



# RED LAKE BAND of CHIPPEWA INDIANS

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May 2, 2006

Northwest Area Water Supply Project EIS  
Bureau of Reclamation  
Dakotas Area Office  
P.O. Box 1017  
Bismark, ND 58502-1017

Re: Comments on EIS Public Scoping

Dear Sir or Madam,

The purpose of this letter is to provide comments for the NAWS EIS Public Scoping Process from the Red Lake Department of Natural Resources on behalf of the Red Lake Band of Chippewa Indians.

The NAWS project proposes to accomplish the inter-basin transfer of waters from the Missouri River Basin (which is within the greater Mississippi Drainage Basin) across the Laurentian Divide into the Red River Basin (which is within the greater Hudson Bay Drainage Basin). Furthermore, it proposes to pump approximately 26 million gallons of water per day across the continental divide via a pipeline to Minot for further distribution.

The ecosystems that evolved in the Missouri and the Red River Watersheds have been separated by a continental divide for hundreds of thousands of years and each contains a number of species of biota (including fish and fish pathogens) that differ from the other. The Red Lake Band of Chippewa, whose people are heavily dependant upon subsistence fishing from the fisheries of the Red Lakes, the Red Lake River, and Lake of the Woods, has gone on record in opposition to inter-basin transfers of water (such as proposed under NAWS) due to the potential for the transfer of invasive species and biota, and in particular fish and fish pathogens. Although the Bureau of Reclamation has demonstrated through its Red River Valley Water Supply Project DEIS that it views the release of exotic species and harmful biota, including fish pathogens, to be of low risk and therefore inconsequential, the Red Lake Band of Chippewa Indians finds even minor risks for the transfer of invasive species and injurious biota to be wholly unacceptable.



The Red Lake Band, in cooperation with the Department of the Interior and the State of Minnesota, has recently completed one of the largest fishery restoration projects in the United States on the sixth Great Lake in the United States - the Red Lakes. The Red Lake Band operated a commercial fishery on reservation waters of the Red Lakes from the late 1920's through the late 1990's which served as a mainstay of the reservation economy. Having suffered the temporary cessation of both subsistence and commercial fishing during the restoration of this fishery, we are extremely concerned about the potential and far-reaching effects of the NAWS inter-basin transfer, especially as related to the potential for an irreversible transfer of invasive species and injurious biota. Furthermore, the waters of the Red Lake Reservation are not simply a physical resource for the Red Lake Band of Chippewa Indians but they carry a profound Cultural and Spiritual significance to the people. Any impacts that would serve to degrade reservation waters thereby would also result in deep Cultural and Spiritual impacts to the tribe and all of its people.

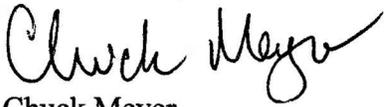
In light of the above discussion, we would like to make the following comments for consideration pursuant to the scoping process and incorporation into the DEIS:

- Reclamation must include a comprehensive list of alternatives and conduct a comprehensive review of the potential impacts of those alternatives, including potential cultural and spiritual impacts to Native American tribes and communities.
- Reclamation must adequately and completely address species and biota transfer in the DEIS. The assessment must be species-specific, and consider any number of scenarios for such transfers that might potentially occur.
- Reclamation must consider a full range of treatment options designed to prevent species and biota transfer, and include various means, including redundancies, whereby in the event of a failure of either the transmission infrastructure or of a given treatment system, such species transfers will be prevented in entirety.
- Reclamation must address the cumulative impacts of the NAWS project on both the Missouri and the Red River Basins. Furthermore, this cumulative impact assessment must take into account the NAWS project's effects in combination with the various other water projects currently 'on the books' or under consideration that would either withdraw waters from the Missouri, or input waters into the Red River, such as the Red River Valley Water Supply Project (in North Dakota) and the Lewis and Clark Rural Water System (in Minnesota) and the South Central Rural Water District's plan to drill for water under the bed of the Missouri (also in North Dakota).

- Reclamation must use the same means and methodologies to assess the impacts of its proposed alternatives on both the Missouri and the Red River Basins, such that the analyses are comparable between the two basins.

We appreciate the opportunity to comment during this phase of the Draft EIS for the NAWS project. If you require any additional information, or clarification of any of the issues we have cited, please contact me via phone at (218) 679-3959 or email at [cmeyer@paulbunyan.net](mailto:cmeyer@paulbunyan.net). We thank you in advance for your consideration of our concerns.

Sincerely,



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Red Lake Department of Natural Resources  
Red Lake Band of Chippewa Indians  
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Red Lake, MN 56671