

Woods, Penelope D

From: JPresident <isca.nv@gmail.com>
Sent: Tuesday, October 11, 2011 9:17 PM
To: Woods, Penelope D
Subject: ISCA Pipeline DEIS Comments
Attachments: ISCA-commentsDEIS.pdf

Penny Woods, Pipeline Project Manager
BLM Nevada State Office
1340 Financial Blvd.
Reno, NV 89502

Dear Ms. Woods

Please accept the attached file with questions and comments from Indian Springs Civic Association re the 2011 pipeline dEIS.

contact information:

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Indian Springs Civic Association (ISCA), comments on “The Clark, Lincoln and White Pine Counties Groundwater Development Project DEIS” (DEIS)

Indian Springs Civic Association (ISCA), a non-profit community organization in rural Clark County, Nevada, for residents of the desert communities of Indian Springs (formerly Indian Creek) and Cactus Springs (formerly Mesquite Springs).

Contact:

Mrs. J. E. Lewis, President

“President” ISCA.NV@gmail.com

ISCA strongly supports the **NO ACTION** (DEIS) alternative. We agree with, support, and restate here the specific reasons, analyses, comments, and conclusions presented by the non-profit *Great Basin Water Network* in its 2011 “*Response to the Clark, Lincoln and White Pine Counties Groundwater Development Project DEIS*”. This pipeline project will have long-term environmental and economic implications for all populations in Nevada and Utah.

Additionally, any such pipeline will have direct effects on our community through damage to the political economy of the counties and the State of Nevada, of which we are a part. Further, if approved in any form, this might very well become a model applied elsewhere to co-opt the deserts’ most valuable resource.

What happens in the target areas while the Southern Nevada Water Authority (SNWA) pipeline project is waiting? Will options be developed? Will we lose our small communities and their more sustainable contributions to agriculture and wildlife?

This DEIS is premature; hearings on the first SNWA applications in four basins are still in progress at present. SNWA does not have the water to put in the pipeline. We must have a supplemental DEIS if any water rights are allowed for the SNWA

pipeline project, and firm proposals as to time lines and conditions. All existing stipulations must be voided and renegotiated, in public. Hearings on other SNWA more northerly applications have not yet even begun and there is still **NO** Utah-Nevada agreement.

The DEIS fails to address the full pipeline cost. The recently released figure of \$15 billion needs full and impartial explanation. Citing a single sum, rather than a range of values is not valid. How much will monitoring, mitigation, operation, maintenance, utilities, etc. each cost? How much is needed for different scenarios? How much for inflation? What do different construction materials and methods cost? How much will have to be imported? How many local people will this project employ and for how long? Will engineering be outsourced to offshore companies?

There is no detailed DEIS explanation of funding options, and who will pay. Will SNWA pre-pay its obligations, or shift them to future generations? If SNWA defaults, who will pay? Who audits SNWA?

Where is the cost-benefit analysis for this project? How would funding cope with future economic difficulties, such as: internet poker, internet gambling, rise in fuel prices, California legalizing gambling, gaming corporations moving offshore, etc.

The pipeline would add to the tremendous concentration of power over a vital resource that is only partially renewable. Such power requires complete transparency to reinforce responsible behavior. The groundwater resource will be depleted over the life of this proposed project. Once funded, would a pipeline place the entire state on a downward economic spiral? When will the taxpayers/rate payers be represented in this process?

At what point will negative environmental impacts require that pumping be shut down? Could it be shut down?

Growth has been the driving force behind the bubble that burst. The SNWA has actively supported the growth paradigm, even knowing that all growth is terminal. Will SNWA be constrained from promoting growth?

Would there be any incentives to discover and deploy new water technologies and conservation during the wait for pipeline?

The SNWA publicly proclaims that cities have imported water since ancient times. Not true for pumped groundwater!