"Susan Lynn"
<sblynn@sbcglobal.net>
08/30/2011 09:36 AM

To <Penny_Woods@nv.blm.gov>
cc
bcc
Subject comments that you gave me yesterday were from Steve Erickson

Hi Penny: I found the email that I'd sent you on June 30. They were Steve Erickson's preliminary review of the Executive Summary only. You'll be getting other comments from him in due course.
However, the prelim comments did come from Steve Erickson in Salt Lake City
His address is 444 Northmont Way, SLC, UT 84103
Thanks for meeting with us again.
Susan

"Susan Lynn"
<sblynn@sbcglobal.net>
06/30/2011 08:04 AM

To <Penny_Woods@nv.blm.gov>
cc
bcc
Subject Fw: I hope you can open this link. If not go to the LA Times.

History: This message has been replied to and forwarded.

Penny: I've received this from a constituent. Have you pinned down the locations yet?
Thanks,
Susan
Have a peaceful July 4!

And I haven't seen anything from the BLM yet about the locations of the DEIS hearings (just checked their website - nada). BTW, did you know that their press release and website say the comments are due 9/8, while the DEIS Exec Summ says 9/9 (ES-2)? Maybe Penny ought to know/make up her mind/put out consistent information?

NOTES ON THE WATER GRAB DEIS.doc

NOTES ON THE DEIS

Executive Summary Overview

1. Inappropriate narrowing of DEIS scope/alternatives –

See ES-15 – analyzes economic feasibility of trucking alternative, rejects desal, other alternatives on (bogus) basis that none of the alternatives would "fulfill the purpose and need for the federal action or provide a comparable volume of water, within a similar time frame, and under financially feasible terms." [All while claiming elsewhere that BLM has no jurisdiction or responsibility to assess or question SNWA's stated need, purpose, timetables, finances, etc.] "As a result, no water supply or management alternatives were determined to be reasonable alternatives to a ROW grant for this draft EIS." (ES-16)

2. Relevant facts/process –
   -affects 35 hydro basins, over 20,000 sq. mi. (ES-39)
   - ½ mile wide ROW corridor to establish a 100 foot ROW (50' pipeline ROW + 50' powerline ROW), 50' temporary/construction ROW
   - 3 alt ROW alignments, 7 alternatives, 306 miles of pipeline, 431 miles of roads, 323 miles of power lines, 5 pumping stations, 74 megawatt power requirement176,655 afy at full build out in 2050
   - 12,303 acres disturbed by construction and operations - 1,104 permanently (for acres disturbed, alts. ABC are same as proposed action (PA)
   -service life of pipeline and main laterals is 65-75 years (localized alignment options obtuse, confusing (ES 26)
   -peak construction in 2015
   - unknown future facilities "presently unknown"…" a series of assumptions were developed" (ES-29)
   - Table ES-9 ranges of impacts are orders of magnitude greater for PA than any of the other alternatives for surface disturbance (but why is this table here in the ES that most people will read rather than summary impacts table)

3. Cumulative Impacts (mostly my opinion based on BLM's shallow overview of this subject)
   – DEIS (wrongly) limited to proposed facilities, surface disturbance, actions and past and present infrastructure and reasonably forseeable actions…(weak, superficial, unimaginative!)
   -how new ROW's affect future development is glossed over
   - visual resources (why not analyze the option of burying powerlines?)
   -Steptoe V impacts from powerlines (is this adequately addressed later in DEIS?) (ES-37/38)
   - just 5 cumulative impacts projects identified (ES-34) – oh, really?

4. Long Term Pumping Effects
   -drawdowns of 50-100 ft in Snake & middle Spring, 100-200 ft in south Spring & Cave@ 75 yrs after build out
   - Alt B drawdowns much worse (B really not doable logistically), Alt C 50-100 ft in so. Spring only-elsewhere20-50', Alt D 200+ in so. Spring w huge impact area!, Alt E 50-100 ft in so. Spring (see ES 48)
   - see ES-51 re: long term drawdown effects ….impacts of drawdowns on water rights (ES-53)
   - 75 yr and 200 yr drawdown effects devastating – 344 gw and surface rights affected at 75 yrs, 500 rights at 200 yrs. How will this be mitigated (paid for)? At what cost?
   - gw drawdowns leading to air quality problems, massive increases in PM10 (ES-55) – tens of thousands of tons of additional PM10
   - hundreds of square miles of subsidence of 5 feet or more at 75 yrs. (no impact on caves?)
   - drawdowns affect thousands of acres of wetlands, thousands of acres of private land
   - long-term risks to agriculture (ES-60)
   - Big Springs is toast, effectively all dried up, under all but the no action alternative
   - ET discharge reduced massively in Spring V, marginally in Snake V

   General Observations:

   -SNWA and BLM don't know where or when this project will actually go, won't say how much it will cost or if/when it will actually be needed, won't discuss legitimate alternatives
   - DEIS is replete with conjecture and assumptions, has a dated and presumptive project needs analysis, ranges of uncertainties of orders of magnitude
   - DEIS employs a "1% solution" to minimizing impacts – if only 1% of any resource value is impacted, then what's the big deal?
   - the potential for the ROWs to facilitate more development (greater cumulative impacts) in the region is totally glossed over or not addressed at all
   - distributed pumping and the tiering of studies of where wells (and associated infrastructure like roads, pipes) would maybe be located will lead to numerous change applications before the NSE. This will create a bureaucratic and legal nightmare for all concerned, and will be very expensive and time consuming!
   - gauging effects at 75 and 200 years is arbitrary when impacts will last much longer (equilibrium not reached for thousands of years in some valleys after pumps are shut off)
   - the proposed action has the worst impacts of any of the alternatives by far and almost entirely across the board
   - air quality impacts due to drawdowns "highly uncertain"
   - see Chapter 3, page 4 (p.3-4) for astonishing list of incomplete and unavailable information (reminiscent of Rumsfeld quote on known unknowns!) Some of this looks like game-changing inadequacies! How can BLM make an ROD based on such incomplete, to be done later data??

Chapter 1

-population growth projects for LV are already off target and dated (1-12)

- by 2035, conservation in Clark Co. to save 276 kafy, perhaps double what the NSE may grant for the pipeline (1-13)

- DEIS punts on establishing need for the project (1-16) – not my department says Werner Von Braun

- framework for development of monitoring plans to follow Stipulated agreements and the UT-NV Agmt (1-6), assuring what? 3M plans w/no shut-off valve? More legal challenges?

Chapter 3

Incomplete and Unavailable Information (3-4 and 3-5):

- Source of water in caves is unknown, on-going studies to determine origin of water.
- Climate change impacts could no be evaluated for this DEIS!!! Future NEPA documents will follow DOI policies related to climate change.
- BLM sensitive species list "not available at this time" (so won't be included in DEIS!), but will be included in the Final EIS. This is unacceptable!
- Final gw development areas and specific pumping locations not defined.
- Many springs and streams lacking specific information regarding characteristics, species occurrence.
- Current Visual Resource Inventory data incomplete at this time. Final report and supporting data will be used later on when available.
- Parts of 4 valleys with no detailed soils data, new mapping underway (but not yet complete?)in Snake V
- NV Wildlife Plan under review, no USFWS Avian Protection Plan
- Numerous on-going/nearly completed studies on Snake V and GBNP waters "will be utilized in the appropriate NEPA process" when it becomes available. What does this mean – utilized in the FEIS when they issue the ROD? Why not wait – the USGS study draft will be presented in mid-August? (argues for extension of comment period)
- Gw model limitations

But not to worry, because “sufficient information was available to complete this draft Tier 1 NEPA analysis *using a variety of information, professional assumptions, or processes*.” What a buncha hooey!