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April 11, 2006

Red River Valley Water Supply Project
 Bureau of Reclamation
 P.O. Box 1017
 Bismarck, ND 58502-1017

Dear Ladies and Gentlemen:

At their meeting on Monday, April 10, 2006, the City Council of Pelican Rapids reviewed the enclosed letter outlining the reasons the City of Pelican Rapids is opposed to the proposed Red River Basin Alternative.

The City Council voted to adopt the letter and requests that it be considered as part of the testimony opposing use of ground water resources from the Otter Tail Outwash and Pelican River Sands Aquifer identified in the Red River Basin Alternative.

Sincerely,

Glenys Ehlert, CMC
 Clerk-Treasurer



April 10, 2006

Red River Valley Water Supply Project
Bureau of Reclamation
P.O. Box 1017
Bismarck, ND 58502-1017

Re: Comments on Draft Environmental Impact Statement
Red River Valley Water Supply Management Project

Dear Ladies and Gentlemen:

The City of Pelican Rapids offers the following comments on the Draft Environmental Impact Statement Red River Valley Water Supply Project. The City of Pelican Rapids is located in Northwestern Otter Tail County and draws its drinking water supplies from the Pelican River Sand Plain Aquifer. Pelican Rapids' comments primarily relate to the proposed Red River Basin Alternative.

For the record it should be noted no representative of our Community and to the best of our knowledge no representative from our area participated in the process leading to development of the alternatives presented in the Draft EIS. We note several communities that will benefit from the project, participated in the work groups and review teams that developed the alternatives. Citizens in our area have had a very limited time to review the Draft EIS and evaluate the information presented.

We would like to thank Mr. Johnson and Mr. Schlag for making presentations at a public information meeting attended by an estimated 125 residents of our area on April 23, 2006. Unfortunately the comments presented by citizens at that meeting will not be part of the formal record, unless those in attendance went to the added step of submitting written comments. Many area residents with interest in the project were not aware or were unable to attend the formal public hearing held on February 16, 2006.

In reviewing the Draft EIS, many of the assumptions related to the impact on water quantity are based upon the average data for the period 1931 to 2001. In measuring the impact of drought with the magnitude of the 1930's, the surface water quantity data for the Red River and Sheyenne is noted. No similar data regarding the impact of drought conditions on ground water supplies is included in the report.

We believe this is serious oversight, as the effects of the additional pressure on ground water resources in the area during a severe drought are not well documented.

Almost all agricultural, residential and industrial water uses in the area are from ground water sources. Surface water is primarily used for recreational purposes and ground water recharge. There is considerable ground and surface water interaction in the area.

Accounts from local residents indicates that many of the lakes and other surface waters in the area were dry or suffered significant reductions of 20, 30 or more feet below their normal high water marks for a sustained period of years during the drought of the 1930's. Given the soils conditions and interaction between ground and surface water one could reasonably expect similar drops occurred in ground water in the surrounding area.

Data gathered during preparation and implementation of the City's Wellhead Protection Plan indicates that surface water from area lakes contribute water to the upper aquifer that is used by the City of Pelican Rapids and the surrounding area. Pumping of high capacity wells changes the normal flow of ground water, which could have an adverse affect on City and area wells.

The City of Pelican Rapids and most rural residents of the area rely on ground water for their drinking water supplies. Most of the approximately 764 well locations located in a 4 mile radius of Pelican Rapids have an average depth of 124 ft. The deepest well (Pelican Rapids well #9 is 422 ft. and the shallowest well in the survey was 15 ft. The nine public water supply wells for the City of Pelican Rapids range from about 100 ft. to 422 ft. deep.

Data provide in the Cities Wellhead Protection Plan points out that the primary hydrologic boundaries impacting the deep aquifer are many miles from the deep wells used by the City of Pelican Rapids. The recharge areas are likely in western Becker and central Otter Tail Counties and discharging to the Red River of the North. This is the area, which is being considered in the proposed Red River Basin Alternative.

The City tests its ground water supplies quarterly to ensure they meet Safe Drinking Water Standards. Recently three of the nine City wells have encountered surface contaminates and are currently not in use. A combination of a lowered water table due to drought and vertical mixing of ground water from an extensive well field consisting of some 100, 150 or more wells could cause water quality in the medium to lower levels of the aquifer to become contaminated to the point it is no longer safe for domestic use without extensive treatment.

The City has adopted an aggressive approach to protect the ground water supplies from becoming contaminated through its Wellhead Protection Program. At this time ground water supplies are of sufficient quality that with the City's water treatment facility, the City's water supply is made safe for public use. A primary user of the City's water supply is a large food processing facility which one of Otter Tail Counties' major employers.

Drilling 100, 150 or more water supply wells would have unknown impacts on water supply throughout a significant portion of Otter Tail and Becker County.

Otter Tail and Becker Counties are primary recreational areas having well over 1000 lakes, several state parks and numerous state and national wildlife management and water fowl productions areas. These resources would be seriously impacted by a drought of the magnitude of the 1930's. It is highly unlikely the drought would be confined to the Red River Valley and would likely have impact throughout and beyond the Red River Basin. Lowering ground water levels would further magnify the impact on a wide variety of local and migratory wildlife populations that would already be under stress.

The Draft EIS does not address the long-term impact from the operational requirements of using ground water located some 60 miles away and what effect it will have on the supply area. Wells in the well field will need to be operated on a regular basis in order to make sure they will work properly when needed. The water pumped from the aquifers during non-drought conditions will likely become part of the "base supply" for those areas to be served by the Red River Valley Water Supply Project. This will further encourage water consumption and enlarge the water supply deficit in the future.

Further the EIS does not address the impact of having user-controlled system being in place to determine when the system should be placed in full operation. With user controlled system in place and the impacts difficult to measure and see, the alternative presents a greater chance for adverse impacts when compared to the more definable and measurable impacts associated with the preferred alternative.

Based upon the information presented in the Draft Environmental Impact Statement, it appears import of water from the GDU Import to the Sheyenne River alternative is the most effective alternative. An extensive investment has already been made in some of the facilities needed to implement this alternative. The proposed biota treatment facility would reduce the probability that exotic species would be transported from the Missouri to Red River Basin to acceptable standards.

For the reasons outlined above the City of Pelican Rapids would strongly urge that alternative of drawing ground water supplies from the Otter Tail Surficial Outwash and Pelican River Sand-Plain Aquifers be dropped from further consideration. Quite simply, there is a great lack of data on the impacts of this alternative and any definitive knowledge of the impact of substantially lowering the level of these aquifers during a severe drought will not be know until the event occurs and it is to late too mitigate adverse consequences.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Runnigen". The signature is fluid and cursive, written over a white background.

Wayne Runnigen
Mayor, City of Pelican Rapids, MN