

TO: DAN FEIL, CORPS OF ENGINEERS TECHNICAL MANAGEMENT TEAM CHAIR
FROM: RUSS KIEFER, STATE OF IDAHO TECHNICAL MANAGEMENT TEAM REPRESENTATIVE
SUBJECT: COMMENTS ON 2010 WATER MANAGEMENT PLAN
DATE: NOVEMBER 30, 2009
CC: JIM YOST, STATE OF IDAHO RIOG REPRESENTATIVE

We appreciate the opportunity to provide input to the 2010 Water Management Plan. Our comments are as follows:

Section 3.6., Preparation of Plans on page 9, contains four bulleted statements summarizing what the planned operations are designed to accomplish. The second bullet states that the operations are designed to: “Make progress towards meeting the biological performance standards specified in the BiOps.” We believe the Water Management Plan should identify operations to meet the BiOps performance standards. We understand delays may exist between implementing certain operations and achieving performance standards; a timeline for operations to meet the performance standards would be informative.

We request that the last couple of sentences in Section 6.3.1. General Albeni Falls Coordination on page 29 be changed to the following: “The purpose of this meeting is to ensure winter lake operation protocol is addressing the needs of kokanee spawning and hence, threatened bull trout, which feed on kokanee. This interagency coordination of drafting to winter pool levels for kokanee also takes into consideration spawning and incubation needs for lower Columbia River chum salmon (not included in NMFS 2008 BiOp). A decision tree has been developed by the parties to guide selection of the recommended winter elevation to meet these objectives (Figure 1).”

We believe it is time to remove “Draft” from the description of the decision tree to guide selection of the winter lake elevation for Lake Pend Oreille on page 31. The TMT and “interagency meeting team” have successfully used this decision tree the past year to guide the selection of the recommended winter elevation for Lake Pend Oreille. Just like the rest of the Water Management Plan, this decision tree is a living document and can be changed at anytime if warranted.

Section 6.3.2. Fall and Winter Lake Elevation on page 30 contains four bulleted statements summarizing what the SOR for Lake Pend Oreille winter elevation specified. The last two bullets should be changed to:

- Operate within a one-half ft. operating range above the MCE until kokanee spawning concludes, or December 31, whichever comes first.
- The end date for kokanee spawning will be determined by IDFG personnel.

We agree with the first paragraph in section 6.6.1. Winter/Spring Operations for Grand Coulee on page 38 that explains why we should start the draft prior to April 10 in

years when we observe an increase in the water supply forecast between the March and April forecast. The same flexibility and process should also be used to reduce the draft if a similar drop in the water supply forecast between the March and April forecast is observed.

We note that there are two sections 6.8.1. and 6.8.6. on pages 41 and 42 that describe fall operations for Dworshak Dam. Section 6.8.6. appears to be more comprehensive and should be the section retained.

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 6.10.1, 6.11.1, 6.12.1, and 6.13.1 on pages 43-45. 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 rationale 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 rationale 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 rationale is explained in Appendix B.2.1 of the Biological Assessment:

“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. 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 note that in 2009, TMT agreed to an operation that allowed more flexibility in lower Snake River reservoir elevations after September 1st. This agreement included a stipulation that the lower Snake River reservoirs would return to

MOP elevations after flow augmentation from Dworshak was complete so that reservoir refill would occur with natural runoff as originally planned, and BPA had increased flexibility to meet power demand. As long as temperature criteria are being met, the State of Idaho will likely be in support of similar adaptive management in the future.