From: Doug Gouge [mailto:doug@DouglasOilandGas.com]
Sent: Friday, January 28, 2011 10:27 AM
To: Duberstein, Leonard (Lenny) B
Subject: Comment: Draft Big Horn Lake Operating Criteria Evaluation Study

Dear Lenny,

First, let me say thank you very much for the work you do in preserving our natural resources. I can only imagine how difficult your job is--trying to balance the interests of Lake Recreation, River recreation, Ranchers and Dam/Hydor management.

I am a long time angler on the Big Horn River and until recently paid little attention to the "politics" of how the river was managed. Threee years ago I bought a small place in Fort Smith and have been spending two months in the spring and two months in the fall--with plans of increasing my time there. But the river management over the last has caused me to re-evaluate my plans. Rather than invest in property on the River and build a second home I have pulled back to take a look at how the river is going to be managed. Over the last three years the river has fluctuated wildly--either too high-- flowing at essentially unfishable flood like rates after Mid-May to too low through the summer into the fall.

Looking into this further I discover that the river is essentially being managed for the perceived benefits of the Lake users while virtually ignoring the interests of River recreation. And as I read the Study it seems that the plan is to continue to serve the interests of Lake recreation while virtually ignoring the River recreation. I feel this plan is seriously flawed and should be revised with a commitment to improve the quality of the River recreation.

The Big Horn river is a truly unique natural resource, as is the Big Horn Lake--it would be a shame to sacrifice one or the both. Both interests must be served. i urge you to reconsider the plan and to do whatever is necessary to provide better river management.

Thanks again for the work that you do.

Sincerely,

Doug Gouge

In mid-November, the Montana Area Office of the Bureau of Reclamation emailed a draft of the Bighorn Lake Operating Criteria Evaluation Study and Report to stakeholders and a number of governmental agencies, asking for written public comments by January 28, 2011. The report is 35 pages in length, and in addition to text commentary, contains a number of graphs, pictures and tabular data. Its purpose is spelled out in the report: “Based on input provided from all of the various interests attending the issue group meetings, the Bighorn Lake operating criteria was

reviewed and studies were prepared to determine if modifications could be made to these criteria which would improve the overall operations and enhance the benefits derived from the Yellowtail Unit." In essence, the modified operating criteria calls for lake levels at least 8 feet higher than in years past, and sets a minimum target lake elevation just 22 feet below the top of the conservation pool which is 13 feet higher than average. The draft document extolls the many "benefits" of higher lake elevations, but curiously ignores or, at the very least, overlooks any downside.

If you live, work or recreate on the Bighorn River, you'll have noticed some these "benefits" during the last three years while this modified operating criteria has been implemented. Minimal to sub-minimal flows reminiscent of several of the drought years during the winter, and recording setting and/or sustained high volume river releases during runoff in the spring are just two of the river "benefits" of the modified criteria, which calls for keeping lake levels 8 feet higher than average or higher. Lake users have been enjoying the "benefits" of inundated and unusable campgrounds, unusable floating docks and restrooms, and driftwood obstructions. The good news is anyone who cared to water ski in near freezing temperatures during the past few Memorial Days at Horseshoe Bend at the south end of the lake could have done so under the new operating criteria, but only a handful did.

If you're like me, when you read this document, you're left wondering just what interests are being served by higher lake levels? The report shows a huge boost to lake levels, so clearly the new criteria is great for lake recreation. The river, however, didn't fare as well. It only showed small percentage increases in "improvements in percent of time [specific releases are] provided". Power generation didn't get much help either, showing small gains overall, but negatives during key seasons such as December through February and July through August. As far as flood control, well, just ask anyone who ranches along the river and has seen their property wash away, or has used Grant March Fishing Access Site before it was lost to flooding in 2008 (flooding which occurred in essentially a normal water year).

Its time we speak our minds about Reclamation's water management policy. Fire up your email and let them know we won't tolerate them favoring lake recreation over river recreation any longer. We're sick and tired of our friends and clients cancelling trips because of high water. We're fed up with losing age classes of fish because the eggs are being stranded and/or the side-channels getting dewatered. Ask Reclamation to draft the reservoir sufficiently to easily manage spring runoff. Remind them that all stakeholder's interests can be satisfied with lake elevations at or below full pool and not a half dozen feet in to the flood pool. Send them pictures of you, your friends *and* your clients to remind them an important economy flourishes on the river; an economy not destined to be buried under silt in the coming years, but one that can continue to grow with a fair and equitable management approach.

A copy of the draft operating criteria can be obtained at the Reclamation website at:
http://bighornriver.org/uploads/operating_criteria_evaluation.pdf
Send your comments to Lenny Duberstein at lduberstein@usbr.gov by January 28, 2011 or call Lenny at (406) 247-7331.