



Board of Water Works of Pueblo, Colorado

P. O. Box 400 - Pueblo, Colorado 81002-0400 - 719/584-0250 • www.pueblowater.org

October 12, 2012

Ms. J. Signe Snortland
Bureau of Reclamation
PO Box 1017
Bismarck, North Dakota 58502

***Re: Arkansas Valley Conduit and Long Term Excess Capacity Master Contract –
Draft Environmental Impact Statement***

Dear Ms. Snortland:

The Board of Water Work of Pueblo, Colorado (Board) appreciates the opportunity to participate as a Cooperating Agency in the NEPA review of the proposed Arkansas Valley Conduit (AVC) and Long Term Excess Capacity Master Contract. As we discussed at the open house in Pueblo, I believe the DEIS provides an incomplete comparison of the alternatives because not all the components have been included in the three action alternatives. I believe this could lead to exclusion of a viable alternative because it may appear to have more environmental impacts or may be more costly when, in fact, it may be the best alternative if all components are included. The Board urges Reclamation to compare all three action alternatives on an equal basis.

In addition, the Board has consistently advocated a regional approach to water treatment and we question whether it is in the AVC participants' best interests to pay for and staff a stand-alone treatment plant. I believe the Board's Whitlock Water Treatment Plant can provide filtered water or filtered and disinfected water at a competitive cost without duplicating staffing. The participants would still pay the incremental costs that the Board would require to replace the treatment capacity utilized by the AVC participants but the Board should be able to provide the water treatment for the AVC up to 20 mgd utilizing current employees. This would have to be verified once the design of the new facilities is finalized. I understand that Reclamation prefers to own all facilities but it seems like it would be worth the effort to determine whether a water treatment contract with the Board would make more sense for the AVC participants. The market for qualified operators in the state of Colorado and more specifically in southern Colorado could present challenges to Reclamation to recruit and retain qualified operators. The Board urges Reclamation to seriously consider the JUP North Alternative or some variation of that alternative that would avoid duplication of facilities and staffing thus potentially reducing the costs for the AVC participants.

Thank you for the opportunity to provide comments on the DEIS. If have questions or would like to discuss the issues, please contact me at (719) 584-0233.

Sincerely,



Terry R. Book
Executive Director

*copy: Matt Trujillo
Lee Huffstutter
Don Colalancia
Jim Broderick*