

Comment on the dates of the 1.5-foot forebay operating range at Lower Snake River projects (Section 6.10.1)

The discrepancy between the Water Management Plan and the Preferred Alternative has not been addressed in the second draft.

Increasing the 1.5 foot operating range to allow for full pool on 15 August may impact Lower Granite Trap operations (steelhead sampling and fall Chinook broodstock collection) by increasing temperatures and altering the thermocline. A request to operate near full pool was denied twice at TMT in 2020 for these reasons. The dates of this operation should be the same as the dates presented in the Preferred Alternative (03 April – 31 August). From a fish perspective, the projects should not be at full pool until temperatures decline in mid-September.

The Preferred Alternative adopted by the Action Agencies in the ROD sets the end date of 1.5 ft operating range as 31 August as quoted in italics below. These sections are from Chapter 7 of the FEIS (bold emphasis added).

p. 7-37 - Operational Measures of the Preferred Alternative:

7.6.3.12 Increased Forebay Range Flexibility This measure was included in MO1. As part of this operation, the Corps would implement operating elevation range restrictions consistent with actual 2019 operations. This operation was described in the 2019-2021 Spill Operation Agreement at the lower Snake River projects and John Day to provide operating flexibility during the fish passage season (April 3 to August 31)

Note that in 2019, the Lower Snake River projects were operated in a 1.5ft range until at least 01 September.

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LOWER SNAKE RIVER RESERVOIR ELEVATIONS

Under the Preferred Alternative, the operating reservoir elevation restrictions at the four lower Snake River projects would be changed to provide operating flexibility during the fish passage season April 3 through August 31 due to the Increased Forebay Range Flexibility measure. At all four projects, the seasonal MOP range is increased from a 1.0-foot range to a 1.5-foot range, each with a 0.5-foot increase in the upper end of the range. The proposed elevation ranges for April 3 to August 31 at each of the four projects are described below:

- *Lower Granite Dam: The Preferred Alternative would have a MOP range of 733.0 to 734.5 feet NGVD29, compared to 733.0 to 734.0 feet NGVD29 under the No Action Alternative.*
- *Little Goose Dam: The Preferred Alternative would have MOP range of 633.0 to 634.5 feet NGVD29, compared to 633.0 to 634.0 feet NGVD29 under the No Action Alternative.*
- *Lower Monumental Dam: The Preferred Alternative would have a MOP range of 537.0 to 538.5 feet NGVD29, compared to 537.0 to 538.0 feet NGVD29 under the No Action Alternative.*
- *Ice Harbor Dam: The Preferred Alternative would have MOP range of 437.0 to 438.5 feet NGVD29, compared to 437.0 to 438.0 feet NGVD29 under the No Action Alternative).*

However, the operational measure dates seem to change later in Chapter 7 (but it is vague) to become inconsistent with the Operational Measure under consideration (p. 7-37)

p. 7-151

Under the Preferred Alternative, operating reservoir elevation restrictions at the four lower Snake River dams would be changed to provide operating flexibility during the fish passage season April 3 through August 15 (August 15–31 becomes minimum spill operations) due to the Increased Forebay Range Flexibility measure. At all four projects, the seasonal MOP range is increased from a 1.0-foot range to a 1.5-foot range, each with a 0.5-foot increase in the upper end of the range. Any fluctuations in water elevations would be approximately 0.5 feet higher than the No Action Alternative and the range of natural variability for daily operations. Therefore, the Preferred Alternative may affect the quantity, quality, or distribution of existing habitat types by making them slightly wetter than the No Action Alternative. However, the overall effect would be negligible.
