

## Woods, Penelope D

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**From:** Abigail Johnson <saged183@gmail.com>  
**Sent:** Tuesday, October 11, 2011 4:42 PM  
**To:** Woods, Penelope D; Penny\_Woods@nv.blm.gov; nvprojects@blm.gov  
**Subject:** DEIS comments

- The DEIS needs to address the impacts of pumping cessation after 75 years, for all alternatives and categories of impacts disclosed in the EIS. This might go in 3.3.2?

- SNWA plans to interconnect the Gonder substation and Apex. The EIS should disclose the role of the North American Electric Reliability Corporation (NERC), Federal Energy Regulatory Commission (FERC), and Western Energy Control (WEC). The discussion of the national process related to the production and distribution of energy is totally missing from this EIS. Why wasn't FERC a Cooperating Agency in this EIS? If SNWA intends to generate non baseload electricity, scheduling issues should be addressed. This issue appears to have been overlooked or dismissed, and it may be significant. (Chpt 2.0 has several items on electrical power, but this is an overall comment.)

- The DEIS lacks a clear description of pipe and pipe maintenance. Much of the soil is alkali, which is corrosive. What kind of pipe will be used, and how will the surrounding soil affect the pipe. Please provide a description of the cathodic protection that will be provided. How do you intend to ensure the performance of the pipeline? What is the leak detection plan? How could leaks affect the accessible environment? This should be analyzed in the EIS.

In the event of catastrophic failure of a portion of the pipe, how will the emergency be handled? For the purposes of handling emergencies, will there be a series of "off" switches?

- Under the public health and safety section 3.19  
Regarding air quality's affect on public health, please disclose the contributions for the PM 10 load. PM 10 will have a direct effect on the health of people downwind. Please provide a meteorological map for wind effects for dust distribution in the project area and downwind. This is absent from the DEIS, is a serious disclosure deficiency, and should be included in the public health section.

- Do the participating water districts under SNWA have firm contractual agreements with SNWA to pay for the costs of the project? Are there agreements between SNWA and the water districts to purchase water at a particular cost? This agreement process should be disclosed in the EIS in Purpose and Need. Are there agreements in place for SNWA to sell to retail customers? Otherwise it is water speculation which should not be supported or abetted with the use of federal and or resources.

Abby Johnson, P.O. Box 183, Baker NV 89311