

TO: DOUG BAUS, CORPS OF ENGINEERS TECHNICAL MANAGEMENT TEAM CHAIR
FROM: RUSS KIEFER, STATE OF IDAHO TECHNICAL MANAGEMENT TEAM REPRESENTATIVE
SUBJECT: COMMENTS ON 2012 WATER MANAGEMENT PLAN
DATE: OCTOBER 27, 2011
CC: JIM YOST, STATE OF IDAHO RIOG REPRESENTATIVE

We appreciate the opportunity to provide input to the 2012 Water Management Plan. The efforts to streamline the document and add the hyperlinks to the Governing Documents and other pertinent documents are leading to a better final product. Our more specific comments will follow the order encountered in the document and are as follows:

Section 6.3.1: Albeni Falls Dam Fall and Winter Coordination. We request that this section acknowledge the acceptance of the USFWS/IDFG SOR for a Lake Pend Oreille winter elevation of 2051' for this winter and for a planned elevation of 2055' for winter 2012/2013. We recognize that language will need to be included that although 2055' is the planned winter elevation for next year, conditions in September 2012 will need to be reviewed to ensure that providing the planned elevation of 2055' is prudent. To improve understanding of Lake Pend Oreille winter elevation decision considerations and ease of WMP use, we request that the decision tree be put back into the WMP and that "Draft" be removed from its description. 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 6.8.3: Dworshak summer operations. Since 2009, TMT has agreed to an operation that reduced potential conflict during the implementation of the component of the Snake River Basin Adjudication that moves 200 KAF of summer flow augmentation from Dworshak Reservoir into early September. Those annual agreements removed the MOP restrictions from the lower Snake River Reservoirs beginning September 1st consistent with the BiOp, and did not use Dworshak summer flow augmentation water to refill the lower Snake River Reservoirs. The State of Idaho continues to support this adaptive operation, but believes it should be described in the WMP so that planned operations are clear.

We offer the following edits to the description of the purpose for 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 42-44. Currently, each of these sections reads in part: "The purpose of this action is to minimize water travel time through the lower Columbia and Snake rivers to aid in juvenile fish passage." The Biological Assessment in Appendix B.2.1 describes another benefit of MOP operations: "Additionally, the Lower Snake River MOP operation reduces the reservoir cross-section and surface area, which is another tool to assist in moderation temperatures." To be clearer on how MOP operations aid juvenile fish passage and list all identified benefits in the Governing Documents, The State of Idaho believes the purpose sentence in each of these sections should read as: 'The purpose of this action is to provide a smaller reservoir cross section

to reduce juvenile salmon and steelhead travel time, and increase the effectiveness of Dworshak summer flow augmentation in cooling the lower Snake River.’