

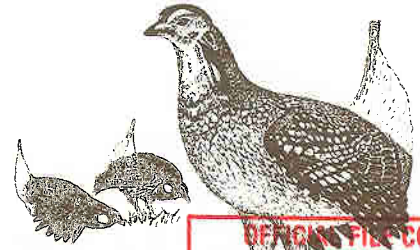
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North Dakota Chapter

THE WILDLIFE SOCIETY

P.O. BOX 1442 • BISMARCK, ND 58502



April 24, 2007

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Mr. Dennis Breitzman, Area Manager
 Dakota Area Office – U. S. Bureau of Reclamation
 P. O. Box 1017
 Bismarck, North Dakota 58502-1017

Re: Red River Valley Water Supply Project

Dear Mr. Breitzman:

The North Dakota Chapter of The Wildlife Society (Chapter) appreciates the opportunity to offer our comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Red River Valley Water Supply Project. This letter supplements the Chapter's comments on the Draft EIS that were submitted to your office in a letter dated April 12, 2006. Our comments focus on specific steps that can be taken to help maintain the ecological integrity of the Sheyenne and Red River ecosystems.

Since the comment period on Draft EIS closed in April of 2006, a considerable amount of work has been accomplished to evaluate project alternatives. Most notably, the Garrison Diversion Conservancy District and the Bureau of Reclamation have agreed on a preferred alternative and the Manitoba Water Stewardship has recommended In-Filter DAF regime followed by UV chlorine/chloramines disinfection be considered as a water treatment option to address biota transfer issues. In addition, the alternatives presented in the SDEIS to meet the comprehensive water needs of the Red River Valley have been modified, based on the comments submitted on the Draft EIS. We believe the SDEIS presents a full range of practical alternatives for meeting the Red River Valley's projected water needs.

The SDEIS identifies the *GDU Import to the Sheyenne River Alternative* as the preferred alternative. This alternative uses the McClusky Canal, a 122 cfs connecting pipeline, and the Sheyenne River to deliver treated water to the Red River Valley. Supplementing flows in the Sheyenne River with water from the Missouri River system has never been previously attempted and there are no similar projects in this region of the country to evaluate. Therefore, the use of the Sheyenne River as a principle component of the project conveyance system presents environmental risks to fish and wildlife resources, including some that can be anticipated and others that likely will be identified only after the project becomes operational.

The presence of environmental uncertainties associated with supplementing the flows of the Sheyenne River with Missouri River water requires all reasonable precautions be incorporated into the project's environmental commitments. A framework also needs to be established that ensures the project's environmental commitments are implemented and future, unanticipated impacts are effectively addressed. To accomplish this objective, we believe it is essential for the Bureau of Reclamation and the Garrison Diversion Conservancy District to endorse an adaptive management strategy to effectively manage environmental risks and ensure the ecological integrity of the Sheyenne and Red River ecosystems.

An adaptive management strategy for the Red River Valley Water Supply Project should be developed consistent with the procedures announced by the Department of the Interior in 2007. We also encourage the Bureau of Reclamation and the Garrison Diversion Conservancy District to incorporate the concepts of the Council on Environmental Quality's recent guidance on adaptive management. Adaptive management procedures present a planning process that uses science and monitoring to effectively move projects forward while addressing environmental risks or uncertainty. To implement a project adaptive management plan, we recommend that the Record of Decision (ROD) include a specific commitment to establish an adaptive management work group. The work group should include the necessary planning and environmental expertise to direct the project's adaptive management program. In many respects, the adaptive management work group's responsibilities will be similar to the work of the Federal Advisory Council that directed the development of the project's mitigation and enhancement plan. The work group should also be tasked with keeping the public informed concerning the steps this project is taking to effectively manage environmental impacts.

The Chapter also recommends the ROD establish commitments to conduct the needed studies to document existing conditions along the Sheyenne and Red rivers, maintain a long-term monitoring program, and implement appropriate mitigation measures if unforeseen impacts occur. Data documenting existing conditions is needed to establish baseline conditions and we believe this work should be initiated immediately after the ROD is signed. This information forms the basis to monitor both the beneficial and detrimental effects that may occur when the project becomes operational. A plan to monitor baseline conditions and any significant environmental change that may occur is essential to objectively evaluate this project and determine whether mitigation measures are warranted.

The designation and development of the Sheyenne River as a conveyance feature to meet the Red River Valley's comprehensive water needs increases the likelihood that this river system will be used to meet future development needs in eastern North Dakota. All future projects tiered off of the Red River Valley Water Supply Project infrastructure must be fully evaluated in accordance with NEPA and other pertinent federal regulations to assess direct, indirect, and cumulative environmental impacts. We believe the information gathered by implementing an adaptive management program this year will provide a solid foundation to make decisions concerning future water development needs.

The project's enabling legislation identifies MR&I water development, water quality, aquatic environment, recreation, and water conservation measures as project needs. We believe developing a water supply system to serve the 13 county project area presents a unique opportunity to strengthen the project's environmental commitments by implementing projects that will enhance North Dakota's natural resources. As fully described in our previous letter, the North Dakota Natural Resources Trust (Trust) is uniquely positioned to implement projects that enhance the aquatic environment in the 13 county project area. The Chapter recommends that the Bureau of Reclamation work collaboratively with the Trust to explore and fund practical ways of implementing mutually agreeable projects to strengthen the project's environmental commitments.

The Chapter appreciates the opportunity to provide comments on the SDEIS for the Red River Valley Water Supply Project. Our comments have focused on strengthening the environmental aspects of the project by recommending actions to implement aquatic environment features that meet the authorized purposes and objectives of the Dakota Water Resources Act. We welcome the opportunity to continue a dialogue with the Bureau of Reclamation, the Garrison Diversion Conservancy District, other environmental and water development agencies and organizations, and North Dakota's political leaders on this important issue.

Sincerely,



Allyn J. Sapa, President
North Dakota Chapter of The Wildlife Society

cc: Governor John Hoeven
North Dakota Congressional Delegation
Manager, Garrison Diversion Conservancy District
Secretary, Lake Agassiz Water Authority
Director, North Dakota Game and Fish Department
State Engineer, North Dakota State Water Commission
Chief, Environmental Health Section, North Dakota Department of Health
Executive Director, North Dakota Water Users Association
Executive Director, North Dakota Natural Resources Trust
Executive Director, The Wildlife Society, Bethesda, MD