John D. Tilford
979 East 75th Street
Ely, Nevada 89301

REC'D - BLM - NSO
9:00 A.M. OCT 13 2011

Penny Woods, BLM Project Manager
PO Box 12000
Reno, NV 89520
775-861-6689 (FAX)
nvgwprojects@blm.gov (Email)

Dear Ms. Woods:

Thank you for the opportunity to comment on the Draft EIS ("DEIS") for the Groundwater Development Project.

The BLM is to be commended for identifying the severe and lasting impacts the proposed project will inflict upon the land and its inhabitants. The DEIS shows that a huge area would lose water resources that people and wildlife depend upon in eastern Nevada and western Utah. The pumping impacts identified in the DEIS will end livelihoods, recreation, and entire ecosystems in eastern Nevada as we now know them. It is clear that mitigation proposed in the DEIS is weak, unenforceable, and will not prevent the complete dewatering of the targeted region. The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.

The DEIS predicts dire environmental damage from the SNWA pumping but contains only a weak analysis of the equally dire social and economic impacts on eastern Nevada and western Utah from the Proposed Action and the five pumping scenarios.

The DEIS contains many flaws and inadequacies that must be addressed before any fully informed Record of Decision can be reached. Among the faults are a failure to disclose and independently analyze the full economic cost of the project, a failure to disclose and analyze the cost of proposed mitigation and monitoring, and a failure to include real alternatives to the

pumping project – alternatives that the public demanded during scoping – such as efficiency and conservation of existing water resources in Southern Nevada, outright purchase of water rights currently used for agriculture in Southern Nevada and elsewhere on the Colorado River, and desalination options. Likewise, the DEIS fails to identify the real "purpose and need" which is clearly to increase water availability for Southern Nevada saying instead that it's the BLM's "need" to issue a right-of-way.

The BLM's mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. BLM cannot approve this project right-of-way that will impose harmful, irreversible and irretrievable impacts on the public lands and resources.

Sincerely,

John D. Tilford