



November 23, 2022

Missouri River Basin Water Management Division
John Remus Chief, Missouri River Basin Water Management
1616 Capitol Avenue, Suite 365
Omaha, NE 68102-4909

Dear Mr. Remus,

The Izaak Walton League of America appreciates the opportunity to comment on the Draft Missouri River Mainstem System 2022-2023 Annual Operating Plan (AOP). The League has over 40,000 members in more than 200 chapters across the country. Our members enjoy angling, hunting, boating, and camping along the Missouri River. After reviewing the draft, the League respectfully requests your consideration of the following topics:

Recreational Access

Recreation on the Missouri River is a major economic driver for the region and the nation. Low reservoir levels caused considerable issues in 2022. The Corps and state agencies did a commendable job, utilizing emergency funding, to sustain recreational access with many temporary low-water sites and needed road projects, especially on Oahe and Fort Peck. However, if the drought and declining pool levels persist into 2023, more funding will be required for low-water access, as additional boat ramps go out of service.

Siltation is causing major problems at access sites and low levels are further exacerbating this situation. We ask the Corps to continue efforts with state agencies to remove accumulated silt and maintain recreational access for the recreation and tourism industries.

Fish Production

The draft AOP states the Corps will try to maintain Fort Peck, Sakakawea, and Oahe at stable or rising levels next spring to facilitate forage and game fish production. If 2023 runoff is low, the draft says management would favor rising Fort Peck and Oahe.

The League requests the draft AOP be corrected, on page 17 (or 23 of 62). We request the AOP clearly state Fort Peck and Oahe will be favored for a rise next spring. The draft references an “attempt to maintain a rising Garrison pool.” We ask that this be changed to reflect that Fort Peck and Oahe will be favored in 2023 if adequate runoff exists.

The League encourages the Corps to provide steady or rising levels in all three of the large reservoirs during the forage and gamefish spawn. We support the rotation of rises between the big three reservoirs to increase successful forage and game fish reproduction.

Research shows recreational spending on the Missouri River reservoirs is linked to angler success. Healthy forage and game fish populations are crucial for both resident and nonresident spending and visitor satisfaction throughout the basin.

Sedimentation

As stated in our access comments accumulating sediment in the reservoirs is an extremely serious and decades-old dilemma. All six reservoirs are experiencing major sedimentation issues. The White River's impact on Lake Francis Case and the enormous sedimentation issues on Lewis and Clark Lake, from the Niobrara River, demand the most immediate action.

The League supports completion of the Lewis and Clark Lake Sediment Management Plan the Corps is working on with the Missouri Sedimentation Action Coalition (MSAC). We urge the Corps to seek the funding needed for the studies and development of alternatives to deal with accumulated sediment in this popular reservoir. The Lewis and Clark Sediment Management Plan will serve as a template not only for the other Missouri River reservoirs but for the more than 400 Corps projects across the country.

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

The League also requests the Corps annually include updated information on sedimentation in all future AOPs. We believe this is a critical need. Sediment continues to accumulate, and it is impacting all eight authorized purposes.

Flood Risk Reduction

The draft AOP states flood risk reduction is the only authorized purpose requiring empty reservoir space. The seven remaining purposes all need abundant stored water. The League asks the Corps to clearly communicate that local heavy rains can cause flooding at any time with little or no notice. Additionally, we urge the Corps to clearly communicate that the ability to reduce stages on the lower river diminishes downstream from the reservoir system. This is due to the large uncontrolled drainage area and the time it takes water to travel from Gavins Point Dam.

Water Supply and Quality

Previous low water levels in the early 2000s brought supply and quality issues for water intakes. If this drought continues or worsens, water supply and water quality issues may exist in both river and reservoir intakes. We encourage the Corps to work with Tribal and other entities to monitor intakes to ensure effective operation and delivery of high-quality water for basin residents.

Navigation

The League supports the draft AOP's stated water conservation measures to provide navigation flow support only to reaches with commercial traffic. This will conserve water, reduce flood risk, and decrease incidental take of the threatened piping plover below Garrison and Gavins Point.

System Storage Checks

Once again the League requests additional system storage checks be authorized and conducted. The amount of water stored in the reservoir system is officially checked only three times a year. Checks on March 15 and July 1 determine flow support and the length of the navigation season. A September 1 storage check determines the winter release rate.

We believe three storage checks isn't adequate for a basin this dynamic. Basin conditions can, and do, change rapidly - from wet to dry - and dry to wet. Basin residents need management and operation that reflects the actual amount of water in the system, not what was predicted months

prior. We again ask for additional system storage checks to better serve all the needs of the entire system.

Threatened and Endangered Species

The draft AOP states Fort Peck test releases, to benefit the pallid sturgeon, will not be conducted in 2023 due to the low level of Fort Peck. While we support attempts to recover the pallid in both the upper and lower basin, the League agrees with this decision given the extreme drought we are facing.

The Gavins Point Dam peaking cycle with two days of lower releases followed by a day of a higher release is done to minimize incidental take of the piping plover. With the extreme drought we ask that this practice be reevaluated to help conserve water.

Missouri River Basin Monitoring Network

The League urges the Corps to secure the funding to complete and maintain the 540 sites of the Basin Monitoring Network in Montana, Wyoming, South Dakota, North Dakota, and Nebraska. These sites will provide crucial data needed to estimate annual runoff and will be a valuable tool for future AOPs. We encourage including updates of this network in upcoming AOPs and how data obtained from this system will be incorporated.

Climate Change

The League is genuinely concerned about climate change and its impacts. Climate models show amounts and types of precipitation may shift in the basin. Areas may get more rain than snow and warmer winter temperatures could lead to earlier thaws. We ask the Corps to consider if an adjustment to the March 1 spring runoff date, and the first system storage check be moved earlier in the year to accurately reflect upcoming climatic conditions.

Invasive Species

The draft AOP does not reference invasive species. The League encourages the Corps to increase public awareness of invasive plant and animal species and the serious threat they pose to the health of the Missouri River. Zebra mussels are causing severe impacts to recreation, power generation, and agricultural and domestic water intakes. Invasive plant and animal species complicate current and future management and raise operational costs. We ask that much more be done to raise public awareness to this threat and to the three simple steps people must take to prevent spreading these species to other waters within the region.

Cultural and Historic Sites

The League supports minimizing impacts to cultural resources and historic sites. The draft AOP states reservoir pool levels may remain below average which increases chances of damage to these valuable and important locations. We urge the Corps to continue collaborating with Tribes, states, and other entities on methods to protect these locations.

Fort Randall Releases

We commend the Corps for minimizing zero releases from Fort Randall Dam. A shut-down of this dam impacts fish and wildlife and recreational access. We urge the continuation of this practice as much as possible.

Summary

With the approach of the 2023 runoff season, the League recognizes regulation of the Missouri River Reservoir System will be conducted according to runoff received. We commend the Corps for the increased level of communication with Tribes, stakeholders, and local governments so basin residents are aware of planned management actions.

The Izaak Walton League of America appreciates this opportunity to comment on the 2022-2023 Draft Annual Operating Plan for the Missouri River Mainstem System and for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Lepisto".

Paul Lepisto
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