



## THE LEAGUE OF WOMEN VOTERS OF SALT LAKE

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August 29, 2011

Comments on DEIS for SNWA  
Bureau of Land Management  
Groundwater Projects Office  
P.O. Box 12000  
Reno NV 89520-0006

Re: Comments on Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft Environmental Impact Study.

To Whom It May Concern:

Thank you for an excellent Draft Environmental Impact Study (DEIS) and for extending the comment period through September, and for holding a hearing in Salt Lake City. The League of Women Voters, with a few omission-oriented exceptions, generally endorses the information and format of the DEIS.

The League of Women Voters of Salt Lake (LVWSL) has a public policy position to "Promote the management of natural resources as inter-related parts of life-supporting ecosystems..." so commenting is appropriate for us. After study and discussion of the Clark, Lincoln, and White Pine Counties Groundwater Development Project DEIS, regarding the Southern Nevada Water Authority's (SNWA) proposal to build a 300+ mile pipeline and dewater the aquifers in the valleys in the Great Basin area, LVWSL respectfully submits the following. The comments are not technical; they are the reaction of interested and informed citizens who were active in presenting an informational Forum on the Water Proposal a year ago, in the fall of 2010, in Salt Lake City.

Our conclusion on the DEIS is that we believe that the No Action Alternative should be BLM's position because of the current incomplete state of the BLM's information and the DEIS' lack of coverage of the entire area. We would like the opportunity to reconsider our positions after full and complete information has been considered and taken into account by BLM. Detailed explanations of our position follow below:

1. The Environmental Impact Study (EIS) should NOT BE PUBLISHED without the various unconsidered or missing information items mentioned in the draft -- well locations, costs, water rights, and other uncertainties; the upcoming US Geologic Survey / Utah Dep't of Natural Resources (USGS/UNR) hydrology study on Great Basin National Park area; discussion of the economic viability of the project (including but not exclusively the pipeline); and other unknowns. Please delay closing the comment period, or at least to agree to issue a supplemental EIS after the missing information is obtained.

We believe the USGS/UNR hydrology study is particularly important. It appears that the entire flow system extends from the Steptoe Valley through Cave, Dry Lake, Delamar, Spring and Snake Valleys onward to the Great Salt Lake. Preliminary results seem to show the different basins have underground

connections with groundwater flowing from one to another toward the Great Salt Lake, and we think the completed USGS work will be informative to BLM's purposes. Pumping in Spring Valley could have a

negative effect on Snake Valley. If Spring Valley is a shared aquifer system with Snake Valley, it could be illegal to pump water out of the area; the Lincoln County Land Act requires studies showing the relationship between Spring and Snake Valleys and the effects of pumping in one or both before pumping.

The financial information is also extremely important. We cannot find information in the DEIS on the real costs of the project, or who will be expected to pay for it. The only information available is that the State of Nevada (and its citizens) will be paying, and that SNWA desires to keep water rates to consumers low. However, a water supply adequate to add over 300,000 families to Las Vegas seems unrealistic. We wonder if the intent of SNWA is to acquire access to a tremendously valuable commodity for resale rather than to fill a real need, and we wonder why the project has to be so oversized.

2. We are particularly concerned that the DEIS considers primarily the impacts to life--animal and vegetable--only in conjunction with the pipeline. We believe the EIS should address, in a great deal more detail, the entire potential impact to all our publicly owned BLM land. The DEIS is clear that construction of the pipeline probably means destruction and desertification on adjacent land; we believe that may extrapolate to mean on all the land in those valleys, an inappropriate outcome. We want the final EIS to detail exactly the degree of damage that will be done on all public BLM land affected by the water removal, and on adjacent private lands. Just because we can destroy everything doesn't mean we should.

3. We are concerned with the DEIS discussion of probable desertification downwind of the Wasatch Front; the DEIS suggests 24,000+ tons of blowing dust will be created. Nevada's desert is contaminated with disease spores, radioactive materials from nuclear testing, and fine particulate materials which act in human lungs exactly like asbestos. The natural vegetation in the various valleys controls the blowing dust, though it is insufficient to prevent it completely. Lowering the aquifer, thus killing off the natural groundcover and bushy plants, will exacerbate this quite serious problem, which, if drought persists, cannot be ameliorated by shallow rooted plants.

4. The Utah portion of the proposed water removal is not addressed in this DEIS, but the proposed removal of the underground water is likely to damage the water tables and water supplies in Utah as well as in Nevada, on both public and private land, as discussed in #1 above.

Snake Valley was a prime pumping area in SNWA's planning; SNWA now wants to discuss that "later." Approval of the pipeline without considering Snake Valley is inappropriate. Please take no action without full and complete analysis of probable outcomes in Snake Valley. The Lincoln County Land Act says no groundwater shall be taken out of the Snake Valley basin without agreement between Utah and Nevada. Approval of the DEIS as written may allow SNWA to work-around the Land Act.

Submitted for League of Women Voters of Salt Lake by

Linda G. Johnson, Co-President & Natural Resources Director