



Nez Perce Tribe

Department of Fisheries Resources Management

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Memorandum

Date: November 25, 2020

To: Doug Baus
Cc: Dave Johnson
From: Jay Hesse

Re: Nez Perce Tribe Review of the Draft 2 of 2021 Water Management Plan

This memorandum describes the Nez Perce Tribe's concerns and revision requests associated with Draft 2 of the 2021 Water Management Plan (WMP). The Nez Perce Tribe (NPT) provided comments on Draft 1 of WMP on October 30, 2020 (available at <https://pweb.crohms.org/tmt/documents/wmp/2021/>). Draft 2 of the WMP addressed some but not all of the NPT Draft 1 comments.

Please consider the following comments and suggest edits as the US Army Corps of Engineers (Corps) finalizes the 2021 WMP.

- Revisions to 2021 WMP Draft 1 appear to be limited to inaccuracies and omitted materials, and generally fail to consider suggested operational changes. I am concerned that the WMP review process does not trigger discussion and/or documentation of alternative operations suggested by reviewers – essentially creating an empty “adaptive management” process that is implied in WMP Section 1.
- Operation of the Lower Granite Dam adult fish trap is an integral part of ESA listed fish status and trend monitoring and hatchery broodstock collections. Elevated water temperatures in the adult trap require trap operation to be discontinued, as such management of Dworshak Dam summer operations (Section 6.8.2) should include a description of management intent to maintain operationally suitable water temperatures in the adult trap. The first sentence in the second paragraph of Section 6.8.2 should read “The summer temperature moderation and flow augmentation releases from Dworshak will be shaped with the intent to maintain water temperatures at the Lower Granite tailrace fixed monitoring site (provide link) and in the Lower Granite adult trap (provide link) at or below 68°F.“

- Dworshak Dam summer operations are functional continued through September “to help meet flow/temperature objectives” (Section 6.8.2). Add the following sentences at the beginning of the first paragraph in Section 6.8.3 “During September the AAs will operate Dworshak to help meet flow/temperature objectives in accordance with the NPT Agreement and in coordination with TMT. After NPT agreement operations in September conclude, flows from Dworshak will be limited.....”
- Deferral of Dworshak Dam Project Maintenance (Section 6.8.4) details to the FPP Appendix I is functional efficient. However, acknowledging project maintenance will not preclude/alter NPT Agreement operations in the WMP is desired. Add the following to the end of Section 6.8.4 “Project Maintenance will occur after NPT Agreement flow augmentation operations have concluded.”
- Pool level management of the Lower Snake River dams within a 1.5 foot range of minimum operating pool (MOP) or alternative variable MOP criteria should be maintained through August 31, rather than August 14 as describe in Section 6.10.1. The Preferred Alternative contains conflicting dates when MOP operations would end (Aug 31 and August 14). August 14 represents a change from recent operations and has not been a point of coordinated with fish managers. August 14 is not currently supported the Nez Perce Tribe as it degrades fish conditions/protections with likely impacts to spill volumes, tailrace temperature, and/or adult trap temperature. An implementation strategy has not been coordinated with fish managers to date, as such this operation should not be included in the WMP.

Lower Granite tailrace and adult trap temperatures are influenced by Dworshak flow augmentation and implementation of summer spill. Changes to Lower Granite pool operational range should not be implemented while Lower Granite tailrace and adult trap temperatures are being actively managed with Dworshak flow augmentation during August.

- Maintenance/management of suitable Lower Granite Dam tailrace and adult trap water temperatures in early to mid- September requires Dworshak temperature flow augmentation. Termination of summer spill on August 31 and filling the Lower Granite pool above variable MOP elevation has elevated water temperatures in the adult trap and caused its shut down. Active water temperature management to maintain suitable Lower Granite Dam adult trap and ladder temperatures should be continued in September until weather conditions cool reservoir surface temperatures. As such, release of Lower Granite pool from variable MOP operations should be delayed until 3 days after cessation of Dworshak Dam flow augmentation. Add the following to section 6.10.1 “Release of Lower Granite pool from variable MOP operations will occur 3 days after cessation of NPT Agreement flow augmentation.”

- Implementation of zero flow operations in the Lower Snake River as early as October 15 and without consideration of fish abundance increases the risk and impacts to adult steelhead, fall Chinook, and coho and juvenile fall chinook (See SOR 2020-6 and RIOG Elevation memo). While the AA rejected SOR 2020-6, duration and frequency of this operation remains a point of concern and contention. RIOG deliberations revealed NOAA's expectation for implementation frequency would not be on consecutive days and no more than 1 out 3 days.

Until a longer term zero flow strategy can be agreed upon, add the following to the 2021 WMP as a zero flow generation operational strategy. "In 2021, the four lower Snake River projects may cease hydropower generation following adult steelhead abundance criteria established in SOR 2005-22 and proposed changes in SOR 2020-6. After the few, if any, abundance criteria are met, zero flow operations could occur 1 out of every 3 days during night time hours and up to 3 hours of daytime."

- Operations of the McNary Pool to improve waterfowl nesting (Section 6.11.1.2) should be removed from the WMP in their entirety. It appears this regular raising and lowering of the McNary pool was not covered in the Biological Opinions.

I appreciate the opportunity to review the Draft 2 of the 2021 WMP and provide suggestions for adaptive management of operations that would reduce the impact of operations on fish. If the Corps has questions or view any of these alternative operations as unacceptable, I request a meeting between the Corps and NPT be arranged.