

BLM_NV_NVSO_GWProjects

From: Donald Shanks <doneshanks@hotmail.com>
Sent: Tuesday, October 11, 2011 4:46 PM
To: BLM_NV_NVSO_GWProjects
Subject: Draft EIS ("DEIS") for the Groundwater Development Project

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 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 end livelihoods, recreation, and entire ecosystems in eastern Nevada 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 are 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 – 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. 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's mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. BLM cannot approve this project right-of-way that will impose harmful, irreversible and irretrievable impacts on the public lands and resources.

I was a scientist for the U.S. Bureau of Mines for 30 years and have seen many destructive projects in the west, but this one takes the cake and will de-water a huge region. The only way that Las Vegas should be allowed to acquire water beyond their current contracts is to re-negotiate the Colorado River compact, desalinate water from the ocean or import water from a much wetter region (Canada). Of special concern to me is that Lincoln County is already pumping too much water and the arrangement between Vidler and Lincoln County will not be sustainable, even if SNWA never removes a drop of water. Las Vegas was very clever to quiet Lincoln County

by giving them the rights to the water in the eastern half of the county; but this just doubles the damage. The pipeline and its corridor will allow SNWA, Coyote Springs and Lincoln County to wheel water all over the place and should not be allowed.

Sincerely,
Donald Shanks
Pioche, Nevada