REC'D - BLM - NSO
9:00 AM SEP 06 2011

NATIONAL SYSTEM OF PUBLIC LANDS

Written Comment Form

Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft Environmental Impact Statement

We want your comments! If you have any issues, concerns, or questions related to the Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft EIS, please complete and submit this comment form. Fold the comment sheet on the lines with the return address showing, and deposit it in the comment box before you leave, or tape it closed, affix postage, and mail at your convenience. You may include additional pages. Please check the project website (http://www.BLM.gov/5w5c) for the comment period closing date (October, 11, 2011).

Please note: Anonymous comments will not be considered.

Freedom of Information Act (FOIA) - Before including your address, phone number, e-mail address or any other personal identifying information in your comment, you should be aware that your entire comment - including personal identifying information - may be made publicly available at any time. While you may ask us to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. If you wish to withhold your name or address from public review or from disclosure under FOIA rules, you must state this prominently at the beginning of your comments or check the box below.

☐ Please withhold my name/address from public review if possible.

What about this environmental analysis are you specifically concerned about?

Attached is a list of 10 comments about the environmental analysis and the document. Also attached is a checklist of actions and items that are inaccurate, incomplete or not analyzed well enough

What is missing from this environmental document?

What other comments or questions do you have?

☐ Please correct/modify my contact information (provide the correct information on the opposite page).

Thank you for your interest and participation!

Public Hearing

For the

Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft Environmental Impact Statement

Baker, NV August 3, 2011.

Public Comments from Wilda Garber, PO Box 57 (940 Page Ave), Baker, NV 89311.

1. The Groundwater Project states that it is a Right of Way (ROW) application for a pipeline that is of unknown specific sources and of a size up to 96" in diameter that could be resized during final design. Also in Chapter 2 (Sec. 2.5.1.2, and Table 2.5-2, P 2-18 and Vol 1 p ES-17 (red print)) the first paragraph last sentence says "The final sizes of the pipelines would be determined during facility design. There is no mention of the product that will be transported in the pipeline except in a questionable water model using a "distributed" network of mostly unproven and undrilled wells. This ROW should be denied or the No Action Alternative should be selected by BLM because the DEIS fails to identify the exact sources, quantity from each source, and pipelines from each.
2. This ROW should be denied or the No Action Alternative should be selected by BLM because the DEIS fails to identify the number of wells, specific well locations, lateral pipelines or the environmental impacts of each well location, drilling operations, maintenance of well sites, and the roads to them.
3. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not address the surface disturbance for the unidentified wells, specific well locations, lateral pipelines, power line and the pumping facilities.
4. This ROW should be denied or the No Action Alternative should be selected by BLM because the DEIS fails to address project costs for the ROW, well development and number and location of wells, lateral pipelines, roads to well sites, power lines and facilities, pumping stations and related power requirements.
5. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not address drawdown impact from wells that are of less than 10 feet; and impacts from within a season, or within 1 year, or through 10 years, or any other reasonable alternative of less than 75 or 200 years. Any drawdowns may affect the area adversely within a short period of time.
6. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not address potential effects of climate change.
7. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not adequately address the new lower population and census figures in the Las Vegas area; (since 2009) the effect of conservation measures there, or alternatives such as desalination with conservation measures in place and a lower future population projection.
8. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not adequately address economic impacts on the entire area and the agriculture and tourism based economy.
9. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not even begin to address cultural effects, Native American sites and culture, or protection of archaeological sites.

10. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not clearly address the concept of an ancient White River geologic complex that supposedly extended from Elko, County to Lincoln/Clark County area, Nevada.

From the heart of the Great Basin Water Network

Here are some topics to help you comment on the DEIS. As residents and friends of the Great Basin, you know your community, the land and its resources. It is best to connect your comments to the DEIS, by page, section, or topic. Everyone: please ☑ include the RED statements along with the topics you choose. Thanks!

☑ Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.
☑ Tell BLM you support the No Action alternative, which is the only one that conforms to BLM's mission: "to sustain the health diversity and productivity of the public lands for the use and enjoyment of present and future generations." BLM should not approve a project that will impose harmful irreversible and irretrievable impacts on public lands and resources.
☑ Demand a Supplemental EIS that addresses impacts from specific well locations.
☑ DEIS fails to disclose project costs and sources and cost of funding.
☑ DEIS fails to adequately assess the purpose and need for project.
☑ Ask BLM to delay decisions because of large number of "unknowns" and "uncertainties" (no SNWA water rights, no well-site locations, no NV/UT shared water agreement...)
☑ DEIS fails to analyze potential environmental effects due to climate change
☐ All of the action alternatives will result in future efforts by SNWA to fill the 96 inch pipe with water from Snake Valley, the rest of White Pine County, Eureka County, Elko County and beyond.
☑ Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEPA and FLPMA.
☑ DEIS fails to analyze environmental impacts of actual well locations for "distributed pumping"
☑ Predicted massive land subsidence area of 5 ft. + is an unacceptable irreversible impact of unlawful groundwater mining.
☑ DEIS projects unacceptable adverse impacts on hundreds of existing surface and groundwater rights.
☑ DEIS does not consider a sufficient range of alternatives.
☑ DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.
☑ DEIS has inadequate, ineffective or missing mitigation measures.
☑ DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.
☑ DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.
☑ Proposed action would lead to major loss of game species; extinction of rare plant & animal species.
☑ DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley.
☑ DEIS provides insufficient information on impacts to Steptoe Valley.
☑ DEIS fails to adequately analyze adverse impacts on and mitigation for ✓ranching __wildlife habitat ✓local businesses ✓wild horses ✓Other human habitation that still lives here
☑ DEIS provides insufficient justification for failing to study drawdowns of less than 10 feet and impacts only to 200 years after build-out when the SNWA Pipeline project is intended to operate indefinitely.
☐ Let BLM and SNWA know you oppose this risky and expensive scheme to mine water in the Great Basin.

Your comments here: Include name & address, and mail to BLM at mailing address on page 1. Deadline is Sept. 9.
BLM: Please address comments checked above. Here are some more comments:

Also attached are 10 additional comments and concerns about the Groundwater Project (SNWA) DEIS.

Wilda Garber

Wilda Garber

Access more details and a sample comment letter: http://greatbasinwater.net/pubs/cmt2011-1.doc