## Woods, Penelope D

**From:** Ken Hill <kenfhill84083@gmail.com>
**Sent:** Monday, October 10, 2011 3:24 PM
**To:** Woods, Penelope D
**Subject:** comments from Ken Hill > Partoun UT

I sent these to the e-mail address given on the BLM website for comments. In my e-mail program I checked 'Delivery Status Notification' which usually lets me know if the message got delivered. It did not notify me that my comments got delivered. So I'm sending you a copy as a backup. -ken

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cost
The DEIS does not contain any analysis of cost for SNWA's proposal although several potential alternatives were dismissed because they were deemed too expensive. Too expensive compared to what? How do we know they are too expensive compared to the proposed action or alternatives outlined in the DEIS if there is no cost to compare them against?
While we have received assurances that cost will now be analyzed, there will be no opportunity to comment on that analysis since it will not be complete by the time the comment period is over.

triggers
If the ROW is approved, the BLM should demand some hard-wired triggers of negative impacts. So far, stipulated agreements only allow for a lot of talk, talk, talk. They even seem to give SNWA a veto power to impede shutting down or limiting pumping.

study area
The DEIS study area is too limited. For example, Fish Springs and all the area south from which it gets its recharge, for example, should have been included. The study area stops at Fish Springs but should cover further east and north. There is flow coming into Fish Springs from the basin east of Snake Valley that could be disrupted by SNWA pumping in Snake Valley and possibly Spring Valley.

Monitoring, mitigation, management
cp Spring Valley stipulated agreements
At a recent meeting of the Utah Snake Valley Aquifer Advisory Council, DNR staffer Chrissy Wilson (who is involved with implementing the Spring Valley monitoring, management and mitigation agreement) said the cooperating groups have had to proactively seek out alternative funding to carry on their work because SNWA has claimed poverty.
If the water rights and ROW are granted but if southern Nevada's economy does not pick up, SNWA will not have significantly increased revenues. How can they be forced to fully engage in their much-touted environmental safeguards?

irreversible impacts
The very significant list of irreversible and irretrievable impacts outlined in the DEIS -- for which the BLM is to be commended -- make it nearly impossible for SNWA go get the amounts of water they want without the impairing the BLM from fulfilling its mission of stewardship and protection of federal lands.
The irreversible and irretrievable impacts alone are reason enough to choose the no action alternative.
Monitoring of groundwater exportation from the target basins must be rigorous enough to ensure the BLM can properly do its job as steward of federal land and resources.
Particular care must be taken to ensure that none of the listed impacts affect the Great Basin National Park.

comment period
The comment period, even with the extension until 11 October is inadequate. Many of the residents in the target basins work in agriculture which is only now winding down. They will not have had adequate time to review the massive DEIS. Additionally, the DEIS comment period has overlapped the Nevada Engineer's water rights hearings for some of the target basins, attention to which has taken time and effort beyond work time. The DEIS comment period should be extended until after the Nevada Engineer hearing are completed.

Preferred alternative
I believe alternative D is the most appropriate alternative. It would give SNWA an expanded water portfolio while restricting the negative impacts across a smaller area. Since the Lincoln County Lands bill does not require a ROW in Spring Valley, this should be given extremely serious consideration.
If alternative D is not acceptable, I believe alternative E should be chosen. It would restrict the amount of harm possible in Snake Valley.
However, even if a ROW is disallowed in Snake Valley, the BLM must make sure that managing, monitoring, and mitigation protocols are established and functioning to prevent the likely negative impacts to Snake Valley if interbasin flow is disrupted between Snake Valley and any of the upgradient basins.

project need
SNWA has said from the beginning that water is necessary to keep southern Nevada's economy growing, calling it Nevada's "economic engine". But growth there has been stalled now for several years and while unemployment is high complete meltdown has not occurred.
Recently consultants from Atlanta-based CBRE analyzed southern Nevada as a place where businesses might want to relocate. Water did not feature in their presentation. Instead, according to news reports the key obstacles to relocation are "Southern Nevada’s workforce isn’t very well educated, the cost of living here is relatively high, government budget cuts are going to limit growth and Las Vegas is often perceived to be 'just another gambling and entertainment town.' "
These factors are going to take many years or decades to fix if they can be fixed at all. The rush to get water for growth have been overstated.
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tiering
I fail to see how tiering can be effective when pumping will not begin so far into the future. If the ROW is granted and water starts flowing from the target basins to southern Nevada, making southern Nevada dependent on the groundwater, pressure to keep water flowing (regardless of negative impacts) will be overwhelming.
In the Nevada water rights hearings, SNWA has told the Nevada Engineer that they may not start building the pipeline unless/until Lake Mead reaches a critical level of 1075 feet. That may not happen for years or decades. Will there be another 6-year environmental impact study in the case of such a delay?

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During the scoping phase, I made a comment about public safety (e.g., fire fighting) possibly being degraded in target basins because of lowered water tables, streams, and ponds. I cannot find where that has been addressed in this DEIS. I assume that is an issue that will be put off to a future tier.
However, it raises the issue of how such future tier EIS processes will adequately deal with previously raised scoping comments. Will I have to re-raise it decades from now if specific well locations are identified and a future environmental impact study is begun? Or is the BLM filing all scoping comments that did not make it through this tier and will the BLM go back through the archives and bring such scoping comments back to help focus future studies?

Indirect Potable Water Reuse
The 9 Oct 11 issue of the Las Vegas Sun (http://www.lasvegassun.com/news/2011/oct/09/some-your-thoughts-water/) quotes Jim Deacon, emeritus distinguished professor of environmental studies at UNLV as follows:
"Five or more years ago, I had an interesting conversation with Walter Johnson (retired chief operator of the Clark County waste treatment plant). He and Dr. Jacimaria Batista at UNLV calculated that an “Indirect Potable Water Reuse” system would be cheaper and produce more potable water than the combined Water Grab/Clean Water Coalition projects. It would also improve water quality in Las Vegas and in the lower Colorado River.
Since then, the Pacific Institute has published studies demonstrating this kind of system is cheaper than desalination."
Has this been analyzed as part of this EIS?

Lincoln County Land bill

It is unclear what the language in the Lincoln County Land bill means when it requires BLM to grant a ROW in Lincoln County while complying with NEPA. Even if it means that the ROW in Lincoln County is a given, it does not mean water can safely be put into a pipeline if negative impacts abound, including (but not limited to) those described in the DEIS section on Irreversible and Irretrievable impacts. It certainly does not require a ROW in White Pine County.
I am not saying the BLM can override the Nevada Engineer about water rights. SNWA should be allowed to get water rights in Spring Valley for the ranches they own there. But if negative impacts are probable by the exportation of water from Spring and Snake Valley, then the EIS should disallow that exportation through the pipeline.

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- Ken Hill
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## BLM_NV_NVSO_GWProjects

**From:** Ken Hill <kenfhill84083@gmail.com>
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**To:** BLM_NV_NVSO_GWProjects
**Cc:** Abigail Johnson
**Subject:** comments from Ken Hill > Partoun, UT

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