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July 6, 2020

Mr. Damien Reinhart
Project Manager
Bureau of Reclamation, Dakotas Area Office
304 East Broadway Ave
Bismarck, North Dakota 58501

RE: Eastern North Dakota Alternate
Water Supply Project DEIS

Dear Mr. Reinhart,

On behalf of the American Waterways Operators (AWO), the national trade association for the tugboat, towboat and barge industry, thank you for the opportunity to comment on the Bureau of Reclamation's Draft Environmental Impact Statement (DEIS) for the Eastern North Dakota Alternate Water Supply (ENDAWS) Project.

The U.S. tugboat, towboat and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves over 760 million tons of cargo each year, including more than 60 percent of U.S. export grain, energy sources such as coal and petroleum, and other bulk commodities that are the building blocks of the U.S. economy. The fleet consists of nearly 5,500 tugboats and towboats, and over 31,000 barges. These vessels transit 25,000 miles of inland and intracoastal waterways, the Great Lakes, and the Atlantic, Pacific and Gulf coasts. Tugboats also provide essential services including ship docking, tanker escort, and bunkering in ports and harbors around the country.

Since 2001, AWO has been a member of the Coalition to Protect the Missouri River (CPMR), a group of stakeholders that advocate for the responsible management of Missouri River resources to ensure the maintenance of the river's Congressionally-authorized purposes, including navigation. In addition, AWO has been a member of the Congressionally-authorized Missouri River Recovery Implementation Committee since its inception in 2008.

AWO makes the following comments and recommendations on the DEIS:

- 1) The Missouri River is part of the economically vital 12,000-mile Western Rivers system that efficiently delivers essential commodities throughout the nation. Barge traffic on the Missouri River has been increasing steadily over the past few years due to reliable flows. However, the ENDAWS Project would reduce downstream flow support

and jeopardize the efficient movement of waterborne commerce. AWO opposes the project and strongly opposes any project that would divert Missouri River water through the Red River Valley Water Supply Project, transferring Missouri River water to the Hudson Bay Basin.

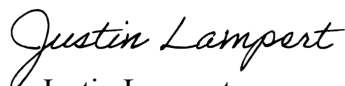
Diverting water from the Missouri River would reduce flows that are critical to support commercial navigation on the Lower Missouri River and on the Middle Mississippi River, especially during times of drought. In fact, according to the Missouri Department of Natural Resources, the Missouri River supplies almost 50% of the flows to the Middle Mississippi River during normal conditions and provided more than 70% during the 2012 drought. During severe drought years, such as the late 1980's, more than 80% of the water flowing by the St. Louis Arch originated from the Missouri River. The 2012-13 severe drought in both the Missouri and Upper Mississippi rivers seriously impacted the continuity of waterborne commerce. Because Missouri River flows are critical to support navigation on the Mississippi River, any future flow change would gravely harm navigation and negatively impact our nation's economy.

- 2) The DEIS fails to demonstrate a strong purpose and need for the ENDAWS Project, similar to the vague nature of the proposed Central North Dakota Water Supply Project's need statement. Page 3-61 projects flat population growth of nine North Dakota counties at just over 1% through 2040. Reclamation must demonstrate in the final EIS an actual need for diverted Missouri River water.
- 3) AWO is disappointed to see the ENDAWS geographic scope limited to just three counties in North Dakota. At the very minimum, the geographic scope of the proposed ENDAWS Project should include the remainder of the Missouri River to the confluence, as well as the Middle Mississippi River from St. Louis, Missouri to Cairo, Illinois, due to its dependence on Missouri River flow support.

Additionally, the DEIS notes on page 4-1 that Reclamation consulted with a variety of "interest groups." However, neither AWO nor CPMR were consulted during preparation of the DEIS. We urge Reclamation to conduct much broader outreach to Lower Missouri River and Middle Mississippi stakeholders for an accurate assessment of project impacts.

Again, thank you for the opportunity to provide comments on the DEIS. Reclamation's commitment to addressing these comments is greatly appreciated.

Sincerely,



Justin Lampert
Manager – Midcontinent Office