



# FISH PASSAGE CENTER

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## MEMORANDUM

TO: Rudd Turner, COE

FROM: David A. Benner

DATE: February 27, 2003

RE: Comments on Spring/Summer Update to the 2003 Water Management Plan

The Spring/Summer Update to the 2003 Water Management Plan is meant to be a real-time management tool based upon current water supply forecasts. The plan predicts what decisions will be made for the upcoming season. The current 2003 water supply forecasts predict runoff volumes that will significantly affect fisheries operations along the Lower Snake River and the Libby Reservoir. After reviewing the Spring/Summer Update to the 2003 Water Management Plan, I have outlined the following comments and concerns:

### **Water Supply Forecasts (Page 1, Draft 2-19-03)**

The Spring/Summer Update to the Water Management Plan includes forecast points that are used to determine BiOp operations on the FCRPS. At several of these sites, the Water Supply Forecasts are (and will likely continue to be) very close to the breakpoint of BiOp action/no action. For example, spring spill on the Lower Snake River is dependant upon the forecasted average flow at Lower Granite, which is a function of the Water Supply Forecast. It has been stated that a 16 Maf April-July forecast at Lower Granite is a fair indicator of whether 85 kcfs could be met through the spring. At Lower Granite, the January Final WSF reported an April-July volume of 15.8 Maf, 0.2 Maf less than the 16 Maf criteria; the January WSF assumed normal precipitation through the future and included snow. The February Final WSF reported an April-July runoff volume at Lower Granite of 14.7 Maf, however, the precipitation input dropped to 45% of normal through mid-February and 90% of normal through the end of March then 100% of normal beyond March. Currently, the February mid-month WSF reports an April-July runoff volume at Lower granite of 15.7 Maf, with actually recorded February precipitation through the 17<sup>th</sup> and 90% precipitation assumed through the end of March and 100% beyond March (No snow Included). The above example illustrates that 1) the WSF at Lower Granite

will likely be very close to the 16 Maf breakpoint for spill/no spill and 2) the WSF is dependant upon precipitation and snowpack assumptions.

Because 2003 appears to be a year in which WSF will play a major part in determining BiOp actions, all assumptions in the water supply forecasts should be very clearly stated. It is suggested that these assumptions and the confidence intervals of the WSF be included in your Water Management Plan. This is particularly important considering that three separate agencies (COE, BOR, and RFC) all create forecasts at certain locations that will decide BiOp actions. This suggested input to your Water Management Plan will clearly define any and all assumptions involved with each WSF and will allow each agency an opportunity to agree or disagree with the WSF and the assumptions provided.

### **Grand Coulee Summer Draft Limit (Page 5, Draft 2-19-03)**

There has been some confusion regarding the August 31<sup>st</sup> draft limit at Grand Coulee as outlined in the NMFS 2000 Biological Opinion. The BiOp reads:

*Based upon the July final April-to-August runoff volume forecast at The Dalles Dam, the Action Agencies shall limit the reservoir draft to the following end-of August elevations: 1280 feet in years when the forecast for The Dalles equals or exceeds 92 Maf and 1278 feet in years when the forecast is less than 92 Maf.*

According to the NOAA River Forecast Center (Harold Opitz, August 2002), the July Final Water Supply Forecast, as identified in the Biological Opinion and the Water Management Plan, **does not exist**. Yet, both the Biological Opinion and the Water Management Plan call for the summer draft limit at Grand Coulee to be determined by the July **Final** Water Supply Forecast. Based upon the language in the Biological Opinion and the Water Management Plan, in August of 2002 we requested in a conversation with Mr. Harold Opitz that the River Forecast Center provide a July final forecast. Mr. Opitz indicated that the forecast would not be finalized and would not change from the July Early-Bird forecast. We are concerned about the lack of a July Final Forecast because: 1) the Biological Opinion and Water Management Plan clearly identify the July Final forecast as the operation criteria relative to summer draft at Grand Coulee, 2) the Early-Bird and Final forecasts are not calculated using the same dataset, 3) the forecast had increased approximately 3 MAF from the 2002 June Final to the 2002 July Early-Bird.

It is suggested that the Water Management Plan acknowledge this discrepancy, and either ask the RFC to provide a July Final April-August Forecast at The Dalles, or explore modifying the language in the BiOp to read July Early-Bird as opposed to July Final.

In conclusion, we appreciate the opportunity to provide comments to your Spring/Summer Update to the 2003 Water Management Plan. We believe that that we have presented are legitimate concerns and suggestions, and will ultimately aid in the decisions that will need to be made in 2003.