

## MEMORANDUM

**TO:** COE/BOR/BPA

**FROM:** CRITFC Fisheries Management Staff

**DATE:** August 22, 2025

**RE:** Comments on Draft 2026 Water Management Plan

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Thank you for moving up the review and comment timeline for next year's draft Water Management Plan (WMP). We hope that this earlier review process facilitates WMP finalization before the 2026 water year begins and supports the timely circulation of draft Fish Passage (FPP) and Fish Operations (FOP) plans. With uncertainty looming over the coming overshoot spill operation and spill season, CRITFC is concerned that the operations necessary to protect fish will not be in place in time.

While the earlier WMP draft release is a positive development, the Action Agencies' decision to offer the co-managers only one opportunity to review and comment on the draft came as a disappointment. We believe that it would be positive and constructive to have a second opportunity to review the draft before it is finalized.

For the 2026 WMP specifically, we offer the following comments for the Action Agencies' (AAs) consideration to increase document clarity and, more importantly, help maximize the plan's effectiveness at achieving its stated goals:

- Section 2 Governing Documents – We recommend that you include the Northwest Power and Conservation Council's Fish and Wildlife Program (FWP) as an Additional Governing Document and the Columbia Basin Restoration Initiative (CBRI) as an additional Key Document. The Northwest Power Act (NPA) requires that the Federal agencies take the FWP into account at each relevant stage of the decision-making process to the fullest extent practicable (NPA 4(h)(11)(A)(ii)). The current WMP appears to be written to meet the lower standard of "avoiding jeopardy" in response to the NOAA and USFWS Biological Opinions, rather than the NPA's standard of "equitable treatment". The goals and objectives of the WMP should be explicitly stated to rebuild salmon and steelhead stocks to healthy and abundant levels consistent with the NPCC's Fish and Wildlife Program goal.
- Section 4.1 CRSO Priorities – Staff recommends that the objective of reducing water transit time (WTT) to improve outmigration conditions be explicitly mentioned in this section. This could be addressed under priority #2 or #3 (page 8) or as a stand-alone strategy or priority.
- Section 4.5 FRM Shifts – the URL at the end of this section appears to be dead/nonfunctioning; replace with updated/correct link.
- Section 5.2 Water Supply Forecasts (WSF) – Given trends towards increased climatic variability (within and between years), as well future demands for on-call storage in CRS reservoirs (i.e., under the CRT AIP), CRITFC recommends that WSF be reviewed, and flood risk management (FRM) elevations be calculated, more frequently than the WMP's official monthly updates. WSFs are already reviewed on a near-daily basis, and the AAs act on these off-cycle updates using deviations when there is a projected increase in flood risk. However, between-monthly WSF are

not generally used to make decisions that could conserve water for fish and future flow augmentation objectives. We believe that increasing the frequency of WSF/FRM updates will more optimally support the system's multiple objectives, without compromising refill targets.

Fortnightly/bi-monthly updates should be an improvement, but there may be other update intervals or forecast improvements that the AAs are considering that will achieve similar ends. Importantly, in shifting to more frequent updates, The AAs should also weigh the day-to-day volatility inherent to different forecast products, particularly when making updates that substantially revise prior FRM targets (see [FPC Memo 17-25](#)). Note that any revisions to forecast frequency will require minor revisions elsewhere in the WMP (e.g., 4.5 FRM Shifts on p 12, content on VDL elsewhere [e.g., 7.4]).

- [Section 6.4.3 Libby FRM](#) – Staff is wondering how frequently Libby meets the refill targets described in the 2020 BiOp? While different projects have different refill probabilities, available data suggests that Libby struggles to meet its targets. We encourage the COE to explore options to increase Libby's refill probability and suggest the December draft strategy described in the WMP be considered as a logical starting point. Trends toward increasing variability in snowpack and the uncertainty inherent to early-season projections make December forecasts problematic. We suggest the COE be cautious with deep drafts in December and review the past 10 years of operations to find a better strategy.
- [Section 7.1 Canadian Storage for Flow Augmentation](#) – The WMP should clearly state how the 1.0 MAF of Canadian storage will be shaped at Grand Coulee to benefit US fisheries. Among priorities and shaping strategies, we recommend that the Canadian water be used to refill Lake Roosevelt primarily, so that an equivalent volume of existing US storage can be used to more generously augment flows earlier in the season when it would benefit more fish.
- [Section 8 Water Quality](#) – the first URL on page 53 needs to be updated to the public.crohms equivalent.