January 18, 2011

To: Lenny Duberstein/ duberstein@usbr.gov
From: Zoe and Dave Opie / absaraka@bhwi.net
Absaraka Cabins, Fort Smith, MT.

Mr. Duberstein,

I have carefully reviewed the draft outlining proposed operating criteria for Bighorn Lake. In addition I have participated in the meeting to discuss the operating draft held January 4, 2011 in Billings. The proposed lake management plan continues, at the least, to service the needs of the south end of the lake at Horseshoe Bend and does not begin to address the issues that the poor planning and management of Bighorn Lake has created downstream on the Bighorn River.

The new lake plan calls for minimum reservoir levels significantly higher than previous years. This not only affects the winter river flows, but insures spring runoff flooding. One of the reservoir's primary purposes is flood control. The current "full lake" policy has not allowed enough lake storage space to handle normal year's runoff. The current lake management draft call for lake levels a full 8 feet higher than last year, a target elevation only 22 feet below the top of the conservation pool and 13 feet higher than average. With even higher lake levels, spring runoff cannot be stored in the lake, as intended, and the amount of high water downstream flooding will only be exasperated. The last two years, of normal snowpack and precipitation, have shown sustained river flows of 10,000+CFS. These water flows have significantly altered the structure of the river, washed away entire islands and eroded river banks, and watered noxious weeds. The high water results were almost as dramatic on the lake with floating debris, lack of recreational opportunities, flooded camp grounds, and lowering hydro electric production. In addition high spring river flow result in higher river temperatures in the fall, resulting in high grass and algae growth.

Not only does this unnecessary high water impact environmental concerns, it dramatically affects the recreational opportunities on the river. The Bighorn River is one of the most prolific fisheries in the United States. Thousands of people each year come to the Bighorn to experience world class fly fishing. A conservative income number to Montana and Bighorn County was $30,000,000

several years ago. River flows above 6500 CFS make much of the river un-wade able and drastically reduces the amount of fishable water. We own and operate the Absaraka Cabins near the three mile fishing access. In 2009, the first year of high flows we experienced a 24% decrease in June business over the prior year. In 2010 we experienced a 36% decrease versus 2009 and a 51% decrease from 2008. I ask you, would you take a 51% pay cut in two years? The high water flows causing the "fishable river" to deteriorate are unnecessary and are a direct result of poor water management by the Bighorn Lake Management.

Additionally, the section on page ten of the draft, defines water flow levels for the river. It states:

Optimum Flows: 2500CFS
Standard Flows: 2000CFS
Minimum Flows: 1500 CFS
Absolute Minimum Flows: 1000CFS

It has been previously determined by biologists from Montana Fish, Wildlife, and Parks that a MINIMUM water flow for the Bighorn River is 2500 CFS. An optimum water flow is 3500-4000 CFS. Below 2500 CFS we lose habitat, spawning areas, and fish numbers. In drought years, it is obvious that all individuals must share the water resource and cooperate with reduced water levels. Why is it in normal water years the river continues to be kept at minimum water levels and assured to be flooded with excessive releases in the spring?

Mr. Duberstein, I ask you to take a close look at the Bighorn Lake operating draft. The planned is seriously flawed and has the potential to cause irreversible damage to the lake, the river and the economy.

Zoe and Dave Opie
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