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Sent: Thursday, October 06, 2005 12:06 PM
Attach: GibsonDamDraftWQStudyPlan-cmt.doc
Subject: Re: Draft water quality study plan, Gibson Dam Project, FERC P-12478

We have reviewed the draft water quality study plan for the Gibson Dam FERC Project, and offer a few comments (see attached).

(See attached file: GibsonDamDraftWQStudyPlan-cmt.doc)

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EPA Comments on Draft Water Quality Study Plan for Gibson Reservoir

1. It is stated (page 2) that Gibson Reservoir water temperature surveys will be conducted in three primary locations, and then two locations are listed: 1) near the reservoir surface near the spillway; 2) at various depth levels near the upstream dam face. It is then stated (page 3) under the heading, *Gibson Reservoir Temperature-at-Depth Monitoring*, that Gibson Reservoir water temperature will be continuously monitored from bottom to surface at 8 different depths. This monitoring discussion is confusing (i.e., Are there two or three locations for temperature monitoring or will temperature be monitored at multiple locations in the reservoir?). We suggest clearer discussion of the locations of reservoir temperature monitoring. We also understand that dissolved oxygen levels will be monitored at all temperature monitoring locations (page 5). Is this correct?
2. The draft study plan suggests that additional water quality monitoring will be carried out during and after project construction to aid in determining compliance with Montana Water Quality Standards (page 6). Potential parameters to be monitored are identified (e.g., Turbidity, Total dissolved solids, Heavy metals, Petroleum distillates, Pesticides, PCB's, Total Suspended Sediment), but no specific details on the frequency and locations of such monitoring or an actual commitment to carry out such monitoring are included. We suggest that you work closely with the Montana Dept. of Environmental Quality (MDEQ) to determine appropriate monitoring plan components to evaluate and assure compliance with Montana Water Quality Standards during project development and implementation. It appears to us that a biological monitoring component may be helpful in assuring compliance with Water Quality Standards (e.g., macroinvertebrate, fish populations). We also recommend that MDEQ validate proposed monitoring of total dissolved gases to evaluate, and thus, avoid supersaturation problems in the river below the dam.
3. We understand that the Montana Dept. of Fish, Wildlife & Parks (MDFWP) is interested in finding ways to improve streamflows in the Sun River, since chronic dewatering of this waterbody has impacted fisheries and aquatic life more than any water quality issue. We support MDFWP's recommendations that you carry out modeling of reservoir inflows, storage, and dam releases and Sun River diversion needs so that reservoir/dam and irrigation project managers have the best information possible to satisfy diversion needs while allowing adequate flows to remain in the river to benefit fisheries and aquatic life. We also support the MDFWP recommendations for minimum Sun River flows of 220 cfs, with an absolute minimum flow during drought periods of 100 cfs to ensure survival of fish and aquatic life.