



Steve Moyer

Vice President of Government Affairs

July 27, 2018

Colonel Christopher A. Hussin
Commander and District Engineer, Tulsa District
United States Army Corps of Engineers
2488 E 81st Street
Tulsa, OK 74137

RE: Adequate Fishery Flows for the Illinois River below Tenkiller Dam

Dear Colonel Hussin,

Trout Unlimited (TU) is the nation's largest coldwater conservation organization with over 300,000 members and supporters nationwide. In Oklahoma, TU has over a thousand members many of which call the Illinois River their "home water" and spend a significant amount of their recreational efforts plying the stretch below Tenkiller Dam for trout. Our members have advocated for improved flows and fisheries below the dam for many years. We are extremely concerned not only about current river conditions but also the long-term health of this important regional tailwater fishery.

In recent years, flows through the trout fishery reach below Tenkiller Dam and Lake Tenkiller in Eastern Oklahoma have diminished, and the fishery has consequently suffered, due to water quality, temperature and flow conditions. The primary causes of diminished flows downstream of Tenkiller Lake are related to traditional reservoir operations including flood control rule curves, hydro production, and to sluice gate seal repairs, which have resulted in diminished leakage. Releases continue to be inadequate to support the downstream fishery at the desired level during certain times of year resulting in fish kills.

Following a notable fish kill in 2011, there has been limited action to address water quantity and quality issues. In fact, the Illinois River continues to be a federal Clean Water Act 303(d) water quality limited river section below the dam, putting at risk not only trout but also the wild striped bass fishery and Oklahoma native fish like the spoonbill.

TU understands that Tenkiller Dam is primarily operated for power production and flood control. However, the Dam and concomitant storage is congressionally authorized for flood control, water supply, hydropower, recreation, AND fish and wildlife purposes. The conservation pool has been fully allocated to water supply and hydropower. All of Tenkiller Lake's Conservation Pool storage has been contracted and committed to various municipal and industrial water users, including communities, rural water districts, hydropower and other industrial uses. Because of a lack of foresight there is no storage allocation or contract for purposes of recreation, fish and wildlife.

A mission to conserve, protect, & restore North America's coldwater fisheries and their watersheds.

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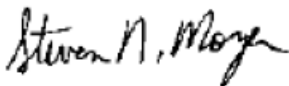
TU would like to engage stakeholders, especially the United States Corp of Engineers (USCOE), about potential operational flexibility to provide some modicum of security for the fishery below the dam. The timing for such deliberations is especially ripe and critical because some storage contract water previously held by Sequoyah Fuels was utilized in recent years for releases downstream of the dam have now been reallocated and won't be available. Those releases contributed to the fishery in the lower Illinois River. Based on the impending fate of the water formerly contracted by Sequoyah Fuel, this water will not be available for downstream releases in the future.

TU would like to specifically request that the Corps of Engineers consider a range of alternatives to allocate a portion of the conservation pool water for downstream fish and /wildlife purposes as authorized in the Congressional authorizing legislation. Rapid action is needed on this task. Because recreation, fish and wildlife are included in the list of congressionally authorized purposes for Tenkiller Lake, and because the required magnitude of the reallocation would likely be small in comparison to the total reservoir size, the decision to allocate water probably could be made by the Corps without explicit congressional action. One potential scenario involves the USCOE taking a seasonal pool approach where conservation water could be stored in the winter and then delivered downstream during critical summer time periods when both flow quantity and quality has been historically compromised.

We would like to work closer with the Tenkiller Lake and Tulsa District offices of the Corps regarding practical aspects of managing Tenkiller Lake in ways that would improve the downstream fishery under the existing Congressional Authorization for fish, wildlife and recreational purposes. These possibilities would include contracting directly for storage pool supplies for downstream fish, wildlife and recreation, potential multi-purpose reservoir operation requirements for new water storage contracts, changes in flood pool and hydropower operations, and possible increased operational efficiencies among storage pool users - all of which might lead to improved downstream conditions. We urge you to include the appropriate Oklahoma state resource agencies and Trout Unlimited, along with other stakeholders, in exploring these possibilities.

We look forward to following up with you and other stakeholders like the Southwest Power Administration regarding the importance of these Tenkiller Dam operational changes. The Illinois River is a significant and diverse regional fishery resource that could provide additional and sustainable local economic benefits.

Sincerely,

A handwritten signature in black ink that reads "Steven N. Moyer". The signature is written in a cursive style with a large, stylized 'S' and 'M'.

Steve Moyer

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