


State of Idaho
Department of Fish and Game
Fisheries Bureau
Boise, Idaho

April 16, 2002

MEMORANDUM

Paul Wagner, National Marine Fisheries Service
Cindy Henriksen, Corps of Engineers

FROM: Sharon W. Kiefer, Idaho Department of Fish and Game 
SUBJECT belated comments to 2002 Draft Water Management Plan for spring/summer update

J. Yost, Idaho Governor's Office
V. Moore, S. Pettit, IDFG

Attached are brief comments from Idaho Department of Fish and Game regarding the 2002 Draft Water Management Plan, which was developed by the federal action agencies. I recognize that the deadline for formal comment has passed. However, my understanding is that there will be a "spring/summer update" to the water management plan that will more specifically address this year's conditions. Our comments are submitted to help guide the spring/summer update, as well as assist with future years' plans. Key to short-term and long-term improvement of the water management plan would be greater flexibility in flood control operations to provide more water volume in the spring during the spring migration period.

Most of our comments were generally addressed in formal comments by other salmon managers. One aspect that we believe the action agencies should consider in the annual water management planning is incorporation of the non-listed fish issues that generally occur on an annual basis. Request for protection of the Spring Creek Hatchery release is an example. This is one issue that can pretty much be expected to be addressed every year, and should be considered within the context of standard, annual planning. I am sure there are other examples as well.

Idaho Department Fish and Game
Comments on
2002 Draft Water Management Plan
March 11, 2002

The Idaho Department of Fish and Game (IDFG) has reviewed the draft *2002 Water Management Plan* (WMP) developed by the US Army Corps of Engineers, Bureau of Reclamation, and Bonneville Power Administration (Action Agencies) and submits the following comments.

General Comments

The IDFG is very concerned that reservoir refill has a higher priority than spring flows for juvenile migrating salmonids. The Action Agencies should include measures to improve water volume in the mainstem during the peak of the spring migration. Primary in these attempts should be the review of the current flood control operations with the purpose of providing greater flexibility for water volume management, which could benefit juvenile salmonids.

Natural and “managed” shortfalls in the hydrosystem toward meeting Biological Opinion conditions significantly affect listed and unlisted fish within the Basin. When hydrosystem conditions do not meet the 2000 Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp), allocation of impacts due to hydrosystem shortfall should be consistent with Northwest Power Act “equitability language”, and the Endangered Species Act. Managed shortfalls in the hydrosystem should not be allowed to pose jeopardy conditions. As we discuss regarding flood control, additional flexibility in flood control operations may mean availability of critical water volume in years of hydrosystem shortfall, thus the potential for flexibility should be thoroughly examined and considered.

Dworshak Operations

The IDFG does not support the summer drafting of Dworshak Reservoir as proposed in the WMP and have previously provided comments to the 1995 and 2000 FCRPS BiOps regarding similar proposals. In our opinion, the flow objectives only provide improved survival for migrating, subyearling fall chinook and ignore other listed, Snake River salmonids, which comprise the largest component of Snake River migrants. As we have in the past, IDFG requests that Dworshak drafting not begin until mid or late July, and that approximately 200 kaf of storage (based on the 1.2 maf) be held back for use in the fall months to improve Snake River conditions for adult steelhead and fall chinook. We will work inseason with the action agencies and other salmon managers regarding this proposal.

The 2002 WMP also calls for a “test” drafting to elevation 1500' for summer flow augmentation. The additional volume would be used during the month of September, to prolong the current operation and provide benefits for adult fish. IDFG cannot support the concept of drafting additional water from Dworshak. The additional 20 feet of draft, in our opinion, could seriously jeopardize reservoir refill and threaten fishery operations

the following spring. If a “test” to study the effects of providing additional augmentation and temperature control during September is undertaken, we recommend that the required volume be shifted from the current summer operation so that the final reservoir elevation does not exceed 1,520'.

Flood Control

IDFG supports comments from other salmon manager agencies that request the WMP establish the tradeoffs for operating to achieve higher probabilities of being on flood control rule curves by April 10 at Grand Coulee (currently 85%) and Libby and Hungry Horse (75%) to improve spring and summer flows and describe conditions under which such operations will maximize benefits and minimize risk to all fish stocks.

IDFG also recommends that whenever possible, a flood control “shift” between Dworshak and Grand Coulee be considered. In a study conducted in the early, 1990s, the Corps investigated the flood control operations within the Basin. It found that approximately, 1maf of storage could be provided if the flood control limits were relaxed at The Dalles project.

Spill Operations

In Section 5 (*Spill Operations for Project Passage*), there is no mention of the Lower Granite Removable Spillway Weir (RSW) testing during the 2002 spring migration. It is IDFG’s understanding that the RSW study protocols call for “special” spill operations. We support the RSW research as long as modifications to the FCRPS BiOp spill levels provide adequate fish protection. We will continue to work with federal managers, TMT, and IT to make recommendations for fish protection in concert with the research. If spill volume has to be reduced to test the spillway weir, we believe a 24-hour spill regime should be considered (BiOp spill is currently based on a 12-hour, night time period) to provide additional protection for migrating salmonids.

The decision by the Corps not to provide BiOp spill at Lower Monumental Dam during the 2002 migration is understandable due to the condition of the stilling basin. We expect options and actions to be considered to provide the best compensation within the resources available. We understand that initial actions have been implemented at Little Goose (24 hr. spill) and Lower Monumental (primary bypass mode). We will work with federal managers, TMT, and IT to develop additional mitigation (onsite, such as continued primary bypass mode), and offsite (such as spill at other projects) for the absence of spill at the project.

Non-Listed Fish Protection

The WMP doesn’t address the need to protect non-listed stocks of anadromous fish adequately in terms of issues that can pretty much be expected to arise. A good example is the release of chinook smolts from Spring Creek Hatchery. Providing protection through the lower reach of the hydrosystem is an annual discussion, and one that the WMP should address.