



September 14, 2022

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*Submitted via email to:* [Mark.R.Himes@usace.army.mil](mailto:Mark.R.Himes@usace.army.mil)

*Re: Fort Peck Flow Reduction*

Dear Mr. Remus:

I write to express grave concern over the Army Corps of Engineers' ("USACE") decision to reduce flow rates out of the Fort Peck Dam. USACE's decision to cut flow rates from eight thousand cubic feet per second (8.0 kcfs) to four thousand cubic feet per second (4.0 kcfs) by September 17th comes at a terrible time for sugar beet production in Northeast Montana. If USACE moves forward with this decision, it will detrimentally impact beet farmers who rely on the Missouri River to irrigate their crops and will harm the rural communities that depend on this agricultural commodity. Accordingly, I request a one-month postponement of your planned flow rate reductions. Alternatively, I request that you host a public meeting, giving stakeholders the ability to express their interests and concerns with the planned flow rate reductions.

**I. Montana sugar beets depend on Fort Peck for irrigation.**

Farmers in Northeast Montana depend on the Fort Peck Dam to irrigate their crops. The Missouri River and Fort Peck Lake are the only significant sources of irrigable water in the region, which means that entire rural communities are dependent on USACE's flow rate decisions for their livelihoods. Normally, USACE stewards this responsibility by maintaining consistent flow rates to the communities that live downriver of Fort Peck. Under this multi-use approach, the Fort Peck Indian Reservation, local towns, and rural farmers all maintain year-round access to potable water and Fort Peck Lake retains its value for wildlife, recreation, and hydropower production.

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But USACE's decision to reduce flow rates—and raise the lake water levels—ignores agricultural dependence on this water, with devastating results for Northeastern Montanans. Cutting flow rates from Fort Peck in half would significantly reduce the availability of water for farmers in the area and potentially jeopardize entire crop harvests.

## **II. The proposed flow reduction would occur before harvest season.**

What's even more disturbing about this planned reduction is its timing: immediately before the sugar beet harvest. Sugar beets require substantial amounts of water at this stage of development, and by cutting off farmers' access to irrigation now, USACE threatens the crop's success. Farmers who planted, irrigated, and maintained these fields deserve better—as do U.S. consumers who depend on Montana to produce 1.2 million tons of sugar beets annually.

At a time when American consumers are already facing runaway inflation, the USACE's decision to dry out one of Montana's largest agricultural products will require Americans to pay even higher prices at the grocery store or force American food manufacturers to consider importing sugar beets from places like Russia.<sup>1</sup> Neither option is acceptable.

## **III. Postponing the reduction by one month would avoid these problems.**

USACE could resolve these problems with a short postponement of its plan to reduce flow rates. Fort Peck Lake levels are still well above historic lows, allowing time to postpone this decision.<sup>2</sup> Farmers won't begin harvesting sugar beets until the very end of September/beginning of October, at which point the need to irrigate diminishes sharply. By postponing the flow rate reduction until then, USACE will allow the Fort Peck Dam to serve its agricultural, hydropower, and recreational purposes.

At the very least, USACE should—before reducing flow rates in September—host an evening meeting with Northeastern Montana communities to hear how this decision, and its timing, will impact them.

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<sup>1</sup> While Montana is a leading State for sugar beet production, Russia is the world leader in sugar beet production. Oishimaya Sen Nag, *The Top Sugar Beet Producing Countries in the World*, *WORLDDATLAS* (Apr. 25, 2017), <https://www.worldatlas.com/articles/the-top-sugar-beet-producing-countries-in-the-world.html>.

<sup>2</sup> As of September 13, Fort Peck Lake's water elevation sat at 2,220.5 feet. While this is 2.3 feet below USACE's target level, USACE still maintains that any water above 2,160 feet is designated for "multiple use." With 60 feet of water still available for use, the USACE's rushed decision to raise lake levels before sugar beet harvest seems particularly inappropriate.

## CONCLUSION

For these reasons, the USACE should pause for one month its planned flow rate reduction out of the Fort Peck Dam. At the very least, USACE should host an evening meeting to hear from effected stakeholders before implementing this rushed and potentially harmful decision.

Sincerely,



Austin Knudsen

ATTORNEY GENERAL OF MONTANA

Cc:

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