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Water Stewardship

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April 25, 2007

Mr. Dennis Breitzman  
Red River Valley Water Supply Project  
Bureau of Reclamation  
P.O. Box 1017  
Bismarck, ND 58502-1017

Dear Mr. Breitzman:

**REVIEW AND COMMENT  
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT  
RED RIVER VALLEY WATER SUPPLY PROJECT  
JANUARY 31, 2007**

Thank you for the opportunity to review and provide comments on the Supplemental Draft Environmental Impact Statement for the Red River Valley Water Supply Project, dated January 31, 2007. Manitoba Water Stewardship is grateful for the opportunity to continue to participate in this important process and respectfully submits the following comments for your consideration.

- (1) Manitoba has consistently opposed and continues to oppose inter-basin transfers of water because there are inherent risks associated with such transfers including, most importantly, the risks related to the transfer of harmful invasive species that cannot be completely mitigated for the life of the project. In-basin options, by contrast, are risk free in this regard. In previous comments on this project (Williamson to Bureau of Reclamation, June 30, 2006), we recommended that an in-basin alternative for the Red River Valley water supply be more fully explored and selected as the preferred alternative. Manitoba Water Stewardship continues its support for this recommended approach since this alternative is consistent with contemporary and sustainable water management principles, is consistent with Manitoba's principles related to management of water within its provincial jurisdiction, is consistent with the Government of Canada's longstanding opposition to inter-basin water transfers, and is consistent with the Natural Resources Framework Plan and Guiding Principles developed by the Red River Basin Commission for the shared waters of the international Red River basin. It is accepted in current water management practice that the use of in-basin resources should be the first priority in meeting current and projected future water demands.

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With regard to in-basin options, Manitoba notes that both Minnesota (Department of Natural Resources Commissioner Mark Holsten to Mr. Dennis Breitzman, April 18, 2007) and Missouri (Department of Natural Resources Director Doyle Childers to the Bureau of Reclamation, April 20, 2007) identify numerous errors, omissions, inconsistencies, and incomplete analyses used by the Bureau and the Garrison Diversion Conservancy District to support the selected Missouri River inter-basin transfer alternative. Both jurisdictions strongly support the in-basin Red River Basin alternative since it will meet the water supply goals of the Dakota Water Resources Act of 2000, incur lower cost, meet the requirements of the National Environmental Policy Act, and similar to Manitoba's concerns, presents least risk to the environment, and can be implemented in reasonable phases.

- (2) Underlying the justification for the magnitude of projected future water needs are the water demand estimates in the Red River Valley to the year 2050. These water demand estimates are based on per capita water use, population projections, and water conservation measures. We believe that deleting Scenario Two from the Supplemental Draft Environmental Impact Statement was a positive step. However, we continue to be concerned that population estimates and per capita water use have been overestimated, which has resulted in inflated water demands being used in Scenario One. In this regard, we would like to re-iterate the comments made in our June 30, 2006 letter to the Bureau and stress, in particular, that the population projections used by the Bureau in the preparation of Scenario One were not based on accepted, scientifically-sound modelling methods, and that it is unreasonable to estimate population growth and subsequent water use projections for a 50 year planning horizon. This flawed methodology is of concern to us since the resulting unrealistic projections of future water needs have been used to justify selection of an alternative involving the inter-basin transfer of water, which has inherent risks to Manitoba's environment and water resources as noted above. The use of more realistic future projections may indicate that future needs can be met with in-basin alternatives which are without similar risks.
- (3) Because of the inability to accurately project future population growth for the northeast region of North Dakota over a 50 year planning horizon, and because of the inherent benefits of selecting an in-basin solution, it is recommended that a phased or staged approach be identified as an alternative and that this option be fully considered. A staged approach would allow a combination of water management measures to be implemented using in-basin alternatives in advance of need over a more realistic and accurate planning horizon. This approach would also be consistent with the principles of adaptive management advanced on p. 4-2 of the Supplemental Draft Environmental Impact Statement. In addition, it will allow modern water conservation measures to be fully developed and implemented at the same time, and will allow time for basin-wide drought management contingency plans to be developed and for the benefits from this approach to be fully realized.

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- (4) As mentioned above, we strongly recommend that an in-basin alternative be selected to meet the future water needs of northeastern North Dakota. However, it is noted that both the Bureau and the Garrison Diversion Conservancy District have selected the Garrison Diversion Unit Import to Sheyenne River as their preferred alternative. Manitoba notes that the Supplemental Draft Environmental Impact Statement commits to meeting the biota treatment goals identified in our June 30, 2006 comments.

We recognize that this represents a positive and significant advancement relative to the Draft Environmental Impact Statement. If the Bureau's preferred alternative or any other inter-basin transfer alternative is ultimately selected and funded, these treatment goals and a multi-barrier treatment process (including filtration) that will achieve these goals must be incorporated into the final project design.

- (5) Although the risk of a treatment system failure might be relatively low during the initial period of operation, we are concerned that, over the life of the project, there is a relatively high risk of system failure. As pointed out in the Supplemental Draft Environmental Impact Statement, regular monitoring, maintenance and on-going replacement of aging system components are critical to ensuring its effective functioning to minimize the risk of transfer of harmful invasive species across the continental divide. We note that a number of general commitments have been included in the Supplemental Draft Environmental Impact Statement (p 4-121) to ensure that the operation of the water treatment facility meets the required water treatment goals. Additional specific detail will need to be developed for each commitment.

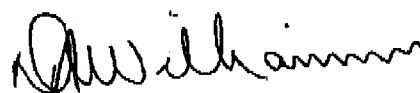
There is a need to develop a reliable monitoring system that immediately detects failure in the water treatment system and has the ability to immediately halt the diversion to prevent a release of inadequately treated water from the facility. This should be a requirement of facility operating plans. In this regard, should an inter-basin transfer alternative be ultimately selected and funded, it is recommended that an open, transparent process be developed to allow Manitoba's participation in the development of detailed, specific plans and to allow for Manitoba's on-going review of treatment performance for the life of the project. There is also a need for on-going, basin-wide invasive species monitoring and assessment program for the shared waters of this region.

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Thank you again for the opportunity to comment on the Supplemental Draft Environmental Impact Statement for the Red River Valley Water Supply Project. We hope these comments are helpful. Should you have further questions, please feel free to contact me at the above address, by calling (204) 945-7030, or email at [Dwight.Williamson@gov.mb.ca](mailto:Dwight.Williamson@gov.mb.ca).

Sincerely,



Dwight Williamson, Director  
Water Science and Management  
Branch

c: Gerry Berezuk  
Don Norquay  
Peter Fawcett  
Wayne Dybvig