

State of Oregon
Comments on
Draft 2004 Water Management Plan, dated 08/13/03
October 2, 2003

The state of Oregon has reviewed the draft 2004 Water Management Plan (WMP) developed by the U.S. Army Corps of Engineers, Bureau of Reclamation, and Bonneville Power Administration (Action Agencies) and submits the following comments.

The draft WMP raises several issues that we have commented on in previous years' water management plans and comments the state submitted on the 2000 Biological Opinions of NOAA Fisheries and U.S. Fish and Wildlife Service. We encourage the Action Agencies to consider these comments that are part of the public record and appended to the 2002 and 2003 WMP's. There are several issues that warrant careful consideration before finalization of this years' WMP.

Hydrosystem Operational Priorities- The Action Agencies flow management strategy assigns priorities for protecting bull trout and sturgeon, summer migrants, spring migrants, and chum. We contend that there is there is no analytical basis for assigning priorities for operations; all stocks affected by the Federal Columbia River Power System are at critical levels and warrant full protection. In fact, some of the spring migrant ESU's (i.e. upper Columbia steelhead and chinook) have exhibited the lowest population growth (λ) observed in recent years but are relatively low on the hydrosystem operations priority list for protection. We have encouraged the Action Agencies to not assign the burden and risk of shortfalls in the hydrosystem solely to fish but to share risks equitably with other "non-fish" uses including flood control, irrigation, power production, and other river uses. In practice, this strategy would entail making a probabilistic estimate of the water available for meeting fish and non-fish based on the range of uncertainty of flow forecasts and identify flow management alternatives that allocate available water to fish and non-fish uses that minimizes risks and maximizes benefits. The WMP should quantify risks and benefits to all river uses for each operational alternative so sound hydrosystem decisions can be made.

Flood Control Draft vs Project Refill- The WMP should evaluate the feasibility of 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%) reservoirs to

improve spring and summer flows and set forth conditions under which such operations will maximize benefits and minimize risk to all stocks.

Spring Flows vs Project Refill and Summer Flows- The WMP should describe the degree to which operations to meet spring flow objectives should be constrained by a priority to refill storage reservoirs by June 30. Uncertainty in forecasts should be hedged by a willingness and planned contingency to draft storage reservoirs as necessary so that a) the probability of being at, and not below, the April flood control elevations is greater than 75-90% and b) reservoir elevations are below August 31 draft limits.

Chum Flows vs Project Refill and Spring Flows- The WMP should describe the degree to which operations to meet chum flow objectives should be constrained by a priority to meet April flood control levels or refill storage reservoirs by June 30. Uncertainty in forecasts should be hedged by a willingness and planned contingency to draft storage reservoirs as necessary so that a) the probability of being at, and not below, the April flood control elevations is greater than 75-90% and b) reservoir elevations are below August 31 draft limits. The referenced chum salvage plan should not be considered an acceptable alternative to providing adequate mainstem flows to allow natural spawning of chum. Success of hatchery supplementation from the Duncan Creek chum program to increase or augment natural production of chum either in Duncan Creek or the mainstem is unknown.

Chum Tailwater Elevations- Oregon is not supportive of changing Biological Opinion requirements for chum spawning below Bonneville Dam and for access of chum into Hamilton and Hardy creeks. The Biological Opinion 125 kcfs minimum instantaneous flow target that results in a 11.5 ft minimum tailwater elevation to be initiated when chum are present no later than November 1 is supported by research collected over the last four years. Research also indicates substantial more spawning habitat would be available above 11.5 ft tailwater, so a 11.5 ft tailwater elevation to be provided no later than November 1 (which historically is when chum spawning is initiated) is a very conservative protection level to achieve some level of spawning in the mainstem by both chum and chinook. The Biological Opinion has already provided TMT substantial flexibility in modifying the RPA action for chum spawning including delaying implementation of the operation if poor hydrologic conditions indicate that the operation cannot be sustained throughout spawning and incubation and reduce flows if the operation conflicts with implementation of other RPA actions (ex: April 10 rule curve elevations).

Sturgeon Pulse vs Summer Flows- The amount of water released from Libby for sturgeon should not reduce the likelihood of meeting summer flow objectives for salmon in the lower Columbia. As discussed in our comments on the NOAA Fisheries' 2000 Biological Opinion, sturgeon operations can result in significant losses of water that could be used to improve spring and summer flows for salmon. If conditions preclude storage of that water in Grand Coulee, contingency plans should be in place to operate these reservoirs below August 31 draft limits to meet summer objectives.