



April 4, 2024

Missouri River Basin Water Management Division
1616 Capitol Avenue, Suite 365
Omaha, Nebraska 68102-4909

The Izaak Walton League of America appreciates the opportunity to comment on the 2024 planned operation of the Missouri River Mainstem Reservoir System. We understand that the actual operation may be modified due to the runoff received.

First, the League acknowledges the U.S. Army Corps of Engineers ongoing efforts to provide updated information about the Missouri River and runoff into the system. This includes the bi-annual AOP meetings held across the basin. Thank you for holding the meeting in Fort Pierre on March 27.

We applaud the Corps for conducting the regular calls with federal and state officials, Tribal Nations, and the media. We also encourage your continued engagement with Tribes, Tribal and State Historic Preservation Officers, and the Advisory Council on Historic Preservation.

The League respectfully requests consideration of our comments on these topics.

Recreational Access

According to information at the spring meeting, recreational access on the upper reservoirs may be challenging in some locations again this year. Low water sites previously constructed for low water periods will help, but we urge continued emergency funding and full cooperation with the states to maintain access sites.

This effort should include removing sediment from ramps and help in constructing temporary roads to allow adequate recreational access. Access is critically important for people to enjoy angling, hunting, camping, boating, and other recreational activities that annually provide millions of dollars in economic input from the reservoir system.

Fish Spawning

In 2024 Lake Sakakawea is favored for forage and game fish spawning if upper basin runoff does not allow rising water levels in all three of the large reservoirs. The League supports steadily rising levels in the big three reservoirs during the spawn. Steady or rising pool levels increases recruitment of forage and game fish if sufficient runoff is available.

Rising water levels during the spawn supports the robust fishery and recreation industry, a major economic engine for the region. We also support the monitoring of cold-water habitat in big three reservoirs this summer when we're under low water conditions.

Water Conservation Measures

The League supports continuing the current water conservation measures. If the preliminary runoff forecast holds, and system storage has already peaked this year, it's imperative that conservation measures are implemented to keep water in the reservoir system for the future needs of all the authorized purposes. We encourage the Corps not to meet navigation flow targets in reaches that do not have commercial navigation traffic.

Fort Peck Test Flows

The first Fort Peck test release is scheduled to be conducted this year. The test flow will be evaluated to see if it triggers pallid sturgeon spawning below Fort Peck Dam and helps pallid recruitment in the upper Missouri River. The test flows require a Fort Peck elevation of at least 2,227 feet. There could be enough water for the April test flow. The second release, scheduled in June, is uncertain due to the low levels of Fort Peck Lake.

The League supports recovering the upper basin pallid population. A decision on whether both test flows will be conducted will be made later this spring. We urge the Corps to continue its work with area stakeholders and the Fort Peck Tribe on this process.

We support monitoring of dam safety, water quality, and potential impacts to cultural resources during and following the release and tracking pallid response to the flow. We commend the Corps for scheduling weekly updates for stakeholders during the test flow.

Fort Randall Releases

The League was pleased to hear the Corps will again try to minimize 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 access in that reach.

Sedimentation

All six Missouri River reservoirs are experiencing major sedimentation issues. The League urges the completion of the Lewis and Clark Lake Sediment Management Plan being developed by the Corps and the Missouri Sedimentation Action Coalition.

We ask for support of the funding needed to complete the pilot study of the bedload collector on the Niobrara River scheduled this summer. We also support funding of the development of alternatives in Phase 3 of the plan. When completed, the Lewis and Clark Sediment Management Plan will serve as a template, not only for the Missouri River reservoirs but, for more than 400 Corps projects across the country.

Climate Change

The League encourages the Corps' Water Management office to continue its involvement with regional and national climate change teams. New climate information will be beneficial when formulating future water management plans and developing annual runoff forecasts.

Invasive Species

The League again asks the Corps to help increase public awareness of invasive plant and animal species in the Missouri River. Invasive species are a serious threat to the future operation of the river. Zebra mussels are already causing severe impacts to recreation, hydropower, water intakes and operational costs. We ask the Corps to help raise awareness of this threat and what people must always do; clean, drain and dry, to prevent the spread of invasive species.

Cultural and Historic Sites

The League encourages the Corps to collaborate with Tribes and other stakeholders to protect historic and cultural sites along the river. Low pool levels impacts shoreline sites. We support actions that avoid, minimize, or mitigate adverse impacts to these locations.

Summary

The Izaak Walton League of America thanks you for this opportunity to comment on the 2024 operation of the Missouri River Mainstem Reservoir System and for your time and consideration.

Sincerely,



Paul Lepisto

Regional Conservation Coordinator

Izaak Walton League of America

1115 South Cleveland Avenue

Pierre, SD 57501-4456

plepisto@iwla.org

605-220-1219