**TO:** JIM ADAMS, CORPS OF ENGINEERS TECHNICAL MANAGEMENT TEAM CHAIR

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

**SUBJECT:** COMMENTS ON 2009 WATER MANAGEMENT PLAN

**DATE:** NOVEMBER 25, 2008

CC: JIM YOST, STATE OF IDAHO IT REPRESENTATIVE

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We appreciate the opportunity to provide input to the 2009 Water Management Plan.

Our comments are as follows:

We request that the language describing the Lake Pend Oreille winter elevation decision tree in section 4.3.1 on page 23 that currently reads: "Idaho Department of Fish and Game (IDFG) and USFWS in conjunction with the Corps and other concerned parties have developed a draft decision tree that can be used annually as guidance to develop a recommendation for winter elevations of Lake Pend Oreille (Figure 1)." be changed to: Idaho Department of Fish and Game (IDFG) and USFWS in conjunction with the Corps and other regional parties have developed a decision tree to guide the recommendations for winter elevations of Lake Pend Oreille intended to provide suitable spawning conditions for kokanee salmon in the lake, and chum salmon below Bonneville Dam (Figure 1).

We offer the following comments and recommendation to the Minimum Operating Pool (MOP) operations described for each of the lower Snake River projects in sections 4.10.1, 4.11.1, 4.12.1, and 4.13.1 on pages 35-38. Currently, each of these sections reads in part as "operate within 1 foot of Minimum Operating Pool (MOP) from approximately April 3 until small numbers of juvenile migrants are present (approximately September 1)". That text is consistent with the FCRPS Biological Opinion and we are not recommending a change to that language. In addition to the number of juvenile migrants present we believe it also is important to consider other simultaneous management actions. The Action Agencies are implementing the component of the Snake River Basin Adjudication calling for 200 KAF of summer flow augmentation water from Dworshak Dam be released in early September. Part of the rational for this flow augmentation shift is to aid the later portion of outmigrating Snake River fall chinook juveniles (especially those originating from the lower Clearwater River) with increased water velocities and moderation of water temperatures. Another rational for shifting some of the summer flow augmentation from Dworshak is to help reduce the likelihood of water temperature increases in early September that can cause a thermal block to adult steelhead and fall chinook migrations. This rational is explained in Appendix B.2.1 of the Biological Assessment: "The Action Agencies will complete studies to evaluate temperature effects on adult Snake River steelhead and fall Chinook salmon of drafting Dworshak Reservoir to elevation 1520 and extending the draft period into September. Provisions of the SRBA Agreement will be implemented, which will include Dworshak drafting

to elevation 1535 feet by the end of August and the remaining 200,000 acre-feet from elevation 1535 feet to elevation 1520 feet in September. This operation has proven to be an effective tool to cool the temperature at the tailwater of the Lower Granite Dam. The Action Agencies currently coordinate through TMT and the Nez Perce Tribe (for SRBA actions) to determine water temperature releases from Dworshak during late June through September to make best use of the cool water at depth in the reservoir. **Additionally, the Lower Snake River MOP operation reduces the reservoir cross-section and surface area, which is another tool to assist in moderating temperatures**." (emphasis added). Going off of MOP operations at the lower Snake River projects at the same time as releasing flow augmentation to speed water velocity and moderate temperatures could be counterproductive. Therefore, we recommend that MOP operations continue into September 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 31st, then MOP operations should continue until TMT determines that significant active summer juvenile migration has ceased. This recommendation is consistent with BiOp Hydropower Strategy 1 – Operate the FCRPS to provide flows and water quality to improve juvenile and adult fish survival.

We notice in section 5.1 on page 43 that mechanical problems at Lower Monumental Dam generating unit 1, are preventing the Action Agencies from fully providing for fish protection measures identified in the BiOp. We request that the Action Agencies expedite the repairs of this unit so that this BiOp measures can be fully provided, or an alternative plan be developed to provide the same level of fish protection. This request is consistent with BiOp Hydropower Strategy 4- Operate and maintain facilities at Corps' mainstem projects to maintain biological performance.