RECD - BLM - NSO
AUG 1 8 2011
9:00 A.M.

From the heart of the Great Basin Water Network

Here are some topics to help you comment on the DEIS. As residents and friends of the Great Basin, you know your community, the land and its resources. It is best to connect your comments to the DEIS, by page, section, or topic. Everyone: please ☑ include the RED statements along with the topics you choose. Thanks!

☑ Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.
☑ Tell BLM you support the No Action alternative, which is the only one that conforms to BLM's mission: "to sustain the health diversity and productivity of the public lands for the use and enjoyment of present and future generations." BLM should not approve a project that will impose harmful irreversible and irretrievable impacts on public lands and resources.
☑ Demand a Supplemental EIS that addresses impacts from specific well locations.
☑ DEIS fails to disclose project costs and sources and cost of funding.
☑ DEIS fails to adequately assess the purpose and need for project.
☑ Ask BLM to delay decisions because of large number of "unknowns" and "uncertainties" (no SNWA water rights, no well-site locations, no NV/UT shared water agreement...)
☐ DEIS fails to analyze potential environmental effects due to climate change
☐ All of the action alternatives will result in future efforts by SNWA to fill the 96 inch pipe with water from Snake Valley, the rest of White Pine County, Eureka County, Elko County and beyond.
☐ Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEPA and FLPMA.
☐ DEIS fails to analyze environmental impacts of actual well locations for "distributed pumping"
☐ Predicted massive land subsidence area of 5 ft. + is an unacceptable irreversible impact of unlawful groundwater mining.
☐ DEIS projects unacceptable adverse impacts on hundreds of existing surface and groundwater rights.
☐ DEIS does not consider a sufficient range of alternatives.
☐ DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.
☐ DEIS has inadequate, ineffective or missing mitigation measures.
☐ DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.
☐ DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.
☐ Proposed action would lead to major loss of game species; extinction of rare plant & animal species.
☐ DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley.
☐ DEIS provides insufficient information on impacts to Steptoe Valley.
☐ DEIS fails to adequately analyze adverse impacts on and mitigation for__ranching __wildlife habitat__local businesses__wild horses__Other_____.
☐ DEIS provides insufficient justification for failing to study drawdowns of less than 10 feet and impacts only to 200 years after build-out when the SNWA Pipeline project is intended to operate indefinitely.
☑ Let BLM and SNWA know you oppose this risky and expensive scheme to mine water in the Great Basin.

Your comments here: Include name & address, and mail to BLM at mailing address on page 1. Deadline is Sept. 9.
BLM: Please address comments checked above. Here are some more comments:

The BLM Mission Statement in itself should be enough to condemn this project.
→ Preserve the delicate balance of this fragile land.

Ms. Janie Young
1221 Beverly Dr.
Carson City, NV 89706-2603

Access more details and a sample comment letter: http://greatbasinwater.net/pubs/cmt2011-1.doc

Uh-Ohs: SNWA Groundwater Pumping Causes Irreversible & Irretrievable Impacts

BLM DEIS Also Lacks Crucial Pumping Location Information and Cave Water Source Data

Most of the impacts from the Proposed Action are deemed "irreversible and irretrievable"(Chpt. 4, page 4-2 to 4-4.) The impacts, long term or from construction include:•Groundwater tables falling 50-100 feet in Snake and Middle Spring Valleys, 100-200 feet in south Spring and Cave Valleys 75 years after build-out •Hundreds of square miles of ground level subsidence •"moderate to high risk" of negative impacts to 8,048 acres of wetlands,305 springs and 112 miles of streams •Impacts to 191,506 acres of shrubland •Irreversible loss of perennial surface water for wildlife, recreation, aquatic habitat and recreation• Die-off of native vegetation for 500 years •Long term increases in fugitive dust, up to 24,000 tons/year during project blowing downwind to the Wasatch front• Irreversible effects on agriculture and livestock• Unknown or unquantified effects on people and human communities.

Incomplete or unavailable information (See Chpt. 3, pages 3-4,5) DEIS lacks: •project descriptions for groundwater development and pumping locations •results of USGS/UNR hydrology study on GBNP •hydrology impacts on and water sources of regional caves including unique cultural and geologic formations •affected environment resource information •impacts on visual resources •data on soils for Snake, Steptoe, Pahranagat, Coyote Springs Valleys • consideration for future climate conditions. How can BLM make a decision without essential information?

Analyzing the Impacts of a Looming Disaster

The Water Grab DEIS is a mixed bag of dire consequences from groundwater pumping (mining) and avoidance of obvious alternatives that would not result in the devastation of rural Nevada. Showing pumping effects for only 75 and 200 years just begins to reveal the full effects, because water tables continue to drop and surface resources continue to dry up long after pumping ceases. BLM only maps areas with 10 foot + drawdown. BLM should disclose entire area to be affected by including 1-10 feet of drawdown areas.

Attention Hunters and Anglers: BLM's analysis shows the project would eventually destroy fishing in the area, and jeopardize hundreds of thousands of acres of winter and summer habitat for mule deer, pronghorn antelope, elk, sage grouse.

Lack of water will imperil wild horses, instigate choking Owens Valley-style dust storms, and jeopardize cultural resources and Native American tribes and customs. In addition to a long list of at-risk species is every HUMAN resident who depends on agriculture, tourism, or water directly or indirectly in the valleys in Nevada and Utah. Even senior and vested water right holders are not protected.

Monitoring, management and mitigation measures proposed are inadequate to reduce, avoid or offset the extreme adverse consequences of SNWA's proposed Project.

BLM has wrongly narrowed the scope of its analysis, abrogating its responsibility to examine all reasonable alternatives to the proposed action. Other than the No Action Alternative, all alternatives offered by the DEIS would have unacceptable environmental impacts.

The DEIS fails to analyze the economic feasibility of the Project, and fails to analyze adequately the direct and indirect financial costs and the lost opportunity costs for rural communities impacted by the Project.

BLM should postpone the Final EIS and issue a supplemental draft EIS after the completion of ongoing studies that address these inadequacies. Ultimately to fulfill its obligation to protect the public trust resources under its management, BLM must select the No Action Alternative.

BLM asks for comments and suggestions specifically for the Snake Valley portion of the project and for help identifying impacts to GBNP, in part due to concerns voiced by the Park and others, and also due to potential for impacts to water-dependent resources. (ES-75) **Let BLM and SNWA know you oppose the risky and expensive scheme to mine water in the Great Basin.**

BLM must select the "No Action Alternative" and deny the ROWs to fulfill its obligation to protect the public trust resources under its management