



Public Comment Submission

1 message

Randy Asbury

Wed, Mar 20, 2013 at 8:52 AM

To: ColoradoRiverBasinstudy@usbr.gov

Cc: Amanda Taylor <ataylor@iowacom.org>, Ashley McCarty <amccarty@mocom.org>, Dale Ludwig <dludwig@mosoy.org>, Dan Cassidy <dcassidy@mofb.com>, David Shorr <DShorr@lathropgage.com>, David Sieck <iowafarmboy@gmail.com>, Doris Moore <dmoore@mofb.com>, Garrett Hawkins <ghawkins@mofb.com>, Gary Marshall <gmarshall@mocom.org>, "J. P. Dunn" <jpdunn@mosoy.org>, "John C. Pozzo" <jcpozso@ameren.com>, "Lynn M. Muench" <lmuench@vesselalliance.com>, Mindy Larson Poldberg <mpoldberg@iowacom.org>, Paul Rohde <PRohde@vesselalliance.com>, Rich AuBuchon <raubuchon@polsinelli.com>, Shane Kinne <skinne@mocom.org>

U.S. Bureau of Reclamation

Attention: Ms. Pam Adams, LC-2721

P.O. Box 61470

Boulder City, NV 89006-1470

Dear Ms. Adams:

On behalf of the members of the Coalition to Protect the Missouri River (CPR), I am writing to oppose all out-of-basin water transfers from the Missouri or Mississippi River basins to the Colorado basin. CPR represents the diverse interests of agricultural, navigational, industrial, utility and business-related entities. It supports responsible management of Missouri River resources and the maintenance of congressionally authorized purposes of the river including flood control, navigation and water quality and supply.

Out-of-basin transfers on the order of the one discussed in the Colorado River Basin Study expose the nation to unnecessarily high risks of environmental damage as a result of potential biota movement. In addition, such water transfers do not guarantee a water supply improvement for the recipient basin in years when drought encompasses the donor basin. It has been known since the inception of Western United States settlement that water was a scarce commodity. To continue to expand infrastructure and populations based upon the ongoing shortage of water is not prudent. To look to another basin to supplement a historically scarce water supply is done so only at the expense of the donor basin. Social, economic and cultural values important to the Missouri and Mississippi River basins have been built on the basis of present water conditions and the "take" of water from these basins would not be good policy.

The attached Missouri Department of Natural Resources (MODNR) letter provides further explanation as to why such transfers are bad policy. CPR would like to go on the record as wholeheartedly supporting the contents of the MODNR letter and also our opposition to any out-of-basin water transfers from the Missouri and Mississippi River basins. This position is in line with our past opposition to other out-of-basin transfers such as the Red River Valley Water Supply Project and the Northwest Area Water Supply Project.

I appreciate the opportunity to provide these comments.

Sincerely,

Randy Asbury

Randy Asbury

Executive Director

Coalition to Protect the Missouri River (CPR)

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Higbee, MO 65257

www.ProtectTheMissouri.com



BOR Colorado River Basin Comment Letter 03142013.pdf
962K



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.

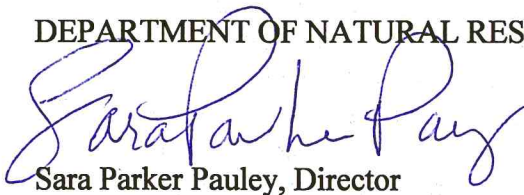
John Wesley Powell recognized well over a century ago that water would be a limiting factor in the development of the Western United States. This became the basis for much of the water law that governs that area. Projects that propose to transfer water from one basin to another violate state water laws 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 blue ink that reads "Sara Parker Pauley". The signature is written in a cursive style with a large initial "S".

Sara Parker Pauley, Director