

Most of the questions and suggestions the Service made during last year's review for the 2010 Water Management Plan have been addressed satisfactorily in the draft 2011 Water Management Plan. The following suggested edits and comments are new and refer specifically to the draft 2011 document. We appreciate the opportunity to review this document.

1. Section 3.1.1: Make the web link active.
2. Section 3.2: Make the first web link active.
3. Section 3.7, 2nd sentence: Seems to be a disconnect with the first sentence of the second paragraph of Section 2 which states the 2008 BiOp has identifiable actions relevant to the Water Management Plan. Does the statement in Section 3.7 mean to say the 2008 BiOp is irrelevant to the WMP? I understood the 2010 Supplemental BiOp was to supplement the 2008 BiOp, not supplant it (?). If in fact the 2008 BiOp is no longer relevant, correct Section 2 and add more explanatory language and ignore comment #4 below.
4. Section 3.7, 2nd sentence; Sections 3.8, 4.1, 4.2, 4.21, 4.3, 4.4, 5: references the supplemental BiOp only - see comment #3 above.
5. Section 3.9, Table 1:
What about sorting these activities from the earliest to occur to the latest to occur during the fiscal year? It would help to follow what happens in a progressive way and to more easily show where actions might overlap.

Add "John Day - waterfowl hunting enhancement October – January" to compliment the wording in section 6.15.5.
6. Section 4.1, add bullet:
 - **Provide the appropriate volume of water from Libby Dam and appropriately shape it to augment flows at Bonners Ferry for listed Kootenai white sturgeon spawning in May-July.**
7. Section 4.1.2, edit bullet:
 - ~~Libby reservoir refill in 2011 may be less likely than recent years as the result of operating in accordance with the VARQ Operating Procedures at~~ **Operate** Libby Dam with the tiered sturgeon volume **shaped** as recommended in the USFWS 2006 BiOp **and clarified (2008) RPA**. These operating assumptions provide an approximately 12% probability of

Libby refill to within one ft. of full by July 31. This is further described in the Corps' 2006 UCEIS³.

8. Section 4.2.4:

“Water released from Libby Dam for spring sturgeon **spawning** flows (pulse)... “

9. Section 4.5: *The following changes incorporate language moved from section 6.9.*

“The AA will look for opportunities to shift system flood control requirements from Brownlee and Dworshak to Grand Coulee periodically between January **1** and April 15. **The purpose of shifting is to allow the Dworshak and/or Brownlee reservoirs to be at higher elevations to increase the probability for increased spring flows in the Snake River. These shifts may be implemented after coordination with TMT. The shifts typically occur in drier years when they will not compromise flood control.** ~~to provide more water for flow augmentation in the lower Snake River during the spring migration.~~ Consideration of these flood control shifts by the Corps will include an analysis of impacts to flood risk management and will not be implemented if flood control would be compromised. These shifts may be implemented after coordination with TMT to discuss tradeoffs and impacts. **A project reservoir involved in a flood control shift must be back to its specific URC by April 30.**”

10. Section 5, Table 2, Operations, Winter column:

“Determine end of December flood control elevation at Libby, using **the Corps'** December ~~The Corps~~ forecast”

11. Section 5.1, Table 4, Albeni Falls, Bull Trout column:

Correct winter elevation from 2051 to 2055.

12. Section 6.51(Grand Coulee, Dworshak, Brownlee):

Correct the reference to Flood Control Shifts from section 4.6 to section 4.5.

13. Section 6.84:

“Opportunities to shift system flood control requirements from Brownlee and Dworshak to Grand Coulee will be considered periodically between January **1** and April 15. See section ~~4.6~~**4.5** on Flood Control Shifts for more details. ~~It will occur when shifts will not compromise flood control..”~~”

14. Section 6.9:

“Opportunities to shift system flood control requirements from Brownlee to Grand Coulee will be considered. **The shifts could occur between January 1 and April 15.** See section

~~4.64.5~~ on Flood Control Shifts for more details. ~~The shifts could occur between January and April 15. The reservoirs need to be back to their specific URC by April 30. The purpose of this shift is to allow Brownlee to be at higher elevations to increase the probability for increased spring flows in the Snake River. These shifts may be implemented after coordination with TMT. The shifts typically occur in drier years when they will not compromise flood control.~~”

15. Section 6.10.1:

A period is needed at the end of the paragraph.

16. Section 6.15.4:

“To encourage geese to nest in areas that are not typically inundated by frequent fluctuations in the John Day pool between March and May each year, ~~the pool~~ the reservoir is operated in the top 1 ft. of the range for several hours every 4 days.”

17. Section 7.4, 1st paragraph:

“... The Ives/Pierce Islands Complex below Bonneville Dam represents about 10% of the natural spawning area for the ESA listed Columbia River chum. **ESA listed lower Columbia River tle fall Chinook**~~Non-listed lower Columbia River bright fall Chinook~~ also spawn in the area. The NMFS 2010 Supplemental BiOp ...”

18. Section 10:

Delete the word “draft” in the first sentence. Eventually the 2011 WMP will be finalized and not a draft document. The use of “draft” would not be correct.