BLM_NV_NVSO_GWProjects

From: Angela <Meow@iglide.net>
Sent: Tuesday, October 11, 2011 4:16 PM
To: BLM_NV_NVSO_GWProjects
Subject: DEIS Comments
Attachments: BLM Letter.docx

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Hello Penny,

My internet has been giving me problems, so I hope this gets to you in time. Please send me a quick note to let me know if you got it. Thanks!

Angela Childs
435-855-2355

Penny Woods, BLM Project Manager
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Reno, NV 89520
775-861-6689 (FAX)
nvgwprojects@blm.gov (Email)
October 10, 2011

Dear Ms. Woods:

Thank you for the opportunity to comment on the Draft EIS ("DEIS") for the Groundwater Development Project. I would also like to thank you for extending the DEIS comment period to October 11, 2011, as I just found out about it today. I respectfully ask that you extend the deadline for at least another 90 days, to give others a chance to participate.

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 and western Utah 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 (as well as sources and costs of funding), a failure to disclose and analyze the cost of proposed mitigation and monitoring, and a failure to identify the real "purpose and need" which is clearly to increase water availability for southern Nevada saying instead that it's the BLM's "need" to issue a right-of-way.

DEIS also fails 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 southern Nevada, outright purchase of water rights currently used for agriculture in southern Nevada and elsewhere on the Colorado River, and desalination options. I lived in Las Vegas for 28 years and still have family and friends there, so I am concerned about the future of southern Nevada. In my experience, there has never been nearly enough effort to conserve water. Adopting conservation techniques similar to Phoenix, AZ and Los Angeles, CA would reduce or eliminate the need for more water. If the pipeline were implemented (devastating eastern Nevada and western Utah), Las Vegas would still have to turn to desalination eventually. I cannot imagine the long-term cost/benefit analysis being in favor of the pipeline.

Clearly more time is needed to address these and many other critical issues. There are far too many unknowns and uncertainties to make any hasty decisions. For example, a supplemental EIS is necessary to analyze environmental impacts of actual well locations for distributed pumping. As a Utah resident, a Nevada/Utah shared water agreement is of the utmost importance to me. Please take the necessary time to analyze the situation before making decisions that will affect our environment, communities, and families for generations to come.

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. Therefore, the only option that fulfills the BLM mission, and does not conflict with BLM's duties under NEPA and FLPMA, is the No Action Alternative.

Thank you for your time and consideration in this very important matter. Please contact me if you have any questions or need more information.

Sincerely,

Angela Childs
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