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**Micki Weimerskirch - Backup E-transmission**

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**From:** "Genevieve Thompson" <genevivet@cableone.net>  
**To:** <ssnortland@gp.usbr.gov>  
**Date:** 4/26/2007 7:53:48 AM  
**Subject:** Backup E-transmission

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Hello Signe -

I sent you Audubon's e-comments on the SDEIS last night, but I cannot find a "sent record" that verifies to me that they were transmitted, so I am also sending them to you from my "travel" email just in case. As I said in my "original" transmission, I will post an original hard copy to you for your files when I return to the office later this afternoon.

Hope all is well in your realm. Cheers, Genevieve



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24 April 2007

Mr. Dennis Breitzman  
U.S. Bureau of Reclamation  
Dakota Areas Office  
U.S. Bureau of Reclamation  
P.O. Box 1017  
Bismarck ND 58502-1017

**RE: Comments from Audubon on the Supplemental Draft Environmental Impact Statement for the Red River Valley Water Supply Project (SDEIS-RRVWSP)**

Dear Mr. Breitzman:

Please accept these comments on behalf of Audubon in regard to the Supplemental Draft Environmental Impact Statement (SDEIS) for the Red River Valley Water Supply Project. Audubon is pleased to partake in the opportunity to provide substantive input into the SDEIS.

Fargo has recently been selected from a pool of 72 cities as the number one urban environment by the *Earth Day Network*, based on factors which included air quality, toxics/waste, and drinking/surface water. In addition, the Mayor of Fargo serves on the *Mayors for Climate Change*. According to his website, "Fargo Mayor Dennis Walaker wants to build an increasingly "green" city. He believes protecting the environment is a key part of being a city leader"<sup>1</sup>. Audubon asserts that the preferred alternative selected by the U.S. Bureau of Reclamation in the SDEIS of an out-of-basin Missouri River diversion to the Red River Basin as a solution to in-basin drought conditions is wholly inconsistent with these green goals. Conversely, the Red River Basin Alternative identified in the SDEIS has the comparable capacity to meet forecast water needs, in an economically and environmentally superior manner.

Audubon believes it is imperative for the Red River Basin to seize the opportunity presented by the Red River Valley Water Supply Project for a sustainable, in-basin water supply. Designation of the Red River Basin Alternative as the preferred alternative would ameliorate multiple adverse impacts posed by the currently designated preferred alternative of an interbasin transfer of Missouri River water for use in the Red River Basin. For example, one of Audubon's primary concerns with the SDEIS is that it has identified potential adverse impacts to the habitat for two endangered species, the interior least tern and the piping plover. The DSEIS states that: "*Reclamation is continuing informal section 7 consultation with the Service and will prepare and submit a biological assessment prior to the release of the FEIS. The assessment will address effects to interior least terns and piping plovers and other listed species and critical habitat for the preferred*



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<sup>1</sup> <http://www.ci.fargo.nd.us/CityInfo/Mayor/MayorsforClimateProtection/>

alternative. Reclamation will prepare the biological assessment on the preferred alternative identified in the FEIS in accordance with ESA regulations on interagency cooperation (50 CFR 402). The biological assessment for section 7 consultation will be attached to the FEIS (p. 396, DSEIS). How can input and comments be provided on the potentially very significant impacts to two endangered species associated with the preferred alternative, when the consultation and assessment have not yet been completed and included?

Table 1 summarizes the comparative advantages of the Red River Basin Alternative as presented in the SDEIS, in relation to the disadvantages of the currently "preferred" alternative of the Missouri river option, in both the short- and long-term.

PROS/CONS	MISSOURI RIVER OPTION	RED RIVER BASIN ALTERNATIVE
<p><b>Avian ESA Issue for Least Tern &amp; Piping Plover</b></p>	<p>The SDEIS states that "implementation of the Missouri River import alternative(s) could likely result in potential adverse impacts to the interior least tern and piping plover and critical habitat for the northern Great Plains breeding population of the piping plover" (p. 4-185, SDEIS). Although the SDEIS provides "new information" about the adverse impacts of a Missouri River alternative on least terns and piping plovers, a <u>formal</u> Section 7 consultation as required under the ESA for the biological assessment is incomplete. This assessment should be completed prior to the SDEIS comment period, to enable a realistic determination of impact. It is difficult to comprehend how an option that has deleterious effects on <u>two</u> listed species would be the "preferred alternative", particularly when the in-basin alternative is less expensive and has <u>no</u> impact on these species.</p>	<p>"This alternative would not impact listed species associated with the Missouri river, including the interior least tern, piping plover, bald eagle, and pallid sturgeon" (p. 401-2, SDEIS).</p>
<p><b>Implementation Timeframe</b></p>	<p>Implementation of a Missouri River option necessitates construction of the entirety of the project features "up front"; it is an all-or-nothing option that assumes the projected water needs 50 years into the future, regardless of the actual degree of drought and/or water demand in the Red River Basin.</p>	<p>Implementation of the Red River Basin Alternative can be incremental and 'responsive' in degree to actual drought conditions as they do or don't occur, particularly if the options for groundwater supplies and conservation/drought contingency measures are implemented simultaneously, to a degree commensurate with the severity of the drought condition.</p>
<p><b>Downstream Impacts</b></p>	<p>The risk of contamination from out-of-basin invasive species and biota transfer (i.e., whirling disease, etc.) mandates the up-front construction of</p>	<p>Implementation of the in-basin Red River Basin alternative precludes the necessity for out-of-basin biota treatment, as well as the potentially</p>

	<p>biota treatment/containment, adding significantly to the upfront cost of project implementation. According to the SDEIS (p. 3-50 or 160), "... (<i>Missouri River</i>) alternatives could be a new pathway for introducing invasive aquatic species into the Hudson Bay Basin... Thus, any species that is in the Missouri River Basin but not in the Hudson Bay Basin is potentially of concern. In addition to known organisms, there may be unknown species (e.g., fish diseases) in the Missouri River Basin whose introduction into the Hudson Bay Basin could cause long-term adverse impacts".</p>	<p>deleterious impacts of unknown and/or unanticipated species introduction across watershed boundaries. The Red River Basin alternative also completely removes the "downstream impacts" to the Missouri River that accrue as a result of permanent depletions out of the Missouri River Basin that accompany the "preferred alternative".</p>
<p><b>Economic Benefits and Impacts</b></p>	<p>The SDEIS presents revised cost estimates for the Missouri River alternatives, as well as for the Red River Basin alternative. The adjusted costs now show construction costs for the "preferred" Missouri River option to be approximately 60% more expensive (at \$700,513,000) than the Red River Basin Alternative (at \$415,438) (p. 2-55). It is not clear from the SDEIS whether the costs of this alternative also include the impacts of drought and permanent water removal for Missouri River Basin inhabitants "downstream" from the withdrawal point, particularly for areas that are already negatively impacted from <u>existing</u> drought conditions on the Missouri River.</p>	<p>The Red River Basin Alternative is approximately 60% less expensive than the Missouri River option. A recent <i>Fargo Forum</i> article<sup>2</sup> demonstrates the economic benefit of the in-basin alternative: "Moorhead may opt out of the \$600 million Red River Valley Water Supply Project, looking to local water sources for drought protection and possibly saving millions of dollars in the process. The city is looking at the possibility of further developing its capacities to draw water from the Buffalo Aquifer, an underground water source five miles east of the city." The article reports that it will cost Moorhead \$12.7 million in construction, plus water treatment, compared to about \$8.5 million to access the Buffalo Aquifer. In addition, the article reported that, "One "big advantage" of going with the Buffalo Aquifer project is that it could be built in a year, McLain said. Thus, the necessary construction for the project would not need to be done until the reserves were needed".</p>
<p><b>Water Demand Analysis (Missouri &amp; Red Rivers) and Conservation Planning</b></p>	<p>Under the "No Action" alternative, it is anticipated that Lake Ashtabula would be drained below its minimum "Conservation Pool", with subsequent adverse impacts to aquatic life and recreation. Similarly, if the Missouri River Basin option is implemented, it is not clear from the SDEIS, particularly and presumably if the Missouri River Basin is in a drought comparable to or more severe than the Red River Basin, whether its permanent pool would be</p>	<p>The SDEIS states that "the Red River Basin alternative would not reduce the volume of Lake Ashtabula below the top of the Fish &amp; Wildlife Conservation Pool and would have a higher average reservoir volume than the No Action Alternative" (p. 4-20).</p> <p>The potential positive impact of drought contingency planning, to levels II and III, is still not adequately reflected in the SDEIS, even though</p>

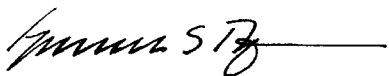
<sup>2</sup> 14 April 2007, J. Shane Mercer

	exceeded, particularly with the continued (i.e., permanent) depletion of Missouri River water out of the basin.	the contribution can be significant in reducing water resource demand. The city of Fargo already implements drought contingency planning (Summer 2006) and could build on that existing capacity.
<b>Overall Efficacy &amp; Sustainability</b>	The "preferred" Missouri River option reflects a lack of ecological and economic fortitude and wisdom. It is an unnecessarily expensive "all-or-nothing" option that brings potentially deleterious impacts to both the Missouri River system and the already-threatened species that depend on this riverine ecosystem habitat. It also jeopardizes the Red River Basin by placing its future water dependency in the event of truly severe drought on an out-of-basin and distant aquatic resource that is routinely and consistently <u>more</u> drought prone.	The Red River Basin alternative reflects a commitment to cooperative and responsible natural resource management between jurisdictions within appropriate watershed boundaries. It represents a fiscally conservative approach that is designed to respond incrementally to drought-related need, particularly if it is linked to the implementation of proven-effective, commensurate drought contingency measures. And in light of the potential inter-jurisdictional challenges faced by the preferred Missouri River option, this is the alternative that promises the delivery of a drought-mitigating water supply in the near-term, foreseeable future.

Audubon looks forward to supporting a process to utilize in-basin resources within the Red River Valley to meet future water needs in an economically viable and ecologically sound manner. We believe that the Red River Basin alternative can be implemented in an effective and timely way, commensurate with actual need. In addition, this alternative simultaneously safeguards the Missouri River Basin, which has been under drought conditions for the past several years. It is truly time for a new approach to the protection of our shared natural resources, through sustainable water resource management, through an ongoing and escalating reduction in our carbon footprint, and in better conservation for the future.

Thank you again for the opportunity to provide input into the SDEIS. Please do not hesitate to contact us if we can provide additional information and/or clarification.

Sincerely,



Genevieve Thompson  
VP & Exec. Director, Audubon Dakota



Betsy Loyless  
Executive VP for Public Policy, Audubon