USFWS Comments on Draft 2007 Water Management Plan
12-14-06

Page 4- section 1.1 Updated Proposed Action, Biological Opinion, and Preliminary Injunction Order

In addition USFWS released a 2006 Biological opinion on February 18, 2006 titled "Fish and Wildlife Service Biological Opinion regarding the Effects of Libby Dam Operations on the Kootenai River White Sturgeon, Bull Trout and Kootenai Sturgeon Critical Habitat." (http://www.fws.gov/easternwashington/documents/Final%20Libby%20Dam%20BiOp%202-18-06lr3.pdf) The 2000 USFWS BiOp, Effects to Listed Species from Operations of the Federal Columbia River Power System, remains in place for the rest of the FCRPS. The 2000 BiOp can be found at http://www.fws.gov/pacific/finalbiop/BiOp.html

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Page 8 – section 2.1 Priorities

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 to support both lower Columbia chum and Hanford reach fall Chinook spawning, and to meet Columbia Falls minimum flow requirements. If projects are maintained through the winter and spring near their flood control elevations (within the constraints of Vernita Bar and Chum flows), there is an increased likelihood of refilling projects by June 30th with a *minimal* impact on Spring flows.

Page 11 – section 2.3 Emergencies

The UPA and 2000 BiOp acknowledge that emergencies and other unexpected events occur and may cause deviations from fish operations. Such deviations may be short in duration, such as a deviation to respond to an unexpected unit outage or power line failure, or longer in duration, such as experienced in 2001 in response to the low water conditions and unprecedented power market conditions. Emergencies must be declared and documented as to their nature, cause and proposed resolution. Emergencies should include measures to mitigate for the impact on fish protection measures, where applicable. The TMT has developed Emergency Protocols to be followed to respond to short-term emergencies. (See Appendix 1 or see TMT homepage at http://www.nwdwc.usace.army.mil/TMT for current version of protocols.) Coordination of longer term emergencies may include the involvement of regional executives.

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Page 22 – section 5.2 All Storage Projects

The purpose of the following actions is to refill FCRPS storage projects (Albeni Falls, Dworshak, Grand Coulee, Hungry Horse, and Libby) as much as possible for spring flows, summer flow augmentation and to cool water temperatures.

The FCRPS dams will be operated during the winter season in order to achieve a high probability (DEFINE "high probability" for each project, cite reference) of water surface elevations within 0.5 foot of the flood control rule curve by April 10, and to refill by June 30, except as specifically provided by the TMT. …..

Because research results indicate that increased flows have more direct survival benefits for summer migrants than for spring migrants depending upon the actual base spring flow being provided, modest reductions in spring flows to facilitate reservoir refill would generally be preferable to refill failure.

Page 23 – section 5.3.2 Summer anadromous fish

During the summer (July and August) the Action Agencies will operate Libby to help meet the flow objectives for juvenile salmon out-migration in the lower Columbia. The 2004 UPA and NOAA BiOp call for Libby to be drafted, not to exceed 2439' by the end of August, to help provide flows for summer anadromous fish.

The Northwest Power and Conservation Council mainstem amendments call for an evaluation of the relative risks posed to resident fish versus the benefits provided to anadromous fish by drafting the reservoir to 2439' by September 30 in the lowest 20% of volume runoff years and to elevation 2449' by September 30 in all other years. The TMT will consider implementation of this plan during the late summer season.

Deleted: During the summer (July and August) the Action Agencies will operate Libby to help meet the flow objectives for juvenile salmon out-migration in the lower Columbia. The summer reservoir draft limit is 2,439 feet, which determines the maximum draft available for summer flow augmentation from Libby. Retention of July/August water in Lake Koocanusa is possible under a Libby-Canadian storage water exchange, but is not guaranteed. This exchange agreement also reduces the second flow peak created by July/August salmon flow through Kootenay Lake July and August. The purpose of this action is to reduce or eliminate the second peak in the Kootenai River, thus protecting bull trout and sturgeon. Additionally, the exchange agreement reduces the draft of Lake Koocanusa and increases upstream benefits (Note: This type of exchange is allowed under the current Libby Coordination Agreement, which was signed February 16, 2000.¶
Because the operation must have mutual benefit and the magnitude of the water year is not known earlier, the operation, if any, for a given water year is not finalized until June or July of that year.)Do wee need all of this? Suggest shorten to the following:¶

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Page 24 – section 5.5.1 Fall draft for fish

The reservoir will be drafted by November 20th to an elevation [2055 to 2051] for Kokanee spawning. This elevation will be maintained as a minimum until Kokanee emergence ends. The elevation will be determined by current conditions and needs as determined by TMT. ***This will match language in section 10.3. Also, CORRECT table 3, Albeni Falls).***

Page 28 – section 5.11 Bonneville Dam Chum Tailwater Elevations

Chum salmon will be captured and used as broodstock to initiate/bolster a spawning population in the recently restored habitat of Duncan Creek. The Northwest Power and Conservation Council's Duncan Creek project outlines the logistics for a brood

movement and fry-rearing program. The salvage operation could expand the numbers of fish captured and reared in this newly established brood collection program to make up for the lack of tributary or mainstem spawning, and would only be conducted under a declared emergency.

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Page 29 – section 7.1.2 Libby VARQ

The purpose of VARQ is to better ensure reservoir refill and to provide more (and more reliable) water for spring flows and summer flow augmentation without reducing flood control protection.

An Environmental Impact Statement (called the Upper Columbia Alternative Flood Control and Fish Operations EIS) has been prepared and additional public and Canadian (including Columbia River Treaty) coordination is being conducted before VARQ can be implemented at Libby and Hungry Horse for the long term. VARQ will continue to be implemented on an interim basis until a final decision is made regarding long-term implementation. The final EIS was made available for public review on April 28, 2006. It incorporates and evaluates two new alter natives in order to meet our requirements under the Feb 2006 Biological Opinion from the US Fish and Wildlife Service for sturgeon in the Kootenai. Those alternatives include the new preferred alternative (VARQ flood control with fish flows including spill at Libby up to 10,000 cfs above powerhouse capacity to evaluate the effectiveness of 35,000 cfs flow releases for providing habitat attributes necessary for sturgeon spawning and recruitment); and a Standard flood control alternative with the same fish flow parameters. A record of Decision is scheduled to be signed in early June following consideration of comments on the FEIS.

In the 2006 operations, the Corps planned to provide stacked flows, releasing full powerhouse capacity on top of the local freshet (peak input from tributaries below the dam) in mid to late May to evaluate this operations effectiveness for providing habitat attributes necessary for sturgeon. The operation was timed to optimize temperature conditions to the extent possible with matching peak flows.

A failure to implement VarQ correctly, coupled with record temperatures, rapid snow melt and significant rain storms contributed to flooding in the Kootenai Valley in June. The spring flood event saw the Kootenai River reach 1766.56 feet above mean sea level, more than 2.5 feet over floodstage at Bonners Ferry. Operations for 2007 will be determined following completion of the After Action Report (AAR), scheduled for November 2006. ***Decided at TMT, or Remand ? Clearly state where these discussions are being held and who will make the decision, so that there will be no surprises, or false expectations.***

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Deleted: The high inflows in May and June filled the reservoir very quickly and ultimately required high outflows to manage the reservoir elevation. Since powerhouse capacity is approximately 25,000 cubic feet per second, use of the spillway proved necessary. Outflow from Libby Dam ultimately reached as high as 55,000 cfs on June 17. During the high flows from Libby Dam, the Corps worked with local officials, citizens, radio stations and other media to inform the public of any changes of the outflow from the dam and changes in the river downstream.

Page 32 – section 7.3.2 Total Dissolved Gas Monitoring

The Reservoir Control Center is responsible for monitoring the TDG and water temperatureconditions in the forebays and the tailwaters of the lower Columbia

River/lower Snake Riverdams, and selected river sites. The operational water management guidelines in Oregon are to change spill levels and, subsequently, spill patterns at the dams (daily if necessary) so that the forebays are as close to, but do not exceed, daily (12 highest hours) average of 115% TDG, and the tailwater levels do not exceed, daily (12 highest hours) average of 120% TDG.

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Page 42 - section 12.9.2 Spring Creek Hatchery Release

The U.S. Fish and Wildlife Service typically releases between 7 and 8 million tule fall chinook fry from the Spring Creek National Fish Hatchery upstream of Bonneville Dam in March. In 2007 the Action Agencies plan to operate Bonneville Dam with a powerhouse 2 priority, to operate all units with fish screens, and to operate the bypass facility in order to provide project passage for this hatchery release. The B2 Corner Collector will be operated for a period of days (to be determined) during the March 2007 release. In 2007 the U.S. Fish and Wildlife Service plans to request spill in conjunction with B2 Corner Collector use.

Deleted: The Fish and Wildlife Service, Corps of Engineers and Bonneville Power Administration reached mutual agreement on an operation at Bonneville Dam for the March 2004 release of sub-yearling chinook from Spring Creek Hatchery in support of a two-treatment evaluation in which the effectiveness of spill as compared to operation of the new B2 corner collector was evaluated. The agreement was reached in exchange for a commitment to no spill for March Spring Creek releases in 2005 and 2006 (unless we see significant problems with the new B2 corner collector, in which case we will revisit 2005 and 2006 operations for the March 2007 hatchery release).