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Mr. Doug Baus
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October 31, 2011

Dear Mr. Baus,

Thank you for the opportunity to review and comment on the 2012 Draft Water Management Plan. The Fish Passage Center comments are as follows:

1. Page 8, Section 4.1, Bullet 3: Consider modifying sentence to “Operate storage projects to be at their April 10 elevation objectives, if possible, to *maximize* spring flow augmentation.”
2. Page 8, Section 4.1, Bullet 4: Consider modifying sentence to “Operate storage projects to *balance the needs* of chum flow augmentation *and spring flow augmentation* from the start of chum spawning...”
3. Page 9, Paragraph 4: Consider modifying sentence to “...; and to provide specific releases from storage projects in order to improve downstream *flows and* water temperatures for fish.”
4. Page 11, Section 4.2.3: This paragraph discusses meeting chum elevations and the balance between flow augmentation, flood control and refill. A sentence should be included in this paragraph that discusses limiting winter/early spring power drafts as power drafts can and often do influence the ability of operators to meet flows, flood control, and refill.

5. Page 13, Section 4.5: This paragraph discusses flood control shifts. A sentence should be included in this paragraph that discusses when projects are required to be back at non-shifted flood control (April 30) if shifts do occur in a particular year.
6. Page 15, Table 2: Under column heading “Sept” this table states under the Libby bullet that stable flows will be established at Libby to protect bull trout and other resident fish while drafting to 10 feet below full by the end of September. In the lowest 20th percentile water years (as measured at The Dalles), the end of September draft at Libby is 20 feet.
7. Page 15, Table 2: Under column heading “early April” this table states that spring flow objectives are set by the April final volume forecasts. Spring flow objectives are set at McNary and Lower Granite using the April Final forecast; however the Priest Rapids spring flow objective is always set at 135 Kcfs and does not utilize the April Final forecast.
8. Page 15, Table 2: Include information concerning the Lake Roosevelt Incremental Storage release.
9. Page 19, Table 4: Under winter at Libby add information about the end of December variable flood control draft.
10. Page 36, Paragraph 5: Consider modifying first sentence to “For September, the Corps will use the best available forecast at the end of August to set a flow that will draft Libby to *either* elevation **2439 or 2449** feet by the end of September.” The original text had only a draft to 2049 feet, which should be 2449 feet, and the draft in the lowest 20% of years should be to 2439 feet.
11. Page 38, Paragraph 1: This paragraph discusses flood control shifts from Brownlee and/or Dworshak to Grand Coulee. This paragraph should include the date (April 30) that reservoirs must be back on regular flood control in the event of a shift.
12. Page 41, Section 6.8.1: This section does not discuss flood control shifts from Dworshak to Grand Coulee during the spring period. Also, this section should, as discussed under other storage reservoirs, outline the operation of Dworshak to its April 10th URC to reduce the amount of reservoir refill during the lower Snake flow periods.
13. Sections 6.10.1, 6.11.1, 6.12.1, and 6.13.1: Each of these sections outline when the Lower Snake reservoirs begin and end MOP operations. The SRBA agreement has moved 200 Kaf of the summer flow/temperature augmentation water from Dworshak into September since approximately 2002. Each year since, discussions have taken place whether it is

appropriate to refill the lower Snake reservoirs above the MOP operation at a time when Dworshak continues to release water meant to augment flow/temperature. The refilling of lower Snake reservoirs during the same period of Dworshak releases would negate some of this intended benefit.

14. Section 7.3.1. First paragraph last sentence: Consider modifying to “Tides, wind, wave and inflows to the Columbia River below Bonneville Dam ***all have an influence on the Bonneville Dam tailwater.***” The original sentence states that inflows below Bonneville are all uncontrolled. The Willamette, Cowlitz, and Lewis all have some level of control.
15. Section 7.5.4: This section states that estimates of the 2012 incremental storage releases will be included in the 2012 seasonal update. Just a note that this language was also in the 2011 WMP and it does not appear that these estimates ever made it into the seasonal update in 2011.
16. Section 9, first paragraph: Prior comments on page 27 and 36 indicate the 30 year record that is used to define the lowest 20th percentile water years will be updated from the 1971-2000 statistical period to the period between 1981-2010. If these comments are correct, then Section 9 should be corrected.

We again thank you for the opportunity to comment on the 2012 Draft Water Management Plan.

Sincerely,



David Benner, Fish Passage Center