

April 13, 2006

Signe Snortland
Bureau of Reclamation
PO Box 1014
Bismarck ND 58502-1017

Dear Ms. Snortland:

We are writing to provide feedback on the Red River Valley Water Supply Project Draft Environmental Impact Statement, hereafter referred to as the Project.

"We" includes Jolee Johnson, a Minnesota resident and junior at Bemidji State University (BSU) in Bemidji, Minnesota; Deidra Lies, from Fargo, North Dakota, also a junior at BSU; and Tessa Haagenson, a Leeds, North Dakota, native and senior at BSU.

We were introduced to the RRWVSP through an educational forum held at Bemidji State University, and since that time have worked to familiarize ourselves with the Project and the related environmental, social and economic implications, focusing on the probable impacts of the various proposals on future generations and minority populations. Our feedback consists of many general concerns, and is based on other comment letters, personal research, and also conversations with individuals who are knowledgeable on the Project and/or may be impacted by the Project.

As college students, having lived in both states (two of us), and as members of a younger generation, we feel that it is important to take advantage of this opportunity to voice our concern over the RRWVSP Draft EIS, and to reiterate what others may have already expressed.

An outline of our comments and concerns is enclosed with this letter.

Thank you for your time. Please feel free to contact us for any additional information.

Sincerely,

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Tessa Haagenson
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SUSTAINABILITY

Our main concern centers on the lack of an overarching vision of sustainability for the future of water supply and water usage in North Dakota. We feel that the attention given to water conservation methods and/or water recycling in the Draft EIS was not adequate. Instead of looking for ways that North Dakota can serve as a *progressive leader* in managing the natural resources of the state, the project proceeds according to the status quo, prescribing expensive, environmentally disruptive means of providing for projected future water needs.

As an alternative, North Dakota could take this opportunity to further educate its citizens and implement more sustainable water policies and actions, and in doing so, provide a model for other states and localities that may be experiencing water supply issues.

ENVIRONMENTAL INJUSTICE

Injustice to minority populations

Native American tribes have expressed the lack of consultation and continual disregard for legal agreements between the federal government of the United States and Native American nations. Several of the proposed water diversion plans would unfairly impact Native American populations. The inherent risk of biota transfer from an inter-basin alternative such as the Sheyenne River import comes from the possible movement of pathogens and invasive species from the Missouri into the Red River Basin. Such diseases and organisms could then spread to other waters, including the water resources found on the White Earth and Red Lake Reservations. Indigenous fishing, harvesting and water rights could be in danger as fish stocks and water quality decrease. As these components of the land, biota and water, are intricately woven into the cultural, spiritual and everyday lives of the indigenous peoples, such an occurrence would damage their way of life in addition to the natural resources on which they rely. Further, it seems unlikely that a decrease in the water resources of the Native American populations along the Missouri River would have no effect on their hunting, fishing and water activities, and rights. A drought of such magnitude as predicted in the Project would likely affect a wide area outside of the Red River Valley, including the Missouri River.

Intergenerational injustice

Additionally, while it is important that current and future populations have access to water for basic needs, it is not fair to say that the future needs of the population of the Red River Valley are more important than the future needs of surrounding areas that would be affected by each of the proposals for water diversion. If there is concern over water shortages in the future, then we should start curtailing use today. Placing the financial and environmental burden on future generations is not just.

ENVIRONMENTAL CONCERNS

Biota transfer

Various agencies and individuals have outlined the probable negative effects of inter-basin transfer of water.

Additionally, there have been legitimate concerns expressed by Canadians with respect to their water resources and related industries. According to Canadian groups providing input on the Draft EIS, these concerns have largely been ignored.

While the various alternatives would have different impacts, the current choice of options among project planners, the Garrison Diversion-Sheyenne River import option does not involve any pretreatment for the water, which could result in biota transfer, including fish pathogens, to the Red River Basin.

Other concerns

While the report states that this alternative would not cause damage to the Sheyenne River and surrounding flora and fauna, this claim is questionable, as the river flow would be significantly increased.

Finally, each alternative involves construction of a system of pipes, which likely means ecosystem disruption. Even if disruption were minimal, if at all possible, it would be preferable to pursue alternative options.

ASSUMPTIONS MADE IN THE DRAFT EIS AND SUPPORTING DOCUMENTS

Population

As expressed by others in their comment letters, there is an inconsistency of population estimates used in the Draft EIS with estimates by the US Census Bureau. According to the EPA comment letter, among others, the estimates used in the report are inflated, resulting in greater projected water needs for the Red River Valley. At the same time, the population of surrounding affected states, such as Minnesota and Missouri, is not calculated using similar estimates.

Water Needs

Additionally, worst-case drought scenarios are used when modeling maximum shortages of supply. While we understand the need to plan for the future, options for reduced use of water and other drought contingency measures should be given more weight.

LEGALITY

There have been concerns expressed over whether ND's Governor has the authority to designate the Garrison Diversion Conservation District (GDCCD) as the representative of the State of North Dakota in the decision making process. The main charge of the GDCCD, the transfer of Missouri water into Central and Eastern North Dakota, brings into question its disinterested position as a project lead. Others have noted concern over whether the National Environmental Policy Act was followed, and whether treaties with Native American peoples have been or will be violated if certain alternatives are pursued, including those providing hunting, gathering or fishing rights.

Additionally, comments and concerns on the Needs & Options Report put out previous to the Draft EIS were not addressed before the release of the Draft EIS.

Finally, the Attorney General of Missouri goes so far as to say that the DEIS should be shelved and redone, based on poor assumptions and issues of legality.

CONCLUSION

Overall, we have examined the concerns of other organizations and individuals.

We feel that a project of this magnitude, with the potential for great environmental, financial (on a national scale as federal taxpayers will foot much of the bill) and cultural impacts, should use as much unbiased information as possible, and when possible, take advantage of the least environmentally, financially and culturally burdensome solutions, as well as those that are innovative. One straightforward option that deserves greater consideration would be to first make more of an effort to use less water now, and also establish policies and plans for continued water conservation, in addition to planning future development according to water availability and needs.

Finally, two of us are residents of North Dakota and are in the position of many other youth of the state -- Do we return to North Dakota after college and find a place to work and live, or do we find employment elsewhere? While there are undoubtedly similar projects occurring in other areas of the country as the demand for water increases, this could be an opportunity for North Dakota to develop industry that is appropriate for its resources; to maintain and/or strengthen regional development partnerships, as opposed to creating tensions with surrounding states and with Canada, and in doing so, establish a basis for which sustainable development of the state and its resources may occur - for the benefit of present and future generations.