



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
3425 Miriam Avenue  
Bismarck, North Dakota 58501



APR 13 2006

### MEMORANDUM

To: Area Manager, Dakotas Area Office, Bureau of Reclamation  
Bismarck, North Dakota (Attn: E. McPhillips)

From: *Jeffrey H. Dawson*  
Field Supervisor, North Dakota Field Office  
Bismarck, North Dakota

Subject: Red River Valley Water Supply Project Draft Environmental Impact Statement (EIS)

This memo transmits the U.S. Fish and Wildlife Service's comments on the December 30, 2005, Draft Red River Valley Water Supply Project Environmental Impact Statement (EIS). The Draft EIS analyzes the environmental effects of seven proposed alternatives designed to meet the "comprehensive water quality and quantity needs of the Red River Valley", compared to no action. We look forward to continuing to work with the Bureau of Reclamation to minimize impacts and maximize benefits to fish and wildlife resources in the proposed project area.

If additional information is required, please have your staff contact Terry Ellsworth of my staff, or contact me directly at (701) 250-4481 or at the letterhead address.

### Attachments

cc/att: NEPA Coordinator, Denver

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## **Fish and Wildlife Service Comments on the December 30, 2005, Red River Valley Water Supply Project Draft Environmental Impact Statement (DEIS)**

### **Executive Summary-**

**Pg. 25, Red River Basin Alternative Adverse Effects** - In the groundwater section, the Sheyenne Delta aquifer is listed as an aquifer that will be adversely affected. In the text describing the alternative, it is stated that this alternative would include the same North Dakota and Minnesota groundwater features as the North Dakota In-Basin Alternative, but the Sheyenne Delta aquifer is not listed as adversely affected in the North Dakota In-Basin Alternative.

During informal section 7 consultation with the Bureau of Reclamation (Reclamation), the use of the Sheyenne Delta aquifer was dropped from consideration as a source of groundwater due to U.S. Fish and Wildlife Service (Service) concerns with potential impacts to the threatened western prairie fringed orchid. In the executive summary, it is not clear whether or not the Sheyenne Delta aquifer will be used as a source of groundwater.

### **Chapter Four Environmental Impacts-**

**Pg. 170, Brightwood, Gwinner, and Milnor Channel Aquifers** - The DEIS states that minor wetlands and small lakes are connected to these aquifers and project groundwater withdrawals could have impacts to these habitats. The text also goes on to state that the existing data are insufficient to model groundwater-surface water interaction. How will Reclamation ensure that impacts to ground and surface waters are avoided to the greatest extent possible while meeting the project purpose?

**Pg. 180, Increased Development Environmental Commitments** - For alternatives that include increased development of groundwater resources, the DEIS states that monitoring would be incorporated to determine acceptable withdrawal rates to minimize impacts to existing uses and resources. The DEIS does not go on to explain how the monitoring data will be used. If the monitoring shows that impacts are occurring, how will that data be used? Will pumping levels be reduced or stopped altogether, will the well be moved or will additional wells be developed to continue to provide the same amount of water? While a monitoring program is an important part of the environmental commitments, it is equally important to have a plan in place to mitigate any adverse impacts from increased groundwater development.

**Pg. 204, Table 55. Risk of Successful Invasion of Open Water Untreated Conveyance (from Linder et al. 2005a).** - It appears that the last three items included in a similar table in Linder et al. 2005a (Table 1. Biota of concern identified for analysis focused on biota transfers from Upper Missouri River basin to Red River basin (open-water transfer, e.g., via lined canals)), are not included in this table. The items are: Invasive biota associated with sludge disposal and indirect pathways associated with inter-basin water transfers; potential plant and disease organisms (plant, wildlife, and human); and potential genetically manipulated organisms.

## **DEIS Appendix B.1 - Surface Water Hydrology**

**Pg. B.1 - 51. State Outlet - Lake Target:** Should be 1445 feet msl not 445 feet msl.

**Pg. B.1 - 53. Upper Limit (Wet Period) third paragraph first sentence** - The statement is that the project would release water primarily in wetter years. The preceding discussion would indicate that the project would not release in wet years when the Devils Lake Outlet will be operating, but in drier years.

**Pg. B.1 - 53. Upper Limit (Wet Period) fourth paragraph third sentence** - “Flow from the outlet into the upper reaches of the Sheyenne River and were to run from 1990 to 1999.” This sentence is confusing and needs to be rewritten.

### **Supporting Reports - Draft Supplemental Report: Risk Reduction and Current Options, and Economic Consequences for Red Lakes**

**Pg. 12. Missouri River to Red River Valley Alternative first sentence** - “The alternative will rely on a radial-collector well system comprised of horizontal wells for extraction of source water from Missouri River alluvial deposits, and also includes a biota treatment plant at the Missouri River near Fargo (Reclamation 2005b, c)”. The biota treatment plant would be located at the Missouri River near Bismarck, not Fargo.