October 25, 2022

Federal Energy Regulatory Commission

Office of Energy Projects

Division of Hydropower Licensing

Washington, D.C. 20426

*RE: Comments on Pre-Application Document*

 *Gregory County Pumped Storage Project No. 14876-002*

Dear Honorable Commissioners:

This letter is written on behalf of Randall Community Water District (hereinafter “RCWD”) in opposition to the proposed Gregory County Pumped Storage Project.

RCWD is a South Dakota water user district as defined by South Dakota Codified Law (“SDCL”) Chap. 46A-9. RCWD is located in Lake Andes, South Dakota, servicing all of Charles Mix, Douglas and Davison Counties and portions of Aurora, Brule, Bon Homme and Hutchison Counties. RCWD provides potable water for approximately 25,000 people and around 100,000 head of cattle. On average, RCWD provides 1.3 billion gallons of potable water per year.

RCWD has two intake sources located in Lake Francis Case. One is located near to the proposed intake/discharge area of the project. The other intake is located near Pickstown, above Fort Randall Dam. Both intake systems use dual intake valves located in the old channel of the river (original channel prior to damming of the Missouri River) that bring water into a caisson to then be pumped out and into RCWD’s system. That water goes through extensive treatment at one (or more) of RCWD’s treatment plants to provide water that meets all state and federal quality requirements for RCWD’s consumers.

Given the lightweight sediment that makes up at least a portion of the riverbed, increased turbidity of the water in Lake Francis Case is expected due to the intake and discharge of water through the proposed Gregory County Pumped Storage Project.

RCWD’s mission is to provide high-quality service to its consumers at the lowest possible cost consistent with sound business practices. For the reasons outlined below, the proposed Gregory County Pumped Storage Project jeopardizes RCWD’s mission.

RCWD requests a study on the expected increase in immediate and future turbidity of water in Lake Francis Case due to the proposed Gregory County Pumped Storage Project. The study should begin by determining the baseline turbidity of the waters in Lake Francis Case prior to the operation of the proposed Gregory County Pumped Storage Project. The baseline study should break down Lake Francis Case into small areas to provide differences in water turbidity now that can be compared to future water turbidity.

The study should also identify expected increases in water turbidity due to the operation of the proposed Gregory County Pumped Storage Project. The study should detail expected increases in similarly broken-down areas of Lake Francis Case as discussed in the paragraph directly above.

It is expected that increased turbidity to the waters in Lake Francis Case would have negative impacts to RCWD, its infrastructures and its consumers in the following ways:

Increase in Water Treatment Costs

Increased turbidity could have an immediate affect on the quality of water pumped into RCWD’s system from Lake Francis Case. The more contaminants in the source water would lead to increased treatment needs. This could increase the amount of time and supplies/chemicals needed to fully treat the water. The decrease in efficiency and increase in needed supplies/chemicals would have a negative affect on RCWD and its consumers.

Increased Maintenance, Repair and Replacement of System

Increase turbidity could have a detrimental physical effect on RCWD’s existing and future system. The increased turbidity could lead to more issues experienced throughout the system. There could be more mechanical failures throughout the system due to the increase in turbidity of the source water. There could also be a need for more frequent mechanical replacements due to additional wear and tear on the system from increased turbidity of the source water. All of this would result in more system down time, which would in turn lead to additional costs for RCWD and its consumers.

Blockage of Intake Sources

Increased turbidity over time could potentially block one or both of RCWD’s existing intake systems. The increased sediment carried by the current of the river system would encounter RCWD’s intake systems, thus causing at least a portion of the sediment to settle in that area. Over time, the sediment could accumulate to an amount that could block the intake systems. Blockage of either or both of RCWD’s intake systems would have catastrophic consequences for the entirety of the system.

Replacement or Relocation of Intake Sources

Should the increased water turbidity of Lake Francis Case due to the proposed Gregory County Pumped Storage Project create a need for replacement or relocation of either or both of RCWD’s intake systems, there would be substantial hardship upon RCWD and its consumers.

The process to obtain an intake on the Missouri River takes substantial time and effort to acquire.

One cannot simply obtain access to Missouri River waters overnight. It takes years to get governmental approval to obtain a water intake on the Missouri River. Applications, studies, hearings, etc. that take time and money are needed before a tap can be approved. On top of that, it would take millions of dollars to duplicate just one of RCWD’s current intake systems. All of this would create severe hardships for RCWD and its consumers.

RCWD is opposed to the Gregory County Pumped Storage Project as it feels it would have immediate and long-term detrimental affects to RCWD’s business operations, water quality issues for RCWD’s consumers and drastic economic consequences for both RCWD and its consumers.

Sincerely,

Meierhenry Sargent LLP

Patrick J. Glover

PJG/saw

cc: client