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City of Grand Forks

ALLEN R. GRASSER, P.E.
CITY ENGINEER

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March 23, 2007

Ms. J. Signe Snortland
Senior Environmental Specialist
Bureau of Reclamation
P.O. Box 1017
304 East Broadway
Bismarck, ND 58502

**Re: Supplemental Draft Environmental Impact Statement (SDEIS) Comments
Red River Valley Water Supply (RRVWS) Project**

Dear Ms. Snortland:

Thank you for the opportunity to review and provide comments on the SDEIS prepared by the Bureau of Reclamation (Reclamation) and the Garrison Diversion Conservancy District (Garrison Diversion) for the RRVWS Project. Please recall that the City of Grand Forks submitted comments dated September 29, 2005 regarding the Draft Needs and Options (N&O) Report and April 12, 2006 regarding the DEIS. Per review of the SDEIS, it appears that many of the comments and concerns expressed by the City in the aforementioned documents were addressed. In accordance with your requested comment deadline of March 26, 2007, this submittal reflects the City's position with respect to various revisions as well as new information contained in the SDEIS. This comment document is organized by category, which is consistent with previously submitted comment letters.

Operational Assumptions

In past comments, the City of Grand Forks supported revisions to the operational assumptions for the RRVWS Project alternatives. Such recommendations and suggested revisions pertained to the identification of supplemental water supply triggers, flows to meet aquatic environment needs, and the preservation of Thompson-Acker appropriation allocations in Lake Ashtabula. The City is pleased to note that these items have been appropriately addressed in the SDEIS and related hydrology modeling efforts used to refine RRVWS Project alternatives.

Nonetheless, the City maintains its previously expressed concerns regarding the ability to accurately forecast the need for permitted releases from Bald Hill Dam, extended hydraulic travel times in the Sheyenne River and Red River, the control over Bald Hill Dam operations, transfer efficiencies associated with channel and evaporative losses, the ability to accurately discern natural flows and project flows, and the reliability of the Red Lake River during a severe drought. As noted near the beginning of Chapter 4 of the SDEIS, adaptive management strategies are discussed to monitor and address potential issues identified for aquatic needs and biota transfer.

Ms. J. Signe Snortland

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Re: **Supplemental Draft Environmental Impact Statement (SDEIS) Comments
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March 23, 2007

Page 2 of 5

It would seem logical to assume that an adaptive management approach could be applied to the operational assumption concerns expressed by the City of Grand Forks, provided that the design of the RRVWS Project included the prudent foresight and flexibility to accomplish such objectives, if necessary during operation. For instance, various assumptions were necessary to estimate the volume and timing of return flows for the purpose of hydrology modeling. From the perspective of a system relying on the Red River downstream of the Fargo/Moorhead area, the City of Grand Forks is of the understanding that return flows serve as a critical water supply component of the alternatives. Deviation from the assumptions regarding return flows, whether caused by future regulations and/or modifications to anticipated discharge practices, could significantly affect the availability of water in the Red River and ultimately the viability of the RRVWS Project. A general sense as to the sensitivity of the presence or absence of return flows would greatly assist the City of Grand Forks in evaluating the extent of its participation in the RRVWS Project.

Water Demand Projections

In comments provided for the DEIS, the City of Grand Forks supported the completion of a sensitivity analysis to develop a range of alternate projections. The results of the sensitivity analysis led to the use of the Scenario 1 population and water demand projections. Given the operational assumption revisions noted above, the City concurs with the use of Scenario 1 projections, which are reflected in the alternatives discussed in the SDEIS. In accordance with previous comments, the City of Grand Forks noted that utilizing groundwater from the Elk Valley Aquifer was appropriately eliminated as a viable feature to meet peak day demands during a drought.

Water Quality

To address water quality challenges and regulatory implications associated with currently utilized surface water sources, the City of Grand Forks is in the midst of planning for relatively significant water treatment improvements in the near future. A diligent effort is put forth daily by operational staff to maintain compliance with the ever increasing monitoring and finished water treatment objectives required by current surface water regulations. The relatively strict water quality standards imposed by recently promulgated, along with the anticipation of future, regulations subject surface water systems to increased risk of regulatory noncompliance and/or the implementation of advanced treatment technologies. It is recognized that treatment technologies are readily available, as noted in the Executive Summary of the SDEIS, to address constituents of concern. However, the City of Grand Forks would prefer to avoid the capital costs and the annual operation and maintenance costs associated with implementing advanced treatment technologies.

As noted in previous comments, the concerns with respect to water quality pertain to the anticipated low flow conditions during drought conditions coupled with the dependence on upstream return flows to meet demands. It is recognized that the results of extensive water quality modeling and study efforts were included in the SDEIS, which indicates that the development of the revised alternatives was not significantly influenced by water quality needs.

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**Re: Supplemental Draft Environmental Impact Statement (SDEIS) Comments
Red River Valley Water Supply (RRVWS) Project**

March 23, 2007

Page 3 of 5

The City of Grand Forks appreciates the extensive level of effort put forth to address its water quality concerns. Despite acceptance of the results, the City maintains its concerns with respect to water quality. The water quality modeling results indicate that the City of Grand Forks could provide adequate treatment and utilize the available supply. Should actual water quality conditions deviate substantially from that indicated in the model and affect the ability to utilize the available supply; however, the City of Grand Forks trusts that consideration would be given toward addressing unanticipated water quality challenges at Grand Forks and other locations dependent on return flows as a future component of the RRVWS Project. As such, the City requests that necessary improvements to water treatment facilities and related infrastructure caused by water quality limitations during drought conditions be considered part of the RRVWS Project and that associated costs be eligible for the funding program under which the RRVWS Project is implemented.

Aquatic Environment

Due to the realized benefits toward meeting recreational needs and general aesthetic quality of life to riparian areas adjacent to rivers receiving supplemental flows, the City of Grand Forks provided support for the inclusion of reasonable aquatic environment flows in the RRVWS Project. Support for meeting aquatic environment needs, however, was contingent upon the costs associated with including project flows being assigned to state and/or federal entities, as appropriate, instead of the users of the RRVWS Project. At least from the perspective of the preferred alternative, the Garrison Diversion Unit (GDU) Import to the Sheyenne River Alternative, the City is pleased that aquatic needs flows were incorporated in the hydrology modeling and operational assumptions. The exclusion of aquatic environment flows from the other alternatives and the related disadvantages are adequately noted in the SDEIS. In relation to the discussion of operational assumptions above and in anticipation that the RRVWS Project moves forward, the City anticipates that a strategy will be developed to adequately measure, monitor, and regulate project flows to the users, project flows assigned to meet aquatic needs, and natural flows available to meet appropriated allocations.

Alternatives

The City of Grand Forks generally concurs with the analysis incorporated in to the SDEIS for the purpose of evaluating alternatives. The inclusion of bulleted lists of advantages and disadvantages offers the reader with objective information regarding the technical viability, economic feasibility, and environmental concerns/benefits of the alternatives. The City agrees with the following:

- Identification that the No Action Alternative does not meet the purpose and need of the RRVWS Project as defined by the Dakota Water Resources Act (DWRA);
- Elimination of the Lake of the Woods Alternative due to concerns raised in comments received on the DEIS;
- Elimination of the GDU Water Supply Replacement Pipeline Alternative due to excessive cost;

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Bureau of Reclamation

**Re: Supplemental Draft Environmental Impact Statement (SDEIS) Comments
Red River Valley Water Supply (RRVWS) Project**

March 23, 2007

Page 4 of 5

- Identification of technical concerns and potential limitations identified for the North Dakota In-Basin Alternative;
- Identification of limitations associated with utilizing groundwater from aquifers located in Minnesota, which prompted Reclamation to ignore the stipulations during revision to the hydrology modeling efforts; and
- Selection of the GDU Import to the Sheyenne River Alternative as the preferred alternative based on the limitations associated with in-basin alternatives, the higher costs of the other Missouri River import alternatives, and the ability to provide aquatic environment benefits.

Biota Transfer

Based on the discussion included in the SDEIS, the City of Grand Forks recognizes that an extensive study effort was completed in regards to the risk of transferring invasive species from the Missouri River Basin to the Hudson Bay Basin via the implementation and operation of an import alternative. The City of Grand Forks is pleased that the primary conclusion drawn from the study effort indicates that there would be minimal risk of transferring invasive species with the control measures proposed in the Missouri River import alternatives. This finding supports the selection and implementation of the GDU Import to the Sheyenne River Alternative.

Financial Analysis

In comments regarding the DEIS, the City of Grand Forks requested that the financial analysis be expanded to better reflect the present population of the Red River Valley, current monthly water costs, and anticipated rate impacts of identified local capital improvements. In recognition that it would be most appropriate for the City of Grand Forks and other stakeholders to address the rate impacts of local capital improvements, the revisions included in the SDEIS adequately addresses the City's comments on the DEIS pertaining to the financial analysis.

Conclusion

The City of Grand Forks appreciates the attention given to its previous concerns and acknowledges the level of effort expended to provide revised information in the SDEIS and supporting documentation. The completeness of the data provided in the report coupled with data obtained from entities performing technical analyses has assisted in facilitating the City's process for evaluating its water quantity and water quality needs, which will ultimately determine the extent of participation in the RRVWS Project. If you have any questions regarding the City's comments, please do not hesitate to contact me.

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**Re: Supplemental Draft Environmental Impact Statement (SDEIS) Comments
Red River Valley Water Supply (RRVWS) Project**

March 23, 2007

Page 5 of 5

Sincerely,

A handwritten signature in cursive script that reads "Allen R. Grasser".

Allen R. Grasser, P.E.

City Engineer

c: Curt Kreun, Grand Forks City Council
Rick Duquette, City Administrator
Todd Feland, Public Works Administrator
Hazel Feters-Sletten, Water Utility Superintendent
Steve Burian, P.E., Advanced Engineering and Environmental Services, Inc.