



## **Montana Fish, Wildlife & Parks**

Dan Jewell  
Area Manager  
US Bureau of Reclamation  
PO Box 30137  
Billings, MT 59107

8 March 2011

Dear Dan,

Montana Fish, Wildlife and Parks (MFWP) submitted Fresno Reservoir water management recommendations to the US Bureau of Reclamation (USBR) in 1987. These recommendations identified seasonal reservoir elevations that had been shown to be both beneficial and detrimental to the Fresno Fisheries. Since this letter, substantial data has been collected that validates the 1987 recommendations and provides additional insight into how reservoir operations affect the aquatic biota. Additionally, since the 1987 letter, sportsmen groups have grown increasingly critical of the perceived lack of operational consideration given to the fisheries.

It is for these reasons that MFWP respectfully submits the following Fresno Reservoir operational guidelines which are intended to update the 1987 recommendations and reengage the USBR in meaningful water management discussions. MFWP is fully aware of the rigid framework and single authorized purpose for Milk River water but hopes these guidelines can be incorporated into an annual operational framework. Furthermore, public pressure continues to mount to acknowledge the recreational benefits provided by the Milk River System.

MFWP understands that the Milk River is arguably one of the most complicated river systems in the United States. USBR has an extremely difficult task balancing trans-basin water transfers, tribal water compacts, international water agreements, irrigation, and municipal water users. Additionally, the recreational benefits associated with the fish and wildlife resources of the Milk River system cannot be understated. Benefits associated with the Milk River range from \$6 million to \$12 million dollars annually nearly equaling benefits derived from agricultural production (Duffield 2006).

In an effort to minimize the operational impacts on the fisheries resources of Fresno Reservoir and provide for a more stable and balanced fishery, the following operational statements are intended to minimize impacts if operational flexibility exists. Additionally, these guidelines remain cognizant of Fresno Reservoir Allocations; specifically the Active Conservation Pool (2567.0 feet) that recognizes Fish, Wildlife and Recreation as components of this water allocation.

Yellow perch, black crappie are critical forage and highly prized sport fish. Spottail shiners are an important forage fish that is vital to walleye growth and survival. Populations of these species are tightly correlated with reservoir operations.

- The most favorable spawning conditions for yellow perch occur when pool elevations are greater than 2565.0 during April and May. Maximum production occurs when reservoir levels are stable or increasing during these months.
- Black crappie and spottail shiners spawning conditions are maximized when pool elevations are greater than 2570.0 during May and June.
- Average winter (Oct.-Mar) pool elevation from 1941-2011 was 2559.5 or 16 ft below full pool. At this drawdown level limited shoreline structure is submerged.
- Overwinter pool elevations of 2561.5-2562.5 feet (which represents only a 2-3 foot increase) would add 156-249 surface acres or 4,555-6,955 acre-feet and submerge critical rock/cobble substrate for young of year fishes to seek refuge from predators.
- Pool elevations below 2555.0 have been shown to be extremely detrimental to the entire fish community of Fresno Reservoir.

MFWP recognizes the complexities and importance of Milk River water to the many users of the system. Additionally, MFWP strongly supports agricultural production of the Hi-Line and the critical link to reliable, cost-effective Milk River water. MFWP stands in support of the restoration of the Milk/St Mary system and is willing to partner with the St. Mary Rehabilitation Working Group, USBR and others to work towards this common goal. MFWP appreciates the difficulty that USBR faces in operation of Fresno and Nelson Reservoirs and is grateful for concessions that have been made to balance water needs through the basin. We hope that managing for healthy fisheries resources throughout the Milk River Watershed can be a common goal for USBR and MFWP into the future.

Sincerely,

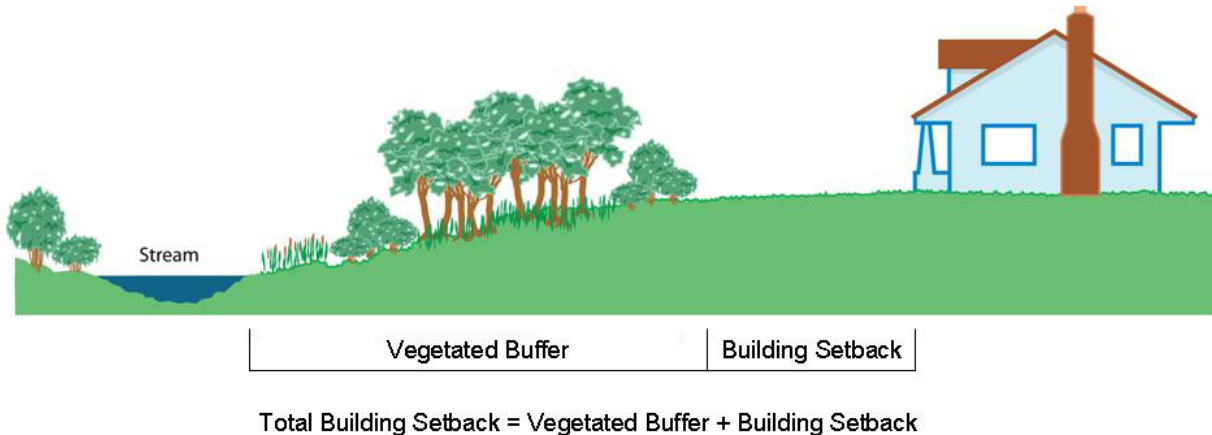
Dave Risley  
Fish and Wildlife Bureau Chief  
Montana Fish, Wildlife and Parks

Cc:  
Chuck Hieinje  
Mike LaFrentz  
Lenny Duberstein

**Guidelines for subdivision development proposed on property that contains or adjoins a natural water body and/or its associated riparian area.**

(1) The following vegetated buffers and building setbacks apply:

- Rivers – 250 feet of vegetated buffer + 50 additional feet of building setback.  
Total building setback is 300 feet from each side of a river.



(2) If the riparian area associated with a natural water body extends beyond the pertinent vegetated buffer outlined above, then the vegetated buffer shall be extended to encompass all of the riparian area. Riparian areas have one or both of the following characteristics: 1) distinctly different vegetative species than adjacent areas, and 2) species similar to adjacent areas but exhibiting more vigorous or robust growth forms. Riparian areas are transitional between a water body or wetland and upland.

(3) Within the vegetated buffer and the building setback:

- All disturbances must incorporate effective measures to limit erosion and sedimentation.