January 24, 2011

Lenny Duberstein
Billings Area Office
Bureau of Reclamation
P.O. Box 30137
Billings, MT 59107-0137

Dear Mr. Duberstein:

I would like to comment on the Bureau of Reclamation's Draft Bighorn Lake Operating Criteria Evaluation Study & Report.

My first comment involves Bureau of Reclamation arbitrary value of 2,500 cfs as "optimum flow." For as long as I have been around the Montana Fish, Wildlife & Parks has defined optimum flow as 3,000 cfs or 3,500 cfs; 2,500 cfs was defined as "recommended minimum flow." Why do you ignore the Montana fisheries biologists' recommendations?

Another point of contention is that you propose to drop the river flow to 1,500 cfs without dropping the lake levels appreciably. This should be an equitable sacrifice, not giving precedence to the lake at the expense of the river. The fishery in the Bighorn River is worth many times over the value of the upper end of the reservoir—fishery and recreation combined.

It is very risky to keep the reservoir so full throughout the year. Keeping the reservoir at or above 3640 feet is asking for a natural disaster in the form of large rainfall event causing the flood pool to be filled entirely and perhaps over topping the dam. Your calculations omitted the 1967 data where the reservoir filled quickly thanks to heavy rains when your calculations stated it would take three years. What would happen if we had a Rapid City style flood of 55,000 cfs coming into the reservoir?

You should not be using the flood pool to manage the reservoir. The flood pool should be for emergencies only. Your plans show that you intend to fill into the flood pool on an annual basis.

Filling the reservoir into the flood pool also eliminates camping and boating opportunities on the entire reservoir. Campgrounds are flooded out and floating logs and debris make for dangerous boating conditions.

Ice jams are a problem for the Shoshone River when the reservoir is kept close to 3640. The ice jams cause flooding of the Yellowtail Habitat Unit and eliminate hundreds, if not thousands of acres of pheasant habitat. Pheasant hunting is one major tourist draw and when a significant amount of the cover is flooded, recreation suffers.

Without a decent drawdown of the reservoir during the summer, annual weeds are negated from growing on the take line. These weeds, when flooded in May and June provide cover, forage areas, and spawning habitat for baitfish. Those fish are important to the sauger and smallmouth bass.

It would be wise to lower the reservoir to 3614 so that there will be adequate storage space for spring runoff.

It would also be wise when there have been high flows in the river (say, above 5,000 cfs) to gradually lower the flows by 100 cfs increments over a longer time span. When you cut back 1,000 cfs or higher in just an hour you strand many aquatic invertebrates, baitfish, and trout fry and fingerlings. Water-logged banks tend to cave in when the flows are reduced quickly/

Thank you for taking my comments. I hope that you will incorporate my suggestions into your operating plan.

Sincerely yours,

Bob Krumm

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