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MISSOURI RIVER CONSERVATION DISTRICTS COUNCIL

November 16, 2007

Sent via Fax to 402-697-2504 and e-mailed to missouri.water.management@nwd02.usace.army.mil

Brigadier General Gregg F. Martin
Missouri River Basin Water Management Division Engineer
Department of the Army
Corps of Engineers, Northwestern Division
12565 West Center Road
Omaha, NE 68144-3871

RE: Missouri River Mainstem System 2007-2008 Draft Annual Operating Plan (AOP)

Dear General Martin:

The Missouri River Conservation Districts Council, a collaboration of the 15 Conservation Districts along the Missouri River in Montana, who collectively represent natural resource conservation along nearly 730 miles of the Missouri River, submit the following comments on the 2007-2008 draft AOP:

1. **Study the low releases -** Page 10 of the draft AOP states that winter releases will average 5,500 – 6,000 cfs, substantially lower than previous years. Previously, an ice study was completed on the river below Fort Peck that showed the negative effects of high winter releases on the river channel. This year's planned low releases will be a very different situation and provide an opportunity to monitor the effect that low releases have on the river channel. The local Conservation Districts are ideally suited to help with the monitoring and we ask that you consider using them to implement a river channel monitoring plan during the low winter releases.

2. **Navigation –** (page 11 of the draft AOP) We appreciate that the Corps recognizes the need to eliminate navigation support for targets in areas where no navigation is scheduled.

3. **Minimum Flows -** Regarding release levels necessary for fish habitat, there should be a provision in the AOP stating that releases will not drop below 4,000 cfs. Page 14 references hourly releases not less than 3,000 cfs when flood flows enter below Fort Peck Dam, but that does not ensure that a minimum flow of at least 4,000 cfs will be maintained at all times. Please add verbiage to the AOP that establishes of minimum release level from the Fort Peck Dam of 4,000 cfs.

4. **Irrigation -** Page 19 of the draft AOP states that the scheduled releases provide sufficient flow for irrigation and only mentions that some access problems may be experienced if the drought

persists. However, the irrigation pumpsites below the Fort Peck Dam have required special dredging (at the farmer's expense) for several years, yet there is no reference to that in the draft AOP. During the draft AOP presentations, several slides were presented showing the economic value of many other uses (navigation, power) but there was no reference to the value of irrigation and recreation. There are 891 irrigation intakes throughout the system; therefore, if economic data is used in the AOP planning process, data specific to irrigation should be included. In eastern Montana, where the average median household income is significantly less than in other areas throughout the system, income generated from recreation on the Fort Peck reservoir is especially important; therefore, the economic impact of recreation should also be considered in the AOP planning process. Additionally, economic data presented should show the real value of authorized uses, for example, transporting valuable cargo does not necessarily make navigation valuable. Economic data, if used at all, should reflect the revenue generated directly from each authorized use.

5. **Dredge -** The Double R Dredge, a specially designed dredge that clears pumpsites in a more environmentally friendly manner, has been used in the reach below the Fort Peck Dam for the past two years. Previously, many sites were cleared with track hoes, excavators, and perhaps even some explosives. The dredge enables the irrigators to operate more efficiently and in a more environmentally friendly manner while providing the Corps greater flexibility in release levels; however, the dredge currently operates at a net deficit of about $70 per hour. Since the dredge provides the Corps greater flexibility in release levels, we encourage you to continue supporting it and helping the local Conservation Districts with the permitting process.

6. **Raise the level of the Fort Peck Reservoir –** The draft AOP references the persistent drought and states that all authorized project purposes except flood control will be reduced and all water conservation measures available will be used (Page 5). Even so, under the lower decile simulation, Fort Peck will hit yet another record low of 2192.3 feet msl – almost 42 feet below the desired level. We can't continue with these record low levels and more needs to be done to stop emptying the Fort Peck reservoir. The preclude for the March Spring Pulse (Plate 3) should be changed from 36.5 MAF to 40 MAF so that when we finally do get the water, we can keep some of it. Additionally, while Fort Peck storage is often used to balance out the rest of the system, there is nothing available above Fort Peck to balance its level; therefore, special consideration should be given to retaining water in Fort Peck. Last year Fort Peck was favored and should have seen a rising pool level, yet already the reservoir is 2.2 feet lower than it was last year at this time. This illustrates how dire the situation is at Fort Peck - even when the Corps planned to favor Fort Peck, we ended up worse than the year before! The Corps should draft a special plan to raise the level of Fort Peck so that it can then respond to other downstream needs without further gouging the Fort Peck reservoir.

7. **Weeds -** Weed management remains a pressing issue at Fort Peck. In addition to the usual suspects – Canada Thistle, Leafy Spurge, and Knapweed, the entire reservoir is surrounded with salt cedar, which is rapidly spreading throughout Montana. In south Phillips County, which remains 99.9% weed-free, salt cedar has been found in the uplands adjacent to the reservoir. Salt cedar is one of the nastiest weeds – it grows into a tree, making it big and bulky and requiring intense manual labor to remove it. Its foliage is salty and causes the surrounding soil to have a high saline content which inhibits native plant growth. Salt cedar thrives along the shore line because it consumes about 80-120 gallons of water per day. It doesn't provide any nourishment or usable cover for wildlife and, worst of all, it produces up to 600,000 seeds

each year! The agency weed coordinators – Patricia Gilbert with the Corps in Fort Peck and Lindy Garner with the USFWS in Great Falls – are doing all they can with the resources they have to keep salt cedar out of the uplands. We understand the strategy of using the money you have to just contain it to the high water mark. It's a good strategy, but it's not working. Patricia needs more money and she needs greater flexibility with that money. The restriction to use only private contractors just doesn't work in rural Montana. The Corps needs to contract with the local Conservation Districts and the County Weed Districts to more efficiently use what limited resources you have. Additionally, raising the water level to drown out the salt cedar may be the most cost effective way to handle the salt cedar. Raising and maintaining a higher water level at Fort Peck for at least two consecutive years will eliminate existing plants, reduce the seed bank available for new infestations and complement the existing control strategies. Treatment costs are about $1,000 per acre and it has been estimated that treating the entire reservoir would cost $12 million. It's time to seriously look at the cost benefit of raising the Fort Peck reservoir level to drown out the salt cedar.

Thank you for your time and attention. We are very proud to host the headwaters and two of the longest remaining free-flowing stretches of the Missouri River. We ask that you consider the comments provided above, contact us or any of the individual Conservation Districts with questions or concerns, and join us in working to ensure that the Missouri River corridor and its multiple uses are sustained for future generations.

Sincerely,

Vicki Marquis
Coordinator

cc: Senator Max Baucus
Senator-elect Jon Tester
Senator Conrad Burns
Congressman Denny Rehberg
Montana Governor Brian Schweitzer
Director Mary Sexton, Montana DNRC
Director Richard Opper, Montana DEQ
Director Jeff Hagener, Montana FWP