



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

March 14, 2013

U.S. Bureau of Reclamation
Attention Ms. Pam Adams, LC-2721
PO Box 61470
Boulder City NV 89006-1470

Dear Ms. Pam Adams:

The Missouri Department of Natural Resources represents the interests of the State of Missouri in all matters pertaining to interstate use of water, water quantity, and water quality. The department also represents the Governor of Missouri on all interstate water issues. As the water resources agency for the State of Missouri, the department submits the following comments on the U.S. Bureau of Reclamation's Colorado River Basin Water Supply and Demand Study (Colorado River Water Supply Study). The State of Missouri has aggressively opposed other Bureau of Reclamation out of basin transfers projects (i.e. the Red River Valley Water Supply Project and the Northwest Area Water Supply Project) and will oppose any new out of basin transfers of water from the greater Missouri River or Mississippi River basins.

We commend you on conducting such a complex and highly challenging study with the admirable goal to help ensure a sustainable water supply and meet future demand in the over allocated and highly variable Colorado River Basin. We understand that the purpose of this study was to define current and future imbalances in water supply and demand in the basin over the next fifty years. Furthermore, we understand that this study is not a decision document of alternatives to be implemented, but rather it serves as a technical foundation that frames the range of potential water supply imbalances that may be faced in the future and the range of solutions that may be considered to resolve those imbalances.

Unfortunately, the study also considered offsetting some of the water supply shortfalls within the Colorado River basin with transfers or (imports) of water from outside the basin (i.e. Missouri, Mississippi and Yellowstone River basin and others). Out of basin water transfers are bad public policy and should not be further considered. These diversions, not only impact water quantity but potentially impact water quality and could transfer biota between major river basins. The Missouri River drains to the Atlantic while the Colorado flows, ultimately, into the Pacific Ocean. These two basins are thus biologically separated by thousands of miles of ocean passage. The need to protect against the transfer of biologically viable material is therefore, exceedingly high, as we and the courts have made clear is response to previous water transfers proposed by the Bureau. The ecological costs of an inadvertent transfer are so high that an incredibly compelling case must exist to justify the risks inherent in any interbasin water transfer. Such a case has not been proven in any one of the projects proposed to date.

The Bureau must also recognize that such transfers offer only false hope for those in need of water. The history of drought in the West shows that water shortages, compounded by a lack of precipitation and increased evaporation, affect multiple basins at the same time. Thus, when needs are greatest in one basin, the ability to fulfill that need by plundering water from another basin is likely to be either impractical or impossible.

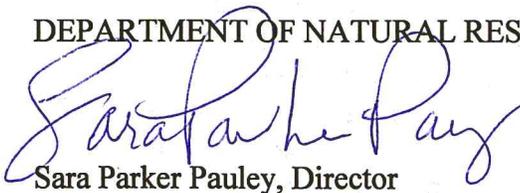
John Wesley Powell recognized well over a century ago that water would be a limiting factor in the development of the Western United States. This became the basis for much of the water law that governs that area. Projects that propose to transfer water from one basin to another violate state water laws in most western states for they claim to create a water right for those living outside a basin that simply does not exist. It is time for the Bureau to recognize that pitting the interests in one basin against those in another is not a productive use of taxpayer monies. Sustainable use and water conservation are a far more productive approach to the water supply challenges of the 21st century.

The State of Missouri formally requests that it be notified and kept apprised of all future Colorado River Basin studies which evaluate and or consider out of basin transfers. We also ask to be informed of and invited to all meetings between the Bureau and other agencies considering any future interbasin transfer of water affecting the greater Missouri or Mississippi River basins.

Please contact Robert R. Bacon of the Department of Natural Resources should any questions arise. He can be reached at (573) 751-3322 or at bob.bacon@dnr.mo.gov.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

A handwritten signature in cursive script, reading "Sara Parker Pauley". The signature is written in dark ink and is positioned above the printed name of the signatory.

Sara Parker Pauley, Director