

October 28, 2015

Scott A. Spellmon, Brigadier General
Army Corps of Engineers
P.O. Box 2870
Portland, OR 97208-2870

RE: Montana Comments on Draft Water Management Plan

Dear General Spellmon:

The Montana members of the Northwest Power and Conservation Council offer these comments on the Draft Water Management Plan. The Montana council members are concerned with the Plan's references to Libby and Hungry Horse dam operations as "experimental."

In the Northwest Power and Conservation Council's 2014 Fish and Wildlife Program, the Council indicated its support for current reservoir operations at Libby and Hungry Horse as set forth in the relevant biological opinions. However, the following program language supports the deletion of any "experimental" language in the Draft Water Management Plan:

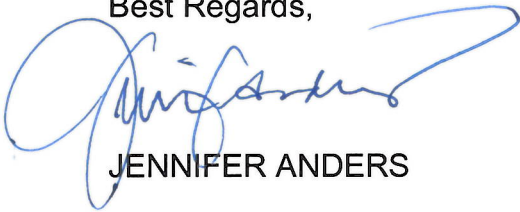
The Council encourages the action agencies to remove any reference to these operations as "experimental" in future biological opinions. The Council supports continued investigations to refine operations at Libby and Hungry Horse dams that improve conditions for fish near those reservoirs and do not adversely affect fish in the lower river, e.g., actions that help reservoir refill, reduce the potential for uncontrolled spill, reduce downstream flooding, and make operations mutually beneficial for the United States and Canada. Montana Fish, Wildlife & Parks should continue working with the pertinent parties to discuss proposals for adjustments to winter and spring operations at Libby and Hungry Horse dams including consideration of potential impacts of winter operations at Libby Dam (including winter power peaking) on the recovery of native fish species, the food web, and fish and wildlife habitat restoration efforts, and

mitigate for those impacts if necessary. The Council will assist in these discussions as necessary. Any significant findings or proposed changes should be reported to the Council.

2014 Fish and Wildlife Program, pp. 63-64. Therefore, we ask that you remove any reference to current operations at Libby and Hungry Horse as “experimental.” We believe there is ample support for these operations as they stand, and there is no longer a need to consider them “experimental.” Our comments are consistent with those submitted to TMT Coordinator Doug Baus, by Montana Fish, Wildlife and Parks.

Thank you for the opportunity to comment on this Plan.

Best Regards,



JENNIFER ANDERS



PAT SMITH