USFWS Comments on draft 2003 Water Management Plan
09/09/02

Section 5.2: All Storage Projects
Describe clearly what is meant by "high probability" for meeting April 10 rule curve.

Sections 5.3.1, 5.4.1, 5.5.1, and 5.8.1: Flood Control
Accurately state what your "high probability" for meeting April 10 rule curve is, as is done in Section 5.9.1 for Grand Coulee

Section 5.11: Bonneville Dam Chum Flows
Clarify the statement: "The chum spawning operation cannot adversely affect implementation of NMFS' 2000 FCRPS RPA or the parties' ability to comply with the Vernita Bar agreement." Refer to the document that dictates this constraint.

If this section is to remain as is, all "2002 " dates in paragraphs two and three should be changed to "2003" to reflect next year's operation(?).

Section 7.1.5: Increased Flow Capacity at Libby
Reasonable and prudent alternative 8.2.a.5 is now in effect. Additional turbine capacity is now called for to fulfill this RPA. The action agencies should be securing additional turbine capacity now and during 2003 since it has been determined that the spillways can not deliver more than about 3,000 cfs and remain in compliance with the existing State of Montana total dissolved gas standard. We are aware of no approved variances to this criterion.

Under RPA 8.2.a.4, the action agencies should be planning on using the spillway(s) to the limit of State water quality standards during the spring of 2003.

Section 9.1.1: Sturgeon
Table 4, the table of tiered water volumes for sturgeon, is NOT that which was agreed upon earlier this year. It should be replaced with the correct table. Contact Marian Valentine at the Seattle District Office.

Add the following after the first sentence of paragraph three (beginning "Libby outflow will fulfill the operational guidelines..."):
During 2003, operational guidelines will include a request to deliver a high flow of water for 4-5 days at a time when both Kootenay Lake-Kootenai River stages are low and local runoff is high to evaluate the potential of increased stream energy to scour sand from buried gravel within designated critical habitat. However, this would be done within established flood control criteria.

Section 12.2.1: Burbot
...flow period should last from **December** ~~January~~ through February.