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Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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JUN 15 2006

Red River Valley Water Supply Project DEIS
Attention: Dennis Breitzman
Bureau of Reclamation
Dakotas Area Office
P. O. Box 1017
Bismarck, ND 58502

Dear Mr. Breitzman:

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I am writing to submit additional comments from the Missouri Department of Natural Resources on the Draft Environmental Impact Statement (DEIS) for the Red River Valley Water Supply Project. I request that these comments be considered independent of any unannounced deadlines that the Bureau of Reclamation (Bureau) may impose on public comment. We are extremely concerned with the inadequacy of the DEIS and the lack of information regarding the process since the release of that document.

The Bureau has not explained the reasoning for the indefinite extension or of the procedures to be followed during the extension of a comment period, which is contrary to the requirements of the National Environmental Policy Act (NEPA). Without some certainty of schedule, this extension is essentially a series of one-day extensions that do not serve the purposes of NEPA and prevent interested parties from planning for comment or knowing whether any comments submitted will be considered as timely submissions under NEPA. We request that the Bureau send out periodic updates and provide a mechanism for input during this period.

We continue to be concerned by the use of indefensible population estimates. In its response to our comments on the Needs and Options Study, the Bureau claims, "The population projections conducted by Reclamation and Northwest Economic Associates were based on the cohort component method, which is generally regarded as the most comprehensive and reliable method to estimate population change over time. Thus Reclamation maintains that these population projections are the most realistic estimates available." However, the Bureau did not use these methods in the DEIS and their cohort models predict triple the growth predicted by the U. S. Census Bureau and much greater growth than historical trends. We request an explanation of the assumptions used to derive the cohort component models used by both the Bureau and NEA for future population growth. We also reiterate our request for an independent analysis of the population estimates given these discrepancies.

We expect the Bureau to address our previous comments on obvious flaws in Missouri River analyses. We request a comprehensive analysis of impacts to the Mississippi River be presented. We also expect all analyses of impacts on the Missouri and Mississippi Rivers to be comparable to and consistent with the methodologies used in the Red River Basin. As an example, what population and water use growth would be predicted for the Missouri River basin using the Bureau's cohort models? If we are not informed of on-going work on an interim basis, the department is likely to require significant time to complete our analyses after the submission of the next DEIS. The department requests that we be kept informed of changes being made in the analysis of potential impacts on the Missouri River. Given the highly contentious disagreements over how the Corps manages the Missouri River and the expertise available in this department, we expect to be allowed access to the analyses completed in this basin.

The Bureau has no option but to issue a revised Draft EIS to allow for further comment on this project. Given the seriousness and the extent of the comments on the initial DEIS, such a revised draft is necessary to allow the level of public comment required by NEPA and the open process required under the Dakota Water Resources Act. Such a draft should only be released after the Bureau has published their responses to comments received in response to the DEIS and should clearly address all comments received on the DEIS.

The Bureau needs to commit to a full and honest investigation of water resources within the Red River Valley and a comprehensive examination of the impacts of a diversion of water from the Missouri River. Furthermore, it is incumbent upon the Bureau to create a transparent process that allows all interested parties access to participate in the analyses and review of this project. A failure to do so will be considered a violation of NEPA and the Dakota Water Resources Act.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Doyle Childers
Director

DC:jej

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c: Governor Matt Blunt
Attorney General Jay Nixon
Dirk Kempthorne, Secretary of Interior
Senator Christopher Bond
Senator Jim Talent
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Congressman W. Todd Akin
Congressman Russ Carnahan
Congressman Ike Skelton
Congressman Emanuel Cleaver
Congressman Sam Graves
Congressman Roy Blunt
Congresswoman Jo Ann Emerson
Congressman Kenny Hulshof
William Rinne, Acting Commissioner, Bureau of Reclamation
Eric Hansen, Office of Management and Budget
Brigadier General Gregg Martin, Commander, Northwest Division,
US Army Corps of Engineers
Brigadier General Robert Crear, Commander, Mississippi Valley Division,
US Army Corps of Engineers
Jim Gulliford, Regional Administrator, Environmental Protection Agency Region 7
Robert Roberts, Regional Administrator, Environmental Protection Agency Region 8