

North Dakota Missouri River Advisory Council

4665 2nd Street Southwest
Dickinson, ND 58601-7231

OUR MISSION - Working collaboratively with North Dakota stakeholders to provide unified representation, advocate for the responsible use of resources, and improve awareness and education relating to the Missouri River and its Tributaries.

July 12, 2018

Send Via Mail and Email: matthew.j.nelson@usace.army.mil

U.S. Army Corps of Engineers, Omaha District
ATTN: CENWO-ED-HA (Matt Nelson)
1616 Capitol Avenue
Omaha, NE 68102

Re: Lake Audubon/Snake Creek Embankment – Draft Environmental Assessment

Dear Mr. Nelson:

Only two alternatives were presented at the June 19th Public Meeting in Bismarck. Neither provides a solution to the identified system deficiency, therefore the current EA process is incomplete. The EA discussion considers this embankment a dam; however, it was constructed by the USACE for the Bureau of Reclamation as part of the Garrison Diversion Project. Its primary purpose is to provide a reliable water source for water supply, irrigation, recreation, as well as fish and wildlife for central and eastern North Dakota. To suggest any alternative that makes it unusable during the severe drought is totally unacceptable. Is the current issue a design deficiency, caused by poor construction or inadequate maintenance? Each point to the USACE's obligation to construct and maintain the original embankment. The promised water supply works for the State of North Dakota must not be relegated to a dam safety issue, though that is the noted deficiency of concern. When the pumps or control structure between the reservoirs fail they are repaired. So why not the embankment? Ultimately the project's purpose and promise to the State of North Dakota must be preserved and the embankment repaired to fully functional status.

Lowering Lake Audubon below 1845 for an extended period will result in significant new bank erosion affecting the lake's shoreline and numerous islands within the Lake Audubon reservoir. These islands were stabilized by the Bureau of Reclamation at considerable expense. At lower water levels the islands themselves will be compromised, adversely impacting the rock riprap structures along with the loss of extensive wildlife values associated with these protected islands. The impacts and restoration costs would be significant and true replacement nearly impractical. These impacts appear to have been overlooked, therefore need to be included in the EA, and in our opinion avoided as unnecessary.

It is respectfully requested the USACE work with BOR to resolve jurisdictional issues and establish a timeline and funding options to restore the integrity of this project feature. The Garrison Diversion Conservancy District has completed an independent evaluation of the embankment, as well as a related economic report that should be included in the EA process.

Respectfully,



Michael H. Gunsch, Chairman

cc: North Dakota Congressional Delegation
Honorable Governor Doug Burgum
Duane DeKrey, Garrison Diversion Conservancy District
Arden Freitag, US Bureau of Reclamation
Garland Eberle, North Dakota State Engineer
Todd Lindquist, Corps of Engineers, Riverdale

Michael Gunsch, Chairman
Friends of Lake Sakakawea

Martin Dahl, Vice Chairman
McLean Electric Cooperative

Mary Massad, Secretary/Treasurer
Southwest Water Authority