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MISSOURI RIVER CONSERVATION DISTRICTS COUNCIL

March 26, 2008

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 Final Annual Operating Plan (AOP)

Dear General Martin:

In a letter dated November 16, 2007, this Council submitted comments to the draft Missouri River Mainstem System 2007-2008 AOP. While we appreciate the final AOP's provisions for lower winter releases from Fort Peck, the elimination of navigation support for targets in areas where no navigation is scheduled, and the addition of verbiage recognizing the need for dredging on the irrigation intakes below Fort Peck (Page 20 of the final AOP), we remain concerned about several other aspects of the final AOP.

- 1. 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. Based on our conversations with Jody Farhat, we realize that if a situation arises, like this past fall, where only one unit is operating at Fort Peck, the release can only be 3,000 cfs. However, we ask that the AOP include language recognizing the need to keep releases at a minimum of 4,000 cfs to keep the fish habitat viable and a statement that unless Fort Peck is down to just one operable unit, the minimum release level will be 4,000 cfs.
- 2. Use of Economic Data** - 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, even though there are 891 irrigation intakes throughout the system and each project includes significant recreation opportunities. While we understand that economic data is not referenced in the AOP and have been told that it is not used in the planning process, the inclusion of select economic data in the presentation slides is misleading and inaccurate. We ask that economic data be eliminated from the AOP process entirely.
- 3. Raise the level of the Fort Peck Reservoir** – The 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

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simulation, Fort Peck will hit yet another record low of 2192.3 feet msl in February 2009 – almost 42 feet below the desired level. The fact that Fort Peck faces yet another record low - the second in three years – illustrates how dire the situation is. More conservation measures need to be taken to keep water in the Fort Peck reservoir and 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. 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.

4. **Weeds** - Weed management remains a pressing issue at Fort Peck and flow modifications should be considered to help fight the persistent salt cedar infestation that circles the Fort Peck reservoir. Research done on the Fort Peck Reservoir in 2005 by Lesica and Miles suggests that just three months of inundation will eliminate existing saltcedar plants^a, which would also reduce the seed bank and complement the existing control strategies. With treatment costs at about \$1,000 per acre and estimates to treat the entire reservoir as high as \$12 million, we ask the Corps to consider the cost benefit of raising the Fort Peck reservoir level for at least 3 months 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 Jon Tester
Congressman Denny Rehberg
Montana Governor Brian Schweitzer
Director Mary Sexton, Montana DNRC
Director Richard Opper, Montana DEQ
Director Jeff Hagener, Montana FWP

^a Lesica, P. and S. Miles. 2004. Ecological strategies for managing tamarisk on the C.M. Russell National Wildlife Refuge, Montana, USA. *Biolog. Conserv.* 119: 535-543.