

BLM_NV_NVSO_GWProjects

From: Robb, Gaylord (IHS/PHX) <gaylord.robb@ihs.gov>
Sent: Wednesday, September 28, 2011 3:55 PM
To: BLM_NV_NVSO_GWProjects; Harmon, Craig B
Cc: Borchardt, Jeanine (IHS/PHX); Tom, Lora (IHS/PHX); Tom, Anthonia (Indian Peaks); Yazzie, Elliott (Koosharem); Bow, Corrina (Kanosh Band); Lomeli, Charlotte (Shivwits)

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Gaylord Robb
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Penny Woods, BLM Project Manager
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Dear Ms. Woods:

Thank you for the opportunity to comment on the Draft EIS (“DEIS”) for the SNWA Groundwater Development Project.

The BLM is to be commended for identifying the severe and lasting impacts the proposed project will inflict upon the land and its inhabitants. The DEIS shows that a huge area would lose water resources that people and wildlife depend upon in eastern Nevada and western Utah.

The pumping impacts identified in the DEIS will destroy livelihoods, reduce recreation, and change forever entire ecosystems as we now know them. It is clear that mitigation proposed in the DEIS is weak, unenforceable, and will not prevent the complete dewatering of the targeted region. The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.

The DEIS predicts dire environmental damage from the SNWA pumping but contains only a weak analysis of the equally dire social and economic impacts on eastern Nevada and western Utah from the Proposed Action and the five pumping scenarios.

The DEIS contains many flaws and inadequacies that must be addressed before any fully informed Record of Decision can be reached. Among the faults is a failure to disclose and independently analyze the full economic cost of the project, a failure to disclose and analyze the cost of proposed mitigation and monitoring, and a failure to include real alternatives to the pumping project – alternatives that the public demanded during scoping.

Alternatives such as efficiency and conservation of existing water resources in S. Nevada, outright purchase of water rights currently used for agriculture in S. Nevada and elsewhere on the Colorado River, and desalination options might well satisfy the water requirements without causing the extensive damage that will certainly occur under implementation of the proposed project. Likewise, the DEIS fails to identify the real “purpose and need” which is clearly to increase water availability for S. Nevada saying instead that it's the BLM's “need” to issue a right-of-way.

The BLM charge as a public land manager is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. BLM must not approve this project right-of-way because it will impose harmful, irreversible and irretrievable impacts on the public lands and resources.

Sincerely,

Gaylord Robb

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