

BLM_NV_NVSO_GWProjects

From: Gretchen Baker <c_g_baker@yahoo.com>
Sent: Tuesday, October 11, 2011 3:10 PM
To: BLM_NV_NVSO_GWProjects
Subject: comments on deis

Dear Ms. Woods:

Thank you for this opportunity to comment on the DEIS. It is apparent that a lot of thought and effort has gone into this document. I hope that the following comments will assist you and your staff in refining the DEIS and selecting the best preferred alternative.

I have spent most of my life in Snake Valley and am very familiar with the land in and around this area. I know that the land is sensitive to even small changes in precipitation, which reduces the amount of water that flows down the streams, emerges from the springs, and produces vegetation. The BLM has long managed much of the area in Eastern Nevada. I recognize that the **BLM has a multiple-use mission**, but I urge you to keep in mind that this mission is for multiple-use, not multiple-destruction. The analysis in the DEIS shows huge swaths of land being destroyed, such as the loss of all the phreatophyte vegetation in the southern part of Snake Valley. This is land we use for grazing, including private land in Burbank Meadows, where a shallow water table allows a variety of nutritious grasses to grow. Even a small change in groundwater level would affect the vegetation here and thus cause hundreds of thousands of dollars of damages each year. These **socioeconomic effects** are not revealed clearly in the DEIS. Speaking of a small change in groundwater level, a ten foot drawdown level as shown on the maps is too coarse in areas with wetlands, wet meadows, and springs. We need a more specific model for these areas.

Baker Ranches, Inc. has water rights to many of the areas that would be affected, for example Big Springs. I am greatly concerned that the DEIS shows that **this project would violate Nevada state laws by impacting senior water rights**. How can the BLM select a preferred alternative that would do this? I believe an additional alternative is needed that would not impact senior water rights.

I am concerned with the **Timeline**. It is represented differently in various sections of the DEIS. In addition, what SNWA has been presenting to the NSE has been different yet. This goes to show that SNWA continues to have a **moving target**. Not only does the timeline change, but the size, location, and cost of the pipeline and wells. This must make it nearly impossible to do an accurate analyze. I urge the BLM to require the SNWA to come up with a proposed action that does not change, with all the details needed, to do an accurate analysis of the environmental effects. As it is, many of the analyses are based on speculation.

As a property owner in Snake Valley, I find the **proposed Snake Valley 3M Plan appalling**. This plan does not take into account the large number of private landholders in the valley that would be impacted. It appears that private landowners would not be involved in the development, implementation, or decision-making of this plan. The plan, as presently outlined, does not make it clear who would enforce SNWA to drill monitoring wells, complete monitoring, or adapt to different pumping schemes if resources are being affected. I am also gravely concerned that the monitoring would be conducted by the proponent. It would be highly preferable to have a third-party entity conduct the monitoring to avoid any conflict of interest.

Additional comments:

- **Lights** added to the valley would not be negligible, especially if the number of light sources more than doubles those that are already there (applicable to all the valleys, not just Snake Valley)
- I am quite concerned about the amount of **dust** expected to arise from this project. Maps show that most of the phreatophytes in the affected valleys would cease to receive water from groundwater. This would result in the replacement by different species, and often by no species if

weather conditions aren't just right. I would like to see additional analysis about the likelihood of nonnative plants invading these areas, especially given the high amount of disturbance due to new power lines, new roads to wells, and a huge pipeline swath. I would also like to see a **model of how the new vegetation** would react to fire. For example, how much is expected to return as cheatgrass? How would that change the fire intervals and following vegetative structure?

- I am also very concerned about the amount of **subsidence** expected with this project. Would this subsidence be sudden and cause our farm machinery to fall into holes and thus cause injury to employees? Some of our fields have been laser-leveled within centimeters to have the best runoff possible. How would subsidence impact these fields, and what would be the route to seek compensation if subsidence occurred in them? And have the drawdown models considered this subsidence? Would a 10-foot drawdown still be 10-feet, or would it now just be 5-feet because the land level is five feet lower?
- I would like some clarification as to some of the administrative parts of the DEIS. Why is a Snake Valley right of way being pursued before a Snake Valley hearing? If a ROW is granted, it could unduly influence the NSE. Also, **how long will this EIS be good for?** 5 years? 10 years? 20 years? SNWA has been stating to the NSE in the last two weeks that they want a project that is ready to be pulled off the shelf whenever it's needed. How long can such a project "sit on the shelf" before it has to be reanalyzed with the most current information? We continue to see scientists studying these areas and learning more about them. NEPA guidelines require using the best science available to do analyses so we don't want this project to gather dust on a shelf and then proceed after other scientists in X years show that it would have different impacts than currently believed today.

Finally, I would like it on record that I requested a **90-day extension** early in the comment period. My busiest times of the year are from April through October. I appreciate that the BLM added a 30-day extension, but I would have been able to have provided more in-depth comments if the comment period had been extended after the corn and hay harvesting season. I have to make my living during the times of year when the climate is favorable.

Sincerely,

Craig Baker
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