

## Idaho Department of Fish and Game Comments on 2005 Water Management Plan

In several instances, we were unclear which Biological Opinion (2000 or 2004) the plan was referring to. We recommend the plan be specific about which Biological Opinion is being referenced.

On page 2 in Substrategy 2.3 the plan states, “provide a better project passage for juvenile fish”. We assume you mean improve or enhance fish survival as stated in the description of the overall Hydro Strategy 2, and the Substrategies (2.1 and 2.2). We believe the goal of Substrategy 2.3 should be made clearer.

On page 5 the plan lists Priority 2.1.1, “Limit the winter/spring drawdown of storage reservoirs to increase spring flows and the probability of reservoir refill.” The last paragraph on page 5 provides more detail about meeting this priority and states, “The initial objective is to operate the storage reservoirs (Dworshak, Hungry Horse, Libby, and Grand Coulee) to be at flood control levels by early April. This level varies by runoff forecast. Reaching early April flood control levels will be affected by how much water was released for flood control, power generation, and fishery flows...” We have attached the December 15, 2004 Joint Technical Memorandum from the state and tribal fisheries agencies, which include our recommendations on how to more consistently meet this water management priority.

On page 5 the plan specifically prioritizes actions when it states in paragraph 2, “The Action Agencies have reviewed these strategies and other actions called for in the BiOps and developed the following priorities (in order) for flow management”. The draft plan lists operating Hungry Horse and Libby to meet minimum flow and ramp rate criteria for resident fish as the number one priority. The Action Agencies rationale to prioritize Columbia Basin flow management actions to meet resident fish criteria downstream from Hungry horse and Libby is unclear. If there is documentation of risk analysis that suggest these populations are at higher risk and thus, the proposed flow management is a higher priority than other actions, then the Action Agencies should reference it in the water management plan. If not, then we question on what basis was this priority established.

On page 5 in first paragraph after priorities the plan states, “Reservoirs are to be operated to meet project minimum outflows, to reduce outflow fluctuations to avoid stranding resident fish...” We request that this sentence be modified to read: “Reservoirs are to be operated to meet project minimum outflows, to reduce outflow fluctuations to avoid stranding fish...” as we do not believe Action Agency obligation to avoid stranding fish only pertains to resident fish.

On page 6, we believe the second paragraph needs sentence acknowledging that TMT has decided the past three years to extend Dworshak summer flow augmentation into mid September, and that this operation is likely to be implemented in 2005 as well. This same comment pertains to section 5.8.3 on page 20 as well.

In section 2.2.1 on page 6 the plan states, “...the BiOps call for the action agencies to study system flood control requirements and forecast procedures to determine if they can be improved.” We request that the Action Agencies review the December 15, 2004 Joint Technical Memorandum from the state and tribal fisheries agencies on this subject for our technical recommendations on how to more consistently meet flow targets.

On page 15, concerning when to end MOP operations to reduce juvenile salmon travel time and reduce flow fluctuations. We recommend stepping down (using late season median juvenile travel time information) the end of MOP operations at the lower Snake River Projects to coincide with the end of Dworshak summer flow augmentation. This recommendation will provide better coordination between these two operations designed to improve juvenile survival by providing better inriver migration conditions.

The first sentence of the second paragraph in section 5.2 on page 17 currently reads “The FCRPS dams will be operated during the winter season in order to achieve a high probability of water surface elevations within 0.5 foot of the flood control rule curve by April 10...” We request that this sentence and the similar ones pertaining to Libby on page 18 and Dworshak on page 20 be changed to ‘...operated during the winter season so that water surface elevations are within 0.5 foot of the flood control rule curve by April 10...’

In paragraph three on page 24 the planning dates for ending summer spill should be staggered to better match fish migration timing like the start of spring spill and the transition from spring to summer spill are. During the past several years there has been a last minute request to curtail summer spill because of a believe by some of the Action Agencies that the migration is already over. Idaho has indicated its willingness to assist in the development of a method that is agreeable to all TMT parties for determining when migrations have commenced and ended with pursuant adjustment of fish protection measures, such as spill, to better match the migration. It would be difficult to accept curtailment of fish protection measures unless such a regionally accepted method is developed to forecast migration timing, and there is agreement to provide fish protection measures for as long as a significant proportion of targeted runs are likely to still migrate.

Paragraph three on page 24 also states “There will be no summer spill at the four collector projects ...”. The plan should acknowledged that there is a proposal for a summer spill test of the RSW at Lower Granite, and that spill will be provided for this study if approved by the appropriate regional forum (SCT).

We have the following comment concerning Table 4 on page 25. We recognize that the 2000 BiOp RPA, as well as the 2004 UPA both call for only 12 hour (nighttime) spill at Little Goose and McNary dams, although the 2004 BiOp reference conditions articulated 24 hour spill at these two projects. We believe the Water Management Plan should retain more flexibility to adaptively respond to emerging information about benefits of spillway passage so that consideration and implementation of reference condition operations at these projects can more readily occur if warranted by the information.

The TDG section beginning on page 28 is out of date, and we reserve the opportunity to provide further comment once this section has been updated. We support using the Bradford Island water quality monitoring station below Bonneville Dam that was recommended by the Salmon Managers in their March 11, 2004 Joint Technical Memorandum.

In section 8.1 on page 33 concerning juvenile transportation from Snake River collector projects the plan states “A review of the information relative to when spring transportation should be initiated will occur during the winter of 2004/2005. Current research information should be available to help inform this decision consistent with NOAA Fisheries’ BiOp action 51.” We look forward to reviewing the available information and expect full participation in these discussions and decisions using current regional management forums.

On page 41 the plan states, “A proposal has been made to operate Lake Pend Oreille in the fall/winter to an elevation of 2,055 feet during the 2004/2005 season.” Our understanding is that SOR 2003-FWS-01 was submitted to TMT, and the Corps has agreed to implement this winter elevation if reasonably possible. All indications from the Corps this fall at TMT has been that they will be implementing the conditions of this SOR and operating Lake Pend Oreille to an elevation of 2,055 feet during the winter of 2004/2205. We believe that the Water Management Plan should more accurately reflect the likelihood of this SOR being fully implemented, and the Corps commitment to implementing this SOR.

Referencing Section 11.0 on FCRPS Hydrosystem Performance Standards on page 42, we believe the plan needs a clarification statement in this section that juvenile survival standards are intended to provide best possible adult return rates given natural runoff and ocean conditions, and that these standards will be adjusted as information indicates that the goal of best possible adult return rates can be achieved with other measures.

In Section 12.6 on page 44 concerning the Vernita Bar Protection Agreement and the Hanford Reach stranding agreement, the Water Management Plan states: “Flow fluctuations are limited from the time of fish emergence in early April through early June.” We request that the Action Agencies refer to the December 15, 2004 Joint Technical Memorandum from the state and tribal fisheries agencies on water management recommendations for a discussion of our concerns with the implementation of the stranding agreement in 2004.