



District Engineer Colonel Ralph H. Graves
U.S. Army Corps of Engineers, Seattle District
P.O. Box 3755
Seattle, WA 98124

May 3, 2002

Re: Implementation of VARQ flood control in Columbia River storage reservoirs

Dear Colonel Graves:

Thank you for the opportunity to comment on the implementation of the variable flow flood control strategy (VARQ) at Libby and Hungry Horse Dams in Montana. The Montana Chapter of the American Fisheries Society (MCAFS) has reviewed VARQ and agrees that implementation is warranted because of the benefits for resident and anadromous fish species. The VARQ flood control strategy is important for coordinating anadromous fish recovery actions in the lower Columbia River with the requirements of resident fish species, including those listed under the Endangered Species Act (ESA), in upper Columbia River basin.

Modeling results show that VARQ allows the reservoirs to remain more full prior to spring runoff during average or low water years. This improves reservoir refill and produces a more natural flow pattern downstream of the dams. Improved storage reservoir refill resulting from VARQ flood control will increase the number of years in which water will be available for summer flow augmentation for anadromous fish, while simultaneously improving river flows and reservoir conditions for listed resident fish species. Both the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (FWS) called for the implementation of VARQ in their respective 2000 Biological Opinions (BiOps) on the operation of the Federal Columbia River Power System. The Reasonable and Prudent Alternatives specified in the BiOps constitute an emergency action to prevent the further decline of endangered species. Since failure to implement VARQ impacts reservoir refill and damages ESA listed fish in the Columbia River Watershed, the Corps should use its authority to implement VARQ immediately while the long-term EIS proceeds to assure compliance with the requirements of the ESA.

Dam operations should first prioritize ESA listed species inhabiting habitats immediately upstream and downstream of the dams. Libby Dam is the only federal storage project that can be operated to help recover the endangered Kootenai white sturgeon (*Acipenser transmontanus*), which has been reduced to less than 2000 individuals, and assure their ultimate delisting. The threatened bull trout (*Salvelinus confluentus*) exists upstream and downstream of Hungry Horse and Libby Dams. These populations represent two of the most important strongholds for the species in the United States. Other species of special concern in Montana, such as the westslope cutthroat trout (*Oncorhynchus clarki lewisi*) and the redband trout (*Oncorhynchus mykiss gairdneri*), are also directly impacted by dam operations and should be considered in decisions by the federal operating agencies.

Restoring native fish and wildlife is largely dependent on reservoir and river operations, including

VARQ flood control. Scientific evidence clearly shows that VARQ will benefit Columbia River fish species with little or no impact to human uses and should therefore be implemented as soon as possible.

Sincerely

Pat Clancey, President
Montana Chapter American Fisheries Society

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