



Steve Davies
Area Manager
Bureau of Reclamation
Montana Area Office
PO Box 30137
Billings, MT 59107

Date: April 11, 2017

Cc: Clayton Jordan

Dear Steve:

Over the course of the last ten years, the Montana Area Office of the Bureau of Reclamation (BOR), on recommendations by the National Park Service's Bighorn Canyon National Recreation Area, has significantly altered its water management practices with regards to Bighorn Lake and Yellowtail Dam in order to provide more favorable lake elevations to a small number of lake users in Wyoming to the detriment of Montana lake and river users. By establishing new operating criteria that reduces available storage during key times of the year, BOR has negatively impacted one of the world's premier blue-ribbon trout fisheries and recreation destinations. Shortly after implementing the new operating criteria, then Area Manager Dan Jewell stated publicly during a stakeholder conference call in 2008 that he was now "managing the reservoir for a twenty foot window". Since that time, the river has evolved from a relatively normal annual hydrograph to months and months of minimal or sub-minimal flows followed by periods of tremendously high and often damaging releases, sometimes in normal water years. In 2008, one of such normal water year, inadequate runoff storage led to extremely high flows and flooding and, making matters worse, leading to the loss of two million dollars in hydropower revenues.

The Bighorn River Alliance continues to take issue with the current water management policies of the Bureau of Reclamation Montana Area Office regarding releases from Yellowtail Dam into the Bighorn River. The Bureau's current operating criteria unfairly advocates for lake recreation at the south end of Bighorn Lake while disregarding river recreation below Yellowtail. The current operating criteria has compromised the Bureau's capability to effectively administer the reservoir for flood control and, at times, hydropower generation. These overly conservative water management practices continue to jeopardize public safety, recreational opportunities and economics for Bighorn River users and stakeholders below Afterbay Dam. During the last ten years since implementation of the operating criteria, inadequate storage in the reservoir has forced higher than normal releases causing excessive downstream erosion of river banks seriously affecting the agricultural community and negatively impacting the river economy and recreation.

As evidence of this, eight of the last ten years have resulted in sustained releases over 7,000cfs. One would have to look at the prior 24 years to see that happen again. Seven of the last ten years have resulted in sustained releases over 8,000cfs. One would have to look at the prior 29 years to see that happen again. Finally, six of the last 10 years have resulted in sustained releases at or above 10,000cfs. One would have to look at the prior 37 years (almost as far back to the year the dam was closed) to see that happen again.

The Bighorn River Alliance urgently requests that Reclamation acknowledge the need to return operations to a point more in line with the previous operating criteria and 1) immediately start managing the entire reservoir, rather than the upper 20 feet; 2) manage the reservoir to provide a better balance of benefits for all of its stakeholders rather than primarily those lake users at the southern end of Bighorn Lake; 3) establish better coordination and cooperation with the Wyoming Area Office; and 4) immediately outline steps it is taking to research and implements these new policies.

We appreciate the hard work and dedication of the Bureau of Reclamation, and recognize managing for multiple uses that are often in direct opposition to the wishes of Mother Nature is difficult. Nevertheless, we genuinely feel BOR intentionally favors lake interests in the Wyoming over river interests in Montana, despite the overwhelming disparity in number of users, economics, accessibility and most importantly long-term viability.

We desire your initial response to our request at our meeting on April 19th in Ft. Smith. We will not entertain pushing off discussion of this request until the fall of this year. We recognize you are busy, especially this time of year, but please know that we are busy too. This is extremely important to the Alliance, its members and partner organizations, landowners, stakeholders, outfitters, guides and anglers, and we hope this request can be dealt with quickly at the MTAO level.

Sincerely,

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