



**Response to the  
International Joint Commission from the  
Milk River Watershed Council Canada regarding the  
Task Force Report (2006)**

**May 23, 2006**

**Introduction**

The Water Supply and Management Team, on behalf of the Milk River Watershed Council Canada, has prepared this response. We are a non-profit society and registered Watershed Planning and Advisory Council under Alberta's Water for Life Strategy. Our vision is a watershed where community well being is supported by a vibrant economy and sustained by a healthy environment that will endure as our legacy for future generations. Our goals address water supply and management, water quality, and biodiversity, among others, in the Milk River watershed. We appreciate this opportunity to provide the following comments.

**General**

The International St. Mary – Milk Rivers Administrative Measures Task Force Report to the International Joint Commission (2006) (herein referred to as the Task Force Report) is an excellent document that has illuminated the important aspects of the issues surrounding the St. Mary and Milk River apportionment. It provides a comprehensive analysis that leads to a much better understanding of those issues so that the impacts of the recommendations can be assessed for the Milk River.

The paramount issue is how to deliver more usable water to all Milk River basin users in a dry year. The domestic, municipal, industrial, agricultural and recreational water interests in the basin share a daily common bond with a supply of water. We have assessed the issue using spreadsheets provided to us by Alberta Environment. These are the same spreadsheets that provided the foundation for the tables presented in the Task Force Report.

If one looks at the flows diverted from the St. Mary during the 5 driest years during the period 1979 to 2004 (Table 1), Montana even under its historical operations received an average of 94.1 % of its entitlement. A canal of 850 cfs capacity would deliver 94.9% of

entitlements. Some graphs show Montana receiving slightly more than its entitlement in 1988. A seasonal balance period diverts 1.5% (2400 acre-feet) more water than the current 15-16 day period for a canal capacity of 650 cfs. A capacity of 850 cfs diverts only 0.65% (1032 acre-feet) more water with a seasonal balance than 850 cfs with a 15-16 day balance period.

**Table 1.** Summary of scenarios from Appendix A.

Criteria	St. Mary Diversion Volume Diverted to the Milk River			
	% of Entitlement Diverted		% of 15-16 Day Volume	
	15-16 Day Balance		Seasonal Balance	
Canal Capacity	650 cfs	850 cfs	650 cfs	850 cfs
Avg. of 5 Driest Years	94.1%	94.9%	101.5%	100.65%
Avg. of 5 Median Years	90.3%	94.5%	103.3%	101.7 %

Sal Figliuzzi tells us that had the LOI been place for all the 5 driest years, Montana would have diverted 98.4% of its entitlement.

Opting for change to a seasonal balance period in dry years has virtually no merit if a canal capacity of 850 cfs were adopted for the reconstruction. In contrast, the annual balance principle requires storage and presents very difficult technical problems for the Accredited Officers. The principle and merits of an annual balance period will be addressed later in this paper.

**Administrative Details**

Apportionment of any kind requires daily recorded supply flows, daily diverted flows to various users, an understanding of the impact of seepage/evaporation losses and a transparent calculation methodology that is not unduly complicated. The Task Force Report deals with this issue in detail and suggests measures to comply with the above. Alberta and Montana water users must rise to the same level of diversion measurement so that accurate apportionment can be provided. Apportionment can only be as accurate as the precision, timeliness and regularity of measurements provided by Alberta and Montana officials.

