

EAST OTTER TAIL SOIL AND WATER
CONSERVATION DISTRICT

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SOIL AND WATER CONSERVATION DISTRICTS



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March 31, 2006

Red River Valley Water Supply Project
Dakotas Area Office, Bureau of Reclamation
PO Box 1017
Bismarck, ND 58502-1017

Red River Valley Water Supply Project:

On behalf of the Board of Supervisors for the East Otter Tail Soil and Water Conservation District (EOT SWCD) I would like to make a few comments on the Draft Environmental Impact Statement (EIS) for the Red River Valley Water Supply Project.

Understanding that the Draft EIS only outlines the potential alternatives to be evaluated, the EOT SWCD Board has some concerns on the Red River Basin Alternative that proposes the construction of well fields in the Pelican River and Ottertail Outwash Aquifers.

The first concern is the population growth and water demand predictions. It appears that there has been a lot of thought and discussion on the growth and needs of the communities in the Red River Valley that would benefit from this project. Our concern is with the lack of information provided for the population growth and water use demand that may be needed for the communities and rural interests that currently use these aquifers. Ottertail County in the past few years has surpassed projected population estimates, and there is currently no sign that this growth is going to slow down. What information has been used or developed on the population growth and water demand predictions for the communities and rural interests that currently use these aquifers and was it considered in development of this option?

The second concern addresses land use issues. If these well fields are installed a very large area within our SWCD boundaries will be within a wellhead protection area. With this there will more than likely be a wellhead protection plan developed that will potentially have some land use restrictions. While this is a good policy to help protect the valuable water resource, it may lead to land use restrictions which could have a negative economic impact on the agricultural community. Are there plans to provide funding, outside of traditional federal or state conservation programs, to provide incentives or cost-share opportunities for the transition that some of the producers within the potential wellhead protection area will need to go through? If so, how will these funds be distributed?

Another concern is the potential that this aquifer has for nitrate problems. This aquifer is considered to be vulnerable to contamination due to the lack of geological features (clay) that would protect the aquifer, which increases the potential for contamination infiltration. The City of Perham is currently using the Ottertail Outwash Aquifer for its source water and has experienced

problems with water from city wells having nitrate levels near the health safety standard of 10 ppm. Perham has gone to great lengths to develop a source water protection plan to help address this problem. It appears that the shallower wells have higher concentrations of nitrates. The City has added an additional deeper well that is used to blend water to dilute nitrate concentrations to obtain compliance with drinking water standards. If the level of these aquifers is drawn down in times of need, what will the potential be for nitrate levels increasing in these deeper wells, and what effect will that have on the drinking water quantity and quality for Perham and other communities in the surrounding area?

Another concern is that fact that the coarse textured soils in the aquifer have a low water holding capacity which makes agricultural irrigation a common practice. Since these well fields will be used for municipal source water, there are fears that there may be additional restrictions placed on irrigators that will have a negative economic impact on them. Since this project is proposed to only be used in times of drought, which are times when irrigation will be very important to produce a crop, there may be additional timing and amount restrictions placed on the irrigators giving the communities using the aquifers as source water priority, thus having a negative impact on these producers. What policies will be in place to compensate these producers or ensure that they will not be impacted?

Our last concern is the potential negative impacts that the construction of this project could have in the area. This proposed project would have a very large footprint, and the construction of these well fields and the miles and miles of pipelines that will be required have the potential to negatively impact many acres of wetland and wildlife habitat resources. It is our concern that these impacts are carefully considered to minimize the impacts and that any unavoidable impacts are mitigated appropriately.

As it is the mission of the East Otter Tail SWCD to conserve and protect our soil and water resources that were placed in our trust, we feel that it is very important to take the time to make sure that any potential projects, like the one proposed, are evaluated and that we are putting plans into place to make sure we are using these resources in the wisest manner.

Sincerely,



Darren Newville
District Manager, East Otter Tail SWCD

cc: SWCD board members