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October 3, 2017

MEMORANDUM

TO: Fish and Wildlife Committee members

FROM: Kerry Berg

SUBJECT: Update on Montana Wildlife Settlement Agreement and Construction, Inundation and Operational Wildlife Impacts in Montana

BACKGROUND:

Presenter: Alan Wood and Dwight Bergeron, Montana Fish, Wildlife & Parks; Norm Merz, Kootenai Tribe of Idaho

Summary: Montana's Wildlife Mitigation Program is designed to mitigate the wildlife impacts caused by construction of Libby and Hungry Horse Dams. These two federal hydroelectric facilities, located in Northwestern Montana, provide cost-effective, renewable energy to electrical consumers in the Pacific Northwest. But the dams also caused the direct loss of 56,700 acres of land that were home to deer, elk, bighorn sheep, bears, and a variety of other native wildlife.

In 1988, the state of Montana and Bonneville Power Administration entered into an agreement that transferred \$12.5 million from Bonneville to a legislatively established state trust account for the purpose of paying for wildlife mitigation projects in Montana. The 60-year agreement is based on impact assessments completed by Fish, Wildlife & Parks in 1984.

Recently the Kootenai Tribe of Idaho (KTOI), in partnership with Montana Fish Wildlife and Parks (MFWP), developed a framework (see attachment)

for assessing operational losses for Libby Dam. That work has improved the understanding of the nature of operational impacts, and consequences to wildlife habitats and populations and has been used as a tool in that area of the basin for habitat efforts. The Kootenai Operational Loss Assessment has been tested on the Flathead, but the applicability to other hydropower facilities has not been tested yet. The presenters will discuss this framework during the meeting today.

A Quick Guide to a Framework for ASSESSING OPERATIONAL LOSSES



This *Quick Guide to a Framework for Assessing Operational Losses* is intended as an introduction to designing and implementing a scientifically defensible, repeatable, comprehensive, and process-based assessment of the ecological impacts of hydroelectric projects on river systems and their associated floodplains. The framework, as described here, was used as the basis for the [Kootenai River Floodplain Ecosystem Operational Loss Assessment](#). The framework describes a series of multimetric indices for each order of impact, and then combines those indices into an overall Index of Ecological Integrity (IEI).

A process-based hierarchy is an effective way to represent this succession of impacts, and provides a ‘road map’ for exploring and assessing the processes linking successive levels of impact. Jorde et al. (2008) proposed a hierarchy for considering operational impacts on floodplain ecosystems, adapted from a framework originally proposed by Petts (1984). This

framework is based on Jorde’s hierarchy with minor revisions. Figure 1 shows the process-based hierarchy underlying the framework.

The overarching goal of this tool is to assess abiotic and biotic factors (i.e., geomorphologic, hydrologic, hydraulic, aquatic and riparian/floodplain community) to develop a definitive composite measure of ecological integrity, called the **Index of Ecological Integrity** or **IEI**.

Process-based, hierarchical analyses provide a powerful tool for assessing operational impacts of dams on physical processes and consequent ecosystem function because physical drivers and biological responses can be displayed in space and time, with the potential for isolating specific operational impacts. This approach provides an advantage over purely empirical techniques because it allows process-based extrapolation over space and time beyond individual observations (Burke et al. 2009).

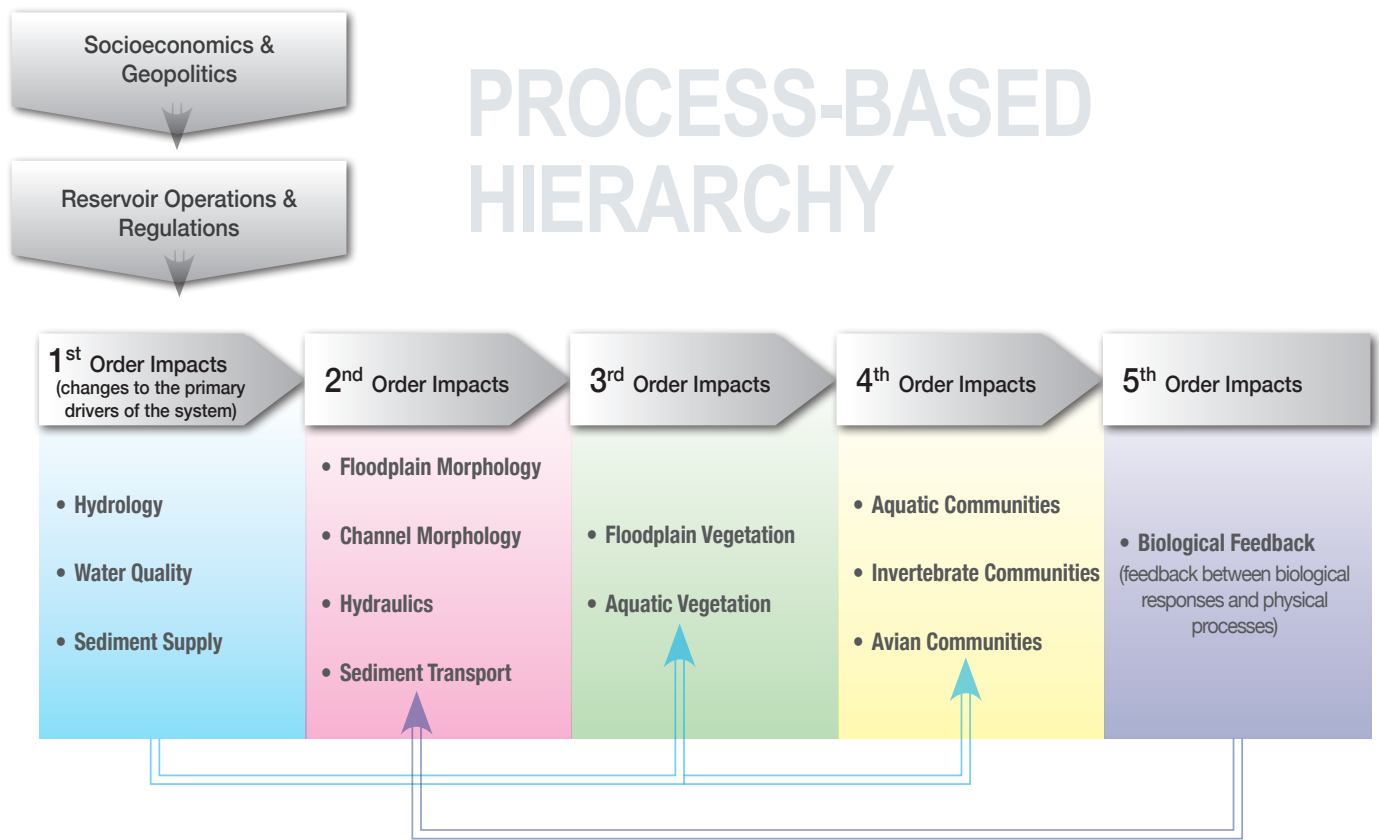


Figure 1. The process-based hierarchy underlying this framework.

Index of Ecological Integrity

The Index of Ecological Integrity (IEI) quantifies the extent of anthropogenic impacts on a river and its associated floodplain. It is a definitive composite measure of ecological integrity and can be defined as a measure of the capability to support and maintain a balanced, integrated, adaptive community of organisms having a species composition, diversity, and functional organization comparable to that of natural habitat of the region” (Karr and Dudley 1981). Its advantages include:

- It provides a system-specific way to rank abiotic and biotic data on a comparable quantitative scale.
- It allows managers to assess direct, indirect, and cumulative effects of management actions on an independent index or a combination of indices at multiple scales.
- It easily adapts to varying audiences — from policy level decision makers that might be interested in the overall score to a scientific audience interested in the details of metric scores and the ecological mechanisms underlying the

overall assessment. Land managers and dam operators can also employ this technique to assess and prioritize ecosystem deficiencies and to monitor management actions.

- It can be adapted to each unique river system. If different metrics or additional indices are needed for a specific area (fish, amphibians, big game, etc.), and suitable empirical data were available, a new index could be developed and inserted on a corresponding axis in the IEI radar chart.

The Multimetric Indices

The IEI is calculated by combining a series of **multimetric indices** that measure each order of impact. When rivers can be divided into major geomorphic reaches defined by unique geomorphology, landform, and land use patterns, an IEI score is developed for each reach. The scores allow for comparison of the relative level of impacts between reaches. Figure 2 shows the specific indices used to determine the IEI and their abbreviations. Each index, in turn, is calculated from a group of more specific **metrics**, each carefully selected.

Compare Historic and Current

Rescale to 1 to 10 Scale and this Equals Metric Score

Metric

Average Metric Scores and this Equals Index Score

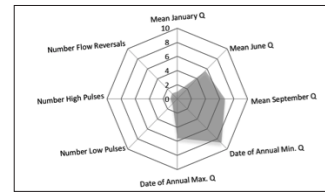
Index

Average Index Scores and this Equals IEI Score

IEI

Historic Metric Value
Current Metric Value

- Metric of Annual Max. 1-day Flow
- Metric of Mean June Flow
- Metric of Mean September Flow
- Metric of Mean January Flow
- Metric of Annual Min. 7-day Flow
- Metric of Number of High Pulses
- Metric of Number of Low Pulses
- Metric of Annual Max. 30-day Flow
- Metric of Annual Min. 30-day Flow
- Metric of Date of Annual Max. Flow
- Metric of Date of Annual Min. Flow
- Metric of Number of Flow Reversals



1st Order Indices (each is an average of multiple metrics)

- Index of Hydrologic Alteration (IHA)
- Index of Sediment Supply Alteration (ISSA)

2nd Order Indices (each is an average of multiple metrics)

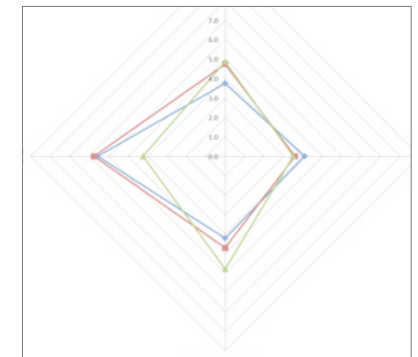
- Index of Fluvial Alteration (in-stream) (IFA)
- Index of Floodplain Fluvial Alteration (IFFA)

3rd Order Indices (each is an average of multiple metrics)

- Index of Land Cover Classification Alteration (ILCCA)
- Index of Wetland Functional Alteration (IWFA)

4th Order Indices (each is an average of multiple metrics)

- Invertebrate Index of Biological Integrity (I-IBI)
- Avian Index of Biological Integrity (A-IBI)



Index of Ecological Integrity

Figure 2. Specific indices used to calculate the Index of Ecological Integrity. Each index is the average of multiple metrics. Insets show examples of radar charts. Note that Riverine Macroinvertebrates and Riverine Fish Index are not included in this Quick Guide.

Research Design and Review Team (RDRT)

The assessment work requires a team of skilled scientists in the fields of hydrology, hydraulics, geomorphology, ornithology, entomology, statistics, riparian and river ecology, among other expertise. This advisory team is known as the Research Design and Review Team (RDRT), and their role is to direct the review, selection, and adaptive management of the research designs used to evaluate the loss of ecological function caused by the operation of a dam.

The Metrics

A list of possible metrics for each index is developed and refined. Then, each metric is calculated in the current and compared to the historic condition¹ and placed on a standardized scale ranging from 1 (drastic change) to 10 (limited change) to quantify the difference. This value is referred to as the metric score. Metric scores are then averaged together to equal the index score. Index scores are then averaged to yield the IEI score.

Radar charts (Figure 2) are used to display and communicate the metric scores, index scores, and IEI scores.



¹ Where historic metric values were not available, a method to assess change was derived and explained under the index where it applied.

Major Steps

- 1 Create Research Design & Review Team**
- 2 Define River Reaches**
- 3 Select Indices and Metrics**
- 4 Identify Existing Data Sources and Data Gaps**
- 5 Conduct Field & In-Office Work to Fill Data Gaps**
- 6 Run Models and Calculate Metric & Index Scores**
- 7 Calculate Index of Ecological Integrity**

Summary of Indices

1a Index of Hydrologic Alteration (IHA) 1st Order Index



Description

Quantitative index based on statistical analysis of long-term measurements of river discharge at key main-stem gaging stations.

Metrics

The IHA software (Richter 1996) calculates 33 metrics, using a PCA analysis on the historic flow data; 12 metrics explained a majority of the variation of the data. Four metrics were redundant with the others and were dropped, leaving 8 final metrics. The same analysis method was used in the Flathead and resulted in selection of the same 8 metrics.

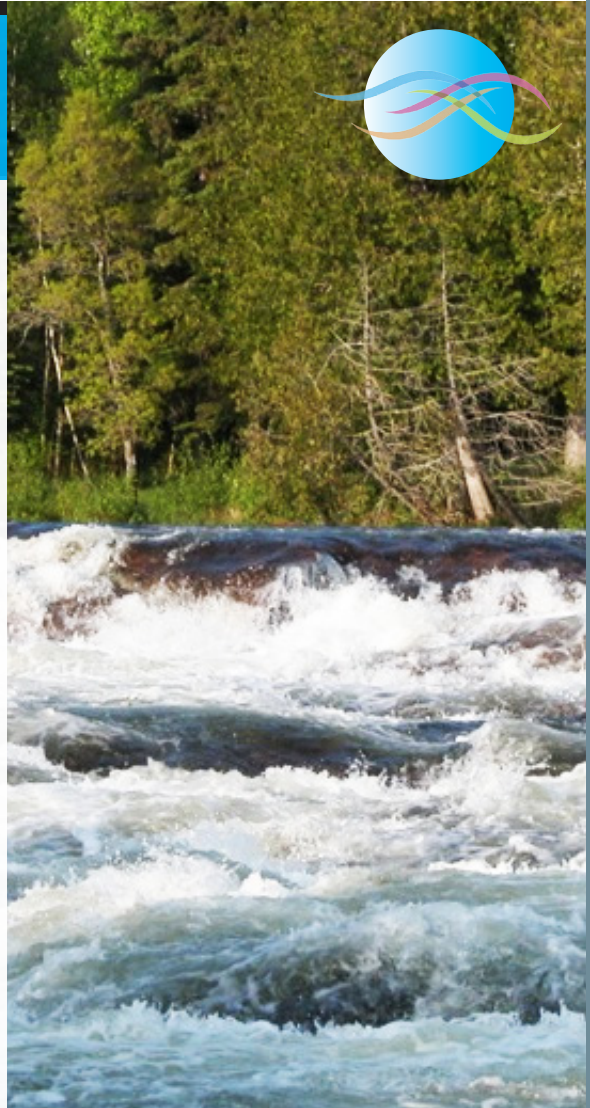
Number of Low Pulses	Date of Annual Min. Flow
Mean June Flow	Number of Flow Reversals
Mean September Flow	Annual Max. 30-day Flow (optional)
Mean January Flow	Annual Min. 7-day Flow (optional)
Date of Annual Max. Flow	Annual Min. 30-day Flow (optional)
Number of High Pulses	Annual Max. 1-day Flow (optional)

Data and Data Sources

Time series of daily mean discharge obtained from records published by the United States Geological Survey (USGS) and the Water Survey of Canada (WSC). Published data typically available from internet databases (<http://waterdata.usgs.gov/nwis>; <http://www.wsc.ec.gc.ca/hydat/H2O/>). For periods lacking data, gage records were extended by graphical correlation and regression methods. The TNC IHA software manual suggests a minimum record length of 15 years to reasonably characterize the attributes and variability of a hydrologic regime. To select our metrics in both the Kootenai and Flathead systems, we conducted a pre-regulation PCA analysis using the 33 variables calculated by the TNC-IHA (Richter et al. 1996) software. The PCA analysis narrowed the metrics to a set of 12, then we refined the set to the final 8 metrics. The 8-metric set was identical between both river systems. Then, we calculated those metrics for each year of record and used a 1000 bootstrap sample (each sample included 16 years of data chosen at random, with replacement) to calculate our final IHA.

Notes

Recommend using an alternate approach to calculating the metrics quantifying the timing of the minimum and maximum flow. For river systems where little flow data exists, or where the primary effects of regulation are short-duration patterns (e.g. intra-daily hydropeaking), alternative hydrologic metrics may be available that are appropriate for use as a basis to calculate alteration.



Cost \$45 K*

**This estimate based on a bare-bones approach used to evaluate the transferability to the Flathead Basin*

1b Index of Sediment Supply Alteration (ISSA)

1st Order Index

Description

A rapidly-calculated, order of magnitude, quasi-quantitative characterization of shifts in sediment supply. An 'informative' index that helps explain the manner and the substantial magnitude of alteration in sediment supply.

Metrics

Sediment supply metric (SS*) = the ratio of reduced sediment supply at any point in time to the sediment supply of a reference condition for a given location. GIS-based analysis to estimate a spatially-distributed index of sediment yield (or yield potential) represents an incrementally more complex alternative approach in which the factors considered to control sediment production (lithology, slope, climate and land cover are each described through sub-index values, then combined into a spatially-distributed composite index.

Data and Data Sources

Varies depending on system, history, jurisdictions, agencies, etc.

Notes

An even simpler approach to the estimate could use relative basin area as a surrogate for sediment supply, instead of the mean annual sediment loads predicted by the Cartier relationship.



Cost \$30 K*

** Based on the original development of the project.*

2a Index of Fluvial Alteration (IFA)

2nd Order Index

Description

A quantitative index based on direct comparisons of flow patterns within the banks of the river for representative years between distinct operational scenarios.

Metrics

Depth	Shear Stress
Daily Stage Fluctuation	Bed Mobility
Velocity	

Data and Data Sources

The determination of second-order impacts was based on comparison of instream processes between water years representative of a range of climatic conditions (wet, average and dry) within each functional scenario (historic, pre-dam and post-dam). The IFA analysis requires development of a 1-D hydrologic model and cross-section data. Characteristic values for instream processes for each year were generated by simulation of the river flow for the year with hydrodynamic models that solve the St. Venant (1871) equations for unsteady, non-uniform flow.

Notes

An individual hydrodynamic model was developed and calibrated for each of the functional scenarios, which allowed explicit simulation of the spatiotemporal flow characteristics resulting from the conditions representative of each scenario. This approach provides an advantage over other purely empirical techniques because it is possible to obtain information over the time and space between measurement points and events and allows for process-based extrapolation beyond measurement points.



Cost \$50 K*

** Based on the original development of the project and assumes access to the ACE models and cross section data produced for the Columbia River Treaty*

2b Index of Fluvial Floodplain Alteration (IFFA)

2nd Order Index

Description

An index that quantifies the changes in hydrology (dam operation) and topography (i.e. levees) to the floodplain by comparing historic versus current water depth, shear stress, flood inundation extent, and duration and frequency of inundation.

Metrics

- Water Depth
- Duration of Inundation
- Shear Stress
- Frequency of Inundation
- Flood Inundation Extent

Data and Data Sources

Metrics are simulated using six different recurrence interval floods (i.e., 1-, 2-, 5-, 10-, 25-, and 50-year RI floods). Danish Hydraulic Institute (DHI) software packages MIKEFLOOD (2007) and MIKE11GIS (2005) are used to simulate the hydraulic metrics in a spatially-distributed manner over the floodplain. The ACE HecRas model developed for the CRT may be an economic and suitable substitution. This model was used successfully in the Flathead River.

Notes

Index alone may not be transferable to other areas to estimate the intensity of human disturbance based on channel flow because reference conditions will be different in other rivers. Reference conditions should be developed at the site where the floodplain IFFA method is applied to analyze the human impacts.



Cost \$100 K*

**This estimate based on a bare-bones approach used to evaluate the transferability to the Flathead Basin. Assumes access to the ACE models and cross-section data produced for the Columbia River Treaty.*

3a Index of Land Cover Classification Alteration (ILCCA)

3rd Order Index

Description

Quantified change in vegetation land cover over time.

Metrics

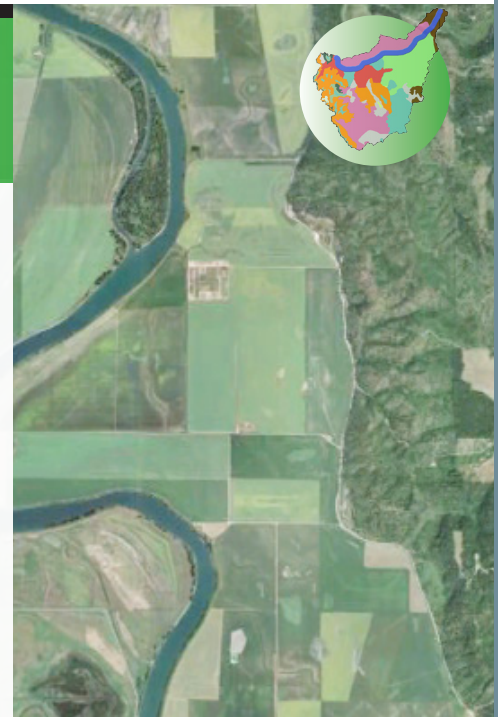
- Streamside Sand/Gravel
- Riparian Mixed Forest
- Riparian Conifer Forest
- Riparian Herbaceous
- Riparian Broadleaf Forest
- Riparian Shrub
- Wetland

Data and Data Sources

National Agricultural Imagery Program (NAIP); Natural-color NAIP imagery for Montana (NRIS; www.nris.mt.gov); 1-meter color infrared (CIR) imagery, analogous to NAIP CIR imagery, acquired in 2004 for the Idaho West subsection, were purchase from Horizons, Inc., a USDA contractor in Sioux Falls, SD; NAIP CIR digital photos; 1934 & 1947 black and white aerial photographs from US Forest Service; USGS 10-meter digital elevation models (DEMS); Ground-based oblique color photographs.

Notes

While this summary describes the use of remote sensing and aerial photos to develop the Land Cover Classification Alteration Index, this method is probably overly expensive and complex for the resolution needed. Aerial photo interpretation alone is probably adequate.



Cost \$60 K*

**Based on the original development of the project.*

3b Index of Wetland Function Alteration (IWFA)

3rd Order Index

Description

A measure of changes in wetland quality and function resulting from hydropower operations that uses the Oregon Rapid Wetland Assessment Protocol.

Metrics

Hydrologic Function	Fish Support Group
Water Quality Group	Aquatic Habitat Group
Nutrient Cycling	Terrestrial Habitat Group

Data and Data Sources

Aerial photographs, detailed topographic maps, hydrologic models and NWI and soil maps combined with Oregon Rapid Wetland Assessment Protocol (ORWAP) field visits (FieldF Tab). Wetland boundaries determined using NWI maps, historic and current aerial photographs, LiDAR generated elevations, 1928 topographic maps, NRCS soil maps, and hydraulic model outputs.



Cost \$50 K*

* Based on the original development of the project.

4a Invertebrate Index of Biological Integrity (I-IBI)

4th Order Index

Description

A multi-metric index used to reflect changes in terrestrial invertebrate community complexity due to human disturbance.

Metrics

Algae_In	Formicidae
Omni_In	Coccoidea
Canopy_In	

These metrics were calculated for the Araneae (spiders), Coleoptera (beetles), Collembola (springtails), Diptera (flies), Hemiptera (bugs), Hymenoptera (ants, bees and wasps) and Orthoptera (grasshoppers, katydids, etc.).

Data and Data Sources

Data collected at randomly selected sites within the 50-year floodplain. Requires a year of site-specific vegetation data, IFFA metrics, and 2-3 years of insect data. The insects were only identified to family.

Notes

The multivariate analyses of the invertebrate data provided an enhanced IBI methodology and produced reasonable IBI scores for the specified invertebrate sites.



Cost \$95 K* / \$200 K**

*One rotation; **Full three rotations.

Estimates assume 2 yrs of data collection on 50 sites and collection of the site-specific vegetation data, availability of IFFA metrics.

4b Avian Index of Biological Integrity (A-IBI)

4th Order Index

Description

A multi-metric index used to reflect changes in avian community complexity due to human disturbance.

Metrics

Richness — Hill's Richness, N_0	Rel. Abund. Resident Species
N_2 Hill's Diversity	Rel. Abund. Short Distance Migrants
N_2/N_1 — Hill's Evenness	Rel. Abund. Species Sensitive to Disturbance
Ave. Key Ecological Functions per Species	
Rel. Abund. Species Dependent on Riparian Veg. for Reproduction	

These metrics were calculated for four guild types: Migratory Status, Nesting Status, Trophic Status, Disturbance Tolerance.

Data and Data Sources

Data collected at randomly selected sites within the 50-yr floodplain. Requires a year of site specific vegetation data, IFFA metrics, and 2-3 years of avian data.

Notes

The multivariate analyses of the avian data provided an enhanced IBI methodology and produced reasonable IBI scores for the specified avian sites.



Cost \$60 K*

**This estimate based on a bare-bones approach used to evaluate the transferability to the Flathead Basin. Estimate assumes 2 yrs of data collection on 50 sites and collection of the site specific vegetation data, availability of IFFA metrics.*

Literature Cited

Burke, M., Jorde, K., & Buffington, J. 2009. Application of a hierarchical framework for assessing environmental impacts of dam operation: changes in streamflow, bed mobility and recruitment of riparian trees in a western North American river. *Journal of Environmental Management*, 90: 224–236.

Jorde, K., Burke, M., Scheidt, N., Welcker, C., King, S., Borden, C. 2008. Reservoir operations, physical processes, and ecosystem losses. In: Habersack, H., Piégay, H., Rinaldi, M. (Eds.), *Gravel-Bed Rivers VI: From Process Understanding to River Restoration*. Elsevier, pp. 607-636.

Karr, J. R. and Dudley, D. R. 1981. Ecological perspective on water quality goals. *Environmental Management* 5: 55-68.

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Petts, G. 1984. *Impounded Rivers: Perspective for Ecological Management*. John Wiley & Sons, Chichester.

WILDLIFE MITIGATION IN MONTANA

Construction, Inundation & Operations

Alan Wood & Dwight Bergeron, Montana Fish, Wildlife & Parks
Norm Merz & Scott Soultz, Kootenai Tribe of Idaho



Pre-Settlement



**Hungry Horse
Full Pool 1954**

**Libby Dam
Full Pool 1974**

**56,700 acres flooded
90 river miles
100 tributary miles**

1984 Loss Statement

MFWP Finalized
losses for:

Hungry Horse
Libby



1985 Plan

MFWP Finalized Mitigation Plans:

Hungry Horse

Libby

Proposed to mitigate
for 100% of C&I
losses

WILDLIFE AND WILDLIFE HABITAT
MITIGATION PLAN FOR HUNGRY HORSE HYDROELECTRIC PROJECT

(Revised)
August, 1985



Prepared by

Montana Department of Fish, Wildlife and Parks

Gael N. Bissell - Wildlife Biologist
Chris A. Yde - Wildlife Biologist

Funded by

Bonneville Power Administration
Project No. 83-464

1986 MT Proposal to NPCC

MT – Costs @ \$40-\$75 Million

PNUCC – Costs Unreasonable

Council – Negotiate Agreement?



1986 Montana Negotiations

PARTICIPANTS

MFWP, BPA, NPPC, USFWS, GNP

ACOE (N Pacific Div. & Seattle Dist.)

USFS (FNF & KNF)

PNUCC (WMG&T, MPC CFAC)

TNC, FLT

1986 Joint Recommendations

MFWP and PNUCC jointly submit the Montana wildlife mitigation plan

Plan covers deer, elk, sheep, grizzly bear, bald eagle, CSTG, otter, marten/OG, waterfowl

Propose a trust fund \leq \$16 million

1987 Program

Council adopts
modified plans

Can't approve
trust fund
approach, but
supported
concept



COLUMBIA RIVER BASIN FISH AND WILDLIFE PROGRAM

1988 Settlement



WILDLIFE MITIGATION
AGREEMENT FOR LIBBY AND
HUNGRY HORSE DAMS

between the

BONNEVILLE POWER
ADMINISTRATION

and the

STATE OF MONTANA

December 21, 1988

1988 Settlement

C&I losses in 1984 loss statements

Term of 60 years

\$12.5 million to MT

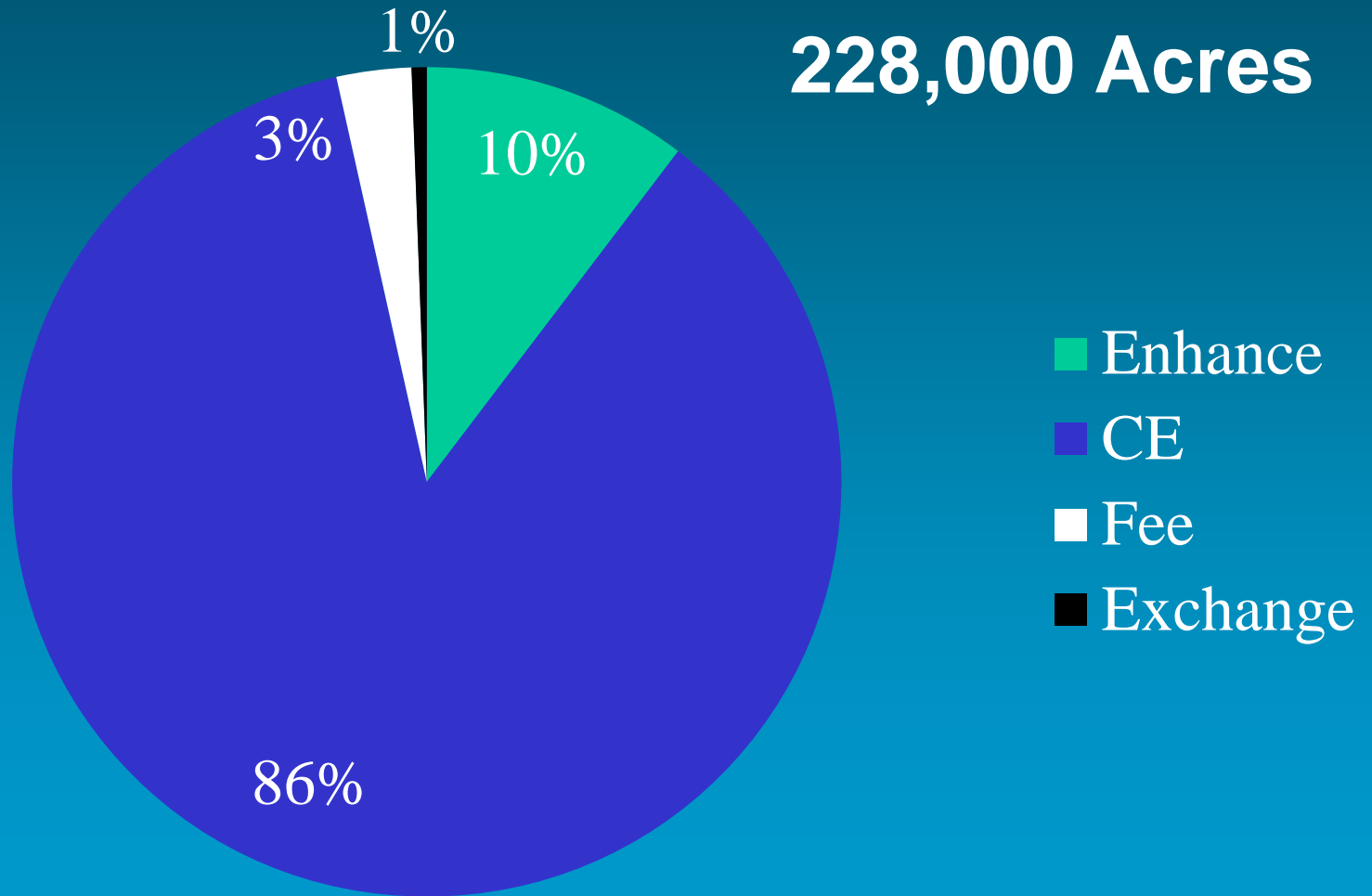
Mitigation to MT

Limited indemnity to BPA

1-to-1 crediting



Accomplishments Under WL Trust

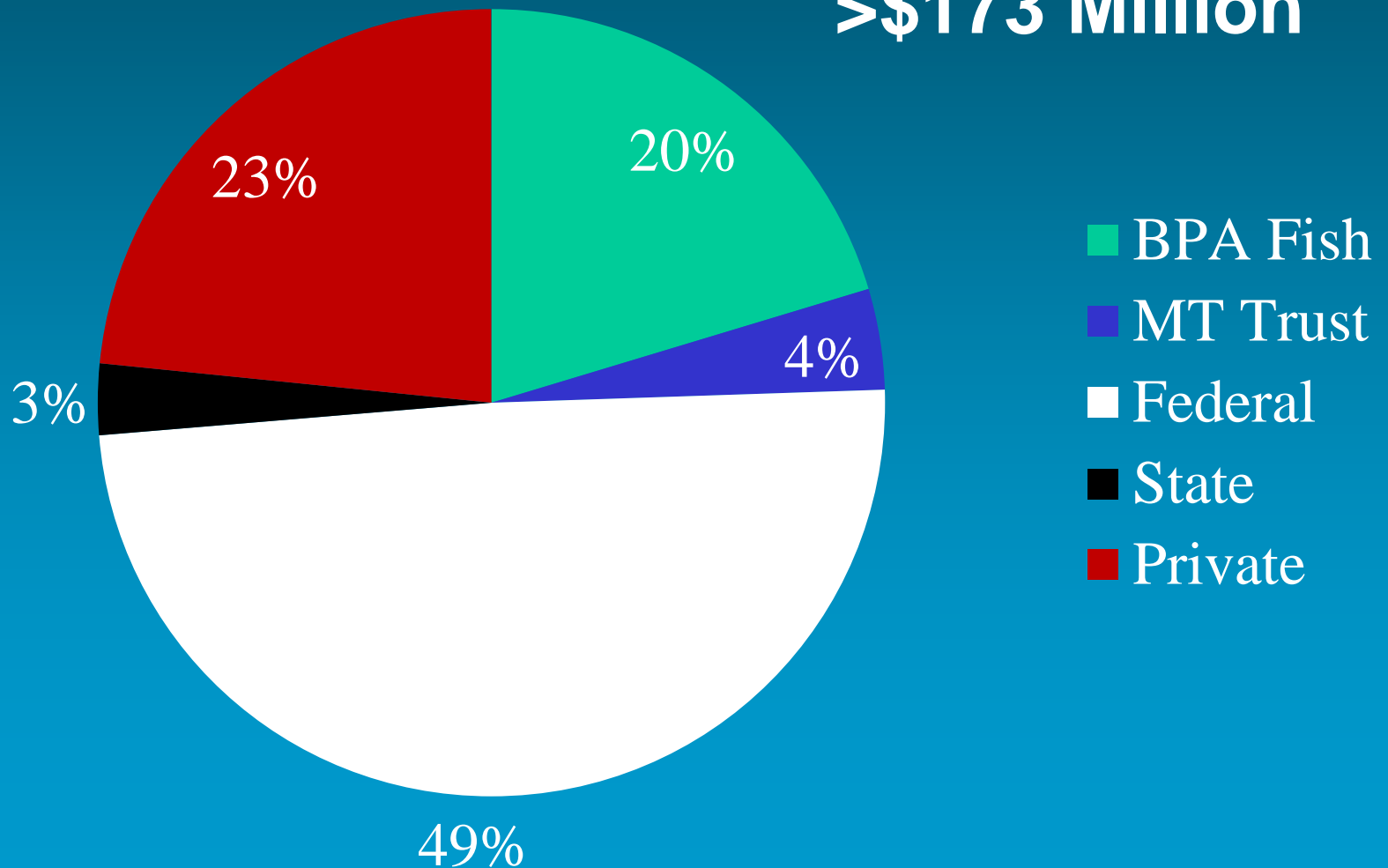


Partnerships are the Key

- 16 Governmental and Tribal Programs
- 14 NGOs
- 5 Corporations
- >100 Private Landowners

Wildlife Mitigation Expenditures

>\$173 Million



Total C&I Mitigation Completed

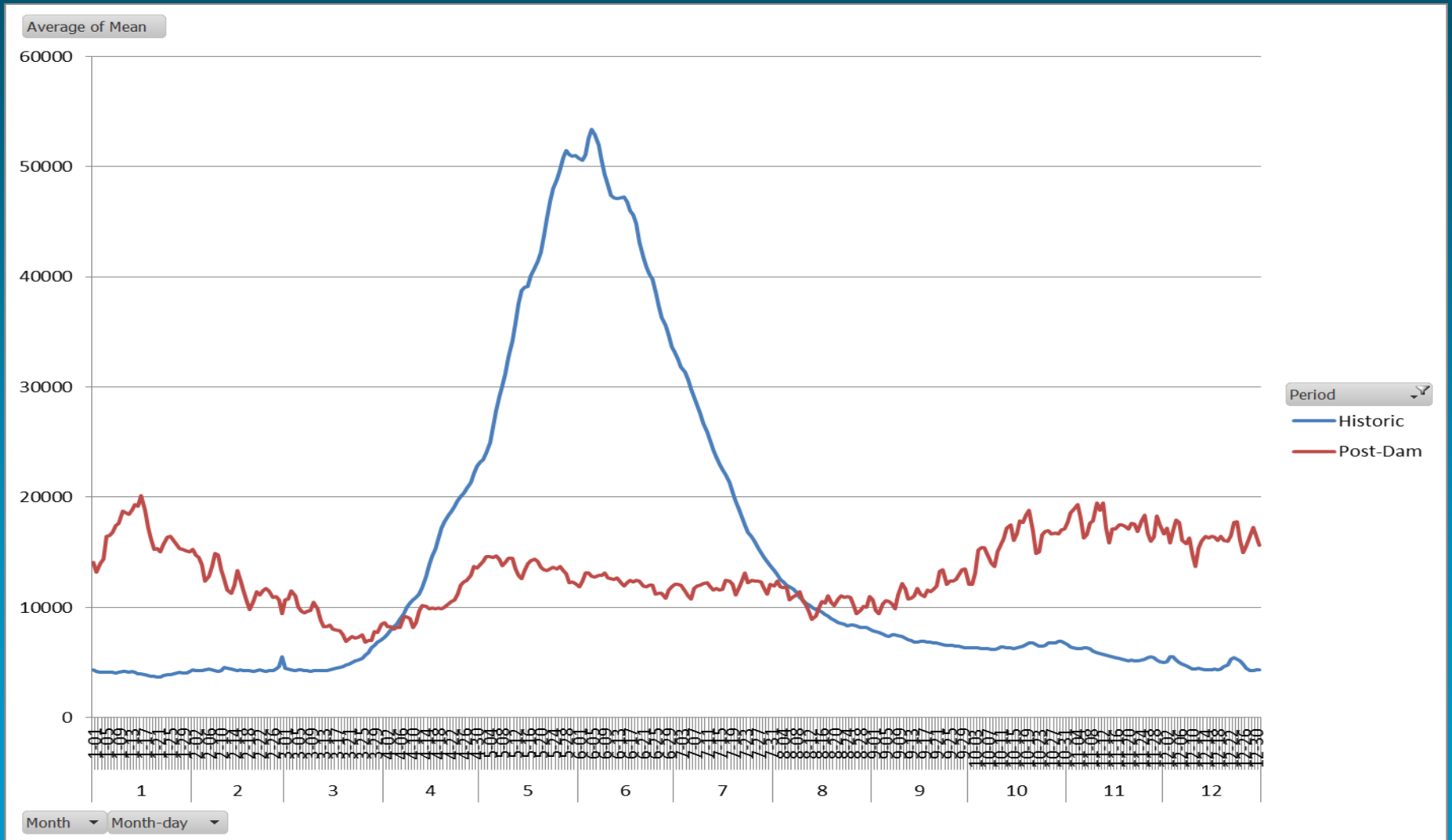
Habitat Unit	Total Losses		Project Acres
	Hydro*	Full	
Riparian/Wetland	14,488	18,600	21,466
Palouse Prairie & Ag	1,251	1,583	8,681
Upland Forest	27,953	36,022	227,860
Total	43,692	56,205	258,007

*Based on congressional repayment allocation – Hungry Horse 76%, Libby 79%.



Wildlife Operational Impacts Not Covered Under Settlement

Wildlife Operational Impacts Remain Unmitigated



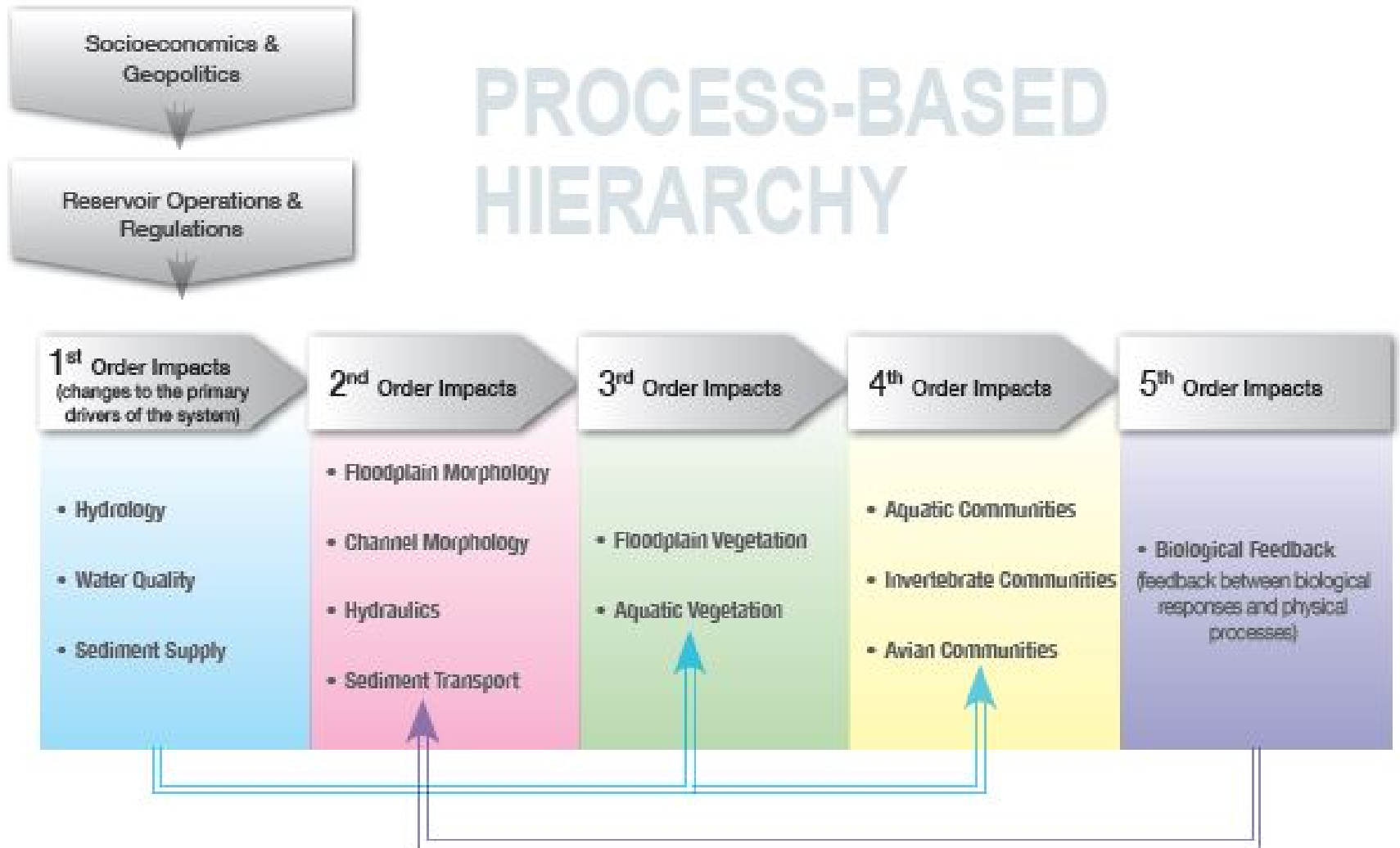
Wildlife Operational Impacts Remain Unmitigated

Operational Impacts directly alter river hydrology and hydraulics, as well as sediment and nutrient availability and transport. These changes degrade physical and ecological processes, vegetation communities, and wildlife habitat.

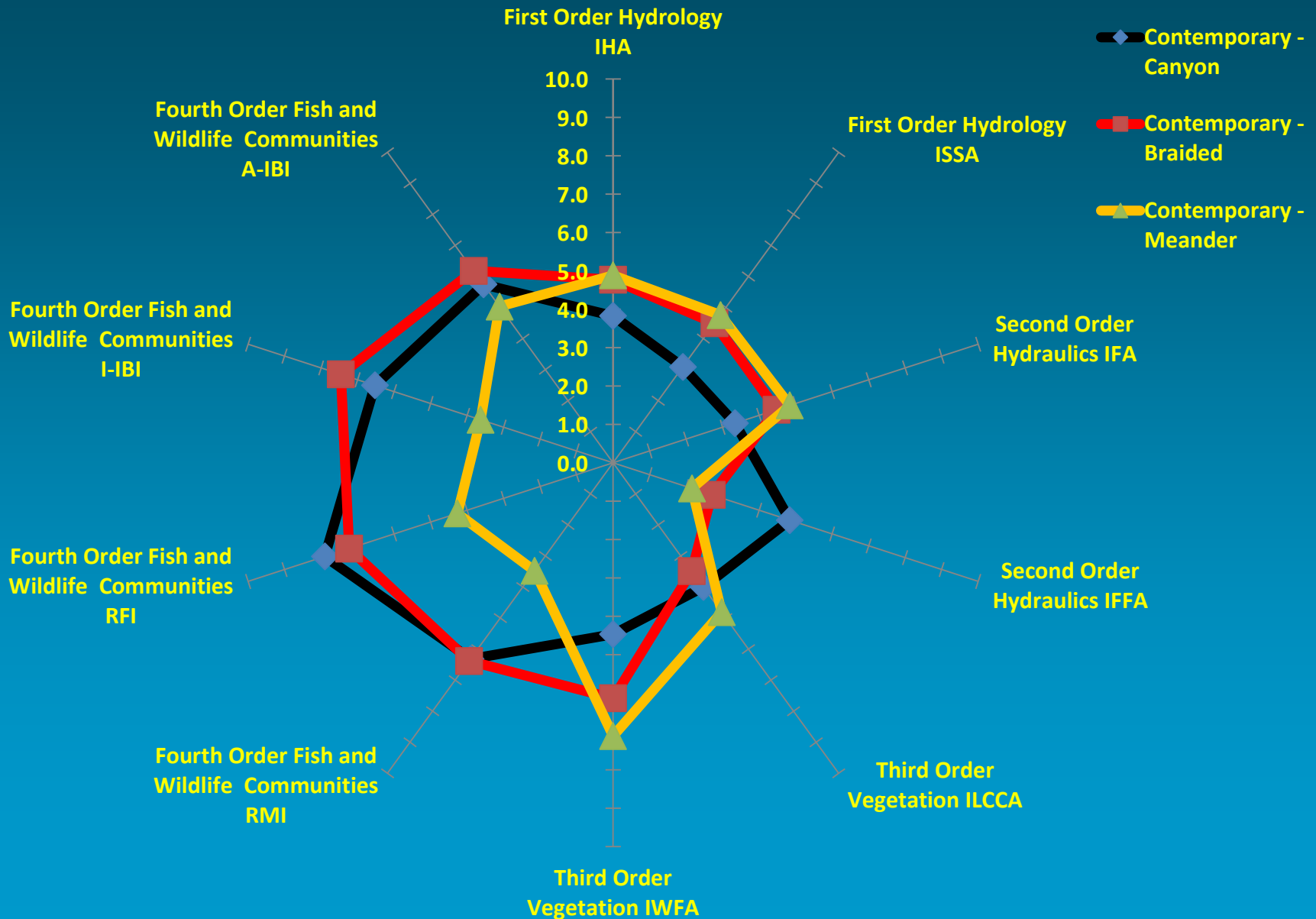


Impacts Cascade through the Ecosystem

PROCESS-BASED HIERARCHY



Kootenai River Operational Impacts Model Quantified those Impacts



Model Successfully Validated

Within the Kootenai, and the Flathead



Index of Hydrologic Alteration

Methods: Principal Components Analysis to select metrics that explain the greatest amount of variability and limit inter-correlation

- 33 metrics trimmed to 12, then to 8 to further reduce inter-correlation

Metric	Kootenai	Flathead
Mean January Q	X	X
Mean June Q	X	X
Mean September Q	X	X
Date of Annual Min. Q	X	X
Date of Annual Max. Q	X	X
Number Low Pulses	X	X
Number High Pulses	X	X
Number Flow Reversals	X	X
Annual Min 7 day Q	X	X
Annual Min. 30-day Q	X	X
Annual Max. 30-day Q	X	X
Annual Max. 3-day Q	X	
Annual Max. 1-day Q		X

Index of Fluvial Floodplain Alteration

Flathead

Synthetic hydrographs for flood return intervals

Adapted CRT HEC-RAS model (public)

IFFA score: 6.5

Kootenai

Representative year hydrograph for flood return intervals

Developed model in MIKE (proprietary)

IFFA score: 3.2

Avian Index of Biological Integrity

Methods: Using conical correlation analysis to select independent variables and dependent metrics in avian communities.

12 independent variables to 6 (3 hydrologic, 3 vegetative)

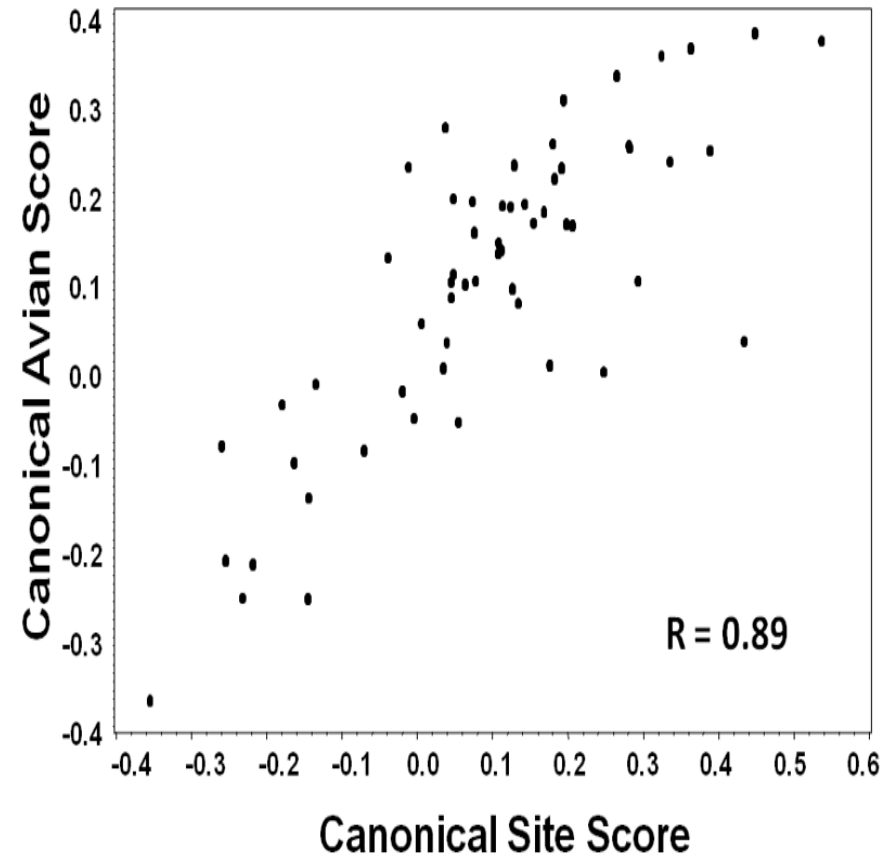
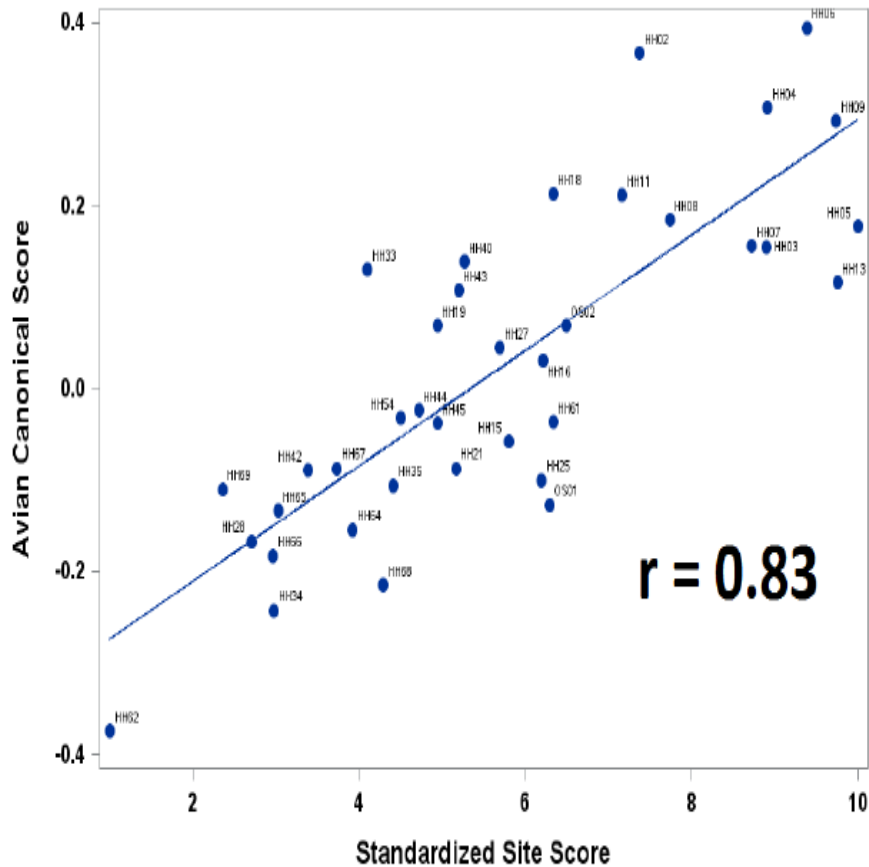
22 dependent metrics to 9 metrics of avian communities

Variable	Metric	Kootenai	Flathead
Average Water Depth		X	X
Average Flood Duration		X	X
Average Shear Stress		X	X
Percent Riparian Tree		X	X
Percent Reed Canarygrass		X	X
Percent Riparian Plants		X	X
	Hill's Diversity (N2)	X	X
	Hill's Evenness (N1/N2)	X	X
	Species Richness	X	X
	Rel. Abund. Residents	X	X
	Rel. Abund. Short Distance Migrants	X	X
	Rel. Abund. Spp Sensitive to Disturbance	X	X
	Rel. Abund. Riparian Dependent Spp.	X	X

Avian Index of Biological Integrity

Flathead

Kootenai



Three Indices Adequately Quantified Impacts in the Flathead

Analysis took two years and \$205,000

Approach is transferable and affordable



A Quick Guide to a Framework for ASSESSING OPERATIONAL LOSSES



Index of Hydrologic Alteration (IHA) 1st Order Index



Description

Quantitative index based on statistical analysis of long-term measurements of river discharge at key main-stem gaging stations.

Metrics

The IHA software (Richter 1996) calculates 33 metrics, using a PCA analysis on the historic flow data; 12 metrics explained a majority of the variation of the data.

Data and Data Sources

Time series of daily mean discharge obtained from records published by the United States Geological Survey (USGS) and the Water Survey of Canada (WSC).

**Cost \$45 K to evaluate the
Flathead Subbasin**



Lessons Learned

1. MT Wildlife Settlement worked, but used strategies not transferable to the rest of the basin (who pays and what tools).
2. Operational impacts remain unmitigated
3. Operational impacts \geq C&I impacts

Acres Impacted	Flathead Subbasin	Kootenai Subbasin
Construction & Inundation	23,750	32,950
Ongoing Operations (100-year floodplain)	45,265	43,596

Questions?

