



November 21, 2023

Missouri River Basin Water Management Division  
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The Izaak Walton League of America appreciates this opportunity to comment on the Draft Annual Operating Plan (AOP) for the Missouri River Mainstem Reservoir System (System). We understand that the AOP may be modified due to the runoff received.

The League commends the U.S. Army Corps of Engineers for the continuing efforts to provide the public with information about the Missouri River. This includes the AOP meetings held across the basin, and regular calls with federal and state officials, Tribal Nations, and the media. This provides the opportunity to learn about management and runoff into the system. We also encourage continued engagement with Tribes, Tribal and State Historic Preservation Officers, and the Advisory Council on Historic Preservation.

The League respectfully requests the Corps' consideration of our comments on the following topics.

### ***Recreational Access***

The Draft AOP states recreational access on the upper reservoirs is expected to be slightly below normal again in 2024. Lowered boat ramps and low water access sites constructed during recent droughts will help provide access. We urge continuation of emergency funding and collaboration with state agencies to help maintain low water ramps, remove sediment, and construct temporary roads to facilitate access. This is critically important for people to enjoy angling, hunting, camping, boating, and other recreational activities on the reservoir system.

### ***Fish Spawn***

The AOP has Lake Sakakawea favored in 2024 for the forage fish spawn if upper basin runoff does not allow rising water levels in all three of the large reservoirs. The League vigorously supports steady-to rising pool levels in Fort Peck, Sakakawea, and Oahe during the fish spawning period to increase recruitment of forage and game fish. This will help support the robust fishery and recreation industry that is a major economic engine for the region.

### ***Flood Risk Reduction***

The Draft AOP states the full flood control capacity of the reservoir system is expected to be available on March 1 for the 2024 runoff season. It's anticipated the Exclusive Flood Control Zone will not be used in any of the five runoff scenarios. We support the use of water conservation measures when, and if, needed. We urge the Corps to widely communicate that the ability to reduce peak stages on the lower river diminish the further you go downstream of

Gavins Point Dam. This is due to the time it takes for released water to move downstream and the large unregulated drainage area below Gavins Point.

### ***Monitoring Network***

The Upper Missouri River Basin Monitoring Network is in the fourth year of a multi-year implementation plan. It is expected to be completed by 2027. The network will eventually have 540 sites in Montana, North Dakota, Wyoming, South Dakota, and Nebraska. The League supports this project. We encourage the Corps to seek the funding needed to finish installation at all the sites. The network will provide information crucial for future management decisions.

### ***Climate Change***

The League encourages the Corps' Water Management office to continue its involvement with regional and national climate change teams. Information from this will be especially useful when formulating future water management plans.

### ***Storage Checks***

Water storage checks conducted on March 15 and July 1 determine flow support and the length of the navigation season. The League repeats our request that the Master Manual be updated to add more storage checks to reflect actual water in the system. The Missouri River basin is extremely dynamic. Runoff amounts can, and do, change quickly. Current and future needs of Missouri River water demand a more flexible, and more adaptive, approach than the existing two system storage checks allow.

### ***Threatened and Endangered Species***

The League supports management measures that minimize incidental take of the threatened piping plover. We encourage the Corps not to meet navigation flow targets in reaches that do not have commercial navigation.

### ***Fort Peck Test Flows***

Fort Peck test releases could be conducted in 2024 to evaluate if pallid sturgeon spawning and recruitment can be achieved in the upper Missouri River. The test flows require an elevation of at least 2,227 feet. The League supports the recovery of the upper basin pallid population. A decision on whether the flows will be conducted will be made in early April. We urge the Corps to continue working with stakeholders and the Fort Peck Tribe on this process.

### ***Fort Randall Releases***

The League supports the Corps minimizing zero releases from Fort Randall Dam. This will help protect the threatened piping plover, produce valuable aquatic invertebrates, benefit other fish and wildlife, and provide continued recreational access.

### ***Sedimentation***

Accumulating sediment is an extremely serious and decades-old dilemma for the Missouri River system. All six reservoirs are experiencing major sedimentation issues. The League supports the completion of the Lewis and Clark Lake Sediment Management Plan that the Corps is working on with the Missouri Sedimentation Action Coalition.

We ask that the Corps obtain funding needed for the studies and the development of alternatives for the accumulated sediment in this extremely popular reservoir. The Lewis and

Clark Sediment Management Plan will be a template not only for the other five Missouri River reservoirs but for more than 400 Corps projects across the country.

We urge the Corps to work with other agencies and landowners to improve land management practices. This can include buffer strips, no-till farming, cover crops, rotational grazing, and other soil health and conservation practices to reduce soil erosion along the Missouri and its tributaries.

The League also recommends the Corps include information on sedimentation in the system in all future AOPs. We believe this is a critical issue as sediment continues to accumulate and is impacting all the authorized purposes.

### ***Invasive Species***

The Draft AOP again does not make any reference to invasive species. The League again asks that the Corps include information on invasive species in the AOP and to work to increase awareness of invasive plant and animal species. Invasive species are an extremely serious threat to the future operation of the Missouri River. Zebra mussels are causing severe impacts to recreation, hydropower, and agricultural and domestic water intakes.

Invasive plant and animal species complicate current and future management and are increasing operational costs. We recommend the Corps do much more to raise public understanding of this threat and increase awareness of the three simple steps - clean, drain, and dry - that people must always do to prevent spreading invasive species in the region.

### ***Cultural and Historic Sites***

The League encourages the Corps to collaborate with the Tribes and other stakeholders to protect historic and cultural sites. Average or below average reservoir pool levels can impact shoreline sites. We support actions to avoid, minimize, or mitigate adverse impacts to these significant locations.

### ***Summary***

As we approach the 2024 runoff season, we recognize management of the Missouri River Reservoir System will be done according to actual runoff received. The Izaak Walton League of America thanks you for this opportunity to comment on the 2024 Draft Annual Operating Plan for the Missouri River Mainstem System and for your time and consideration.

Sincerely,



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