

## **BLM\_NV\_NVSO\_GWProjects**

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**From:** Debbie Coffey <honualoha@sbcglobal.net>  
**Sent:** Monday, October 10, 2011 3:23 PM  
**To:** BLM\_NV\_NVSO\_GWProjects  
**Cc:** honualoha@sbcglobal.net  
**Subject:** Public Comment on Clark, Lincoln, and White Pine Counties GDP DEIS

October 10, 2011

Penny Woods, Project Manager  
Bureau of Land Management  
Nevada Groundwater Projects Office  
Nevada State Office (NV-910-2)  
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Reno, NV 89520-0006  
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RE: My public comment for the  
Clark, Lincoln and White Pine Counties  
Groundwater Development Project  
Draft Environmental Impact Statement

Dear Ms. Woods:

My comments on the above referenced DEIS are:

- 1) I support the NO ACTION ALTERNATIVE.
- 2) On maps ES 15 , ES 16, ES 17, ES 1820, and ES 21, (Proposed Action - Full Build Out maps)it did not include 1 foot and 5 foot water drawdowns. Since a stream can dry up with a 1 foot water drawdown, and since it does not cost much or take long to do 1 foot and 5 foot water drawdown maps for these areas, I am requesting that BLM complete 1 foot and 5 foot water drawdown maps as part of the EIS analysis. It seems that this DEIS is incomplete and deceptive to the public without including this information. As you must well know, a far greater area of land and water will be affected by 1 foot and 5 foot water drawdowns.
- 3) Concerning AIR AND ATMOSPHERIC VALUES: The DEIS stated that "because groundwater development facilities would be constructed several years after other foreseeable projects sharing the same utility corridor, the GWD would not contribute to cumulative increases in construction equipment emissions and fugitive dust." This is illogical and unbelievable. Even though 20,570 acres are going to be disturbed and an there will be a noted increase in soil erosion, you expect no additional dust in this corridor? With road expansions being built and so many trucks driving through, you don't anticipate additional dust or additional equipment omissions? Are all of the trucks going to run on electric power?
- 4) Concerning VISUAL RESOURCES: The DEIS notes that strong contrasts and cumulative effects will take place in Dry Lake Valley, Delamar Valley, Coyote Spring Valley, Steptoe Valley, and Lake Valley. This impact cannot be mitigated and since the conflicts aren't minimal, the BLM should NOT grant the ROWs.
- 5) Concerning WILD HORSES: This GDP will remove 3,200 acres of wild horse forage in the Silver King and Eagle HMAs, but this is supposedly "not expected to affect wild horse herd sizes." I attended the roundups in Silver King last year, and read the EAs for these roundups, which were supposedly due to a lack of forage. Does the BLM NOW suddenly have

extra forage to give away to support another use after removing so many wild horses for this reason? If the BLM now has the extra forage, shouldn't some wild horses be returned to the range? Also, this DEIS has omitted any mention of WATER for the wild horses. Again, the BLM is lacking foresight by not doing 1 foot and 5 foot water drawdown maps, which could dry up streams in these HMA areas. Will the BLM guarantee no future Wild Horse roundups in these HMAs since the BLM has extra forage to destroy? The BLM seems to minimize the impact of the GDP in this DEIS, while the BLM seems to exaggerate the "degradation to the range" caused by wild horses in comparison to this project.

6) Concerning Cultural Resources, Socioeconomics & Environmental Justice, and Public Health & Safety: This DEIS uses the word "not expected" often, which seems to allow a lot of "wobble room" for error. This section of the DEIS also uses the word "foreseeable," but then seems to allow for short sightedness in anticipating realistic outcomes by omitting other factors. For instance, the public is aware that solar projects use a LOT of water, and solar projects may be near the same areas as this GDP. Also, much of this land seems to be on the Chainman Oil Shale, so it should be anticipated more water will be used for oil and gas drilling.

7) According to the DEIS, 176,656 acre feet of water will be used annually (57.6 BILLION gallons of water per year). And according to Chapter 3, 3.4- 7, maps show areas with severe water erosion potential, vast "draughty soils" areas near prime farmland, and areas with low revegetation potential. FLPMA mandates BLM to manage multiple uses to avoid continued degradation of the rangelands and to "prevent further degradation of rangeland resource." If BLM grants the ROWs for this GDP, it would be a reckless disregard of FLPMA, which mandates that resources be utilized to best meet the present and future needs of the American people and consider long term needs of future generations. Would creating a dust bowl in Central Nevada be in the best interest of future generations? Will this GDP contribute to future food shortages when farmers and ranchers no longer have enough water or affordable water for their lands?

This GDP isn't in compliance with the Ely District Approved Resource Management Plan (August 2008) because it will not maintain "a thriving ecological balance."

Based on CEQ (Council on Environmental Quality) criteria for significance (40 CFR 1508.27) with regard to the context and intensity of impacts, the BLM has clearly noted in this DEIS that the severity of impacts is significant with severe water erosion potential, vast "draughty soils" areas and areas with low revegetation potential.

8) Glaringly omitted in this DEIS was the "NEED" for this GDP. The "necessity" was not described. Perhaps this water, which will be taken from farmers and ranchers, is to be used for Las Vegas' many golf courses, fountains and new development projects, and Henderson's need for watering grass in city parks, etc. Peter Gleick, President of think tank Pacific Institute, found that Las Vegas, through more conservation, could save nearly as much water as it planned to take from Northern Nevada. He asked "How fair is it to look for more and more water, from farther and farther afield, when we're using the water we have improperly?" There are no public documents attached to this DEIS that show how Las Vegas and other cities/Clark County included in SNWA have conserved water, or plan to conserve water in the future, or a comparison of how much water is being used and how much water is being conserved. This GDP just looks like a giant giveaway to SNWA because SNWA "wants" water.

Again, I am asking the BLM to choose the NO ACTION ALTERNATIVE in connection with this GDP DEIS, and to deny the Right of Way request.

Thank you for your time.

Sincerely,  
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