



THE CONFEDERATED SALISH AND KOOTENAI TRIBES
OF THE FLATHEAD NATION

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February 7, 2003

Mr. Mark Walker, Public Affairs
Northwest Power Planning Council
851 SW 6th Ave.
Suite 1100
Portland, OR 97204

re: Draft Mainstem Amendments to the Columbia Basin Fish and Wildlife Program

Document 2002-16

Dear Mr. Walker,

Through this letter, the Confederated Salish and Kootenai Tribes of the Flathead Indian Reservation (CSKT) respectfully submit comments regarding the *Draft Mainstem Amendments to the Columbia Basin Fish and Wildlife Programs*¹. Tribal comments are generally structured to follow the specific subject areas where the Northwest Power Planning Council (Council) has requested comment, with emphasis toward reservoir and river management in the headwater areas in Montana.

Changes in storage reservoir operations, in general

The Salish and Kootenai Tribes support the Council's system-wide water management goal to operate and balance the Columbia hydrosystem so that patterns of flow more closely approximate the natural hydrographic patterns and are directed at re-establishing natural river processes where feasible². This precept, and the statements that immediately follow it, with emphasis to the statement supporting seasonal flood events and reduction in daily fluctuations that lead to stranding, will move flow regimes in the Columbia Basin and tributary network to a more natural pattern. Animal and plant species that have evolved and adapted to natural flow patterns in the basin can only benefit by moving toward a more natural flow regime.

¹ Northwest Power Planning Council, document 2002-16, dated October 2002

² Draft Amendments pg 29, line 5 ff.

The CSKT strongly concur that flow augmentation³ which leads to drafting of the two Montana headwater systems – Hungry Horse and Libby, should balance the needs of not only anadromous fish species, but also resident fish species in the reservoir facilities as well as downstream river reaches. Further, flow augmentation schemes that detrimentally impact, or do not provide benefit to resident fish species, or do not provide quantifiable benefits to anadromous fish should be abandoned. Flow augmentation schemes that are employed should work within the Power Planning Council’s goal to more closely mimic natural flow patterns, and should be shaped to follow from the peak flow recession limb in a unidirectional pattern.

The CSKT concur with the Power Planning Council to support implementation of VARQ operations in storage reservoirs. VARQ operational procedures increase the probability of refill of storage reservoirs, improve the chance for a spring high flow release, and in the case of Flathead Lake, VARQ operations may improve the maintenance of lake levels in certain dry years.⁴

Changes in storage reservoir operations – Alternative that preserves status quo operations while evaluations are pending

The CSKT concur with the alternative identified by the Power Planning Council that changes in status quo in storage reservoir operations should occur while federal agencies evaluate a comprehensive flow target and flow augmentation program.

Changes in storage reservoir operations – elimination of April 10 flood control elevation target

The Tribes’ understanding of this recommendation is that the April 10 upper rule curve target be eliminated in the storage reservoirs and replaced with an operating rule that the reservoirs be managed to assure 95% probability of refill by the end of June. This modification would allow greater flexibility for power managers to increase winter reservoir drafts in some years. One outcome of this modification would be a potential reduction in spring and summer outflows when greater volumes of runoff would be required to fill reservoirs. The Draft Mainstem Amendments do not provide the breadth of analysis for the Tribes to fully evaluate this point, but the following concepts should be incorporated into the decision process.

Potential reductions in spring and summer flows do not conform to the Council’s goal to return flow patterns in the hydrosystem to more natural processes. Even with the 95% probability of refill target by end of June, most or all of the spring runoff may be

³ flow augmentation is defined in the Draft Amendments as the intentional release or drafting of water from storage reservoirs for the purpose of increasing flows to enhance migratory conditions for juvenile and adult life stages of salmon and steelhead through the reach of the lower river hydroprojects, Draft amendments page 29, line 42

⁴ analysis completed in Voluntary Environmental Assessment Interim Operation of the VARQ Flood Control Plan at Hungry Horse Dam, MT, USBOR PNR, March 2002

allocated to fill reservoirs in certain years.

In certain years in Montana, elevated runoff conditions continue well beyond the end of June and can continue through July. During these years the 95% refill criteria may lead to spill at the reservoir facilities.

The Tribes are not confident that the operations that would occur with a 95% refill criteria would correspond with VARQ operations at Hungry Horse and proposed VARQ operations at Libby. VARQ operations call for more limited reservoir drafting in average or near average forecast runoff years, in part so there is a greater probability of refill and release of a spring high flow.

Changes in storage operations – summer flows

The Draft Mainstem Amendments call for a number of summer, and other season, reservoir and river flow protocols. First, the Tribes assume that the instream flow schedules identified in the Draft Mainstem Amendments are those identified in the USFWS 2000 Biological Opinion.⁵ If this is the case, the Tribes concur with the Council in their support of these instream flow schedules.

The Tribes also concur with the Council that summer reservoir drafting limits at Hungry Horse and Libby be reduced to 10 feet in all but the driest years. This activity will maintain some level of flow augmentation, but will also protect reservoir fisheries resources.

Additionally, as previously identified, the CSKT support the scheduling of summer flow releases to maintain stable outflows.

The Confederated Salish and Kootenai Tribes appreciate the opportunity to provide input into water management and fish and wildlife decision making in the Columbia Basin. The Draft Amendments appear to envision more balance between upper and lower Columbia Basin resource allocation. These issues are vital to the Tribes, and will continue to be vital to the Tribes into the future.

Sincerely,



D. Fred Matt, Chairman
CONFEDERATED SALISH AND KOOTENAI TRIBES

⁵ Biological Opinion Effects to Listed Species from Operations of the Federal Columbia River Power System. USFWS R1, R6, December, 2000.