

# North Dakota Wildlife Federation

Ensuring abundant wildlife, wildlife habitat, and access to wildlife recreational opportunities



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Mr. Dennis Brietzman  
DKAO Areas office  
US Bureau of Reclamation  
PO Box 1017  
Bismarck, ND 58501

May 1, 2006

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Dear Mr. Brietzman,

The North Dakota Wildlife Federation appreciates this opportunity to review the RRVWSP Draft DEIS and is providing the following comments.

The NDWF believes the DEIS is very well prepared and we commend your staff for providing an understandable document. We are especially supportive of the State's selection of a preferred alternative that is clearly the most environmentally acceptable of all the alternatives. We look forward to seeing the Secretary's selection for a plan and because of the minimal environmental impacts; we would encourage Interior to give strong consideration to accepting the State's preferred alternative.

While no environmental impact would be the best plan, we recognize that some impacts are unavoidable. The proposed mitigation plan should address all our concerns on impacts to our state's natural resources. The acre per acre wildlife mitigation plan is one of the best in the nation.

While we are not experts on the subject of biota transfer and biota treatment plants after our review of the detailed studies you conducted, especially the risk analysis, it is our opinion that you have adequately addressed this issue. We would ask that you conclude this section in chapter 4 with a detailed environmental commitment on exactly what you propose to do for treatment, how you will be operating the plant and how you will be handling waste from the plant.

One issue you failed to address adequately is the NDGF recommendation that minimum instream or augmented flows be provided in the Sheyenne and Red Rivers. North Dakota needs to show its support for our aquatic environment as most other states have done. The impact of drying up these rivers is unacceptable. Your responsibility as stated in the DWRA is to meet the Aquatic needs and we do not believe you have met that need. We would ask that the state's recommended flow be included in the FES and that this flow be assured by enactment of a specific water permit with the State Water Commission, and an interstate compact with Minnesota. This will guarantee that the flows be reserved for aquatic life in perpetuity. NDGF should be a signatory to both these documents.



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Another aquatic need which should be an environmental commitment is maintaining Lake Ashtabula's fish and wildlife conservation pool. We request that within the preferred alternative that a commitment is made to not allow the water level to go below that pool level. This is important in minimize the impacts to the aquatic resource and possibly providing enhancement.

We also understand that the NDGF has requested minor modifications to a few low head dams to allow fish passage during spawning periods. We support that action and request that these features also be included in the FES.

These three actions, minimum flows, maintaining the conservation pool at Lake Ashtabula and assuring fish passage at low head dam should be considered as fisheries and wildlife enhancement and as such be a federal expense as intended in DWRA.

Again we thank you for this opportunity to comment and if during the preparation of the FES there are significant changes from this draft we would ask that you provide a 45 day review period after you file the FES so we may conduct a final review.

Thank you,

Don Baasch  
President NDWF