

Comment IND-05

2504 Baldy Loop NE
Rio Rancho, NM 87144-6743
thundermesa@peoplepc.net

Mr. Rick Gold, Regional Director
U. S. Bureau of Reclamation
Upper Colorado River Regional Office
125 South State Street, Room 6107
Salt Lake City, UT 84138-1147

June 27, 2007

Dear Mr. Gold:

I have read—or attempted to—most of the five pounds of the Draft Environmental Impact Statement for the Navajo-Gallup Water Supply Project and wish to comment.

But first, while it is not particular relevant to the issue at hand, I would like to say—just for the record—that if anyone in anyway believes the environmental-input process is anything about involving the public, they are either being disingenuous or simply don't care about the public. I have been involved in and worked on water issues, as a citizen and as a journalist, for 30 years. I remain firm in my belief that there is something fatally flawed with a process this complicated, predicated on bad decisions made earlier and so appallingly stilted toward full-time attorneys, politicians, lobbyists, environmental scientists, engineers and bureaucrats that, short of giving up their day jobs, most of the public have little hope of giving informed input, albeit input, by appearances, that is nothing more than a *pro forma* process anyway. But then, perhaps I have been reading too much of Lou Dobb's *WAR ON THE MIDDLE CLASS* and Lee Iacocca's *WHERE HAVE ALL THE LEADERS GONE?* After 30 years of conflict, dispute, anger and public outrage over the Animas-La Plata project at Durango, Colorado, it appears that no one has learned anything from one of the largest water controversies in American history or worked to change the procedural, planning, design and practicality flaws that so haunted that project and, unless the system is refined, will haunt others, including this one.

Again, simply for the record, and that based on my experience as a founder of Taxpayers for the Animas River against the Animas-La Plata project, I want it understood that I only reluctantly participate in a process that says, "Here are the alternatives—most of them absolutely awful, disconnected from down-to-earth practicalities or the realities of a likely drought-plagued new century or even what is best for our country—tell us which of these absolutely awful alternatives you like

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best.” Most alternatives proposed (sprawling, centralized, high-tech, resource-intensive, overpriced) are, from my view, unacceptable in an era of rising energy costs, likely energy shortages, the looming threat (according to, among others, scientists at Los Alamos National Laboratory) of global warming and the need for innovation and creativity from engineers, no evidence of which can be found in the alternatives proposed. But conversely, I think if the Bureau were creative, it could do better—at least to some extent for EXISTING POPULATION—than a “no action” alternative, by using cutting-edge, decentralized, on-site approaches.

My input, with specifics to follow, is that we do not need another 1950s-era, high-tech, centralized water project for the arid San Juan Basin. We need a decentralized, innovative project designed with a global-warming-generated water crisis and the problems of an over-allocated Colorado River in mind. **Manhattan Project scientist and quantum-theory father Niels Bohr’s warned against using yesterday’s solutions for today’s problems, exactly what the presented alternatives are: outdated before they even leave the drawing boards.**

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I do not particularly believe there are any good answers—from an engineering standpoint—for the City of Gallup. Gallup—and virtually every other town and city in the state—needs to understand that engineering and science cannot endlessly substitute for the need for courageous leadership and society-wide focus on unfettered growth. (Population Summit of the World’s Scientific Academies (58 nations) 1994) It needs to understand that Third World-like growth rates, in ranges of 2 percent (doublings in less than 38 years), are not sustainable in a region as arid as the San Juan Basin. Cities and towns in this region cannot continue to expect the American taxpayer to engineer short-term “techno fixes” at exorbitant costs—financially, socially and environmentally—to try, in vain, to circumvent that stark carrying-capacity reality. As the old television commercial use to say, “It’s not nice to fool Mother Nature.” Perhaps more apropos would be, “You can fool Mother Nature for a while, but then she’s going to insist that you pay the piper big time, and she’ll get really nasty while insisting.” Los Alamos, with its Cerro Grande fire, and New Orleans, with Hurricane Katrina, saw that.

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Similarly, the Navajo and Jicarilla tribes needs to understand that their high growth rates (nor anyone else’s **in the fourth fastest growing nation on earth, one of the fastest growing regions in the world, and one of 8 nations contributing half of all the planet’s growth to 2050**) is not sustainable, even with short-term “fixes” like the proposed Navajo-Gallup Water Supply Project, although I would hope—in the best of all possible worlds—we would have a U. S. Bureau of Reclamation that is

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cutting-edge enough and visionary enough to look to on-site water reuse technologies, long used at remote homes in the Colorado mountains, for individual homes on both reservations and/or chapter houses on the Navajo reservation. (Heck, the government could more cheaply pay the tribes to truck bottled water to residences than build this project.) That is if the real purpose of this project is really anything about bringing water to people on remote parts of reservations. (The Animas-La Plata was depicted as about “helping the Utes,” when it became vividly clear very quickly that the real purpose was water for land speculation and energy development, as well as “make work” for major national contractors like Halliburton.) I would also hope that the Bureau of Reclamation would try to look for innovative proximity-solutions via wells or trucking water to regional lined ponds, rather than pumping huge amounts of water across hundreds of miles of desert, to provide water for livestock belonging to Navajos and Jicarilla Apaches, although again, it is time for both to take a hard look at the desert’s carrying capacity and whether grazing is sustainable, especially if global warming increases the extent and severity of desert conditions on the reservation. From what I have seen of erosion and desertification expanding across the reservations (both size and intensity) from the San Juan Basin to Monument Valley, I submit that livestock grazing is not at sustainable levels, nor has it been for 100 years. I ponder why the Navajos and Jicarilla Apache would ask taxpayer to invest in an exorbitantly expensive project to provide water for more livestock or even existing livestock in an area where they should not be **any** livestock unless in feedlots or carefully chosen, managed and maintained areas. I ponder a United States government that, on one hand, finances soil-conservation districts while, on the other, financing water projects to increase livestock loads in the desert.

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This proposal—diverting an already diversion-depleted San Juan River, a major tributary of a Colorado River, also in crisis due to drought, over-allocation and population growth—offers no real water solutions for a region confronting severe, prolonged drought. Lake Powell, as the Bureau has recently admitted, is more than half empty and likely can never be refilled at today’s far higher population than in the 1960s and 1970s. There are serious concerns that Lake Mead, within 10 years, unless weather trends improve sharply, could be empty. In such a reality, politically, water is not going to go to Gallup or the reservations—no matter water rights on paper—when Los Angeles and Las Vegas need that water for millions. Meanwhile, experts say global warming will mean a new norm of at least 10 to 20 percent less precipitation by mid-century (Source: NOAA). So, where is the rationale, the wisdom of yet another project diverting water from the San Juan and Colorado rivers, especially for the marginal purposes described in the DEIS: to provide water to a small town in New Mexico and reservations? Traditional

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Navajos are warning that this project will sound the death knell to the San Juan River. They are absolutely correct and should be respectfully listened to by this state's leaders. Nor do I see anything in the DEIS defining what actions the involved communities, New Mexico state leaders or Navajo tribal leaders will be expected to take toward living within the region's water means in return for an absolutely enormous taxpayer investment for this project.

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The Bureau depicts this project as a "solution" to the water woes of Gallup, the Navajos and the Jicarilla Apaches. Assuming the project is built, what solutions if it simply encourages the arrival of however many additional tens of thousands by mid-century? Where do the Bureau, politicians, boom boosters and tribal leaders propose the area turn for water in 2040 or 2050, at the-then far higher population, likely in drought, likely enduring global warming in a region, even at today's far lower numbers, seriously strapped for water? (If some bureaucrat reading my comments is preparing to label that comment as not within the purview of this document, it had better darned well start being, because that is the bottom line: one of the fastest growing regions in the world is running out of water and it is time for government and politicians (including presidential candidates) to find their backbones and a little moral courage. They need to stop focusing on the "supply side" of the equation and start considering "demand side," or our nation's Third World-like growth rate churning us to a China-like one billion late century, while other developed nations have stopped growing!

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On the topic of likely cost "overruns" on this project, I suggest that we need firm and clear understanding **up front** of what the Navajo-Gallup project will cost, **and** we need guarantees and structuring to assure that its price is not being "low balled." **Considering that every water project constructed by the U. S. Bureau of Reclamation in the Four Corners area in the last 30 years has come in at 200 to 300 percent over budget, the American taxpayer has every right to expect the Bureau and politicians to make darned sure that the estimated costs of this project are not low balled. Cost projections in engineering, while involving some unknowns and fluctuations, are not rocket science; the Bureau owes citizens and this nation better than future 200 percent-to-300 percent "oops" experiences. Give us a cost projection and give us a project within reasonable range of that projection, on time and within budget! And, please clarify, what will be the per-person cost of this project at today's population at the**

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estimated cost of the project today? (The numbers I come up with are staggering and reflect, like the Animas-La Plata project before it, another Rolls Royce solution to a used-Chevy problem!) From my read of the numbers, it would be far cheaper to send the entire population of the project area to live on the Riviera than to build this project and that based on construction costs alone!

I also assume—but perhaps I am wrong—that Bureau engineers are providing designs with the lowest possible energy consumption and carbon footprint for the 21st and 22nd century. What methods of pumping? What energy-conservation approaches? What alternatives to fossil fuels for pumping have been considered? What will the annual operational carbon footprint of this project, under the alternatives suggested, be or does our non-global-warming, non-reality-based government have a clue?

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In conclusion, I am baffled as to the rationale or the wisdom of the Bureau designing yet another sprawling, centralized water diversion project to provide water to the Navajo Nation, the Jicarillas and to Gallup. It would seem that that is the antithesis of the kind of project that should be designed for the, what, 35,000 square mile project area? You are not, after all, designing for high density Brooklyn, but the sprawling Navajo Nation and a distant Gallup. Therefore a lot of smaller solutions would be more suitable than one big, centralized solution. Barring that, the only reasonable alternative, considering drought and the area's uncertain water future is the no-action alternative, although I'll hasten to add that I think the Bureau misleads by focusing on a centralized municipal water reuse system in its definition of "conservation." Like solar energy, the technology works better on a smaller scale, with applications at per-household or per-business, rather than a municipal system.

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Finally, as I look at maps of all those dozens of miles of pipeline scattered across the reservation and as one relatively familiar with the "urban" development on the reservation, where is the water-delivery system to individual homes and communities? If such a system is not part of the project, what use the project? If that is to be part of the federally funded project, what will the price be or is this another attempt at low balling? Will the water-delivery be another, "Oh by the way, there's one other cost" later on? Is this project not looking suspiciously like other projects (Navajo Dam and Animas-La Plata) pitched to Congress to "help the Indians," yet appallingly devoid of infrastructure to accomplish that, if that, rather than water for land speculation and urban development and perhaps for energy development are not the real reason—that is, beyond the expedient of politics to resolve Indian water rights. Those expedients,

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I'll add, will make for disastrous water future for our region. Governor Richardson, Albuquerque Mayor Martin Chavez and others should be ashamed if the "build" alternatives for this project are their idea of good water planning or a "sustainable" water future.

Thank you for the opportunity to comment on this absolutely outrageous proposal. While I have little reason to believe the Bureau will pick a no-action alternative, it is nice to have the opportunity to go on record in advance to point out an appallingly flawed proposal.

Sincerely,

Kathleene Parker