



NORTH DAKOTA
DEPARTMENT of HEALTH

ENVIRONMENTAL HEALTH SECTION

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February 15, 2008

Northwest Area Water Supply Project EIS
Bureau of Reclamation
PO Box 1017
Bismarck, ND 58502-1017

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| REPLY: | YES | NO |
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| CLASSIFICATION | | |
| PROJECT | | |
| CONTROL NO. | | |
| FOLDER I.D. | | |

Dear Sir,

This Department has completed its review of the Northwest Area Water Supply (NAWS) Project draft Environmental Impact Statement (EIS) on water treatment. This project's purpose is to provide a safe and reliable water supply to tens of thousands of North Dakotans. This need was well documented in the final environmental assessment.

The draft EIS focuses on the risk of transferring invasive species via project features. It is appropriate to compare this risk with the risk of transferring invasive species through other pathways. The draft EIS includes a list of common pathways initiated from human activities. According to the Environmental Protection Agency, these pathways increase the frequency by an order of magnitude by which nonnative plants, animals and pathogens are introduced to new areas. Treated water was not listed in the 20 common pathways for methods of transfer. In addition to human activity pathways, numerous natural pathways also exist. In combination, these pathways dwarf the possibility of transfer from treated water.

The draft EIS includes biota treatment goals recommended by the Province of Manitoba. Reclamation has chosen to consider these goals when evaluating the efficacy of treatment processes for biota treatment. The goals exceed levels of treatment required to protect human health under the Safe Drinking Water Act. The basis for these goals and justification for such high levels of treatment have not been clearly established.

We believe that the No Action Alternative is appropriate and sufficiently protective to address biota transfer risk for the project. If treatment beyond that proposed in the No Action Alternative is deemed necessary, an additional and less costly treatment option should be considered, raw water disinfection south of the drainage divide using chloramination and ultraviolet (UV) light. Chloramination was earlier shown to provide 3- and 4-log inactivation of *Giardia* and viruses, respectively, in the raw water. Similarly, UV light has the potential to achieve high *Cryptosporidium* inactivation in the raw water due to its low turbidity.

There is no better time than now to interject common sense and situational awareness to this issue. Reclamation acknowledges the risk of transferring invasive species through the construction and operation of any of the proposed alternatives is very low compared to other existing and competing pathways.

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Given the relative risk of transfer from the no action alternative (very low) to other pathways (much higher), we conclude the money required for rigorous water treatment could be better spent on education, surveillance and enforcement. This would reap much higher dividends of reducing invasive specie transfer than rigorous treatment.

We welcome the opportunity to meet with you to discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. David Glatt', written over the printed name below.

L. David Glatt, Chief
Environmental Health Section

LDG/MTS:dlp