



March 22, 2023

VIA ELECTRONIC FILING

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NW
Washington, DC 20426

**Re: Pensacola Hydroelectric Project (FERC No. 1494-438)
Request for Extension of Time to File Additional Information**

Dear Secretary Bose:

On March 14, 2023, Federal Energy Regulatory Commission (Commission or FERC) staff issued its Determination on Requests for Study Modifications and New Studies (Determination) for the Grand River Dam Authority's (GRDA) Pensacola Hydroelectric Project, FERC No. 1494 (Project).¹ FERC staff's Determination provides that GRDA is to complete additional runs of its Hydrologic and Hydraulic (H&H) Modeling Study and its Sediment Transport Modeling (STM) Study, and use those results to respond to staff's Determination within 30 days, or by Thursday, April 13, 2023.

After reviewing the information requested in the Determination, GRDA's technical consultants determined that they need significantly more time to develop the information requested in the Determination. For the good cause demonstrated herein,² GRDA respectfully requests an additional 100 days to respond to staff's Determination, so that it would file its response by Monday, July 24, 2023.

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¹ Determination on Requests for Study Modifications and New Studies for the Pensacola Hydroelectric Project, Project No. 1494-438 (issued Mar. 14, 2023) [hereinafter, Determination].

² 18 C.F.R. §§ 5.29(f)(2), 385.2008.

a. H&H Modeling

The Determination requested GRDA to conduct additional modeling runs for the “extreme” circumstance in which the U.S. Army Corps of Engineers (“Corps”) would deviate from its Water Control Manual, such that “the initial starting elevation remains steady until the arrival of flood flows as recommended by the City [of Miami],” i.e., until the flood flows reach Pensacola Dam.³ The Commission’s study plan determinations throughout this relicensing effort have directed GRDA to utilize the Corps’ RiverWare model. Therefore, GRDA’s Flood Routing Model (FRM) and Operations Model (OM) were never constructed to deviate so dramatically from predicted Corps operations, which are prescribed by its 1992 Updated Water Control Manual. Rather, the FRM and OM were developed with the goal of validating them against the Corp’s RiverWare model, as required by the Commission. For this reason, GRDA will need to re-architect the FRM and OM to meet the requirements of Commission staff’s Determination. This will require GRDA to complete the OM simulations, then post-process the OM results for input into HEC-RAS. The estimated time to complete this work is 20 working days.

The Upstream Hydraulic Model (UHM) simulation times, while less than the Sediment Transport Model (STM) simulation times discussed below, are substantial. A single simulation takes anywhere from one to four hours to complete. Assuming an average run time of two hours, running the first iteration of operation alternatives will take over 140 hours, or nearly 18 working days. Moreover, each simulation will need to be run twice, which is the bare minimum needed for troubleshooting, requiring a total of 36 working days for simulations. Mead & Hunt, GRDA’s technical consultant, intends to use parallel computing to the extent possible, but completing the work required by FERC’s Determination will still require significant monitoring and effort by the modeling team.

Finally, post-processing the Hydrologic Engineering Center’s River Analysis System (HEC-RAS) results for presentation and analysis will take a substantial amount of time. For example, over 9,300 individual hydrographs must be extracted from the simulations, imported into Excel for analysis, and checked. This process was performed in support of the USR and must be performed again to address Commission staff’s request in the Determination. The estimated time to complete this work is 10 working days.

After HEC-RAS results are post-processed, exported, and checked, Mead & Hunt will develop new report materials, including new figures, new report text, and new report appendices. The report appendices, in particular, will take a substantial amount of time to create. Following development of all relevant materials, Mead & Hunt will develop a draft report and begin coordination with GRDA to ensure the materials meet GRDA’s standards. This will include multiple rounds of review

³ Determination at B-2.

and final technical editing of all documentation. The estimated time to complete this work is 22 working days.

In total, GRDA estimates that responding to the additional information requested by Commission staff associated with the H&H modeling work will require approximately 88 working days, which do not include weekends and holidays. Based on this calculation and using the day after Commission staff's issuance of the Determination as day 1, GRDA anticipates that it can complete this effort by approximately July 18, 2023. The request to extend the deadline until July 24, 2023, provides some buffer time to address unforeseen circumstances that may arise.

b. STM Modeling

The Determination requested GRDA to “revise the downstream boundary condition for Tar Creek at the Neosho River confluence to reflect a flatter friction slope (if normal depth is used) or use a different downstream boundary condition, as appropriate.”⁴ Completing this request will require modification of the model, simulation of the system, post-processing of the results, and evaluation of the efficacy of the changes to address water level differences at the Tar Creek and Neosho River confluence. This process may require several iterations to adequately address concerns at the confluence, evaluating several potential solutions. During this process, it is also possible that changes to the STM will cause instabilities, leading to model crashes and a need for evaluation of the issue, correction, and re-running the model.

The requested modifications cannot be completed in 30 days because the STM requires significant time to run. A stable simulation of a 50-year period takes between 12 and 20 hours of computation time, followed by additional time to process the results and determine whether iterative simulations using the OM are required. In the study as presented in the September 2022 USR, the STM simulated a 50-year period, results were processed, stage-storage curves were provided to the OM, and the OM provided new water level inputs for the STM. The STM was then re-run with the updated water levels, outputs were processed, and predicted geometry was provided for simulation in the 1D UHM. After simulating the July 2007 and 100-year events at multiple starting reservoir pool levels, those outputs were then processed and reported. This is a multi-day process that may be required for each of the four scenarios presented in the USR.

GRDA's consultant, AnchorQEA, assumes that each simulation will be run twice to account for troubleshooting. When revision of the Tar Creek confluence, testing, troubleshooting, and final simulation time are all considered, this work will require approximately 53 working days. Anchor QEA and the sediment team intend to use parallel computing to the extent possible, but

⁴ *Id.* at B-11.

completing the work required by FERC's Determination will still require significant monitoring and effort by the modeling team.

Post-processing the data will also be a time-intensive process. For each scenario, several figures and tables must be produced to show, for example, water level outputs and sedimentation profiles. Stage-storage curves will be re-computed for each STM scenario, and OM water level predictions need to be provided in a format suitable for STM inputs. STM geometry file outputs will be reviewed, and the geometry will then be incorporated into the 1D UHM for further analysis. Water level outputs from the 1D UHM then will be converted to water surface profile plots for inclusion in the updated report. Each of these outputs must be reviewed for accuracy and properly formatted for inclusion in the updated report materials. The estimated time to complete this work is 10 working days.

Following development of all relevant materials, the sediment team will develop a draft report and begin coordination with GRDA to ensure the materials meet GRDA's standards. This will include multiple rounds of review and final technical editing of all documentation. The estimated time to complete this work is 22 working days.

In total, GRDA estimates that that responding to the additional information requested by Commission staff associated with the STM model will require approximately 85 working days. Based on this calculation and using the day after Commission staff's issuance of the Determination as day 1, GRDA anticipates that it can complete this effort by approximately July 13, 2023. The request to extend the deadline until July 24, 2023, provides some buffer time to address unforeseen circumstances that may arise.

c. Conclusion

GRDA appreciates the Commission's consideration of this request. If you have any questions or comments regarding this submittal, please contact me at 918-981-8473 or at brian.edwards@grda.com.

Sincerely,



Brian N. Edwards
Executive Vice President
Grand River Dam Authority

Cc: Distribution List (see attached)

Stakeholder Distribution List

March 2023

* Denotes correspondence was mailed to relicensing participants without a known email address.

Federal Agencies:

Dr. John Eddins
Advisory Council on Historic Preservation
Federal Permitting, Licensing and
Assistance Section
401 F Street NW, Suite 308
Washington DC 20001-2637
jeddins@achp.gov

Mr. Andrew Commer, Chief
U.S. Army Corps of Engineers, Tulsa
District
Attn: CESWT-RO (Regulatory Office)
2488 East 81st Street
Tulsa, OK 74137
Andrew.Commer@usace.army.mil

Ms. Loretta Turner
U.S. Army Corps of Engineers
288 East 81st Street
Tulsa, OK 74137
loretta.j.turner@usace.army.mil

Ms. Jennifer Aranda
U.S. Army Corps of Engineers
2488 East 81st Street
Tulsa, OK 74137
jennifer.a.aranda@usace.army.mil

Mr. William Chatron
U.S. Army Corps of Engineers
2488 East 81st Street
Tulsa, OK 74137
william.a.chatron@usace.army.mil

Mr. Scott Henderson
U.S. Army Corps of Engineers
2488 East 81st Street
Tulsa, OK 74137
scott.a.henderson@usace.army.mil

Ms. Dawn Rice
U.S. Army Corps of Engineers
2488 East 81st Street
Tulsa, OK 74137
dawn.rice@usace.army.mil

Mr. Terry Rupe
U.S. Army Corps of Engineers
2488 East 81st Street
Tulsa, OK 74137
terry.d.rupe@usace.army.mil

Mr. David Williams
U.S. Army Corps of Engineers
2488 East 81st Street
Tulsa, OK 74137
david.j.williams@usace.army.mil

Ms. Eva Zaki-Dellitt
U.S. Army Corps of Engineers (Regulatory
Office)
2488 East 81st Street
Tulsa, OK 74137
eva.a.zaki-dellitt@usace.army.mil

Mr. Eddie Streater
Regional Director
U.S. Bureau of Indian Affairs
Eastern Oklahoma Regional Office
PO Box 8002
Muskogee, OK 74401-6206
eddie.streater@bia.gov

Mr. Mosby Halterman
Division Chief
U.S. Bureau of Indian Affairs
PO Box 8002
Muskogee, OK 74401
mosby.halterman@bia.gov

Ms. Allison Ross
Environmental Protection Specialist
U.S. Bureau of Indian Affairs
Eastern Regional Office
PO Box 8002
Muskogee, OK 74401
allison.ross@bia.gov

Mr. Harold Peterson
U.S. Bureau of Indian Affairs
Central Office
545 Marriot Drive, Suite 700
Nashville, TN 37214
harold.peterson@bia.gov

Mr. William Brant
Regional Archaeologist
U.S. Bureau of Indian Affairs
Eastern Regional Office
PO Box 8002
Muskogee, OK 74401
william.brant@bia.gov

Ms. Lisa Atwell
U.S. Bureau of Indian Affairs
Eastern Regional Office
PO Box 8002
Muskogee, OK 74401
lisa.atwell@bia.gov

Mr. James Schock
Regional Director
U.S. Bureau of Indian Affairs
Southern Plains Office
PO Box 368
Anadarko, OK 73005
james.schock@bia.gov

Ms. Crystal Keys
Water Program Manager
U.S. Bureau of Indian Affairs
Southern Plains Office
PO Box 368
Anadarko, OK 73005
crystal.keys@bia.gov

Mr. John Worthington
Natural Resources Officer
U.S. Bureau of Indian Affairs
Southern Plains Regional Office
PO Box 368
Anadarko, OK 73005
john.worthington@bia.gov

Mr. Robert Pawelek
Field Manager
U.S. Bureau of Land Management
Oklahoma Field Office
201 Stephenson Parkway, Suite 1200
Norman, OK 73072
rpawelek@blm.gov
blm_nm_comments@blm.gov

U.S. Department of the Army *
1645 Randolph Road
Fort Sill, OK 73503

Mr. Conor Cleary
Field Solicitor
U.S. Department of the Interior
Tulsa's Field Office of the Solicitor
7906 East 33rd Street, Suite 100
Tulsa, OK 74145
conor.cleary@sol.doi.gov

Ms. Valery Giebel
Attorney
Tulsa Field Solicitor's Office
U.S. Department of the Interior
P.O. Box. 470330
Tulsa, Oklahoma 74147
valery.giebel@sol.doi.gov

Ms. Kimeka Price
NEPA Project Manager
U S Environmental Protection Agency
Region 6
Fountain Place
1201 Elm Street
Dallas, TX 75202-2760
price.kimeka@epa.gov

Mr. Ken Collins
U.S. Fish and Wildlife Service
9014 E 21st Street
Tulsa, OK 74129-1428
ken_collins@fws.gov

Mr. Daniel Fenner
U.S. Fish and Wildlife Service
9014 E 21st Street
Tulsa, OK 74129-1428
daniel_fenner@fws.gov

Mr. Kevin Stubbs
U.S. Fish and Wildlife Service
9014 E 21st Street
Tulsa, OK 74129-1428
kevin_stubbs@fws.gov

Chief Vicki Christiansen
U.S. Forest Service
1400 Independence Avenue, SW
Washington, DC 20250
vcchristiansen@fs.fed.us

Jason Lewis, Director
U.S. Geological Survey
Oklahoma Water Science Center
202 NW 66th Street, Building 7
Oklahoma City, OK 73116
jmlewis@usgs.gov

Acting Chief Terry Cosby
U.S. Natural Resources Conservation
Service
1400 Independence Avenue, SW Room
5744-S
Washington DC 20250
Terry.cosby@usda.gov

Mike Reynolds
Regional Director
National Park Service
12795 Alameda Parkway
Denver, CO 80225
IMRextrev@nps.gov

Ms. Nicole McGavock
National Weather Service
Tulsa, OK Weather Forecast Office
10159 E 11th Street, Suite 300
Tulsa, OK 74128
nicole.mcgavock@noaa.gov

Mr. James Paul
National Weather Service
Tulsa, OK Weather Forecast Office
10159 E 11th Street Suite 300
Tulsa, OK 74137
james.paul@noaa.gov

Tyler Gipson
Southwestern Power Administration
1 W 3rd Street, Suite 1600
Tulsa OK 74103
tyler.gipson@swpa.gov

William Hiller
Southwestern Power Administration
1 W 3rd Street, Suite 1600
Tulsa OK 74103
william.hiller@swpa.gov

State Agencies:

Dr. Kary Stackelbeck
State Archeologist
Oklahoma Archeological Survey
University of Oklahoma
111 East Chesapeake Street, Room 102
Norman, OK 73019-5111
kstackelbeck@ou.edu

Mr. Scott Mueller
Secretary of Commerce and Workforce
Development
Oklahoma Department of Commerce
900 North Stiles Avenue
Oklahoma City, OK 73104
scott.mueller@okcommerce.gov

Mr. Brooks Tramell
Director of Monitoring, Assessment &
Wetlands
Oklahoma Conservation Commission
2800 North Lincoln Boulevard, Suite 200
Oklahoma City, OK 73105
brooks.tramell@conservation.ok.gov

Ms. Shanon Phillips
Director of Water Quality Division
Oklahoma Conservation Commission
2800 North Lincoln Boulevard, Suite 200
Oklahoma City, OK 73105
shanon.phillips@conservation.ok.gov

Chairman Todd Hiatt
Director of Administration
Oklahoma Corporation Commission
2101 North Lincoln Boulevard
Oklahoma City, OK 73105
contacttoddhiatt@occ.ok.gov
jana.slatton@occ.ok.gov

Mr. Blayne Arthur
Commissioner
Oklahoma Department of Agriculture
Food and Forestry
2800 North Lincoln Boulevard, Suite 100
Oklahoma City, OK 73105
blayne.arthur@ag.ok.gov

Mr. Joe Long
Environmental Programs Manager
Watershed Planning Section
Oklahoma Department of Environmental
Quality
PO Box 1677
Oklahoma City, OK 73101-1677
joe.long@deq.ok.gov

Ms. Elena Jigoulina
Environmental Programs Specialist
Oklahoma Department of Environmental
Quality
PO Box 1677
Oklahoma City, OK 73101-1677
elena.jigoulina@deq.ok.gov

Mark Gower
Oklahoma Office of Emergency
Management
PO Box 53365
Oklahoma City, OK 73152-3365
mark.gower@oem.ok.gov

Commissioner Lance Frye*
Oklahoma Department of Health
1000 NE 10th Street
Oklahoma City, OK 73117

Mr. Tim Gatz
Executive Director
Oklahoma Department of Transportation
200 NE 21st Street
Oklahoma City, OK 73105
tgatz@odot.org

Mr. Jerry Winchester
Executive Director
Oklahoma Tourism and Recreation
Department
900 North Stiles Avenue
Oklahoma City, OK 73104
jerry.winchester@travelOK.com

Ms. Kris Marek
State Parks and Resorts
Oklahoma Tourism and Recreation
Department
900 North Stiles Avenue
Oklahoma City, OK 73104
kris.marek@travelOK.com

Mr. JD Strong
Director
Oklahoma Department of Wildlife
Conservation
PO Box 53465
Oklahoma City, OK 73152
jd.strong@odwc.ok.gov

Mr. Wade Free
Assistant Director
Oklahoma Department of Wildlife
Conservation
PO Box 53465
Oklahoma City, OK 73152
wade.free@odwc.ok.gov

Mr. Josh Johnston
NE Region Fisheries Supervisor
Oklahoma Department of Wildlife
Conservation
PO Box 1201
Jenks, OK 74037
josh.johnston@odwc.ok.gov

Mr. Josh Richardson
Wildlife Biologist
Oklahoma Department of Wildlife
Conservation
PO Box 53465
Oklahoma City, OK 73152
josh.richardson@odwc.ok.gov

Mr. Bill Dinkines
Chief of Wildlife Division
Oklahoma Department of Wildlife
Conservation
PO Box 53465
Oklahoma City, OK 73152
bill.dinkines@odwc.ok.gov

Mr. Brad Johnston
Fisheries Biologist
Oklahoma Department of Wildlife
Conservation
61091 E 120 Road
Miami, OK 74354
brad.johnston@odwc.ok.gov

Mr. Ken Cunningham
Chief of Fisheries
Oklahoma Department of Wildlife
Conservation
PO Box 53465
Oklahoma City, OK 73152
kenneth.cunningham@odwc.ok.gov

Richard Snow
Assistant Chief of Fisheries Division
Oklahoma Department of Wildlife
Conservation
PO Box 53465
Oklahoma City, OK 73152
richard.snow@odwc.ok.gov

Mr. Mike Plunkett
NE Region Wildlife Supervisor
Oklahoma Department of Wildlife
Conservation
9097 N 34th Street West
Porter, OK 74454
mike.plunkett@odwc.ok.gov

Ms. Lynda Ozan
Deputy State Historic Preservation Officer
Oklahoma Historical Society
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105-7917
lynda.ozan@history.ok.gov

Ms. Kristina Wyckoff
Oklahoma Historical Society
800 Nazih Zuhdi Drive
Oklahoma City, OK 73105-7917
kristina.wyckoff@history.ok.gov

Ms. Julie Cunningham
Executive Director
Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118
julie.cunningham@owrb.ok.gov

Mr. William Cauthron
Acting Director, Water Quality Division
Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118
bill.cauthron@owrb.ok.gov

Ms. Nikki Davis
Staff Secretary, Water Quality Division
Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118
nikki.davis@owrb.ok.gov

Mr. Lance Phillips
Environmental Programs Manager
Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118
lance.phillips@owrb.ok.gov

Mr. Monty Porter
Section Head, Water Quality Standards
Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118
monty.porter@owrb.ok.gov

Mr. Chris Neel
Planning and Management Division
Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118
chris.neel@owrb.ok.gov

Harold Thompson
Office of State Fire Marshal
2401 NW 23rd Street, Suite 4
Oklahoma City, OK 73107
harold.thompson@fire.ok.gov

Tribal Organizations:

Inter-Tribal Council Inc. *
PO Box 1308
Miami, OK 74355

Chief Nelson Harjo
Alabama-Quassarte Tribal Town
PO Box 187
Wetumka, OK 74883
nharjo@alabama-quassarte.org

Chairman Bobby Komardley
Apache Tribe of Oklahoma
511 E Colorado
Anadarko, OK 73005
info@apachetribe.org

Chairman Bobby Gonzalez
Caddo Nation of Oklahoma
PO Box 487
Binger, OK 73009
bgonzalez@mycaddonation.com

Mr. Jonathan Rohrer
Caddo Nation of Oklahoma
Tribal Historic Preservation Officer
PO Box 487
Binger, OK 73009
jrohrer@mycaddonation.com

Chief Chuck Hoskin, Jr.
Cherokee Nation
PO Box 948
Tahlequah OK 74465
chuck-hoskin@cherokee.org

Ms. Elizabeth Toombs
Cherokee Nation
Tribal Historic Preservation Officer
PO Box 948
Tahlequah, OK 74465
elizabeth-toombs@cherokee.org

Ms. Deborah Dotson
President
Delaware Nation
PO Box 825
Anadarko, OK 73005
ddotson@delawarenation.com

Katelyn Lucas
Delaware Nation
PO Box 825
Anadarko, OK 73005
klucas@delawarenation-nsn.gov

Dr. Brice Obermeyer
Historic Preservation Office
Delaware Tribe of Indians
1200 Commercial Street
Roosevelt Hall, Room 212
Emporia KS 66801
bobermeyer@delawaretribe.org

Chief Glenna J. Wallace
Eastern Shawnee Tribe of Oklahoma
70500 E 128 Road
Wyandotte, OK 74370
gjwallace@estoo.net

Chairman Edgar B. Kent, Jr.
Iowa Tribe of Oklahoma
335588 E 750 Road
Perkins, OK 74059
ekent@iowanation.org

Ms. Renee Hagler *
Acting Tribal Administrator
Iowa Tribe of Oklahoma
335588 E 750 Road
Perkins, OK 74059

Ms. Kellie Lewis
Acting Tribal Historic Preservation Officer
Kiowa Tribe Office of Historic Preservation
PO Box 369
Carnegie, OK 73015
kellie@tribaladminsivices.org

Ms. Regina Gasco-Bentley
Little Traverse Bay Bands of Odawa Indians
7500 Odawa Circle
Harbor Springs, MI 49740
tribalchair@ltbbodawa-nsn.gov

Chief Douglas G. Lankford
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74354
dlankford@miamination.com

Julie Olds
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74354
jolds@miamination.com

Ms. Robin Lash
General Counsel
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74354
rlash@miamination.com

Mr. Joe Halloran
Counsel for Miami Nation
Jacobson Law Group
180 East 5th Street, Suite 940
St. Paul, MN 55101
jhalloran@thejacobsonlawgroup.com

Mr. Phil Mahowald
Jacobson Law Group
180 East 5th Street, Suite 940
St. Paul, MN 55101
pmahowald@thejacobsonlawgroup.com

Mr. Jeff Holth
Jacobson Law Group
180 East 5th Street, Suite 940
St. Paul, MN 55101
jholth@thejacobsonlawgroup.com

Chief Bill Follis
Modoc Nation
22 N Eight Tribes Trail
Miami, OK 74354
modoctribe@cablone.net

Chief David Hill
Muscogee (Creek) Nation
PO Box 580
Okmulgee, OK 74447
dhill@mcn-nsn.gov

Ms. RaeLynn Butler
Historic and Cultural Preservation
Department, Manager
Muscogee (Creek) Nation
PO Box 580
Okmulgee, OK 74447
raebutler@mcn-nsn.gov

Chief Geoffrey Standing Bear
Osage Nation
627 Grandview Avenue
Pawhuska, OK 74056
gdstandingbear@osagenation-nsn.gov
Dr. Andrea Hunter
Osage Nation Historic Preservation Office
627 Grandview Avenue
Pawhuska, OK 74056
ahunter@osagenation-nsn.gov

Ms. Eden Hemming
Archaeologist
Osage Nation Historic Preservation Office
627 Grandview Avenue
Pawhuska, OK 74056
eden.hemming@osagenation-nsn.gov

Chairman John Shotton
Otoe-Missouria Tribe of Indians
8151 Hwy 177
Red Rock, OK 74651
jshotton@omtribe.org

Ms. Elsie Whitehorn
Tribal Historic Preservation Officer
Otoe-Missouria Tribe of Indians
8151 Hwy 177
Red Rock, OK 74651
ewhitehorn@omtribe.org

Chief Ethel Cook
Ottawa Tribe of Oklahoma
PO Box 110
Miami, OK 74354
cethel.oto@gmail.com

Ms. Rhonda Hayworth
Tribal Historic Preservation Officer
Ottawa Tribe of Oklahoma
PO Box 110
Miami, OK 74354
rhonda.oto@gmail.com

Chief Craig Harper
Peoria Tribe of Oklahoma
118 South Eight Tribes Trail
Miami, OK 74354
chiefharper@peoriatribe.com

Charla EchoHawk
Director of Cultural Preservation
Peoria Tribe of Oklahoma
118 South Eight Tribes Trail
Miami, OK 74354
cechohawk@peoriatribe.com

Chairman Joseph T. Byrd
Quapaw Tribe of Oklahoma
PO Box 765
Quapaw, OK 74363
joseph.byrd@quapawnation.com

Mr. Everett Bandy
Quapaw Tribe of Oklahoma
PO Box 765
Quapaw, OK 74363
ebandy@quapawnation.com

Chief Justin Wood
Sac and Fox Nation of Oklahoma
920883 S Hwy 99, Building A
Stroud, OK 74079
justinwood@sacandfoxnation-nsn.gov

Chief Charlie Diebold
Seneca-Cayuga Nation
PO Box 453220
Grove, OK 74345-3220
cdiebold@sctribe.com

Mr. William Tarrant
Tribal Historic Preservation Officer
Seneca Cayuga Nation
23701 South 665 Road
Grove, OK 74344
wtarrant@sctribe.com

Richard Schlottke
Seneca Cayuga Nation
23701 S 665 Road
Grove, OK 74344
rschlottke@sctribe.com

Chief Ben Barnes
Shawnee Tribe of Oklahoma
PO Box 189
Miami, OK 74354
chief@shawnee-tribe.com

Ms. Tonya Tipton
Tribal Historic Preservation Officer
Shawnee Tribe of Oklahoma
PO Box 189
Miami, OK 74355
tonya@shawnee-tribe.com

President Russell Martin
Tonkawa Tribe of Oklahoma
1 Rush Buffalo Road
Tonkawa OK 74653
rmartin@tpmlawatribe.com

Chief Joe Bunch
United Keetoowah Band of Cherokees
PO Box 746
Tahlequah, OK 74465
jbunch@ukb-nsn.gov

Director Ernestine Berry
United Keetoowah Band of Cherokees
PO Box 1245
Tahlequah, OK 74465
eberry@ukb-nsn.gov

President Terri Parton
Wichita and Affiliated Tribes
PO Box 729
Anadarko, OK 73005
terri.parton@wichtatribe.com

Mr. Gary McAdams
Tribal Historic Preservation Officer
Wichita and Affiliated Tribes
PO Box 729
Anadarko, OK 73005
gary.mcadams@wichtatribe.com

Chief Billy Friend
Wyandotte Tribe of Oklahoma
64700 East Highway 60
Wyandotte, OK 74370
bfriend@wyandotte-nation.org

Ms. Sherri Clemons
Tribal Historic Preservation Officer
Wyandotte Tribe of Oklahoma
64700 East Highway 60
Wyandotte, OK 74370
sclemons@wyandotte-nation.org

Mr. Norman Hildebrand, Jr.
Second Chief
Wyandotte Nation
64700 East Highway 60
Wyandotte, OK 74370
nhildebrand@wyandotte-nation.org

Mr. Christen Lee
Environmental Director
Wyandotte Nation
64700 East Highway 60
Wyandotte, OK 74370
clee@wyandotte-nation.org

Congressional Delegation:

The Honorable James Mountain Inhofe
United States Senate
205 Russell Senate Office Building
Washington DC 20515
dan_hillenbrand@inhofe.senate.gov

The Honorable James Lankford
United States Senate
316 Hart Senate Office Building
Washington DC 20510
michelle_altman@lankford.senate.gov

The Honorable Markwayne Mullin
1113 Longworth House Office Building
Washington DC 20515
benjamin.cantrell@mail.house.gov

The Honorable Michael Bergstrom
Oklahoma State Senate, District 1
2300 North Lincoln Boulevard, Room 522
Oklahoma City, OK 73105
michael.bergstrom@oksenate.gov

The Honorable Marty Quinn
Oklahoma State Senate, District 2
2300 North Lincoln Boulevard, Room 417B
Oklahoma City, OK 73105
marty.quinn@oksenate.gov

The Honorable Blake Stephens
Oklahoma State Senate, District 3
2300 North Lincoln Boulevard, Room 325
Oklahoma City, OK 73105
blake.stephens@oksenate.gov

The Honorable Josh West
House of Representatives, District 5
2300 North Lincoln Blvd, Room 242A
Oklahoma City, OK 73105
josh.west@okhouse.gov

The Honorable Rusty Cornwell
House of Representatives, District 6
2300 North Lincoln Boulevard, Room 509
Oklahoma City, OK 73105
rusty.cornwell@okhouse.gov

The Honorable Steve Bashore
House of Representatives, District 7
2300 North Lincoln Boulevard
Oklahoma City, OK 73105
steve.bashore@okhouse.gov

The Honorable Tom Gann
House of Representatives, District 8
2300 North Lincoln Boulevard, Room 500
Oklahoma City, OK 73105
tom.gann@okhouse.gov

The Honorable Kevin Stitt*
Governor of Oklahoma
2300 North Lincoln Boulevard, Suite 212
Oklahoma City, OK 73105
governor@gov.ok.gov

The Honorable Kenneth (Ken) Wagner
Secretary of Energy and Environment
204 North Robison, Suite 1010
Oklahoma City, OK 73102
kenneth.wagner@ee.ok.gov

Other Governmental Entities:

Afton Public Works Authority
PO Box 250
Afton, OK 74331
phyllostoa@att.net

Ms. Debbie Bottoroff
Assistant City Manager
City of Grove
104 West 3rd
Grove, OK 74344
dbottoroff@sbcglobal.net

Mayor Bless Parker
City of Miami
PO Box 1288
Miami, OK 74355
bparker@miamiokla.net

Mr. Bo Reese
City Manager
City of Miami
PO Box 1288
Miami, OK 74355
breese@miamiokla.net

Ms. Barbara S. Jost
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20006-3401
barbarajost@dwt.com

Mr. Craig Gannett
Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101
craiggannett@dwt.com

Shannon O'Neil
Associate
Davis Wright Tremaine LLP
1301 K Street, NW, Suite 500 East
Washington DC 20005
shannononeil@dwt.com

Mr. Walker Stanovsky
Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101
walkerstanovsky@dwt.com

Ms. Amber Prewett
City of Miami
PO Box 1288
Miami, OK 74355
aprewett@miamiokla.net

Fire Chief Robert Wright
City of Miami
PO Box 1288
Miami, OK 74355
rwright@miamiokla.net

Police Chief Thomas Anderson
City of Miami
PO Box 1288
Miami, OK 74355
tanderson@miamiokla.net

Kevin Browning
Public Works Director
City of Miami
PO Box 1288
Miami, OK 74355
kbrowning@miamiokla.net

Coo-Y-Yah Museum *
847 Highway 69
South 8th Street
Pryor, OK 74361

Mr. Lowell Walker
Craig County Commissioner
District 1
210 W Delaware Avenue, Suite 106
Vinita, OK 74301
ccd1@junct.com

Mr. Hugh Gordon
Craig County Commissioner
District 2
210 W Delaware Avenue, Suite 106
Vinita, OK 74301
ccd2@ruralinet.net

Mr. Dan Peetom
Craig County Commissioner
District 3
210 W Delaware Avenue, Suite 106
Vinita, OK 74301
ioni.jones_18@yahoo.com

Mr. Morris Bluejacket
Craig County Flood Plain Manager
210 West Delaware, Suite 103
Vinita, OK 74301-4236
ccecm@junct.com

Amanda Montgomery
District Conservationist
Craig County Conservation District
235 West Hope Avenue
Vinita, OK 74301-1302
amanda.montgomery@ok.usda.gov

Mr. David Poindexter
Delaware County Commissioner
District 1
2001 Industrial 10 RD
Grove, OK 74344
delcohwy1086@gmail.com

Mr. Jake Callihan
Delaware County Commissioner
District 2
327 South 5th Street
Jay, OK 74346
delbarn2@yahoo.com

Martin Kirk
Delaware County Commissioner
District 3
327 South 5th Street
Jay, OK 74346
delco.d3@gmail.com

Mr. Travis Beesley
Delaware County Floodplain Administrator
PO Drawer 309
429 South 9th Street
Jay, OK 74346-0309
delawarecountiem@yahoo.com

Delaware County Historical Society &
Museum *
538 Krause Street
Jay, OK 74346

Delaware County Conservation District
2749 State Highway 20
Jay, OK 74346
delawareccd@conservation.ok.gov

Eastern Trails Museum
215 West Illinois Avenue
Vinita, OK 74301
etmuseum@junct.com

Ms. Jill Lambert
Ketchum Public Works Authority
PO Box 958
Ketchum, OK 74349
jclabornkpwa@wavelinx.net

Mr. Matt Swift
Mayes County Commissioner
District 1
One Court Place, Suite 140
Pryor, OK 74361
mswift@mayes.okcounties.org

Mr. Darrell Yoder*
Mayes County Commissioner
District 2
One Court Place, Suite 140
Pryor, OK 74361

Mr. Ryan Ball
Mayes County Commissioner
One Court Place, Suite 140
Pryor, OK 74361
rball@mayes.okcounties.org

Mayes County Conservation District
4238 N E 1st
PO Box 36
Pryor, OK 74362
mayesccd@conservation.ok.gov

Mr. Johnny Janzen
Mayes County Floodplain Manager
One Court Place, Suite 140
Pryor, OK 74361
mayescountyem@yahoo.com

Mr. Jeremy Hogan
Superintendent
Miami Public Schools
26 N Main Street
Miami, OK 74354
jhogan@mpswardogs.com

Cindy Morris
Director
Miami Regional Chamber of Commerce
11 South Main
Miami, OK 74354
cmorris@miamiokchamber.com

Mr. Brian Estep
Council Member
NE Ward 1
PO Box 1288
Miami, OK 74355-1288
bestep@miamiokla.net

Mr. Kevin Dunkel
Council Member
NE Ward 2
PO Box 1288
Miami, OK 74355-1288
kdunkel@miamiokla.net

Mr. Ryan Orcutt
Council Member
SW Ward 3
PO Box 1288
Miami, OK 74355-1288
ward3@miamiokla.net

Mr. Chad Holcom
Ottawa County Emergency Management
Certified Floodplain Manager
123 East Central Ave., Suite 103
Miami, OK 74354

Mike Furnas
Ottawa County Commissioner
District #1
102 East Central Avenue, Suite 202
Miami, OK 74354
ottawacountyd1@sbcglobal.net

Mr. Steven Chasteen
Ottawa County Commissioner
District #2
310 West Walker
Wyandotte, OK 74370
d2commissioner@ottawa.okcounties.org

Mr. Russell Earls
Ottawa County Commissioner
District #3
102 East Central Avenue, Suite 202
Miami, OK 74354
rearls@ruralinet.net

Ottawa County Conservation District
630 East Steve Owens Boulevard, Suite 3
Miami, OK 74354-7800
ottawaccd@conservation.ok.gov

Ottawa County Historical Society *
(Dobson Museum)
110 A Street SW
Miami, OK 74354

Mr. Matt Outhier
RWD #3 Delaware County
PO Box 1228
Jay, OK 74346
aquazena@yahoo.com

RWD #3 Mayes County – Disney
PO Box 279
Disney, OK 74340
mayersrwd3@grand.net

Town of Afton *
PO Box 250
Afton, OK 74331

Town of Bernice *
209 S Broadway
Bernice, OK 74331

Town of Disney
PO Box 318
Disney, OK 74340
townofdisney@outlook.com

Town of Fairland *
PO Box 429
Fairland, OK 74343
Town of Ketchum *
PO Box 150
Ketchum, OK 74349

Ms. Melissa Yarbrough
Town of Langley
PO Box 760
Langley, OK 74350
myarbrough@langleyok.org

City of Vinita *
PO Box 329
104 East Illinois Avenue
Vinita, OK 74301

Town of Wyandotte *
212 South Main
Wyandotte, OK 74370

Non-Governmental Organizations:

American Rivers
1101 14th Street NW Suite 1400
Washington DC 20005
akober@americanrivers.org

American Whitewater
PO Box 1540
Cullowhee, NC 28723
info@americanwhitewater.org

Nathan Johnson
Ducks Unlimited
Regional Director
1812 Cinnamon Ridge Road
Edmond, OK 73025
njohnson@ducks.org

Grand Lake Audubon Society *
PO Box 1813
Grove, OK 74345-1813

Mr. Bruce Watson, Squadron Commander
Grand Lake Sail and Power Squadron
31380 S 628 Lane
Grove, OK 74344
lakepappy@gmail.com

Grand Lake Watershed Alliance Foundation
PO Box 451185
Grove, OK 74345-1185
glwafadmin@gmail.com

Ms. Rebecca Jim
Local Environmental Action Demanded Inc.
223 A Street SE
Miami, OK 74354
rjim@neok.com

Christophe Courchesne
Senior Attorney
Environmental Advocacy Clinic
Vermont Law & Graduate School
PO Box 96, 164 Chelsea Street
South Royalton, VT 05068
ccourchesne@vermontlaw.edu

Mr. Mike Fuhr
State Director
The Nature Conservancy
10425 S 82nd E Avenue, Suite 104
Tulsa, OK 73133
mfuhr@tnc.org

Ms. Katie Gillies
Director of Conservation
The Nature Conservancy
10425 S 82nd East Avenue, Suite 104
Tulsa, OK 73133
katie.gillies@tnc.org

Mr. Chris Wood, President
Trout Unlimited
1777 N Kent Street, Suite 100
Arlington, VA 22209
cwood@tu.org

Mr. John Kennington
President
Tulsa Audubon Society
PO Box 330140
Tulsa, OK 74133
johnkennington@gmail.com

Public/Citizens:

Larry Bork
GSEP
515 S. Kansas Ave.
Topeka, KS 66603
gsep@gseplaw.com

Mr. Andy Stewart
Shoreline, LLC
PO Box 6586
Grove, OK 74344
andy@patriciaisland.com

Ms. Alicia Hampton
Assistant General Manager
Patricia Island Country Club
PO Box 451500
Grove OK 74345
alicia@patriciaisland.com

Dr. Robert Nairn
School of Civil Engineering
The University of Oklahoma
202 West Boyd Street, Room 334
Norman, OK 73109-3073
nairn@ou.edu

Dr. Robert Knox
School of Civil Engineering
The University of Oklahoma
202 West Boyd Street, Room 334
Norman, OK 73109-3073
knox@ou.edu

Dr. Randy Kolar
School of Civil Engineering
The University of Oklahoma
202 West Boyd Street, Room 334
Norman, OK 73109-3073
kolar@ou.edu

Oklahoma State University
Burns Hargis, President
107 Whitehurst
Stillwater, OK 74078
debbie.lane@okstate.edu

Mr. Kyle Stafford
President
Northeastern Oklahoma A & M College
200 I Street NE
Miami, OK 74354
kyle.j.stafford@neo.edu

Mr. Mark Rasor
Vice President for Business
200 I Street NE
Miami OK 74354
mraser@neo.edu

Dr. Keith Martin
Dean, Professor of Biology
Rogers State University
1701 West Will Rogers Boulevard
Claremore, OK 74017
kmartin@rsu.edu

Miami Flood Mitigation Advisory Board *
City of Miami
PO Box 1288
Miami, OK 74355-1288

Rusty Fleming
Executive Director
Grand Lakers United Enterprise
PO Box 1
Langley, OK 74350
grandtimesongrandlake@gmail.com

Mr. Jay Cranke
Director Grand Lake Association
9630 US Highway 59, Suite B
Grove, Oklahoma 74344
jay@glaok.com

President
Grove Area Chamber of Commerce
9630 US Highway 59
Grove, OK 74344

South Grand Lake Area Chamber of Commerce
PO Box 215
Langley, OK 74350
grandlakechamber@gmail.com

Oklahoma Association of Realtors *
9807 Broadway Ext
Oklahoma City, OK 73114-6312

Har-Ber Village *
4404 West 20th Street
Grove, OK 74344

Dr. Mark Osborn *
301 2nd Avenue SW
Miami, OK 74354

Mr. Jack Dalrymple *
54297 E 75 Road
Miami, OK 74354

Mr. Mike Williams
Director of Communications & Gov't Relations
Shangri-La Marina
57151 East Highway 125
Afton, OK 74331
mike.williams@shangrilaok.com

Mr. Joe Harwood
Owner
Arrowhead Yacht Club (North & South)
PO Box 600
Ketchum, OK 74349
joeharwood@aol.com

Mr. Jeff Rose
Regional Manager
Safe Harbor Marinas
14785 Preston Road, Suite 975
Dallas, TX 75254
jrose@shmarinas.com

Mr. Jerry Cookson
Manager
Cedar Port Marina
PO Box 600
Ketchum, OK 74349
jerry.cookson@cedarport.com

Mr. Todd Elson
Manager
Indian Hills Resort and Marina
PO Box 3747
Bernice, OK 74331
indianhillsok@aol.com