions by GFID should be subject to claimaints on the West Little Walla Walla River.

Response: See response to comment #2

Comment: 4) Ecology claims recharge is benefiting the West Little Walla Walla River, but there is no evidence to verify this claim.

Response: This portion of this comment concerning Ecology has been referred to Ecology. The efficacy of recharge efforts in restoring the West Little Walla Walla River is not part of the scope of the review of the GFID Plan, as no element of the Plan pruports to benefit flows in the West Little Walla Walla River.

Comment: 5) The quickest aquifer recharge would be to dump water in the West Little Walla Walla River.

Response: This comment has been referred to GFID, specific sites are not authorized or precluded in the final LWP.

Comment: 6) Is Ecology/Washington State determined to restore the West Little Walla Walla River? Does GFID support restoration of this stream? Does the Partnership support restoration of this stream?

Response: The Partnership supports the implementation of the WRIA 32 Watershed Plan which identifies restoration of this stream as a priority. Questions regarding the intent of Ecology and GFID have been referred to Ecology and GFID.

Comment: 7) Fish need increases in cold water in stream not just more (warm) water.
Response: Consideration of this comment will occur as part of Water Resource Panel review and the Board review and approval process.

Comment: 8) Is the bypass always deducted from GFID's maximum diversion rate? The pre-post agreement volume does not seem to show a decrease.
Response: The bypass flows only reduce the diversion of GFID when flows at the Beet Rd gage immediately downstream decrease to ~19 cfs in January-June and ~18cfs July-December.

Comment: 9) Reporting should be done on an instantaneous and a total basis on a publically accessible monthly basis. Critical flows need to be defined.
Response: The Guidelines and Criteria for implementation of RCW 90.92 adopted by the Board maintain specific requirements for annual reporting. Consideration of this comment will occur as part of Water Resource Panel review and the Board review and approval process.

Comment: 10) Adding Shallow Aquifer Recharge (SAR) to the GFID will expand the volume of the water right by a large, un-quantified amount.
Response: Consideration of this comment will occur as part of Water Resource Panel review and the Board review and approval process.

Comment: 11) The West Little Walla Walla has experienced a decrease in ground water recharge, the only current source of recharge is the GFID canal. Further reductions in the amount of water in the GFID canal as a result of this LWP will decrease recharge further.
Response: Consideration of the GFID LWP does not obligate GFID to provide "recharge" nor is it obligated to provide third-party benefits associated with its inefficiency in conveyance as part of a LWP.

Comment: 12) Claims for shallow aquifer recharge water are probably over-allocated, their availability should be evaluated and a determination of "critical areas" before more commitments are made.
Response: Consideration of this comment will occur as part of Water Resource Panel review and the Board review and approval process.