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CONTROL NO.		
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Date: March 13, 2006

To: U.S. Department of Interior
Bureau of Reclamation
Dakotas Area Office
Box 1017
Bismarck, ND 58502

From: Richard Betting
11630 39 ST. SE
Valley City, ND 58072

Re: comments on *Draft Report on Red River Valley Water Needs and Options*

Data supporting the need for water for the Red River Valley area in the next fifty or more years has been overly optimistic in the predicted need and overly pessimistic in the available supply. One example: If there is a continued drought in the area long enough to require outside water supplies, there will be little if any agricultural produce that will require large amounts of water for production. For instance, ethanol plants. So including a need for water to supply non-working industry is misleading. Data need to be revisited and revised to reflect realistic expectations.

Under the heading of "Alternatives" the Draft EIS discusses the Spiritwood Aquifer briefly. The size and quality of the aquifer in Sargent County—850,000 acre/feet of water under 175 square miles of land—are mentioned, but the aquifer runs north from there almost two hundred miles. Certainly, the Final EIS should contain analyses of the quality and availability of the rest of the aquifer. This option should not be eliminated upon such scant analysis. Do it again.

While the Draft EIS concludes that the Sheyenne River and Lake Ashtabula contain water "suitable for most designated uses," there does not seem to be any analysis in the document of how the water quality in the river and the lake will be affected by other water projects. For example, the Devils Lake outlet was already put into operation in the fall of 2005. Water from West Bay contains over 500 mg/L sulfates, 1500 mg/L total dissolved solids and many other contaminants that will flow down the Sheyenne River and end up in Lake Ashtabula, described as a "nutrient and sediment trap." According to the North Dakota SWC the total inflows to Lake Ashtabula could be over 17,000 acre/feet per year. The EIS needs to explain and analyze the effects of Devils Lake water on the lake and then on the Missouri water intended for the Red River Valley Water Supply Project. How will the river and lake ecosystems, as well as water treatment, be impacted by water from Devils Lake?

The Final EIS could also explain why Devils Lake water itself is not a possibility. After all, if West Bay water can flow down the Sheyenne and not negatively impact downstream users, it should be good enough for Red River Valley users.

Another project that is in the works is a trench from Stump Lake into the Sheyenne River via the Tolna Coulee. Sometimes called the "Tolna Coulee Outlet." This project would take water from Stump Lake and dump it into the river at an elevation of 1438 feet msl, acting as a pass-through from Devils Lake whenever the lake is at or over 1448 feet msl. That means the Tolna Coulee could flush Stump Lake water at a rate at or exceeding flows from 2005. Those flows were sometimes over 300 cubic feet per second.

Stump Lake water would impact the Sheyenne and Lake Ashtabula significantly. Sulfates in Stump Lake now register over 4500 mg/L and chlorides average over 750 mg/L while TDS is much higher. The Final EIS should examine the results of such a project having been run. If not, the Final EIS should explain how the Bureau of Reclamation will deal with the project as it is being planned. Either the Final EIS should explain how the addition of Stump Lake water will affect Lake Ashtabula and thus the RRVWS project, or the Final EIS should explain how the Bureau will oppose the Stump Lake outlet so that it won't be an issue. If the Devils Lake Basin Joint Water Resource Board can build and operate such a project as the Stump Lake outlet without the authorization of the ND State Water Commission, Corps of Engineers or the EPA, then projects such as the RRVWS cannot be planned for at all.

The Final EIS should also contain a detailed explanation of what communities will pay for the project. That is, what communities have agreed to and expect to pay for, how and when. Who will pay when no water is running or whether the supply will operate even when no water is needed in the Red River Valley. For example, Valley City is listed in some places as part of the RRVWS project. Is Valley City a recipient of water benefits—even when it may not need Missouri River Water? Has Valley City agreed to participate?

There are many more problems with the proposed project but I assume others will address them in detail.

Sincerely,


Richard Betting