

**TO:** CATHRYN HLEBECHUK, CORPS OF ENGINEERS TECHNICAL MANAGEMENT TEAM CHAIR

**FROM:** RUSS KIEFER, STATE OF IDAHO TECHNICAL MANAGEMENT TEAM REPRESENTATIVE

**SUBJECT:** COMMENTS ON 2007 WATER MANAGEMENT PLAN

**DATE:** DECEMBER 15, 2006

CC: JIM YOST, STATE OF IDAHO IT REPRESENTATIVE

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We appreciate the opportunity to provide input to the 2007 Water Management Plan, recognizing that there may be changes to this plan as a new FCRPS proposed action and biological opinion is vetted.

Our comments are as follows:

We are concerned that on page 9, refilling storage reservoirs by about June 30 to enhance summer flow augmentation opportunity has priority over achieving spring flow objectives. From our understanding this priority was based primarily upon reach survival estimates, and the fall chinook reach survival estimates used were confounded by overwintering juveniles. We also note that available information indicates that flows up to a certain threshold are important to adult return rates of spring migrants. In addition, summer flow augmentation from the upper Snake River may cause water temperature increases in the lower Snake River that could offset the benefits from increased flows if not managed with this consideration. We therefore recommend that reservoir refill/flow augmentation prioritizations should be regionally reviewed and adjusted to reflect the relative importance of flow and temperature on adult return rates, ESUs affected, and the status and trends of these ESUs.

We have several comments, concerns, and recommended changes to Table 3. The summer draft limits are dramatically different for the storage reservoirs used to provide summer flow augmentation (Dworshak 80 ft, Libby and Hungry Horse 20 ft, and Grand Coulee 10 ft). We believe a discussion of the rationale for these different draft limits should be included. The Albeni Falls Fall/Winter elevation should be listed as (2051 - 2055 as determined by TMT) both in Table 3 and section 5.5.1. We note that Grand Coulee only has to meet an 85% confidence of meeting April 10 flood control elevation, while all other storage reservoirs have to operate to meet April 10 elevations. We recommend that Grand Coulee also be operated to meet its April 10 flood control elevation. The description of flows below Bonneville Dam for chum spawning should be changed from a specific flow amount to the tailwater elevations that are currently being used.

We recommend the following changes to the Minimum Operating Pool (MOP) operations described in section 4.1.1 on page 20. Based upon smolt arrival data we recommend that MOP operations begin on April 1<sup>st</sup>, and continue as long as flow augmentation water from Dworshak is still affecting flows in the lower Snake River. If flow augmentation from Dworshak ends before August 31<sup>st</sup>, then MOP operations should

continue until TMT determines that significant active summer juvenile migration has ceased. We further recommend that TMT develop regionally accepted criteria for determining when significant active summer juvenile migration has ceased to aid this annual decision.

The refill at Grand Coulee in section 5.9.2 on page 26 is described as “by approximately July 4” while all other storage reservoirs are “by approximately June 30”. The rationale for this different refill date for Grand Coulee should be explained.

For section 6 on page 28, we recognize that the current TDG waiver will be in place during the 2007 water year covered by this water management plan. We assume the COE will pursue a new dissolved gas waiver to facilitate future operations and the following comment addresses this process specifically and does not speak to the States’ “non-waiver” TDG standard of 110%. As the COE pursues a new dissolved gas waiver, we offer the following perspective and recommendation. We support the current waiver to the 120% gas cap to facilitate implementation of the fish spill substrategy at the FCRPS dams with smolt passage, which is the current waiver threshold at the tailrace. The gas bubble trauma monitoring and adult fallback data indicate that operating with this 120% gas cap does not cause significant gas bubble trauma or adult fallback. However, our review of the available data indicates the current waiver threshold of 115% TDG at the designated downstream monitoring station in the next downstream forebay is unnecessarily restricting this substrategy. We therefore recommend requesting a waiver to the 120% gas cap at all current tail water and designated downstream monitoring stations.

In section 12.1 on page 40, it does not seem intuitive that spawning protection flows for mountain whitefish (which spawn in the fall when natural flows are low) need to be three times greater than those of rainbow trout (which spawn in the spring when natural flows are higher). What are the justifications for these spawning protection flows?

We notice that Appendix 6 (Transport Criteria), needs to be updated. However with the ongoing regional technical and policy discussions occurring about mainstem migration strategies, we believe it would be premature to recommend specific language at this time. We suggest that TMT identify a subgroup to prepare draft criteria as soon as reasonably possible.