

## **BLM\_NV\_NVSO\_GWProjects**

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**From:** Ralph R Sacrison <rsacrison@frontiernet.net>  
**Sent:** Wednesday, September 14, 2011 2:47 PM  
**To:** BLM\_NV\_NVSO\_GWProjects  
**Subject:** SNWA DEIS Public Comment submittal  
**Attachments:** BLM SNWA RRS submittal.pdf

SNWA Project  
Bureau of Land Management  
1340 Financial Boulevard  
Reno, NV 89502

Attn: Penny Woods

Ms. Woods,  
Please accept the attached document as part of the public comment on the DEIS for the SNWA groundwater project.

Thank you for this opportunity.

Respectfully,

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Penny Woods  
SNWA Project  
Bureau of Land Management  
1340 Financial Boulevard  
Reno, NV 89502

Re: DEIS Public Comment

Ms. Woods,

This submittal addresses the Southern Nevada Water Authority Clark, Lincoln, and White Pine Counties Groundwater Development Project. Please accept this as public comment on the June 2011 Draft Environmental Impact Statement. In 2005 I submitted a white paper – ‘A Conceptual Review of Nevada Water Supply Alternatives,’ as part of the initial EIS process. Others also suggested alternatives.

The current draft essentially addresses only groundwater. The State of Nevada and the Bureau of Land Management should openly investigate any and all reliable long-term water supply solutions.

Massive groundwater development within a net evaporative basin may not be a wise scientific or societal choice. Alternatives to the SNWA groundwater proposals should be thoroughly vetted as part of state, regional, and national reviews.

Desalination, fresh-, and groundwater supply all are cost-competitive. Groundwater supply is the least reliable, though politically the only alternative whose infrastructure is confined within the state. Evidently that political simplicity is driving the selection, though drawdown also is expected in Utah.

Political expedience must not be accepted blindly. There is a reasonable expectation that the municipal drawdown will result in mining groundwater. The requested perpetual production is nearly 110,000 gpm. At their greatest rates, lasting only a few years to dewater to mining depths, the mines on the Carlin trend approached 70,000 gpm. Much of that flow was and the now reduced flow continues to be used in agricultural production. A significant amount is directed to aquifer recharge basins distant from the active workings. It seems the SNWA plans will only recharge water treatment plants.

Even with a reduction of the requested amount, significant infrastructure must be built regardless of the flow rate. The working model is to initiate production and monitor the technical (flow rate, water quality, etc.) and environmental (spring cutoffs, range and forest desertification, etc.) characteristics. If production cannot be sustained for either technical or environmental reasons, Las Vegas will only have deferred either the fresh water supply or desalination alternatives.

Fresh water supply could be provided either through a revisited North American Water and Power Alliance or by oceanic transshipment. The political complications of NAWAPA or variants such as the Tilley Plan may remain prohibitive. Though locally valid for premium (i.e., bottled) water,

economic transshipment of municipal water may require additional technical efficiencies to consistently compete with desalination. Alluvial intake is among those, analogous to buried sublittoral intakes for desalination systems. These techniques can significantly reduce filtration requirements while minimizing environmental impacts.

Desalination uses currently working technologies, providing substantial drinking water across the globe. Two alternatives present themselves. Plants in California provide a possibility of simply swapping Colorado River allocations for the desalinated water. That eliminates the need for overland piping. Since coastal industrial development commonly is discouraged in California, funding plants in Mexico may be attractive.

These and other alternatives bear honest and thorough investigation if the thirst of Las Vegas is to be slaked in a responsible and lasting manner. We should mine minerals, not water.

Respectfully,

Ralph R. Sacrison

September 14, 2011