

The US Fish and Wildlife Service (Service) has reviewed the 2010 Draft Water Management Plan, and the new December 31, 2009 version. The Service offers the following comments and suggested changes:

1) Page 7, Section 2, 2nd paragraph, 1st sentence, addition

“The purpose of the Water Management Plan (WMP) is to describe how the AAs plan to implement specific operations identified in the NMFS 2008 Biological Opinion (BiOp) and the USFWS 2000 and 2006 BiOps on the operation of the FCRPS during the current water year (October 2009 – September 2010).”

- You’ve already stated that FWS must be consulted with for listed species affected by system operations in the first paragraph.

2) Page 7, Section 2, 2nd paragraph, last sentence, addition

“The system operations contained herein may be adjusted according to water year conditions based on recommendations from the TMT and pending review and coordination with NMFS and/or USFWS, whichever is appropriate.”

- The FWS is recognized as an integral part of consultation for system operations in the first paragraph. Coordination with the Service should be similarly affirmed.

3) Page 8-9, Section 3.4

- When clicked, the web link returns a message “page not found”.

4) Page 9, Section 3.5

- When clicked, the first web link returns a message “server not found”.

5) Page 9, Section 3.6

- When clicked the web link returns a message “page not found”.

6) Page 10, Section 3.7, last paragraph

- The web link to the FPP goes to the 2008 FPP. What is needed is a link that goes to a master list of all the FPPs, as is done with the WMP link on page 16, section 4.3.

7) Page 12, Section 4.1.2, last bullet on the page, correction

“Libby reservoir refill in 2010 ~~2009~~ may be ...”

8) Page 15, Section 4.2.4, addition

“Water released for sturgeon spawning flows will ...”

9) Page 16, Section 4.3.3

“The AAs agree to take reasonable actions to aid non-listed fish, especially lamprey, during brief periods of time due to unexpected equipment failures or other conditions and when significant detrimental biological effects are demonstrated. When there is a conflict in such operations, operations for ESA-listed fish will take priority.”

10) Add a new section**Section 4.5 *Lamprey Passage***

In May 2008, a Memorandum of Agreement (MOA) between the Action Agencies, the Accord Treaty Tribes (Umatilla, Warm Springs, Yakama) and the Columbia River Inter-Tribal Fish Commission addressed actions to protect Pacific lamprey. Specific to the USACE, the MOA requires collaboration with the tribes and the U.S. Fish and Wildlife Service (USFWS) to develop a 10-year lamprey plan. The goals of the Pacific lamprey passage program within the Northwestern Division of the U.S. Army Corps of Engineers (USACE) are to improve both juvenile and adult lamprey passage through the FCRPS such that potential passage issues do not negatively affect population viability contributing toward recovery of the species. Critical passage needs lists for adult and juvenile lamprey were developed in 2009 by the Columbia River Federal Caucus Lamprey Focus Group. The AAs will further the continuing efforts to develop a coordinated federal strategy for lamprey conservation that prioritizes the actions to be taken, and integrate that strategy, which includes the USFWS lamprey conservation initiative, with Tribal lamprey plans. These efforts should provide guidance for project operations that meet the needs and improved passage conditions for adult and juvenile lamprey.

Specific 2010 passage operations for juvenile and adult lamprey will be defined in the appropriate project sections of the 2010 FPP. In-season conflicts between operations for listed species and Pacific lamprey not covered in the FPP will be reviewed by TMT and recommendations will be made.

11) Page 18, Table 2, Winter column

- A bullet symbol needs to be added to differentiate “Minimum flows from Hungry Horse Dam ...” from the previous bullet.

12) Page 31, Section 6.3.1, first sentence

- This first sentence is incorrect. The FWS 2000 BiOp (RPA 11.A.1.4.d, page 91) does not specifically mention the Kalispel tribe here, and only states the annual meeting will “...evaluate Lake Pend Oreille kokanee monitoring results and make necessary adjustments through subsequent in-season management.”

A correct statement is:

The AAs, the USFWS, NOAA Fisheries, and IDFG will meet annually (per the 2000 USFWS BiOp and the USFWS letter of September 28, 2007 to the Corps and BPA on “Lake Pend Oreille Winter Lake Elevations.”), along with the Kalispel Tribe and other interested parties, to evaluate...

13) Page 32, Section 6.3.1, addition

“...salmon (not included in NMFS 2008 BiOp) and the decision tree developed by the parties to guide recommendations on minimum winter lake elevations (Figure 1). The interagency meeting recommendation will be reviewed by TMT and a final recommendation will be made.”

14) Page 32, Section 6.3.2

- A general process description is needed here. Then refer to the fall/winter update. What is currently written in this section properly belongs in the 2010 Fall-Winter Update. Move it out.

15) Page 33, Section 6.3.2, Figure 1

- The caption incorrectly states that the September forecast is used to make the draft recommendation. The original October 15 date should be reinserted. This is the consensus master plan arrived at through long deliberations. Even though there was an adaptive management choice to use the September forecast this year, it should not be codified into the 2010 plan. The choice to use September in 2009 should be explained in the 2010 Fall-Winter Update. See previous comment.

16) Page 36, Section 6.4.3.1, first paragraph, correction

“From 15 May to 30 June and during the month of September, a minimum flow of 6,000 cfs will be provided and minimum flows of 4,000 cfs will be provided for the rest of the year. Volume to sustain basal flow of 6,000 cfs from May 15 through May 31 ~~until the start of the sturgeon operation~~ will be accounted for with sturgeon volumes, and in the fall should be drawn from the autumn flood control draft.”

- The USFWS 2006 BiOp clearly states this time period. Prior WMPs have consistently stated the May 15 through May 31 time period. No process has been completed to suggest a change would be appropriate. **Note:** Why does the Corps take bull trout minimums out of the sturgeon volume if VARQ dictates that the flows would be above the bull trout minimums? In other words, if BT minimum flow is 9 kcfs, and VARQ flows are 12 kcfs, why in the world would you take the BT flows out of the sturgeon volume? You were above minimum BT flow regardless.

17) Page 37, Section 6.4.3.1, Table 7, addition to caption

“**Table 7.** Minimum bull trout releases from Libby Dam July 1 through 31 August, based on the May final Libby water supply forecast for the April-August period (May 15 – June 30 and all of September the minimum is 6 kcfs).”

18) Page 37, Section 6.4.3.2, second paragraph

“Accounting for these total tiered volumes will begin when the USFWS determines benefits to conservation of sturgeon are most likely to occur or when additional flow is needed to sustain basal flow of 6,000 cfs from May 15 ~~until the start of the sturgeon operation~~ through May 31.”

- See comment above. Note: It appears that when the Corps does its VARQ calculations for Libby it never factors in the sturgeon volume, which reduces the likelihood of refill. Why act as if sturgeon volumes do not exist, when we know they do? When the May final forecast comes out, we even know the exact volume.

19) Page 40, Section 6.5.1, second paragraph

- This lengthy discussion on increasing the draft based on the March forecast makes sense. However, if adaptive management allows for an early draft, a reduction in the forecast between March and April should allow the possibility of slowing the draft. This needs to be added.

20) Page 40, Section 6.5.1, third paragraph, addition

“Opportunities to shift system flood control requirements from Brownlee and Dworshak to Grand Coulee will also be considered. [See section 4.X on Flood Control Shifts for more details.](#)”

- Note: Add a section on shifting flood control in section 4. Since it involves multiple projects, put all the specifics and explanations there in one place. All three reservoirs need to be back to their specific URC by April 30 (?). Put all this in the new Shift section.

21) Page 42, Section 6.6, addition to end of paragraph

[The findings and implications for management will be discussed at TMT.](#)

22) Page 43, Section 6.8.1

“... achieve a high probability of reaching the April 10 elevation objective.”

- Define the probability as a percentage as is done for Grand Coulee and Hungry Horse.

23) Page 44, Section 6.8.4, third paragraph, addition

“Opportunities to shift system flood control requirements from Brownlee and Dworshak to Grand Coulee will be considered periodically between January and April 15. [See section 4.X on Flood Control Shifts for more details.](#)”

- Note: Add a section on shifting flood control in section 4. Since it involves multiple projects, put all the specifics and explanations there in one place. All three reservoirs need to be back to their specific URC by April 30 (?). Put all this in the new Shift section.

“These shifts may be implemented after coordination with TMT. The purpose of this action is to provide more water for flow augmentation in the lower Snake River ~~late April~~ **during the spring**. This will occur when the shifts will not compromise flood control.”

24) Page 44, Section 6.9, addition

Opportunities to shift system flood control requirements from Brownlee to Grand Coulee will be considered. See section 4.X on Flood Control Shifts for more details. “

- Note: Add a section on shifting flood control in section 4. Since it involves multiple projects, put all the specifics and explanations there in one place. All three reservoirs need to be back to their specific URC by April 30 (?). Put all this in the new Shift section.

25) Page 44, Section 6.10.1 first sentence

“Lower Granite will operate within 1 ft. of Minimum Operating Pool (MOP) from approximately April 3 until small numbers of juvenile migrants are present (approximately September 1) and enough natural cooling has occurred to maintain temperatures in the tailrace at or below 68°F, unless adjusted to meet authorized project purposes, primarily navigation. TMT will provide a recommendation. The purpose of this action is to provide a smaller reservoir cross section to reduce juvenile salmon travel time and reduce flow fluctuations, and to decrease surface area to assist in moderating temperatures.”

26) Page 48-49, Sections 6.17.4 through 6.17.6

- It is confusing to have separate chum operation sections (6.17.4 through 6.17.6 and 7.4). Lots of flipping back and forth ... information overload. It's cleaner to move it all to section 7.4 and condense it down. Leave a statement in section 6.17.4 to see section 7.4 for specific chum operations. Merge these repetitive sections into Section 7.4. It will be much easier to follow in one place.

27) Page 51, Section 7.1.4, first sentence

“The Corps will continue to manage spring and summer spill for fish passage to the state of Oregon and Washington’s TDG water quality ~~criterion~~ criteria with all applicable waivers and exemptions.”

28) Page 56, Section 7.2.6

- This section can be deleted. It’s a repeat of the third bullet in section 7.2.1

29) Page 61, Section 7.5

“For example, Grand Coulee’s January VDL is computed as:”

- Be consistent. Spell out each month in the bullets.

30) Page 65, Section 9, fifth bullet on page

“Upon issuance of the FCRPS Biological Opinion, the AAs will convene a technical workgroup to scope and initiate investigations of alternative dry water year flow strategies to enhance flows in dry years for the benefit of ESA-listed ESUs.”

- The 2008 BiOp has been issued (May 5, 2008). This is the document with which that you underpin the WMP. Do you mean some action or validation by the Court or some new BiOp or what? This statement needs fixing. However, why delay in discussing dry year alternatives?

31) Page 64, Section 9, last bullet

- Delete this bullet. It is a repeat of the forth bullet.