RECLAMATION
Managing Water in the West

Comment Sheet

Bighorn Lake Draft Operating Criteria Comment Sheet

(Please Print Clearly)

Name Scott Campbell

Organization and Address Town of Lovell
336 Nevada Ave.
Lovell, WY 82431

Phone ( ) 307-548-6551 **FAX ( )** _____ **E-mail** scampbell@tctwest.net

Narrative Comments:

It is too easy to think in absolute terms and the objective I believe can be defined in smaller increments to improve equability.

There does not have to be an either/or situation or win/lose scenario. More accurately it needs to be and/also situation plus a shared sacrifice mentality. All players must be willing to accept fair and honest operations that enable them to realize their opportunities without it being at the loss of the other players.

It appears to me that elevations need to be in increments of five feet and the flows could to be 100 or even 200 cfs per catagory and still meet the fishery requirements. i.e. 1400, 2400

-Attach additional sheets if necessary-

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Narrative Comments:

Access and convenience are issues relative to users and seem to be affecting operational decisions. i.e. 2500 cfs stream flow insures a float time of 2hrs. provides a water edge close to the boat launch site. Elevation 3620 insures horseshoe bend boat launching. Perhaps both can be addressed by the construction of multiple ingress/egress points along the river to accommodate slower water and the boat ramp could be built longer to accommodate lower water.

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Narrative Comments:

I am concerned that there is a bias built into the rules curve which adversely affects, unnecessarily, the lake and there should be an effort to equalize the impacts of operational decisions and natural events.

For example, the lake level is being purposefully drawn down to 3605 as a means of limiting the release of greater then 12,000 cfs. but there is a practice of trying to limit the outflow to under 8,000 cfs which means that there is 4,000 cfs margin built in which results in an unnecessary lowering of the lake during averge conditions and may actually result in the lake not reaching capacity in some years. There is a practice of augmenting stream flow beyond the natural in-flow of the lake to the detriment of the lake.

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Narrative Comments:

Considering the increased capacity of the lake when water is stored at the south end it makes good economic sense for power generation, at the same time it benefits tourism, and recreation purposes.

My comment is that the criteria needs to be weighted in favor of keeping the lake levels as high as possible for the longest amount time.

This changes the operating philosophy from river centered to lake centered meaning river levels are slightly more variable than are currently practiced and minimums lowered by a foot or two when possible and Maximums are increased slightly when necessary.

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Narrative Comments:

It is my opinion that Gordon and Lenny have accomplished a difficult and complicated task in a commendable way. It appears to me that Dan is sincerely interested in operating the dam in a responsible and equitable fashion based on the criteria and goals he is given. I believe that they are working toward the objective of satisfying both the river and lake users as well as the competing interests and in the face of opposing objectives.

It is my hope that they will be allowed to continue to develop and administer the operational rules without any outside political wrangling to miss-align their efforts to fairly and equitably share the water so that none of interests are unnecessarily advantaged or disadvantaged.

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Narrative Comments:

There are two issues of encrouachment one natural and the other human. The side channels are being choked off because of natural immigration of rocks, sediment, and plants. That can be taken care of mechanically removing them and hydraulically flushing them as water levels allow.

The second encroachment is people building structures in the flood plane and then reacting negatively when their property is threatened or flooded. That can be taken care of by enacting or enforcing a building code. The other is to not indemnify or modify operations in response to flood plain violations.

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Narrative Comments:

The rules curve design criteria appears to be based on the expectation of high runoff and the lowest lake level needed to not exceed the maximum river flow limits as the lake fills.

My question is what percent of the time would that occur. If it is less than 50% of the time should not the criteria be based on the average expectation of runoff knowing that the rules curves would not be followed as was the case in 2010 on the unusual occurance.

this change would insure that the lake would normally fill rather than gamble on the chance that it might not fill.

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Narrative Comments:

I suggest that an economic study be undertaken to determine the actual value of the operations of the dam. The political efforts currently being exerted are based on economic development issues. The value of stream fishing and the need for a robust fishery as opposed to the value of a healthy lake and the opportunities for fishing, boating, waterfowl, and recreation. This study could then be used as a factor in determining the weight of the various elements i.e. power generation, flood control, industry, agriculture, economic development, recreation, and tourism etc.

Once the value could be assigned the determination of lake level would be based on value rather than political pressure or bias.

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Narrative Comments:

For millennium fish have spawned in low dirty water. With the advent of the dam it is an opportunity to provide the optimum except for the need to be equitable above and below the dam.

My comment is that the criteria and goals need to be reviewed and evaluated based on the equality of outcome with no preference given for either side.

The expectation is that the normally limited amount of water must be shared with equal sacrifice both in optimal flow and elevation the challenge is to prescribe equal measures and allowable negative impacts or an agreed upon trade-off i.e. alternating years.

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