Responses to World Wildlife Fund

Comments on the Draft Report on the Red River Valley Water Supply Project Needs and Options

WWF for a living planet®

WWF-Canada
World Wildlife Fund Canada

245 Eglinton Avenue East
Suite 410
Toronto, Ontario
Canada M4P 3J1

Tel: (416) 489-8800
Toll-free: 1-800-26-PANDA
(1-800-267-2632)
Fax: (416) 489-3611
panda@wwfcanada.org
wwf.ca

October 3, 2005

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

Dear Mr. Breitzman,

Please accept our comments on the "Draft Report on the Red River Valley Water Needs and Options" for consideration under the 120-day review period according to the Dakota Water Resources Act.

Comment 1 Canadians have long been concerned about cross-border and inter-basin transfers of water, given what the federal government has called the "costly, unpredictable, irreversible and catastrophic economic and environmental damage which can occur from interbasin diversions of water."

WWF-Canada is part of the global WWF network, which pursues a freshwater conservation mandate highlighted by specific quantiative targets. See the list attached, and note the emphasis on sound water conservation management within river basins.

Below we note concerns with both the problem definition and principles of sound freshwater conservation.

Describing the Problem

The focus of the current report has been on the possibility of drought and securing a safe water supply for residents and business in the eastern counties of North Dakota in the Red River Valley. However, in Canada, the main human risk issue for residents of the Red River Valley has been periodic flooding. Drawing water from other basins, or storing more inter-basin water in specific resevoirs, poses the risk of additonal flood levels during high precipitation periods and/or events. This is an added consideration for this project, particularly if any water storage catchments are not designed to hold water during infrequent high precipitation events. **Comment 2**

Comment 3 We suggest that describing only two larger basins (Missouri and Hudsons Bay) is not an appropriate context to discuss the problem and options. Cumulative effects and environmental impacts of project specific operations should also be consdered for smaller watersheds on the order of 100-1,000 km^2, not only for very large basins that register at continental scales. **Comment 4**

..../2

Responses to World Wildlife Fund

Response to Comment 1

Water treatment plants to address the import of Missouri River water are described in the Final Needs and Options Report, chapter four, pages 4-6 through 4-9 of the report. Reclamation also produced a study titled *Water Treatment Plant for Biota Removal and Inactivation Preliminary Design & Cost Estimates, Red River Valley Water Supply Project*, which describes these plants in more detail. However, consideration of potential impacts from interbasin transfer is an issue evaluated in the DEIS (draft environmental impact statement), not the Needs and Options Report.

All of the alternatives considered in the DEIS that would use Missouri River water include treatment and control systems that would minimize the risk of biota transfer. Reclamation has evaluated the risks and potential impacts of interbasin biota transfer in the DEIS. These analyses calculate that the risk of biota transfer through project-related pathways would be very low with the control systems proposed for the Missouri River import alternatives.

Response to Comment 2

The Draft Needs and Options Report is an assessment of needs and an engineering study to develop potential options for the Project (Red River Valley Water Supply Project). The DEIS is the appropriate document for documenting impacts. In the DEIS potential changes in surface water quantity (including flooding) for each alternative and how these changes may affect other resources are disclosed.

Surface water quantity modeling revealed that there would be changes in flow regimes on the Sheyenne and Red Rivers caused by the addition of Project water as well as depletions from increased demand. An analysis of a wet cycle from 1990 - 1999 was done to predict if the Project would increase flows during times when the rivers' flows are highest. Extreme high flows associated with spring months may correspond with an increase in erosion, which may affect water quality, riparian areas, cultural resources, and aquatic communities. Our analysis shows changes would be less than +/-10% along the Sheyenne River and Red River, when compared to the No Action Alternative. Although there would be no change on a monthly basis to extreme high flow events, as compared to No Action, that is only an indicator that the Project will not affect flooding and flood associated erosion. Because the hydrologic modeling was based on monthly flows but flooding occurs on a daily basis, there are no data to directly measure the potential for flooding and associated erosion resulting from Project flows.

Response to Comment 3

We disagree. Section 8 of DWRA (Dakota Water Resources Act) directed the Secretary and the state of North Dakota to "jointly prepare and complete a draft environmental impact statement concerning all feasible options to meet the comprehensive water quality and quantity needs of the Red River Valley and the options for meeting those needs including delivery of Missouri River water to the Red River Valley..." [Section 8(c)(2)(A)]. Therefore, there is a need to look for options both within basin (the Red River Valley is in the Hudson Bay basin) and outside the basin (Missouri River Basin) as directed by DWRA (Dakota Water Resources Act). This was done.

Response to Comment 4

The Draft Needs and Options Report is an assessment of needs and an engineering study to develop potential options for the Project. The DEIS is the appropriate document for evaluating and documenting cumulative and environmental impacts. Because the geographical scope of this Project covers portions of the Hudson Bay and Missouri River Basins, the smaller watersheds within those basins will also be considered within the scope of the project as well as potential Project-related impacts within those smaller watersheds.

WWF for a living planet®

Principles

Comment 5 Efficiency - Smaller is better than bigger. WWF-Canada is not able to comment on the engineering aspects of the proposed options. However, it is likely that larger projects will result in more opportunities for leakage and inefficiencies in the system. For the most part, this sytem will only be in demand during drought periods. Therefore, regular operating during relatively normal precitpation periods should aim to be as efficient as possible, such as reducing travel distances for displaced water. This is more likely to be achieved with smaller projects in which any displaced water is travelling shorter distances.

Comment 6 Within-basin options are better - Within-basin options have fewer envrionmental risks. Freshwater systems already experience some of the largest invasions by alien species, so that placing more stress on these systems should be avoided. Although we cannot comment on the engineering and construction risks of larger projects, there are clear environmental risks of inter-basin transfers of water and associated species, including pathogens. Comment 1

Comment 7 Consultation - Any water management project in the Red River Valley is necessarily a bi-national one and should therefore be subject to consultation with, or at least comment by, affected commnities and other stakeholders in Canada. The International Joint Commission and the Boundary Waters Treaty provide precedents for conducting these.

Sincerely yours,

Mike Russill
President & CEO
WWF-Canada

c.c. Carter Roberts, President, WWF-US
John McCutcheon, WWF-Canada Board Member

Responses to World Wildlife Fund

Response to Comment 5

Again, according to DWRA, Reclamation was to explore "all feasible options to meet the comprehensive water quality and quantity needs of the Red River Valley and the options for meeting those needs," and that includes both large and small options.

Response to Comment 6

The Draft Needs and Options Report is an assessment of needs and an engineering study to develop potential options for the Project. The DEIS is the appropriate document for evaluating environmental risks.

Response to Comment 7

We note that the statutory provisions of NEPA (National Environmental Policy Act) and the Council on Environmental Quality's regulations implementing NEPA do not require assessment of environmental impacts within the territory of a foreign country. However, as a voluntary measure, the DEIS includes information on impacts of the proposed action that may affect areas within Canada solely because of the unique aspects of the Project (including, for example, an alternative that involves a lake straddling the international border). Canadian government agencies have participated on Technical Team that reviewed plans of study and draft reports used to produce the Needs and Options Report. They also had opportunities to comment on preliminary sections of the Draft Needs and Options Report.

It is premature at this time to refer this project for formal consultation until such time a preferred alternative is selected. Section 1(h)(1) of the Dakota Water Resources Act states:

> "Prior to construction of any water systems authorized under this Act to deliver Missouri River water into the Hudson Bay basin, the Secretary, in consultation with the Secretary of State and the Administrator of the Environmental Protection Agency, must determine that adequate treatment can be provided to meet the requirements of the Treaty between the United States and Great Britain relating to Boundary Waters Between the United States and Canada, signed at Washington, January 11, 1909 (26 Stat. 2448; TS 548) (commonly known as the Boundary Waters Treaty of 1909)."

WWF for a living planet®

WWF's Global Freshwater Targets and Milestones for 2005-07

TARGET 1: Conserving river basins and ecoregions

Freshwater habitats and environmental processes are maintained or restored in at least 50 river basins and ecoregions by 2010.

1. Major river basin initiatives for conservation and restoration of the environment have been adopted by governments and commenced in at least 25 priority basins and ecoregions by 2007.

TARGET 2: Sustainable water use

Water use policies and practices adopted by at least 100 governments, and 10 industry sectors or international processes, contribute to conserving the environment of priority river basins and ecoregions by 2010.

1. By 2007, at least 20 WWF initiatives in priority river basins and ecoregions have resulted in either stopping or significantly modifying the operations of water infrastructure schemes, or have established national strategies that reduce the demand for new dams.
2. Establish 5 market-based or policy frameworks for agricultural commodities that promote better management practices for water use and effluent reduction by 2007.
3. Support 10 countries to develop and enact sustainable water sue programmes that promote poverty alleviation and biodiversity conservation by 2007.

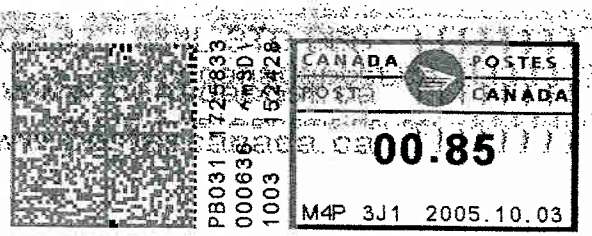
TARGET 3: Conserving freshwater habitats

250 million hectares of representative habitats world-wide are protected and more sustainably managed by 2010.

1. An additional 45 million hectares of representative freshwater habitats are protected by June 2007 in priority river basins and ecoregions.
2. An additional 30 million hectares of freshwater habitats are more sustainably managed in priority river basins and ecoregions by June 2007.

World Wildlife Fund
Fonds mondial pour la nature

245 Eglinton Avenue E., Suite 410
Toronto, Ontario M4P 3J1



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