

Comments and Responses - Individuals

ID	Comment	Response
<u>Kari</u>		
33979-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization	Based on your comments, text has been added to Chapter 1.
33979-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33979-3	lack of specificity of well locations to gauge the environmental impacts.	See Standard Resource Responses Gen-1 and Gen-2.
<u>Anderson, Jerald</u>		
34504-1	In the Nevada State Engineer water rights hearings on Spring, Cave, Dry Lake and Delamar Valleys, the conceptual model developed for this EIS differs from the hydrology being presented in the representation of flows between Spring and Snake Valleys. The results being used to justify available water in Spring Valley are without accuracy estimates, and are not statistically better than the previous estimates.	The estimates of interbasin flow are reasonable and generally fall within range of previously published estimates as described in the Conceptual Model Report (SNWA 2009a).
34504-2	SNWA has presented ONE possible description of the geology and hydrology in this area, but much more needs to be done to support any conclusions which justify the impacts from the removal of such a large amount of groundwater in this environmentally sensitive region.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34504-3	No estimate of project costs and the associated financial commitments over the project life (75 years) is presented. Current conceptual estimated costs including financing are in the \$15B to \$20B range, which averages to \$200-300 million per year. These costs do not include environmental and operating and maintenance costs, which should also be estimated per year. This amounts to at least \$100 per person per year in the project service area (\$400-\$600 per year per family of four).	Thank you for your comment regarding the overall project cost and potential implications for consumers. See SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS.
34504-4	One specific example of increased overhead is the interconnection to the Bulk Electric Supply grid for the project high-voltage power supply lines. The FERC permit for the hydroturbines is only a small part of the oversight and control required for such an interconnection. NERC and WECC requirements must be addressed, along with the continuing audits and compliance activities for any entity generating into the BES grid.	These permit requirements are not relevant to the EIS analysis other than potentially contributing to the project costs.
34504-5	Some representation of the developing impact of pumping should be included. The first impact presented is at 75 years—a complete life span for an individual. At least 3 generations would be included in that time period. A sequence of ten-year projections should be included for the Proposed Action up to the 75-year project life. The time scale of this project is not easily comprehended, so additional graphics would be helpful.	Thank you for your comment. Please see WR-2 for a response to your concern and suggestion regarding the time frame of the analysis.
34504-6	A section devoted to “Irreversible and Irrecoverable Impacts” should be included. The impacts of this proposed project are so great that they must be present in the summary presentation.	A short summary and reference to where irreversible and irretrievable impacts are discussed in the EIS was added to the Executive Summary.
34504-7	Section 2.6--The impacts of the 2008-2011 economic downturn must be used to update the economic and population assumptions in the report. SNWA’s planning documents are still based on the period of time and the economic forecasts of the sub-prime mortgage boom, and do not accurately describe the need for this project. The “need” expressed in this analysis is not accurately represented, if it exists at all. Optimism for economic recovery in Southern Nevada is not warranted, given the financial troubles of our own country and the global economy.	See standard resource response SocEcon-2.
34504-8	At the 2035 target of 199 GPCD (currently 242 GPCD), the existing population of 2 million in the area should have reduced their consumption by 96,000 AFY, more than half of the expressed “need”. This would provide enough water for a population of 2.4 million, without any of the additional resources they have defined.	Thank you for your comment. Please see Gen-3 and SocEcon-2 regarding the scope of the decision to be made by the BLM on the basis of this EIS and concerns regarding the SNWA's need for the water and/or adequacy of current water resources. Determining options for other water sources is beyond the scope of this Final EIS.
34504-9	The CBER population forecasts (REMI-based) do not reflect the realities of the Las Vegas economy in terms of foreclosure, unemployment, or growth. They appear to be focused on justifying a population of about 3.8 million in 2050 by adjusting the growth percents. This basis for population based “need” is highly suspect on its surface.	Thank you for your comment regarding the reasonableness of the population forecasts described in the EIS. Please see standard resource response SocEcon-2 for additional discussion regarding this issue.
34504-10	SNWA’s intent to leave this project “on the shelf” for future development should be reflected. As it stands now, this project is speculative due to the enormous costs and lack of signed commitments by its members to incur the costs associated with it.	Note that BLM must process the application unless SNWA chooses to withdraw it. See SocEcon-1 regarding the inclusion of additional information on project costs in the EIS.
<u>Andrews, Jan</u>		
34897-1	First: It is essential to do a proper geophysical survey to determine how the water systems under Western Utah and Eastern Nevada are connected and to estimate how long the aquifers would last after the pipeline began drawing water. Second: I find the rationale behind the water diversion preposterous. Las Vegas believes that after this downturn that great masses of people will once again come to inhabit the fragile desert landscape. This is unlikely to happen.	Updated section 3.3 (water resources) discusses potential impacts from groundwater pumping. Please refer to standard resource response MM-1 for information on this topic.

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34897-2	Second: I find the rationale behind the water diversion preposterous. Las Vegas believes that after this downturn that great masses of people will once again come to inhabit the fragile desert landscape. This is unlikely to happen. There are too many variables that could and will change the prospects of growth and development for Nevada and, indeed, the whole world.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Austin, Jerry & Pat		
33834-1	The proposed pipeline is a terrible idea. If Las Vegas needs more water they should do away with canals, fountains, pools and require all new building (commercial, residential etc) to be exersicaped.	This information will be provided to SNWA for their use in future water resource planning.
Baker, Craig		
34894-1	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.	Thank you for your comment. The potential effects of drawdown on pumping costs and the local agriculture industry are noted in Section 3.18.2.8 and suggested mitigation measure SE-6 outlines the need for mechanisms to help address potential adverse financial burdens. Text has also been included to recognize the recognition and protections of existing senior water rights incorporated in Nevada water law.
34894-2	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.	See response WR-1 regarding the use of the model simulated 10-foot drawdown for the programmatic analysis of potential effects to water dependant resources; and discussion of the regional groundwater flow model.
34894-3	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.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities. The Nevada State Engineer has the statutory authority to protect senior water rights consistent with Nevada State Law. The ROW would be issued (if granted) consistent with SNWA's Nevada State water rights.
34894-4	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.	Inconsistencies have been resolved to the extent possible in the Final EIS.
34894-5	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.	Thank you for your comment. Please see Standard Resource Response MM-1.
34894-6	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).	Section 3.15 includes information from the Plan of Development, which indicates that nighttime lighting during project operations will be activated only if needed for safety and security, either manually or motion activation; and thus would have minimal effects to dark skies of the GBNP and surrounding region. In addition, lighting will be shielded and directed downward, thereby reducing lighting effects when activated. When activated, the shielded, downward directed lighting would not add to sky glow in the night-time sky, and thus would have minimal effects to dark skies of the GBNP and surrounding region. Section 3.15.2.2 has been revised to indicate that the proposed lighting is consistent with the International Dark Sky Association guidelines for lighting to minimize sky glow in night skies.
34894-7	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?	Impacts to phreatophytic vegetation have been detailed in Section 3.5.2. Additional analyses will be performed during subsequent NEPA to address specific areas with specialized plant communities and specific soil conditions.
34894-8	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?	Potential impacts related to groundwater pumping have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.

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34894-9	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.	Based on your comment, text has been added to Chapter 1. Because of the programmatic nature of the EIS, subsequent EISs will update the main EIS (this one) and provide further analysis. This should extend the usefulness of the analyses contained herein. In all cases where a new authorization (a ROW or a Notice to Proceed) is to be issued, the EIS is reviewed and updated, if appropriate, before BLM would issue an authorization.
34894-10	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.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
<u>Baker, Dean</u>		
34005-1	Draw down of water in east central Nevada and western Utah will create dust, but also could have more nuclear content than the nuclear problems in Japan, because of the military nuclear testing history in southern Nevada.	Please see common responses Air-1 and Air-4.
34005-2	Will the environmental impacts be large?	This should not have been bracketed as a comment.
34005-3	Will wildlife and wild horses be lost?	The FEIS discusses potential impacts to wildlife in Section 3.6.2; and potential impacts to wild horses in Section 3.12.2.
34005-4	Will it cost billions of dollars more than expected?	Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS.
34005-5	Will it lessen food production, beef, lamb, milk, and many other products?	There will be a certain amount of acreage and forage vegetation temporarily and permanently lost to project rights-of-way, facilities, and groundwater drawdown effects within grazing allotments. Overall, this could translate to a reduction in livestock carrying capacity.
34005-6	Will it reduce the sheep and cattle production from the desert ranges?	There will be temporary and permanent losses of acreage and forage vegetation due to project rights-of-way, facilities, and groundwater drawdown within grazing allotments. Overall, this could translate to a reduction in livestock carrying capacity.
34005-7	Will It hurt the quality of Great Basin National Park and the view of the valleys below the Park?	Please see Standard Resource Response Air-5.
34005-8	Will the winds create more dust?	Please see common response Air-4.
34005-9	Will the use of water on golf courses have impact on millions of acres of rural areas?	The potential effects to water resources and water dependent resources were provided in Section 3 of the DEIS (and FEIS).
34005-10	Will the meadows and grass areas that were large before and white man arrive in the west be hurt and disappear?	Impacts to vegetation are discussed in Section 3.5 of the EIS.
34005-11	How many springs will dry up?	Potential effects to springs, including the number of springs at risk from the proposed pumping is provided in Section 3.3.2 of the EIS with additional detail provided on a basin by basin bases in Appendix F3.3.8, F3.3.9, and F3.3.10.
<u>Barker, George W</u>		
33873-1	But first, back to Walker Lake. Recreational use of this Lake must be stopped at once (perhaps temporarily). Then, the Lake must be dredged to a depth of 200 to 300 feet. It will then soon become a reservoir SOLELY for Lake Mead and Las Vegas.	Thank you for your comment. The subject of this comment is beyond the Draft EIS scope and does not require further agency response. However, your comment topic will be considered by the BLM during preparation of the Final EIS and Record of Decision.
<u>Bayless, Joe</u>		
34153-1	Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34153-2	Demand a Supplemental EIS that addresses impacts from specific well locations.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. A conceptual analysis of distributed pumping and other alternatives is contained in the FEIS. Please review standard resource responses Gen-1 and Gen-2.
34153-3	DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. Please see SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.

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34153-4	DEIS fails to adequately assess the purpose and need for project.	Based on your comment additional text has been included in Chapter 1.
34153-5	DEIS fails to analyze potential environmental effects due to climate change	Please see standard resource response Air-15.
34153-6	Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEPA and FLPMA.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34153-7	DEIS fails to analyze environmental impacts of actual well locations for "distributed pumping"	Please refer to standard resource responses Gen-1 and Gen-2 for information on this topic.
34153-8	DEIS does not consider a sufficient range of alternatives.	Please refer to standard resource responses Gen-3 and Gen-5 for information on this topic.
34153-9	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.	Please refer to standard resource responses SocEcon-5 for information on this topic.
34153-10	DEIS has inadequate, ineffective or missing mitigation measures.	See Standard Resource Response MM-1.
34153-11	DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.	Section 3.17 has been revised and updated based on this comment and others.
34153-12	DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
34153-13	DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley. DEIS provides insufficient information on impacts to Steptoe Valley.	See response WR-5 regarding potential effects to Fish Springs. The maximum extent of the model simulated drawdown area resulting from the GWD pumping scenarios occur at the full-build out plus 200 year timeframe. At this point in time, the nearest location of the simulated drawdown area resulting from project pumping is located in northern Spring Valley; located two hydrographic basins away from (approximately 20 miles southwest) of Deep Creek Valley; and approximately 15 miles from the Goshute Indian Reservation boundary. Therefore, impacts to water resources in Deep Creek Valley and the Goshute Indian Reservation are not anticipated. Drawdown related effects are estimated to eventually propagate into the southeast margin of the Steptoe Valley Hydrographic Basin as described in Section 3.3 and Appendix F3.3 of the EIS.
34153-14	DEIS fails to adequately analyze adverse impacts on and mitigation for ranching, Wildlife habitat, local businesses, wild horses	Please refer to standard resource response SocEcon-5 for information on this topic.
34153-15	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.	See response WR-1 regarding the use of the model simulated 10-foot drawdown, and WR-2 regarding the future time frames considered for the programmatic analysis of potential effects to water dependant resources.

Belknap, William C

34861-1	The Clark, Lincoln, and White Pine Counties Groundwater Development Project DEIS considers the reduction of evapotranspired water from the valleys where groundwater removal is being contemplated, but does not consider the consequential reduction in relative humidity in the air above the project. The increases of the drying effect beyond present-state conditions from winds passing over the project area would add greater stress on plants and animals. Of particular concern would be effects during times of low humidity on organisms near their margin of survival. This could be a serious oversight of deleterious effects both within the project area of study and beyond.	No data exist to support the hypothesis that the transition and replacement of phreatophytic vegetation in the project area would significantly alter regional levels of relative humidity.
34861-2	The DEIS states that the groundwater outflow from the total project area is 56,193 afy, and the reasonably foreseeable future actions will take 47,465 afy. Thus there is only about 9,000 afy that could be considered surplus from the study area, which of course ignores the downstream effects of such withdrawal. Yet the proposed action is to withdraw 176,655 afy, clearly an amount that requires mining subsurface water. Soon the projected water needs of SNWA will be greater than the ability of the Colorado River to supply, so the chances of the project area naturally recharging while SNWA stops pumping appears to be nil. Thus the project is unsustainable.	Updated section 3.3 (water resources) discusses the conceptual water balance of the project and potential impacts from groundwater pumping.

Benson, Robert & Sandra

35026-1	It is clear that mitigation proposed in the DEIS is weak, unenforceable, and will not prevent the complete dewatering of the targeted region.	Please refer to standard resource response MM-1 for information on this topic.
35026-2	The BIM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.

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35026-3	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.	Please refer to standard resource response SocEcon-5 for information on this topic.
35026-4	Among the faults are a failure to disclose and independently analyze the full economic cost of the project,	Please refer to standard resource responses SocEcon-1, SocEcon-3 and SocEcon-6 for information on this topic.
35026-5	a failure to disclose and analyze the cost of proposed mitigation and monitoring,	Costs for monitoring and mitigation can not be made until the measures are defined in more specific detail. This level of detail will not be available until after the Record of Decision is prepared for this EIS and subsequent NEPA is conducted, and in many instances, until after project implementation and years of groundwater pumping . See also SocEcon-3 and MM-1 for additional response to this comment.
35026-6	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 S. Nevada, outright purchase of water rights currently used for agriculture in S. Nevada and elsewhere on the Colorado River, and desalination options.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
35026-7	Likewise, the DEIS fails to identify the real "purpose and need" which is clearly to increase water availability for S. Nevada saying instead that it's the BLM's "Need" to issue a right-of-way.	Based on your comment, text has been added to Chapter 1.

Bledsoe, Bruce

38006-1	There are so many things that the DEIS does not do, or do thoroughly enough, including impacts on wildlife habitat and future development of the affected areas, as well as proper mitigation if there could be any, which is doubtful.	Please refer to Standard Comment Response Gen-1 regarding appropriate subsequent NEPA analysis for future facilities.
38006-2	It seems seems incredibly shortsighted to analyze the impacts of pumping over only some 200 years at best when it seems self-evident that such a drastic withdrawal of groundwater will harm the environment far beyond that time span, especially when global warming is expected to make the land even dryer—and that is not really considered either.	Please refer to standard resource response WR-2 for information on this topic.
38006-3	And is this project really affordable? Does the cost-benefit analysis in any way say that this thing can work? We don't really know that either.	Thank you for your comment. Please see standard resource responses SocEcon-1, SocEcon-3 and SocEcon-6 for additional information on this topic.

Bond, Kenneth

33830-1	If Las Vegas needs more water, and are using their allotment from the Colorado river, they should spend all the money for this bad idea, on a system that recycles their waste water into a potable water supply, from their existing supply.	Please see the SNWA Water Plan (www.snwa.com); recycling of wastewater currently is a component of their water plan.
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Brady, Connie

34002-1	Some of the reasons for denial of the right of way for this project-(1) Threatens to dry up an area in Great Basin equal to the size of Vermont, five national wildlife refuges, four state wildlife areas, seven state parks, and two national parks including Great Basin National Park.(2) Loss of surface water for recreation and wildlife, including wild horses and rare endangered species.(3) Cost will be thrust upon Clark County taxpayers (estimated cost \$3.6 Billion via SNW A which would only go higher and this is not the time, nor in the future, to thrust this disaster upon taxpayers.(4) Even though the DEIS analyzes and predicts dire environmental and socioeconomic impacts from the proposed action and five alternatives, the DEIS contains many flaws and inadequacies that must be addressed before any fully informed record of decision can be reached.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS.
34002-2	(5) The DEIS fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization.	Based on this comment, text has been added to Chapter 1.
34002-3	(6) Failure to disclose the economic cost of the project, and the lack of specificity of well locations to gauge the environmental impacts	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the decisions to be made by the BLM based on this EIS and the inclusion of project cost information in the FEIS. See also Section 1.3.3 and Gen-1 regarding future NEPA analysis, including public scoping and review, to be done when more specific information regarding future facilities is available.

Brown, Andrew

33846-1	Instead, retro-fitting appliances that use water, such as sinks, showers, toilets, washers, etc.. could be done. The types of plants growing on the strip could be changed, and self sustaining rain gardens could be used.	Thank you for your comment. This information will be given to SNWA for their use in future development of water resource planning.
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Brown, Jon

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35311-1	The Socio-Economic portion of the Draft Environmental Impact Statement includes an in-depth analysis of the potential impacts the SNWA Groundwater Development Project may have on Lincoln and White Pine counties. The DEIS does not include, however, a detailed evaluation of the potential impacts to Clark County should the project not be constructed. As the economic engine of this state, Southern Nevada's economy must recover in order for the state's economy to begin thriving once again. This is not possible without sufficient water resources to manage drought conditions and future development.	Thank you for your comment regarding the potential implications for Clark County should the GWDP not proceed. The concern is identified in Section 3.18. See also Standard Resource Response SocEcon-4 which notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized. Furthermore, as noted in Section 2.2.1, SNWA could pursue other sources of additional water should the project not proceed.
<u>Bunker, Brett and Dana</u>		
34205-1	How far reaching will the impact of this pipeline be?	Impacts of the proposed project were evaluated and disclosed for defined study areas for both the project-specific ROWs and groundwater actions and cumulative.
34205-2	Our number one question concerning the Southern Nevada Water Project is: If there is water for this project, 'Where is it going today'? Where did it go 10 years ago? Where did it go 100 years ago? 1000 years ago?	The conceptual model of the groundwater flow system is summarized in Section 3.3.1 of the EIS and in SNWA 2009a.
<u>Bunker, Clyde and Nan</u>		
34237-1	Our question concerning the Southern Nevada Water Project is quite simply: If there is water for this project, 'Where is it going today'? Where did it go 10 years ago? Where did it go 100 years ago? 1000 years ago?	The conceptual model of the groundwater flow system is summarized in Section 3.3.1 of the EIS and in SNWA 2009a.
<u>Bunker, Kristopher and Cristy</u>		
34140-1	How far reaching will the impact of this pipeline be?	Impacts of the proposed project were evaluated and disclosed for defined study areas for both the project-specific ROWs and groundwater actions and cumulative, see chapter 3 of the FEIS.
<u>Bunker, Richard</u>		
35020-1	First, it is unrealistic to believe the drought-ridden Colorado River, which currently serves more than 25 million people, can continue to provide Southern Nevada with 90 percent of its drinking water in the future.	Thank you for your comment. Issues associated with the Colorado River water supply and long-term water demands forecast for southern Nevada were provided in Section 1.6 of the DEIS.
<u>Burton, Steve</u>		
33890-1	It is my opinion, that the planned pipeline doesn't go far enough North. We have a Central California Project and a Central Arizona Project. It is time for a Central Nevada Project. The pipeline should be extended about 250 more miles to the Snake River in Idaho, not to take all of the water of course.	BLM is responding to the current application and does not consider additional pipeline needs.
<u>Callahan, Kathy</u>		
34025-1	Finance—how will it be paid for and how much will it cost? Human consequences on the people who don't live in Las Vegas. They too contribute to the state's economy.	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS. Also see SocEcon-4 regarding the issue of social and economic implications for Clark County/LVV if the proposed GWP does not move forward.
<u>Capozzelli, J</u>		
35012-1	In its own water-resources reports, the Southern Nevada Water Authority discloses it can increase supply through enhanced conservation by an amount greater than the envisioned pipeline would provide. Other options are available as well, such as growth-management provisions and studying trading ocean desalinated water for Colorado River waters.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
<u>Carroll, Lynn</u>		
35100-1	I would, however, appreciate a further extension of the comment period till this December, to allow further study.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
35100-2	The threatened Desert Tortoise would suffer long-term loss of 2,350 acres of habitat, about 1760 of these critical, and permanent loss of 245 acres of critical habitat, according to page 3.6-39 of the DEIS. The draft correctly notes that the recovery time for the disturbed desert habitat is great (100-200 years), which might not be soon enough for the continued viability of the species. In spite of several measures meant to reduce impacts to the tortoises, significant numbers of tortoises and tortoise eggs would be crushed by construction equipment and worker vehicles. These in combination with the anticipated indirect impacts are incompatible with the goal of delisting this species.	Please refer to Standard Comment Response WL-3.

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ID	Comment	Response
35100-3	A great deal of the project area is habitat for Greater Sage-Grouse, so these birds would be subject to evengreater potential impacts. Although no active leks are known within a quarter mile of the ROW, sage-grouseare sensitive to all sorts of disturbance. The ACMs and mitigation measures listed would be helpful, but thehabitat fragmentation related to the project would still be considerable. This is just one of numerous projectsacross the west that threaten the Greater Sage-Grouse.	Thank you for your comment. Since the release of the Draft EIS, the BLM has issued Instruction Memorandum (IM) 2012-043, which provides greater sage-grouse interim management policies and procedures. The IM requires the BLM to work with applicants to minimize habitat loss, fragmentation, and direct and indirect effects to greater sage-grouse and its habitat. Further, the IM requires BLM to work with the Nevada Department of Wildlife (NDOW) to assess the impacts to greater sage-grouse and its habitat, ensure that reasonable alternatives are considered, and to identify technically feasible best management practices and conditions that may be implemented in order to eliminate or minimize impacts. Through the technical assistance process, the USFWS will be involved with this coordination, which will result in development of specific mitigation, minimization, and/or avoidance measures. The wildlife section (Chapter 3.6) has been updated with additional information regarding greater sage-grouse and the new policy, and new mitigation measures have been added to this section as well.
35100-4	This is where the greatest impact on the Greater Sage-Grouse would come. Survival of young grouse depends on forbs and insects found in wet meadows or around springs or streams. It wouldn't take a 10-ft draw-down of the water table to have an impact-any draw-down will reduce production of young in a drought year; the effect just becomes more widespread as the pumping continues.	Please refer to Standard Comment Response WR-1 regarding the 10-foot drawdown.
35100-5	Migrating birds, raptors, and the other bird species of concern would all be competing for smaller habitats and food supplies (vegetation or prey populations) when some seeps and springs dry up.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS. See section 3.6, Wildlife, for a discussion of impacts to your areas of concern.
35100-6	I'm also aware that amphibians are declining in a large portion of the world. I hate to see any action that would dry up springs where frogs and/or toads are living. Amphibians are also sensitive to changes in water quality, which the DE IS mentions would result from reduced flows in springs that don't dry up completely. I question whether it will be possible to prevent or mitigate the resulting harm.	Thank you for expressing your concerns related to the Draft EIS. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document. Potential impacts to amphibians are described in Section 3.7 of the FEIS.
35100-7	There are great uncertainties about the degree to which the pumping of groundwater in these basins will affect Utah water bodies.	Uncertainties related to the modeling analyses are discussed in detail in Section 3.4, Water Resources.
35100-8	Now I hear concern expressed that reduced hydraulic pressure at springs in Nevada will permit salty water from the Great Salt Lake basin to migrate into previously fresh water bodies and wells.	Water quality in the region is summarized in Section 3.3.1.6 with additional data provided in Appendix F3.3.4 of the DEIS. Groundwater quality data summarized in Welch et al. 2007 found that 7 out of 10 sites in northern Snake Valley had chloride concentrations greater than the Maximum Contaminant Levels. These locations are downgradient from the proposed pumping and a considerable distance north of the simulated drawdown area that is focused in southern Snake Valley under the Proposed Action's and alternatives' pumping scenarios evaluated in the DEIS. This information indicates that the proposed groundwater withdrawal is not expected to result in capturing or reversing the gradient within the vicinity of the high chloride waters located in northern Snake Valley.
35100-9	These and other uncertainties about the project are supposed to be prevented or mitigated through an adaptive management process. I don't believe this will be adequate to protect sensitive wildlife species. First because the reaction time of the agencies involved is likely to be two slow. By the time a problem is detected, then confirmed, it is likely to have become critical. Then there will be delay as funding is sought for corrective measures. Second, if increasing the water available to the habitat is needed, will it be available? From where?	Thank you for your comment. Please see Standard Resource Response MM-1.
Carter, Jacob		
34430-1	I trust that the DOI and BLM will make critical judgment on the information gathered within the DEIS. I believe the document is to large and encompasses to many land types and to many unpredictable watersheds all at once. It is a large document but there is no human way it states all the effects do to ground water movement and heavy soil disturbance. A more broken down, sectioned and precise document is needed to measure the effects of the project	Appropriate subsequent NEPA analyses will be completed and will present more granular information for consideration.
Cebe, Genevieve		
33862-1	There is much about Southern Nevada hydrology that is not known. What has been most studied is the hydrology around Yucca Mountain. The hydrologists at the Yucca Mountain Project used to have difficulty finding enough knowledgeable hydrologists in this kind of hydrology to do peer reviews.	A team of experienced hydrologists conducted a peer review of the modeling analyses for this EIS.
33862-2	If we adversely affect those counties from which we are taking water, we cannot give it back. We cannot return their environments to their natural condition. It is irrelevant that we bought the land and the water rights. We are risking permanently wrecking their way of life because we will not alter our own.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS.
33862-3	The only way we can continue to honorably sustain such a population in a desert is to desalinate water.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.

Chaffee, Ninna

Comments and Responses - Individuals

ID	Comment	Response
34149-1	I am writing to voice my concerns about the water situation. I do not think that the Southern Nevada Water Authority should be allowed to pipe water from Northern Nevada down to Southern Nevada. Our water is a precious commodity. If you pipe the water down to Las Vegas, we will dry up and be a dust bowl. I lived in Las Vegas for 20 years and know the amount of water that has been wasted there.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34149-2	Please check into the desalination of water from California.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Chappell, Scott		
34051-1	I feel that the County needs to look at water reduction policies (that include the big casinos) before stealing water from the ranchers.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Chars, Robert		
34060-1	A greater source of water approximately the same distance away would be the Pacific Ocean. It would require desalinization and some agreement with California but the rewards are much greater.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Childs, Angela		
35004-1	I respectfully ask that you extend the deadline for at least another 90 days, to give others a chance to participate.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
35004-2	It is clear that mitigation proposed in the DEIS is weak, unenforceable, and will not prevent the complete dewatering of the targeted region.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. Please see standard resource response MM-1 for a discussion of the mitigation and monitoring process associated with this project.
35004-3	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
35004-4	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 purpose of this EIS is to analyze impacts related to the right-of-way, access roads and ancillary facilities. The proposed pipeline routes, as submitted by the applicant, have been analyzed in this EIS and the impacts associated with the proposed alignment have been presented therein. Impacts related to well locations, pumping, and groundwater drawdown are analyzed on a programmatic level and will be analyzed in further detail in future NEPA. See also Standard Comment Response Gen-1 for more information on tiering. .
35004-5	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 (as well as sources and costs of funding),	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS. See also Standard Comment Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS.
35004-6	a failure to disclose and analyze the cost of proposed mitigation and monitoring,	The costs of mitigation can not be completed until specific monitoring and mitigation measures are defined, which will occur during subsequent NEPA analyses.
35004-7	a failure 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.	Based on your comment, text has been added to Chapter 1.
35004-8	DEIS also fails 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.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
35004-9	a supplemental EIS is necessary to analyze environmental impacts of actual well locations for distributed pumping.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA.
Clemens, Mark		
34795-1	Contrary to BLM laws and regulations (and Secretarial Order 3226) on considering climate change impacts when making major decisions affecting BLM's environmental resources, the DEIS dismisses all potential climate change impacts from its impacts analysis in chapter 3 (page 3-5): "since the current state of climate change science prevents the association of specific actions with specific climate-related effects, the BLM can neither: (a) analyze the climate-related effects of BLM actions nor (b) ascribe any significance to these potential effects." Despite difficulties and uncertainties in predicting the exact effects of climate change, these impacts should be a part of the impacts analysis for all resources, not just air and atmospheric resources.	Please see common responses Air-15 and Air-17.

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ID	Comment	Response
34795-2	The Humboldt-Toiyabe (H-T) National Forest Climate Change Vulnerability Report, published in April 2011, for much of the same area affected by the GWD project shows that climate change will increase temperatures and aridity and that warmer winters will cause earlier melting of snow with less water available overall. The study shows that "...higher temperatures will increase evapotranspiration and droughts..." and "...warmer wintertime temperatures and earlier melt dates will deplete this virtual reservoir, leaving much less available water for natural systems and human uses." Has BLM conducted similar climate change vulnerability studies on its public lands in eastern Nevada and western Utah?	Please see common response Air-16.
34795-3	The DEIS should use the H-T study and the best available science for a model analysis of reduced precipitation to assess the effects of various scenarios of recharge on future water supply availability and reliability. The DEIS model should also assess the cumulative impacts of the GWD project, especially the pumping drawdowns with, for example, a 10, 20, and 30% reduction of recharge in the study area.	Thank you for your comment. Please see common response Air-16. Refer to the Cumulative Impact section in each resource.
34795-4	I'm further concerned by the assertion on page 3.1-34, "It is expected that annual species would continuously bind the soil surface with living or dead root systems, even though the individual annual plants would not act as long-term barriers to wind." What basis in the literature gives BLM confidence that in an increasingly arid regime sometimes inadequately supporting even annual plant species, living and dead root systems would bind the soil surface?	Please refer to Section 3.5 Vegetation Resources.
34795-5	It appears from page 3.1-37 that the principal or perhaps only mitigation measure foreseen by SNWA and BLM for air quality impacts resulting from wind erosion is to "conduct large-scale seeding to assist with vegetation transition from phreatophytic communities in Spring and Snake Valleys to benefit wildlife and reduce potential air resource impacts." Does BLM have any way to quantify the potential benefit of this mitigation measure?	Please review section 3.20 of the FEIS and standard resource response MM-1 for a updated discussion of the mitigation and monitoring associated with this project.
34795-6	The analysis then proceeds with a paragraph describing a Monitoring, Mitigation and Management Plan for Air Quality. The following sentence suggests a reduction or even cessation of pumping might be considered, "It is anticipated that the Plan would be effective in identifying early warning of potentially undesirable impacts to air resources and provide a substantial amount of time and flexibility to implement management measures and gage their effects." Would these management measures include reduction or suspension of groundwater pumping?	Please review the response to your comment #5.
34795-7	If the BLM's confidence in the conversion of the phreatophytic vegetative cover to annual plants is misplaced, how long would it take for the phreatophytic cover type to be re-established after reduction or cessation of groundwater pumping?	Thank you for your comment. This issue is covered in detail in section 3.5, Vegetation.
34795-8	Given that the total additional PM10 emissions could be in excess of 30,000 tons per year, it would be helpful for the reader to know what "very small fraction" will be carried to Salt Lake County. 30 tons, 300 tons or 3,000 tons? With what frequency would PM10 from the Proposed Action or Alternatives blow into Salt Lake or Tooele Counties? Is the statement on page 3.1-61 based on modeling, expert opinion or simple faith?	Please see common response Air-8.

Coffey, Debbie

34499-1	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.	See response WR-1 regarding the use of the model simulated 10-foot drawdown for the programmatic analysis of potential effects to water dependant resources.
34499-2	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?	The text has been revised to clarify the authors meaning.
34499-3	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.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The visual resource classification for these areas allow for some modification of the viewshed as noted in the FEIS sec 3.15.
34499-4	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?	Under the Proposed Action Alternative 3,015 acres would be temporarily and permanently displaced between the two HMAs. This equates to 2.5% of the total area. 164 acres would be permanently displaced between the two HMAs. This equates to .01% of the total area in the HMAs. Although significance criteria can vary depending on the resource in question, this level of disturbance is typically not considered a significant impact.
34499-5	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?	Water is mentioned several times in the Wild Horse and Herd Management Area section, specifically it is summarized in tables 3.13-3, 3.13-8, and 3.13-10 - 3.13-17. The analysis of groundwater drawdown will remain at the 10 foot or greater level. Future predictions of wild horse roundups is beyond the scope of this project.

Comments and Responses - Individuals

ID	Comment	Response
34499-6	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 "wiggle room" for error. This section of the DEIS also uses the word "forseeable," but then seems to allow for short sightedness in anticipating realistic outcomes by omitting other factors.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34499-7	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.	The known proposed solar energy projects within the cumulative resource study areas have been addressed. Future projects have not been specifically identified. No oil developments have been specifically identified, based on a lack of filings with the BLM.
34499-8	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?	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS.
34499-9	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."	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. Management goals and direction from the BLM Land and RMPs will be part of the comprehensive project-wide monitoring and mitigation plan (COM Plan). See Standard Resource Response MM-1.
34499-10	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.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS.
34499-11	8) Glaringly omitted in this DEIS was the "NEED" for this GDP. The "necessity" was not discribed. 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 givaway to SNWA because SNWA "wants" water.	Based on your comment, text has been added to Chapter 1. Additional information regarding this comment may be found in Appendix A.
Coffman, Mari		
35358-1	If SNWA were to lower the water table in my area we would have no water available for our residence. This is also true for 3 other residences on this side of the highway. We cannot live here without this water source, which would surely be endangered by the proposed pipeline.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. Water rights are managed by the Nevada State Engineer. Any senior water rights would be protected or mitigated by the State Engineer.
de Queiroz, Alan		
34993-1	Adverse effects on wildlife in general (pages ES-58 to ES-59). A couple of quotes make the potentially wideranging impacts clear: "Species groups with potential adverse effects would include big game, small and large mammals, upland game birds, waterfowl, nongame birds, bats, reptiles, and invertebrates." "Pumping by all alternatives could conflict with recovery or conservation management objectives for federally listed species." The latter statement represents a particularly clear contradiction of the BLM's mission statement.	The intent of the EIS process under NEPA is the disclosure of potential impacts related to a proposed project. The BLM makes land use decisions under FLPMA based on the results of that disclosure. Multiple use under FLPMA does not preclude irreversible or irretrievable impacts to protected species or other elements of the natural or human environment.
34993-2	Adverse effects on special designation areas (page ES-59). The statement about negative impacts on resources being protected by Areas of Critical Environmental Concern, like the quote about federally listed species, is another very clear example of how the GWD Project conflicts with the mission of the BLM.	Changes have been made in the FEIS text to address the central concern that underlies this comment; however, due to its overarching nature, specifics regarding the placement of changes in the FEIS are not provided this response.
34993-3	That measure of assurance would also be provided by desalination projects and, especially, by responsible growth and stronger water conservation policies. These alternatives would not threaten ecosystems and human communities in eastern Nevada and western Utah dependent on groundwater.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Dominguez, Donna		
34151-1	Request a 90 day extension on the DEIS comment period It's only fair, they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.

Comments and Responses - Individuals

ID	Comment	Response
34151-2	Demand a Supplemental EIS that addresses impacts from specific well locations.	Subsequent NEPA analyses will evaluate specific project component locations including well locations.
34151-3	DEIS fails to adequately assess the purpose and need for project.	Based on your comment, additional text has been included into Chapter 1.
34151-4	DEIS fails to analyze potential environmental effects due to climate change	Please see common response Air-15.
34151-5	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers Out of business and depopulate rural areas.	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.18 of the FEIS which has been updated concerning these issues. Please also review standard resource response SocEcon-5 for further information.
34151-6	DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
34151-7	DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley. DEIS provides insufficient information on impacts to Steptoe Valley.	See response WR-5 regarding potential effects to Fish Springs. The maximum extent of the model simulated drawdown area resulting from the GWD pumping scenarios occur at the full-build out plus 200 year timeframe. At this point in time, the nearest location of the simulated drawdown area resulting from project pumping is located in northern Spring Valley; located two hydrographic basins away from (approximately 20 miles southwest) of Deep Creek Valley; and approximately 15 miles from the Goshute Indian Reservation boundary. Therefore, impacts to water resources in Deep Creek Valley and the Goshute Indian Reservation are not anticipated. Drawdown related effects are estimated to eventually propagate into the southeast margin of the Steptoe Valley Hydrographic Basin as described in Section 3.3 and Appendix F3.3 of the EIS.
34151-8	DEIS fails to adequately analyze adverse impacts on and mitigation for ranching, wildlife habitat, wild horses	Please review section 3.20 of the FEIS. Please also note standard resource response MM-1.
34151-9	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.	See response WR-1 regarding the use of the model simulated 10-foot drawdown, and WR-2 regarding the future time frame considered for the programmatic analysis of potential effects to water dependant resources.

Douglass, Veronica

33964-1	Snake Valley and Deep Creek Valley (Ibapah & Goshute Indian Reservation). Hydrologic studies have shown connectivity of these valleys to Spring and Southern Snake Valley's.	Where available, published information was used to describe connectivity between hydrological basins in the region of study.
33964-2	The DEIS also fails to address impacts to Fish Springs NWR area and it s water and aquatic resources.	As noted in Table 3-14.2 in Section 3.14 of the DEIS, the Fish Springs NWR is not crossed by the ROWs or Ancillary Facilities nor is it within the groundwater development areas. An analysis of drawdown impacts is included in the water resources analysis in Section 3.3 of the DEIS.
33964-3	This project would adversely affect my water resources and water rights needed for me and my family survival in the future.	Section 3.3 (Water resources) and 3.18 (Socioeconomics) both note that groundwater development poses potential risks to existing water rights, creating the possibility of adverse social and economic consequences in the areas affected by drawdown.. SE-6, which has been revised, suggests additional mitigation to address some potential consequences.
33964-4	The DEIS also fails to analyze the economic feasibility of the project across all ownerships, resources, and hydrologic areas. BLM needs to address all these in the EIS before it is final.	Thank you for your comment. The underlying concerns in your comment are outside the scope of the EIS. However, because of comments received to the EIS, information on project costs is included in the FEIS. Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6 provide additional response to this comment..

Dove, Heather

33828-1	1. There is no need for further development in Las Vegas. This region of the country suffered greatly from the financial and housing crises and has one of the highest rates of foreclosure in the country.	Based on planning by SNWA, the need for water will continue in the Las Vegas Valley. BLM is reacting to an application submitted by SNWA for this pipeline.
33828-2	2. The model of the developers in Las Vegas typically includes building more golf courses to act as anchors for nearby housing developments and businesses. Golf courses in the desert make no sense. They are a tremendous and shameful waste of precious water.	Please note response to your comment #1.
33828-3	This aquifer will not adequately recharge after it is drawn down.	See Water, section 3.3 for potential effects to the regional aquifer and the rebound response if pumping stops.
33828-4	4. Perhaps most important, drawing down the aquifer will cause further drying out of the west desert which will further exacerbate airborne dust. Air quality in Utah is already very poor and regularly violates national standards. Further degradation of air quality would be ill advised and potentially disastrous, especially given that much of this dust contains heavy metals and radioactivity (a legacy of the bomb testing era in the 1950's).	Please see common responses Air-1, Air-3, and Air-14.

Duff, Donald A

Comments and Responses - Individuals

ID	Comment	Response
33956-1	It is premature for the BLM to select an alternative when actual well sites, economic viability and total resources analyses have not been provided fully and accurately.	See Gen-3, Gen-2, and Section 2.3 of the Executive Summary regarding the decisions to be made based on this EIS and those that require supplemental NEPA. The BLM has responded to an application for a pipeline. Future facilities will be covered through site-specific analysis with appropriate mitigation when an additional right-of-way application is submitted.
33956-2	The GWDP would adversely affect my property, spring, and perennial stream in southern Snake Valley and ability of our family to survive in future years with the groundwater pumping.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. The BLM appreciates that you have identified your specific concerns regarding the impacts disclosed in the DEIS. See section 3.3 for water impacts and section 3.18 for socioeconomic impacts.
33956-3	The DEIS fails to analyze economic feasibility of the GWDP and the direct and indirect financial costs and lost opportunity costs for rural communities, including ranchers permittees, and citizens living in the project area and adjacent impacted areas. How can you make a decision without essential information on the resources, economics, and SNWA specific project data which is lacking in the DEIS.	Thank you for expressing your concerns. Please see Section 3.18.2.8 which notes the risks of economic and social effects related to long-term drawdown. See also Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6 regarding the decisions to be made by the BLM based on this EIS and the inclusion of project cost information in the FEIS. See also Section 1.3.3 and Standard Comment Response Gen-1 regarding future NEPA analysis, including public scoping and review, to be done when more specific information regarding future facilities is available.
33956-4	BLM should not issue a final decision until all the "unknowns" and "uncertainties" are addressed in the DEIS.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Dye, LaDell L		
34226-1	There needs to an extension of the time before authority or a decision is to be made to allow greater input.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34226-2	There will be unintended consequences if this water draw is allowed, existing water rights surface and ground will likely be affected. The land will likely change its grasses and shrubs, etc. maybe even animal habits will be altered. This would irreversible.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please see section 3.3 (water) and section 3.5 (vegetation) for a discussion of your noted impacts.
34226-3	The ranchers and local residents will feel the greatest effects, if this is approved it will never be stopped, only the eventual draining of the basin will cause it to be stopped.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34226-4	The costs are not clear or disclosed,	Thank you for your comment. The underlying concerns in your comment are outside the scope of the EIS. However, because of comments received to the EIS, information on project costs is included in the FEIS - also see Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6.
Erickson, Steve		
34130-1	1. Inappropriate narrowing of DEIS scope/alternatives –	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to consider in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative has been added to the analysis for this Final EIS to expand the range of alternatives.
34130-2	See ES-15 – analyzes economic feasibility of trucking alternative, rejects desal, other alternatives on (bogus) basis that none of the alternatives would “fulfill the purpose and need for the federal action or provide a comparable volume of water, within a similar time frame, and under financially feasible terms.” [All while claiming elsewhere that BLM has no jurisdiction or responsibility to assess or question SNWA’s stated need, purpose, timetables, finances, etc.] “As a result, no water supply or management alternatives were determined to be reasonable alternatives to a ROW grant for this draft EIS.” (ES-16)	Your comment has been reviewed by the BLM and considered in its choice of the agency preferred alternative presented in this FEIS.
34130-3	-service life of pipeline and main laterals is 65-75 years (localized alignment options obtuse, confusing (ES 26)	Thank you for expressing your concerns related to the Draft EIS. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document.
34130-4	Table ES-9 ranges of impacts are orders of magnitude greater for PA than any of the other alternatives for surface disturbance (but why is this table here in the ES that most people will read rather than summary impacts table)	Table ES-9 displays a summary of impacts expected from drawdown.
34130-5	Cumulative Impacts (mostly my opinion based on BLM’s shallow overview of this subject) – DEIS (wrongly) limited to proposed facilities, surface disturbance, actions and past and present infrastructure and reasonably foreseeable actions...(weak, superficial, unimaginative!)-how new ROW’s affect future development is glossed over- visual resources (why not analyze the option of burying powerlines?)-Steptoe V impacts from powerlines (is this adequately addressed later in DEIS?) (ES-37/38)- just 5 cumulative impacts projects identified (ES-34) – oh, really?	The RFFA projects were those identified as potentially additive to past, present, and project alternatives, using the criteria for inclusion/exclusion. Powerline burial was not considered a reasonable option, given the long length of the lines required.
34130-6	- see ES-51 re: long term drawdown effectsimpacts of drawdowns on water rights (ES-53)	Your comment has been noted.
34130-7	- 75 yr and 200 yr drawdown effects devastating – 344 gw and surface rights affected at 75 yrs, 500 rights at 200 yrs. How will this be mitigated (paid for)? At what cost?	Please see Standard Resource Comment Responses SocEcon-3, WR-2, MM-1 and MM-2 for relevant information and discussion of the monitoring and mitigation plan. Mitigation related to groundwater development will be included in subsequent NEPA and associated valley-specific COM Plans as described in Section 3.20 of the FEIS.

Comments and Responses - Individuals

ID	Comment	Response
34130-8	- hundreds of square miles of subsidence of 5 feet or more at 75 yrs. (no impact on caves?)	Potential impacts to caves from drawdown are more appropriately addressed in Section 3.3.2.8, Water Resources Groundwater Development and Pumping and Section 3.6.2.8, Terrestrial Wildlife Groundwater Development and Pumping. A statement referring the reader to these sections has been inserted under the Issues heading in Section 3.2.2.8 and references to caves have been deleted from the groundwater pumping headings under Section 3.2.2.8.
34130-9	-SNWA and BLM don't know where or when this project will actually go, won't say how much it will cost or if/when it will actually be needed, won't discuss legitimate alternatives	See Gen-1, Gen-3 and SocEcon-1 for additional responses related to the issues raised in this comment.
34130-10	- DEIS is replete with conjecture and assumptions, has a dated and presumptive project needs analysis, ranges of uncertainties of orders of magnitude	Thank you for your comment. Chapter 1 has been revised to include more specific information and a specific applicant rationale for the project. Even though generic comments of this type do not require a specific response, we have considered your concerns as we have revised the EIS.
34130-11	- the potential for the ROWs to facilitate more development (greater cumulative impacts) in the region is totally glossed over or not addressed at all	See DEIS discussion of growth-inducing effects under Socioeconomics which is included in Appendix F3.18.
34130-12	- distributed pumping and the tiering of studies of where wells (and associated infrastructure like roads, pipes) would maybe be located will lead to numerous change applications before the NSE. This will create a bureaucratic and legal nightmare for all concerned, and will be very expensive and time consuming!	Please review Standard Resource Response MM-1 for information relevant to this comment.
34130-13	- gauging effects at 75 and 200 years is arbitrary when impacts will last much longer (equilibrium not reached for thousands of years in some valleys after pumps are shut off)	Please review Standard Resource Response WR-2 and section3.3 for information relevant to this comment.
34130-14	- air quality impacts due to drawdowns "highly uncertain"	Please review the revised section 3.1 (air)
34130-15	- see Chapter 3, page 4 (p.3-4) for astonishing list of incomplete and unavailable information (reminiscent of Rumsfeld quote on known unknowns!) Some of this looks like game changing inadequacies! How can BLM make an ROD based on such incomplete, to be done later data??	The FEIS addresses the action in question (request for a ROW grant) and programmatically addresses future facilities and potential water drawdown.
34130-16	-population growth projects for LV are already off target and dated (1-12)	Thank you for your comment. Please see SocEcon-2 regarding the role of projected long-term population and economic growth in Clark County in regards to BLM's NEPA assessment of the proposed GWP project
34130-17	- by 2035, conservation in Clark Co. to save 276 kafy, perhaps double what the NSE may grant for the pipeline (1-13)	Water conservation in Clark County was considered in estimating the water demands for SNWA's service area, as discussed in Section 1.6.1 of the EIS.
34130-18	- DEIS punts on establishing need for the project (1-16) – not my department says Werner Von Braun	Based on your comment, additional information has been included in Chapter 1.
34130-19	- framework for development of monitoring plans to follow Stipulated agreements and the UT-NV Agmt (1-6), assuring what? 3M plans w/no shut-off valve? More legal challenges?	Please review standard resource response MM-1 and the revised section 3.20 which both address this comment.
34130-20	- Source of water in caves is unknown, on-going studies to determine origin of water.	The DEIS acknowledged in Section 3.0.3 (Incomplete and Unavailable Information) that the source of water in caves is generally unknown and that studies regarding the source of water in caves is ongoing for cave resources in Great Basin National Park.
34130-21	Climate change impacts could no be evaluated for this DEIS!!! Future NEPA documents will follow DOI policies related to climate change.	Please see common response Air-17.
34130-22	BLM sensitive species list "not available at this time" (so won't be included in DEIS!), but will be included in the Final EIS. This is unacceptable!	The BLM sensitive species list was being updated at the time of the DEIS drafting. BLM sensitive species were addressed in the DEIS as per the previous list. The FEIS was revised to address the species in the 2011 updated BLM sensitive species list that are relevant to the proposed project.
34130-23	Final gw development areas and specific pumping locations not defined.	Groundwater development areas are defined in the FEIS. Specific pumping locations will be analyzed as part of subsequent NEPA.
34130-24	Many springs and streams lacking specific information regarding characteristics, species occurrence.	All available species occurrence information was obtained from resource agencies (NDOW, UDWR, USFWS, and NPS) during the data collection efforts and feedback from the Biological Resources Task Group. All relevant and available hydrology information for springs and streams in the project study area was used in the EIS.
34130-25	Current Visual Resource Inventory data incomplete at this time. Final report and supporting data will be used later on when available.	The revised analysis includes the most recent available draft or final VRIs from the Ely and Las Vegas Field Offices.
34130-26	Parts of 4 valleys with no detailed soils data, new mapping underway (but not yet complete?)in Snake V	The most current soils data were used to characterize the environment and evaluate impacts. As new data becomes available, this would be utilized for monitoring and mitigation.
34130-27	NV Wildlife Plan under review, no USFWS Avian Protection Plan	Please refer to Standard Comment Response WL-4 regarding the Nevada Wildlife Action Plan and Standard Comment Response WL-1 regarding the USFWS APP.

Comments and Responses - Individuals

ID	Comment	Response
34130-28	Numerous on-going/nearly completed studies on Snake V and GBNP waters “will be utilized in the appropriate NEPA process” when it becomes available. What does this mean – utilized in the FEIS when they issue the ROD? Why not wait – the USGS study draft will be presented in mid-August? (argues for extension of comment period)	Numerous studies in the area are either proposed or ongoing. The USGS study mentioned was unavailable as of March 2012. The FEIS contains information from any new studies that have been developed since the DEIS was written. NEPA requires BLM use the best available information available at the writing of the EIS. Subsequent tiers for NEPA on wellsites, collector lines, etc. in the individual valleys will benefit from these future studies.
34130-29	Gw model limitations But not to worry, because “sufficient information was available to complete this draft Tier 1 NEPA analysis using a variety of information, professional assumptions, or processes.” What a buncha hooley!	Your comments on the Draft EIS have been considered. Please see section 3.3 on the limitations of the model and the analysis based on the model and other hydrological and geologic data. See also standard resource response MM-1.
Ewing, Robert W		
33984-1	Groundwater drawdown vs groundwater re-charge rates.Ecological impacts to Snake and Spring Valley (dry up and blow away).	Comment noted.
33984-2	Economic impact to Baker, public land use change (no H2O).Visitor and tourism impacted (no one wants a dust bowl).	Thank you for your comment. Section 3.18 addresses potential short-term and long-term economic effects in the Baker area related to possible changes in outdoor recreation and tourism in the region.
33984-3	More time is needed to complete the DEIS (extend to 90-day review).	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
33984-4	Integrity of DEIS “economic impact” to local homeowners and local business.	Thank you for your comment. Text has been added in Section 3.18.2.8 noting the potential for indirect effects on property values in response to possible impact arising from the indirect long-term environmental effects from groundwater drawdown.
Finnegan, Corey		
34004-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization	Based on your comments, text has been added to Chapter 1.
34004-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
34004-3	lack of specificity of well locations to gauge the environmental impacts.	Thank you for your comment. Please see Standard Comment Response WR-1
Foremaster, Gail		
35356-1	I am concerned about the effect that drilling into the aquifers will have on our natural springs that are so necessary for our livelihood.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.3 (water resources) for the potential impacts of water withdrawals from the SNWA project.
Fryer, Irene		
33848-1	BLM Nevada Groundwater Project:I am against any pipe line that will take from Utah groundwater to Nevada. The groundwater needs to stay where it is to help and nourish the land above.Water is precious – what is in Utah should stay in Utah –	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Gallegos, Claudia		
34185-1	The environmental justice ramifications of this action are huge. A small group of ranchers, farmers and other folks that live in an extremely arid valley will have their water taken away by a large city known for wasteful and extravagant living. If aquifers dry up in the Snake Valley, those that live there will not be able to maintain their livelihoods. The farms and rural communities in those areas would be forced to leave.	Thank you for your comment, The underlying topics of this comment involve public policy issues that are outside the scope of this EIS. Standard Resource Response Gen-8 provides additional discussion of this topic.
Garber, Wilda		
34173-1	1. The Groundwater Project states that it is a Right of Way (ROW) application for a pipeline that is of unknown specific sources and of a size up to 96” in diameter that could be resized during final design. Also in Chapter 2 (Sec. 2.5.1.2, and Table 2.5-2, P 2-18 and Vol 1 p ES-17 (red print)) the first paragraph last sentence says “The final sizes of the pipelines would be determined during facility design. There is no mention of the product that will be transported in the pipeline except in a questionable water model using a “distributed” network of mostly unproven and undrilled wells. This ROW should be denied or the No Action Alternative should be selected by BLM because the DEIS fails to identify the exact sources, quantity from each source, and pipelines from each. 2. This ROW should be denied or the No Action Alternative should be selected by BLM because the DEIS fails to identify the number of wells, specific well locations, lateral pipelines or the environmental impacts of each well location, drilling operations, maintenance of well sites, and the roads to them.	Thank you for your comments on the Draft EIS. Future developments (well locations, collector lines, access roads, etc...) will require a separate NEPA analysis and a supplemental or tiered EIS.
34173-2	3. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not address the surface disturbance for the unidentified wells, specific well locations, lateral pipelines, power line and the pumping facilities.	Additional assessment of the impacts associated with specific well locations will be analyzed in subsequent NEPA, see Chapter 1.

Comments and Responses - Individuals

ID	Comment	Response
34173-3	4. This ROW should be denied or the No Action Alternative should be selected by BLM because the DEIS fails to address project costs for the ROW, well development and number and location of wells, lateral pipelines, roads to well sites, power lines and facilities, pumping stations and related power requirements.	Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS.
34173-4	5. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not address drawdown impact from wells that are of less than 10 feet; and impacts from within a season, or within 1 year, or through 10 years, or any other reasonable alternative of less than 75 or 200 years. Any drawdowns may affect the area adversely within a short period of time.	See response WR-1 regarding the use of the model simulated 10-foot drawdown, and WR-2 regarding the future time frames, considered for the programmatic analysis of potential effects to water dependant resources. Comparison of the drawdown maps provided in the EIS indicates that the drawdown is predicted to increase over time. Therefore, an evaluation of the potential impacts to water resources at year 1 or year 10 after pumping is initiated would be substantially less than the effects described at the longer time frames (i.e. full build out plus 75 years, and full build out plus 200 years).
34173-5	6. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not address potential effects of climate change.	Please see common responses Gen-6 and Air-15.
34173-6	7. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not adequately address the new lower population and census figures in the Las Vegas area; (since 2009) the effect of conservation measures there, or alternatives such as desalination with conservation measures in place and a lower future population projection.	Thank you for expressing your concerns. See Standard Comment Response Gen-3 regarding the decisions to be made by the BLM based on this EIS and Standard Comment Response SocEcon-2 regarding the relevance of the population data presented in the EIS. See also, section 3.18 and Chapter 1 and 2 of the FEIS.
34173-7	8. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not adequately address economic impacts on the entire area and the agriculture and tourism based economy.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. Section 3.18.2.1 addresses the effects associated with construction and operation of the main pipeline and facilities and the actions tied to decisions to be made by the BLM on this EIS. Few impacts to agriculture and tourism are expected from those activities. Long-term risks to agriculture and tourism associated with drawdown are noted in 3.18.2.8. Additional text regarding such risks have been added in the latter section and further assessments could occur as part of subsequent NEPA (see Standard Comment Response Gen-1).
34173-8	9. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not even begin to address cultural effects, Native American sites and culture, or protection of archaeological sites.	As stated in the DEIS, no Class III inventories have been conducted at this time. Therefore, the analysis of impacts to cultural resources cannot be quantified. Per the Programmatic Agreement (PA), an intensive Class III inventory would be conducted to identify historic properties that could be adversely affected by the proposed project. In addition, government-to-government consultation has been and will continue to be conducted to identify any properties of traditional religious and cultural importance to Native American tribes. In compliance with the PA, adverse effects to historic properties would be avoided, minimized, or mitigated.
34173-9	10. This ROW should be denied or the No Action Alternative should be selected by BLM because the Groundwater Project DEIS does not clearly address the concept of an ancient White River geologic complex that supposedly extended from Elko, County to Lincoln/Clark County area, Nevada.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34173-10	Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34173-11	Demand a Supplemental EIS that addresses impacts from specific well locations.	Thank you for expressing your concerns. Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. See Chapter 1.
34173-12	DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. Please see SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34173-13	DEIS fails to adequately assess the purpose and need for project.	Based on your comment, additional text has been included in Chapter 1.
34173-14	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...)	The unknowns and uncertainties are documented in the EIS. The EIS was conducted on the best available information. A programmatic- tiered approach was used in this impact analysis, which is an acceptable approach under NEPA. Subsequent NEPA analyses will evaluate specific project component locations including well locations.
34173-15	DEIS fails to analyze potential environmental effects due to climate change	Please see standard resource response Air-15 and also section 3.1 of the FEIS. Each resource section now contains an analysis of climate change in the cumulative effects section.
34173-16	Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEPA and FLPMA.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34173-17	DEIS fails to analyze environmental impacts of actual well locations for "distributed pumping"	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. A conceptual analysis of distributed pumping and other alternatives is contained in the FEIS.

Comments and Responses - Individuals

ID	Comment	Response
34173-18	Predicted massive land subsidence area of 5 ft. + is an unacceptable irreversible impact of unlawful groundwater mining.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34173-19	DEIS projects unacceptable adverse impacts on hundreds of existing surface and groundwater rights.	Potential impacts on surface and groundwater rights are disclosed in this EIS.
34173-20	DEIS does not consider a sufficient range of alternatives.	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to analyze in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative (F) has been added to the analysis for this Final EIS to expand the range of alternatives analyzed.
34173-21	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.18 of the FEIS which has been updated concerning these issues. Please also review standard resource response SocEcon-5 for further information.
34173-22	DEIS has inadequate, ineffective or missing mitigation measures.	A comprehensive project-wide monitoring and mitigation plan (COM Plan) will be implemented for this project. The COM Plan will integrate protective measures from the BLM Land and RMPs, Biological Opinion, ACMs, Stipulated Agreements, the DOI Handbook for Adaptive Management, and additional mitigation measures. The 3M Snake Valley Plan is considered a part of the COPM Plan.
34173-23	DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.	Impacts to cultural resources and sacred sites are discussed in Section 3.16 of the DEIS.
34173-24	DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
34173-25	Proposed action would lead to major loss of game species; extinction of rare plant & animal species.	Impacts to Wildlife are discussed in section 3.6.
34173-26	DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley. DEIS provides insufficient information on impacts to Steptoe Valley.	Your comments on the Draft EIS have been considered. Please see section 3.3, Water Resources.
34173-27	DEIS fails to adequately analyze adverse impacts on and mitigation for _X_ ranching, _X_ Wildlife habitat, _X_ local businesses, _X_ wild horses, _X_ Other human habitat that still lives here.	Impacts are disclosed for ranching, wildlife, wild horses, and socioeconomics in the EIS. A comprehensive project-wide monitoring and mitigation plan (COM Plan) will be implemented for this project. The COM Plan will integrate protective measures from the BLM Land and RMPs, Biological Opinion, ACMs, Stipulated Agreements, the DOI Handbook for Adaptive Management, and additional mitigation measures. The 3M Snake Valley Plan is considered a part of the COPM Plan.
34173-28	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.	See response WR-1 regarding the use of the model simulated 10-foot drawdown, and WR-2 regarding the future time frames considered for the programmatic analysis of potential effects to water dependant resources.
Garrett, Jo Anne		
34904-1	Having listened to all of the several days of SE hearings being held in Carson City this week and last, my main concern about the DEIS is whether it will be wholly relevant to the pipeline project as the latter evolves through the give-and-take discussion in the SE's hearings.	Thank you for your comment. The subject of this comment is beyond the Draft EIS scope and does not require further agency response. However, your comment topic will be considered by the BLM during preparation of the Final EIS and Record of Decision.
Ghiqlieri, Dennis		
35320-1	The DEIS inadequately analyzes impacts to wildlife and fish resources, impacts to domestic livestock grazing, and the socio-economic loss of local communities to name just a few of the deficiencies.	The FEIS has been updated and expanded based on comments such as yours.
35320-2	The DEIS purpose and need section is incorrect. The BLM does not have a "need" for action.	Based on NEPA and FLPMA as well as other legal mandates such as the Lincoln County Conservation, Recreation and Development Act, BLM is required to address the application submitted by SNWA. This is the need for which this EIS was written.
35320-3	Except for the no action alternative there are no alternatives to compare the various pumping scenarios to. All alternatives to increase the water supply by 78 to 177 thousand acre-feet annually should have been part of the DEIS. And, despite numerous public scoping comments (including my own) asking for alternatives to the GWDP to increase supply in S. Nevada, the BLM ignored those scoping comments.	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to consider in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative has been added to the analysis for this Final EIS to expand the range of alternatives.
35320-4	the DEIS must quantify • all the existing water resources at the disposal of the SNWA, • all the water resources available to the SNWA on the Virgin & Muddy Rivers agricultural areas, • population increase anticipated as a potential range based on current trends.	Thank you for expressing your concerns related to the Draft EIS. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document.

Comments and Responses - Individuals

ID	Comment	Response
35320-5	DEIS must provide a range of alternatives to meet projected demand including but not limited to 1) water efficiency and conservation, 2) water purchases within the available surface water resources remaining in Nevada, 3) water purchases/sharing with other Colorado River entities including potential for desalination as an exchange for additional Colorado River supplies. All alternatives must have an independent analysis of their costs including the GWDP.	See Standard Comment Response Gen-1.
35320-6	While the BLM has identified the serious groundwater drawdowns of the pumping proposal, there is a general and systemic failure in the DEIS to recognize that the mitigation in the referenced, secretly negotiated Stipulated Agreements (Appendix B) is woefully inadequate.	See Standard Resource Response MM-1.
35320-7	The agreements fail, in part, because they have not been subject to NEPA as major federal action affecting many thousands of square miles of public lands and resources and the agreements provide only a process for discussion but do not call for definitive steps to be taken such as timelines for action, constraints on the pumping, or limits on drawdown to protect public or private resources from degradation and loss.	The stipulated agreements were an administrative action by the DOI agencies under Nevada state law and is not subject to NEPA analysis.
35320-8	the capacity of the pipeline is not identified but it appears likely that it would have capacity in excess of the amounts analyzed in the DEIS.	The pipeline proposal was sized to hold and transport the water applied for in SNWA's water rights applications. The final design will be based on the Nevada State Engineer's rulings.
35320-9	The DEIS fails to identify all the water applications which could reasonably be expected to be brought forward during the 3.8 decades until "full-buildout". These applications include some by the SNWA itself as well as some by Lincoln County Water District or Vidler and the owners of the Coyote Spring Development. All of these applications, if approved in whole or part, would be most likely placed into the pipeline. The amount of water applications under consideration is significant in at least 8 basins and totals to over 200,000 acre-feet per year. The DEIS fails to fully consider these reasonably anticipated future actions.	Please see Standard Resource Response Gen-1 which discusses programmatic analysis and subsequent NEPA. The granting of water rights is a function of the office of the Nevada State Engineer and the BLM cannot predict or influence the granting of those
35320-10	The DEIS is deficient by not specifically setting the thresholds which are required to protect the water critical to public lands and resources.	Impact thresholds or triggers will be determined as part of the comprehensive project-wide construction, operation, maintenance, monitoring and mitigation plan (COM Plan) as described in section 3.20. See also Standard Resource Response MM-1.
35320-11	the No Action alternative is not truly "no action." The BLM includes pumping actions which would not be possible without the issuance of the right-of-way. This taints the analysis by overestimating the negative effects of No Action. The DEIS must correct this deficiency.	The No Action Alternative is correctly described in this EIS.
35320-12	The DEIS needs to provide full and independent cost analysis for the GWDP, and all the costs associated with the monitoring and mitigation program. Costs that would be required of federal agencies and private individuals and businesses to protect their land and resources should also be estimated.	Thank you for your comment. The BLM lacks authority and a need to independently analyze project costs, or the potential long-term implications on ratepayers, in conjunction with the ROW application. However, because of comments received to the EIS, information regarding project costs are included in the FEIS. SocEcon-3 provides additional response to this comment.
35320-13	The DEIS fails to adequately address the social and economic impact from the GWDP on ranching, farming, and mining communities in Nevada and Utah.	Thank you for your comment. Although this comment provides no specific concerns, Section 3.18 has been revised to address similar comments that do identify a concern.
35320-14	he DEIS does not acknowledge nor quantify the long-time cost to these same communities inability to grow and expand because of the SNWA water applications have brought (and continue to bring) economic development in the valleys to a halt.	Section 3.18 acknowledges the identified concerns on the part of some residents and officials of White Pine and Lincoln counties. It is our understanding that previously approved water rights remained available for economic development. Furthermore, applications for additional water to support local economic development could have been, and can continue to be filed with the NSE, which would then be processed in consideration of local economic development needs. Finally, as noted, water is but one factor necessary to support growth and development. Consequently, there are no assurances that growth and development would have occurred in the proposed groundwater production basins absent SNWA's applications. SocEcon-5 also addresses this concern.
35320-15	Including drawdowns in the range of 1' to 10' will add many thousands of acres more than depicted in the DEIS and the potential damages will be far greater than the DEIS claims. The DEIS is deficient in not showing and acknowledging the loss of public land resources from drawdowns in the 1' to 10' range.	See Standard Response WR-1 for the use of the 10-foot drawdown contour for this EIS.
35320-16	The DEIS is premature and no tiering is needed. The ROW should only be considered once all the known locations for the pumping have been determined.	The application before BLM is for a water pipeline and no applications for additional rights-of-way have been submitted. Programmatic NEPA analysis and tiering are discussed in BLM Handbook H-1790-1. See section 1.3.6 of the FEIS for additional information. See also Standard Resource Response WR-1.
35320-17	DEIS is deficient because there are so many unknown aspects of the project including whether or not there is any groundwater permitted and where the permitted groundwater will be allowed to be pumped.	Please review section 3.18 which has been updated based on comments such as this. Please also review the discussion on incomplete and unavailable information in section 3.0.
35320-18	The DEIS uses old information on population, growth and a water resources plan from 2 years ago based on 2008 data.	where newer data were available, Section 3.18 has been updated.
35320-19	The DEIS is premature and based on out-of-date and incomplete and missing information and lacks any independent analysis to demonstrate a need for additional water resources.	Please review section 3.18 which has been updated based on comments such as this. Please also review the discussion on incomplete and unavailable information in section 3.0.

Comments and Responses - Individuals

ID	Comment	Response
35320-20	The signing of the first agreement terminated the BLM and other federal agency protests of the very water applications the subject of this DEIS. The BLM and other agencies dropped their protests to the 1989 SNWA applications in 2006 (and subsequently). These facts are missing from the DEIS and further compromises the ability of the commenting public to fully understand the conflicting roles of the BLM.	The Stipulated Agreements were included in Appendix C of the DEIS.
35320-21	I request that the BLM reissue a DEIS when the many unknowns and missing information are finally available from the SNWA and the project is in a form that it can be studied and all the impacts fully analyzed.	Comment noted. Subsequent Tiering will address future actions related to this project.
Giannantonio, Ben & Mary Lou		
35360-1	Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours
35360-2	Demand a Supplemental EIS that addresses impacts from specific well locations.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA.
35360-3	DEIS fails to disclose project costs and sources and cost of funding.	See also SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
35360-4	DEIS fails to adequately assess the purpose and need for project.	Based on this comment, text has been added to Chapter 1.
35360-5	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.18 of the FEIS which has been updated concerning these issues. Please also review standard resource response SocEcon-5 for further information. The potential adverse economic effects to the agriculture industry and individual ranchers are addressed in Section 3.18.2.8. The text has been revised to describe additional potential economic effects to agriculture that may arise in conjunction with drawdown.
35360-6	DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.	Impacts to cultural resources, water resources, plants, animals, and Native American traditional values are discussed in sections 3.16, 3.3, 3.5, 3.6, 3.7, and 3.17 of the DEIS.
35360-7	EIS fails to take a hard look at indirect & cumulative impacts, including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
35360-8	Proposed action would lead to major loss of game species; extinction of rare plant & animal species.	The potential impacts to game species are discussed in the FEIS in Section 3.6.2; potential impacts to rare plants in Section 3.5-2; and potential impacts to rare animal species in Section 3.6.2.
35360-9	DEIS fails to adequately analyze adverse impacts on and mitigation for wildlife habitat.	In response to your and other similar comments, the monitoring and mitigation discussion has been expanded in the Final EIS. Please see Standard Resource Response MM-1. Potential impacts to wildlife habitat are disclosed in Section 3.6.2 of the FEIS. See also Section 3.20 of the FEIS for more information on the COM Plan.
Giannopoulos, George		
33811-1	There is no certainty that the water tables do not interconnect with those that serve Ely, McGill, and other outlying residences and ranches. If they do, this project will render White Pine County uninhabitable.	The connection between hydrologic basins is discussed in Section 3.4, Water Resources.
Glass, Kristi		
33981-1	There is no credible research available regarding the size and location of the underground aquifer that this project proposes to tap. It is likely that the water under Elko County could be illegally taken by this project.	The development of the water resources section used the best available science and an approved groundwater model for future projections. Please see section 3.3 of the FEIS. Water development and usage is under the jurisdiction of the Nevada State Engineer.
33981-2	This project, if allowed, could quickly suck the water out from under my well, requiring me and many others in rural Nevada to foot the expense of deepening our wells, repeatedly, as the water table under our homes and businesses is lowered by this project. Ultimately, our aquifer could be totally sucked dry.	GW-WR-6 is provided as a general mitigation measure to address potential impacts to water rights. The protection and mitigation of effects to water rights is the responsibility of the Nevada State Engineer (and UDWRi in Utah). In Nevada, the State Engineer would oversee the groundwater development project and monitor effects to existing surface and groundwater rights and take necessary actions to prevent or mitigate impacts if they occur.
33981-3	I would greatly prefer that Las Vegas limit its expansion to developments that have water rights in place that do not include sucking water out from under rural Nevada. Better yet: deport the illegals that have swarmed into Las Vegas, increasing that city	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Gloekner, Pat		
34933-1	I believe that the water needed and being applied for through the State Water Engineer to fill this pipeline will also have a devastating effect on our stock watering rights in the Dry Lake Valley.	See general response WR-1 regarding the use of the model simulated 10-foot drawdown contour to define the drawdown area for the programmatic analysis.

Comments and Responses - Individuals

ID	Comment	Response
34933-2	I also believe that the cost of this project is way under estimated and it is not right that the tax payers or the consumers of SNWA pay for such a project	See SocEcon-1 regarding the inclusion of project cost information in the FEIS. Chapter 2 and section 3.18 have also been updated to include information on project funding.
Goodall, Doug		
34129-1	I would suggest that desalinizing water and bringing it in to from ocean be considered. It may be necessary to stop building big fountains too.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Gordon, Sydney		
34224-1	One critical factor that has not been analyzed in this PDEIS is the financial impact that this project will have on the economy in Nevada and the rural counties affected. In the current economy there is not an adequate financial resource identified to permit the proposed GWD projects to be initiated-much less to be completed. Deficit financing which will be necessary to fund the construction and operational aspects of this program is not in the best interest of the current residents of Nevada-they are the ones who will have to provide the funding. Also, the future impacts on residential water rates have not been analyzed.	Thank you for your comment. The underlying concerns in your comment are outside the scope of the EIS. However, because of comments received to the EIS, information on project costs is included in the FEIS - also see Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6.
Green, Jared P		
35355-1	In addition to addressing environmental concerns, the project will provide a much-needed boost the region's economic prospects by preserving jobs and vital tax revenues generated in Southern Nevada.	Thank you for your comment regarding potential benefits associated with the project. Statements of opinion do not require specific responses or text revisions under the NEPA regulations; however, they will be considered by the BLM and documented in the administrative record associated with this FEIS. Standard Comment Response SocEcon-4 addresses a related topic.
Hager, Jon		
33835-1	Not only will this have a deleterious affect on agriculture for communities that have little else to thrive on, it will also impact the 1.5 million people that live along the Wasatch Front in Utah.	Please review the updated Section 3.18 (SocioEconomics and Environmental Justice), Section 3.1 (Air and Atmospheric Values), and Section 3.3 (Water Resources) for this discussion on issues you have outlined.
33835-2	Not only will this have a deleterious affect on agriculture for communities that have little else to thrive on, it will also impact the 1.5 million people that live along the Wasatch Front in Utah. Not only will this extraction of water from the aquifer affect people living in an already precarious desert environment, but it will have a negative impact on wildlife and vegetation that require the aquifer to continue to live.	Please review response to your comment #1.
33835-3	This also has the potential to leave the Fish Springs National Wildlife Refuge vulnerable to a loss of a precious water source.	Comment noted. The potential risk of flow reductions at Fish Springs resulting from the proposed groundwater development and alternative pumping scenarios was evaluated in Section 3.3.2 of the EIS.
33835-4	If Las Vegas has water issues, perhaps, the first thing they should do is enact strict water conservation laws and enforce them stringently. Perhaps, the enormous hotels and resorts should cut back on their lavish and extravagant water displays and fountains.	This information will be provided to SNWA for their use in future water resource planning.
33835-5	Once that water, that has taken literally hundreds of thousands of years, if not millions of years to accumulate, is gone... it can never be replaced.	Your comments on the Draft EIS have been considered. Please review Section 3.3 (Water Resources) in the FEIS.
Halverson, Cheryl D		
34881-1	A recent op ed by Dr. Brian Moench, president of the Utah Physicians for a Healthy Environment in the Salt Lake Tribune warned about the toxic metals that would be in that dust. He warned of increased respiratory illness and an upward death rate from the polluted air impacts on the heavily populated Salt Lake City and other towns of the Wasatch Front.	Please see standard resource responses Air-3, Air-8, and Air-14.
Handy, Mark D		
33831-1	I am strongly opposed to the pipeline. Anyone thinking this will not have huge and irreversible affects on the citizens of the Wastach front and the whole great Basin ahs their head in the sand. This is a long term problem with serious implications for our future.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Hansell, Connor		
33841-1	We can run out of ground water if more water is discharged than recharged. For example, during periods of dry weather, recharge to the aquifers decreases. If too much ground water is pumped during these times, the water table can fall and wells may go dry. In such an arid location typically the replenishment rate is extremely low.	Your comments on the Draft EIS have been considered. Please review Section 3.3 (Water Resources) in the FEIS.
33841-2	After the Utah/ Nevada, Skull Valley aquifer is dry and the water has been used up, Las Vegas and Nevada will still be searching for a more long term solution to their problem, while the farming communities that rely on those wells and that ground water for their livelihood will be left unable to sustain the way of life they have lived since the late 1800's.	The Skull Valley hydrographic basin lies outside the scope of the water resource study area. Furthermore, results of the water resource modeling do not indicate effects in the northern extent of the region that would affect the Skull Valley.

Hansell, W Craig

Comments and Responses - Individuals

ID	Comment	Response
33833-1	The proposed Las Vegas pipeline would drain the Snake Valley aquifer and waste the land, destroying the lives of four generations of residents who were there long before Las Vegas was even a wide spot in the road. There has to be a better solution. Save Utah's water.	Please review sections 3.18 (SocioEconomics and Environmental Justice) and 3.3 (Water Resources) for information on these issues.
Happe, Matt & Shannon		
33889-1	If Vegas needs more water have them begin conservation.	Thank you for expressing your concerns. This information will be provided to SNWA for their use in future water resource planning.
Harris, William		
33971-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out—of—hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
33971-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see Standard Resource Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33971-3	lack of specificity of well locations to gauge the environmental impacts.	See Standard Comment Response WR-1.
Hicks, Robert		
34183-1	In my opinion, it makes more sense to buy the water rights that run into Idaho and to run that pipeline to Las Vegas.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Higbee, Ed		
34023-1	Is the desertification described?	Potential impacts to vegetation resources as a result of the proposed project have been discussed in detail in the DEIS
34023-2	Who will and where will be the triggers that will stop the pumping of water if the aquifer pulls down?	The monitoring and mitigation for this project is complex and extensive. The BLM is looking at two separate processes for the development of the monitoring and mitigation plans for this project. Currently, there are stipulated agreements which have been developed through the Nevada State Water Engineer that BLM contributed to. BLM also manages surface and mineral resources for federal lands it administers under FLPMA and BLM has developed a project-wide COM Plan to protect federal resources that may be impacted by construction, operation, maintenance and abandonment of the project related facilities (see revisions to Section 3.20). This section outlines the process that BLM will follow, now and in the future, for mitigation for this project. Mitigation related to groundwater development will be included in subsequent NEPA and associated valley-specific COM Plans as described in Section 3.20.
Hill, Kathy		
34365-1	Sustainability The EIS should show an alternative action based on a sustainable amount of water withdrawn from the aquifer. Based on the amount of water withdrawn for the pumping project, the EIS model could not achieve a steady state or equilibrium for the aquifer, so the 75 and 200 year time frames were somewhat arbitrarily assigned. The DEIS has not considered a sustainable yield scenario as one of the alternative actions. All the actions in the DEIS could be considered groundwater mining because they don't allow the aquifer to reach equilibrium in the foreseeable future, and all the actions modeled for the DEIS show permanent and irretrievable impacts. Prof. Victor Ponce, hydrologist, San Diego State University states that an average sustainable yield is about 40% capture of recharge, with a least conservative capture of 70% and a reasonable conservative estimate of 10% capture of recharge. http://ponce.sdsu.edu/icwehs_090416.html	Please see Standard Resource Response WR-2 for a discussion of timeframes used in the water model for the programmatic analysis and WR-19 for a discussion of estimation and representation of recharge.
34365-2	Drought The BLM should create a model based on a drought scenario in the pumping area. Alternate action C is based on drought on the Colorado River. During drought years, SNWA would pump more water, and during wet years, they would pump less water. However, the DEIS has not studied the impact of drought in the pumping area. Climate change with more heat and less precipitation is nearly universally accepted based on current evidence.	Please review Standard Resource Response Gen-5 as well as Air-15, Air-16 and Air-17 for information relevant to your comment.

Comments and Responses - Individuals

ID	Comment	Response
34365-3	Mitigation The DEIS should include a study about the effectiveness of specific mitigation and management procedures, including time for recovery after pumping has stopped. “J.C. Davis, spokesman for the water authority, said the feared effects on water levels won’t happen because BLM officials don’t take into account planned mitigation efforts or groundwater monitoring.” – a quote from the Las Vegas Review Journal. This is a theme song we have heard from SNWA for years, but they have presented no evidence that shows this statement to be true. However, highly regarded hydrologists such as John Bredehoeft say management and mitigation will be extremely difficult to do. In a paper, Ground Water Development-The Time to Full Capture Problem. by J. Bredehoeft and T. Durbin, it states, “ Monitoring for control also has fundamental problems. The maximum impacts are larger than those observed at the time pumping stops, and they occur some time after the pumping stops. This is especially true if the monitoring is some distance away from the pumping. In addition, ground water systems will be very slow to recover to their predevelopment state once pumping is stopped.” The DEIS discusses required monitoring and refers vaguely to a few mitigation programs that will be initiated in the future. There is very little solid information about mitigation and no information about the effectiveness of mitigation in the DEIS.	Mitigation effectiveness will be determined as part of the comprehensive project-wide monitoring and mitigation plan (COM Plan). See Standard Resource Response MM-1.
34365-4	Drawdowns not measured until they reach 10 feet The DEIS needs a model that can more precisely predict drawdowns. The model used for the DEIS is not specific enough to differentiate between drawdowns of 6 inches and 6 feet. This is unacceptable. Drawdowns of 2-3 feet in shallow wetlands are enough to dry them up. Subsidence is predicted to occur with less than 10 feet of drawdown.	Comments noted. See response WR-1 regarding the use of the model simulated 10-foot drawdown for the programmatic analysis of potential effects to water dependant resources.
34365-5	Maps need to include all affected areas The DEIS maps should show all areas affected by the groundwater pumping project and not just end with the hydrologic boundary. DOI uses maps and has requested monitoring for a larger area than the DEIS uses. The DOI map includes Tule Valley-Fish Springs, Sevier Valley, and Pine Valley among others which the DEIS does not. The maps used in the DEIS abruptly end with the hydrological boundary, although commonsense tells us that areas outside the boundary will be affected.	The maps generally show either the area defined by the Biological Working Group to encompass species of concern or by the area analyzed in the water model. Known impacts outside the mapped boundaries are described in the FEIS text.
34365-6	You asked for comments regarding Snake Valley’s inclusion in the groundwater project and about the Great Basin National Park in the Executive Summary. The No Action Alternative is the only action that protects Snake Valley and the Great Basin National Park. Snake Valley is going to be affected whether SNWA actually pumps from it or not. Southern Snake Valley may be more severely impacted if SNWA pumps only from Lincoln County, depending on what the NSE grants them. The distributive pumping alternatives in Spring Valley threaten north Snake Valley and Fish Springs. Leaving Snake Valley out does not mean we will not experience severe impacts.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34365-7	What does “subject to NEPA” mean in the Lincoln County Land Act? The language used in the DEIS is inconsistent and difficult to understand. Does the Lincoln County Land Act in fact bypass the EIS process and mandate a right-of-way as the DEIS states, or does the phrase “subject to NEPA” in the Act mean that there is no mandate and the BLM should follow standard procedures to select the appropriate action based on environmental needs. The language of the DEIS needs to be consistent and clear.	LCCRDA mandates that BLM grant a ROW to SNWA in Lincoln and Clark Counties for the purposes of a water conveyance system. That law states that “before granting a right-of-way ... [BLM] shall comply with [NEPA], including the identification and consideration of potential impacts to fish and wildlife resources and habitat.” Therefore, the ROW cannot be granted until the requirements of NEPA have been satisfied for the entire project. Text in Chapter 1 and the executive summary has been revised to clarify that LCCRDA mandates BLM to grant a ROW in Clark and Lincoln Counties, however this does not limit BLM’s ability to formulate mitigation and monitoring strategies for that portion of the project. Clarification has also been added to explain that for White Pine County, BLM will use FLPMA as its authorizing legislation and has the ability to determine whether a ROW should or should not be approved and if approved, to formulate appropriate mitigation and monitoring strategies.
34365-8	How will pumping and lowering water tables affect the flow of the groundwater? Could it change the flow pattern and direction of flow? For example, one hydrologist has suggested that in the Big Springs area of Snake Valley where overpumping has already occurred, continued lowering of the water table may reverse groundwater flow. This could change interbasin flows as well as other flow patterns.	The analyses of pumping effects evaluates impacts to water resources (including springs, streams, ET discharge areas, and water rights) and water dependant resources. Potential effects to flows at Big Springs are summarized in Section 3.3.2 and 3.3.3 of the EIS.
34365-9	Costs of the pipeline need to be evaluated. SNWA has a new cost estimate of \$7.5 billion for the pipeline and with financing, a total of \$15 billion. However, SNWA stills quotes the \$3.5 billion as today’s cost. Additionally, the cost estimates do not take into account the cost of mitigation from the GWP. An independent study of the costs and associated costs is needed. Also, a true comparison of costs between other alternatives such as desalination would provide important information in determining the best alternative.	See SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application. See also Gen-3 regarding the assessment of other water source options.
34365-10	Tiering of the project makes the DEIS of little value. The real issues are not with the ROW but with the groundwater pumping which will follow. In this case, providing a Right-of-Way (which garners few critics) provides and clears a path for the larger concern of groundwater withdrawal. Further, since little accurate information is available for the subsequent groundwater pumping, comments can only be speculative based on possible scenarios. Approving the first (and least damaging) part of the project enables the second part of the project to proceed. With so much money already invested, pressure mounts to give consent to the rest of the project. The Right-of-Way should not be separated from the purpose of the Right-of-Way simply for the convenience.	The application before BLM is for a water pipeline and no applications for additional rights-of-way have been submitted. Programmatic NEPA analysis and tiering are discussed in BLM Handbook H-1790-1. See section 1.3.6 of the FEIS for additional information. See also Standard Resource Response WR-1.

Comments and Responses - Individuals

ID	Comment	Response
34365-11	This DEIS is premature since SNWA has testified at the Spring, Cave, Dry Lake, and Delamar hearings that they will not start the pipeline until Lake Mead water levels fall below the 1075 feet level and there is no time table for that. SNWA does not plan to begin building the pipeline right away. Unless the No Action alternative is selected, BLM should only give conditional approval depending on how soon construction begins on the pipeline.	Please see response to your comment #10.
34365-12	The DEIS does not adequately study dust created by the project and subsequent pumping. No one has studied the variations of the soil and its components in the entire area affected by pumping so particle size is still an unknown. While the smallest particles are the most dangerous to human health, larger particles can be damaging and affect overall air quality. Saying that dust particles will not travel far enough to reach the Wasatch Front is ludicrous since satellite images have shown dust storms traveling across oceans.	Changes have been made in the FEIS text to address the central concern that underlies this comment; however, due to its overarching nature, specifics regarding the placement of changes in the FEIS are not provided in this response. Please see common responses Air-3, Air-8, and Air-10.
34365-13	The LCCRDA requiring an agreement between Utah and Nevada regarding the division of water is under dispute regarding the wording of "groundwater flow system(s)". The language needs to be clarified to determine which flow systems are involved which need the agreement to be in place. If there are pending law suits to clarify language, the BLM should hold off on the DEIS.	Water rights which are the subject of the referenced agreement, are under the jurisdiction of the two states and is not a direct responsibility of BLM in conducting this NEPA review. However, information concerning this agreement is included in the EIS.
34365-14	Water used for construction purposes, for well exploration and testing, and for mitigation purposes is not accounted for in the DEIS even though substantial amounts will be required. The DEIS should take a stand on how much water needs to be reserved from any groundwater withdrawals to meet these needs.	The Record of Decision will require construction plans before a notice to proceed is issued. These plans will provide more specificity regarding the source of construction water.
34365-15	Amount of water to be transported by the pipeline varies from a low amount of 79,000 af/y to upwards of 200,000 af/y. The highest figures are used by SNWA at the NSE hearings. The DEIS needs to better inventory all the water and its sources which may be conveyed by the pipeline.	Please see Section 1.4 in the Final EIS for sources of water that have been identified for conveyance in the pipeline.
34365-16	The project life for the purposes of the DEIS was estimated to be 65-95 years. However, water rights are granted for perpetuity and SNWA has taken no position on limiting pumping. Although the life of the pipe may need to be re-evaluated around the 65-95 year time frame, pumping may continue past this time frame. The DEIS needs to address consequences of termination at this time, which include continued mitigation and restoration of affected areas. The DEIS also needs to address increased effects and necessary mitigation should the pumping continue in perpetuity.	Thank you for your comment. Please see Standard Resource Response MM-1.
34365-17	Mitigation and monitoring is expensive business. SNWA has already cut back some of the monitoring required by the stipulated agreements for Spring Valley, crying poverty. Agencies have had to go to other resources to provide funds for the monitoring. Are there any guarantees that SNWA will continue to have money for the required management, monitoring, and mitigation of the impacted valleys? The DEIS should have a cost analysis of full monitoring and mitigation required by SNWA and a plan whereby these costs are covered during all the years of pumping and until the valleys have recovered from impacts of pumping.	Monitoring and mitigation measures related to groundwater pumping impacts are focused on the framework and process at this stage of the project. Costs can be estimated when specific details are defined for these measures. The BLM will require that the applicant be responsible for monitoring and mitigation costs once they are defined. A summary of the Project Development Financing and Costs has been included in Chapter 2 of the FEIS based on the SNWA "Ability to Finance" report (Hobbs and Bronow, 2011).
34365-18	The DEIS has a list of irreversible and irretrievable commitments of resources as a result of this GWP. The DEIS should also have a list of unacceptable impacts of the project and a means of discontinuing the project should these unacceptable impacts occur. Currently, the stipulated agreement which the BLM entered calls for meetings, for talk, but no decisive action which would stop the project.	The NEPA process does not require a list of unacceptable impacts. A combination of BMPs, applicant-committed measures, and additional mitigation are implemented to avoid or reduce impacts to a low level of intensity.
34365-19	As a Utah citizen in Snake Valley, I find the DEIS is very limited on its study of impacts to Utah. References to Utah are limited, general in scope, and seem to be of less concern than impacts to Nevada.	The project footprint occurs in Nevada. Potential impacts to resources in Utah have been considered on a programmatic level. If future NEPA determines there is the potential for effects to Utah resources, additional analysis will be conducted.
34365-20	There are too many known unknowns and unknown unknowns. Groundwater flow patterns are uncertain; there are wide variations in data surrounding precipitation, recharge, and available groundwater; climate change is occurring; impacts on plant life and wildlife is inevitable. And there are no provisions for saying, "Stop!"	Please review section 3.0.3 (Incomplete and Unavailable Information) and 3.3 (Water Resources) for discussions on how incomplete and unavailable data was compensated for during the analysis. Standard Resource Response WR-1 discusses how uncertainty in the water model was addressed in the analysis.
34365-21	In the back of the printed copy of the DEIS (Vol. 1-B) is a list of "Agencies, Organizations, and Individuals to Whom Copies of this Statement are Sent." I am curious as to why my name and my husband's name is not on it. We have both been participants in this project, making both spoken and written comments during scoping meetings, participation in updates and now comments on the DEIS. We have received mailings from the BLM so I am assuming this is an oversight. An oversight this small is forgivable, but oversights on the GWP may have serious results --- and apparently, it can happen! That's why I oppose this project.	As personally communicated to you, both of you were considered as representatives of Juab County and were incorporated under the local agency heading.
34910-1	For the hearing going on now, NSE is only considering the 19 well applications in Spring Valley. So the distributed pumping plan is currently not the proposed action, but Alternative Action B is the proposed plan being acted upon at the hearings. So terminology in the DEIS as to the proposed action and the alternative actions is either confusing, or at the worst, inaccurate. If the BLM made a decision in favor of the "proposed action," just which action are they approving – distributed pumping as stated by the DEIS, or the points of diversion being heard by the State Engineer?	Based on your comment, text has been added to Chapter 2. Some alternatives in the EIS would require change applications and further action by the Nevada State Engineer.

Comments and Responses - Individuals

ID	Comment	Response
34910-2	SNWA really has no concrete plans or funds set aside for monitoring and mitigation. According to Entsminger, SNWA has no estimate for costs of management, monitoring and mitigation, has no firm plan about how to do it since it is so "site specific," and has no annual budget set for it. However we know they are "committed" to it. So how can the DEIS analyze the MMM plan for this project when there is no plan?	SNWA will be required to implement and fund the monitoring and mitigation plan after it is finalized. Monitoring and mitigation measures related to groundwater pumping impacts are focused on the framework and process at this stage of the project. Costs can be estimated when specific details are defined for these measures. Costing could be initiated after the Record of Decision for this EIS is completed and continued into subsequent NEPA analyses.
34910-3	According to the attorney for the LDS church at the NSE hearing, in order to get the amount of water from SNWA's water applications of 19 wells and which the State Engineer is considering at this time, SNWA will need to pump all the wells at a maximum rate 365 days a year with no down time. This does not allow for a management. So promises to "manage" pumping is not a reality, just a promise. The DEIS should have a concrete plan of how the pumping will be managed given the realities of the number of wells, the capability of the wells to produce water, and amounts of water removed from the well over a given period of time.	The BLM has developed a project wide monitoring, management and mitigation program for the project that identifies the process that would be used to identify and manage monitoring requirements for the project. This document is provided in Section 3.20 of the FEIS and is referenced in GW-WR-3 in response to this comment. Also see response MM-1.
34910-4	The stipulated agreement between the DOI and SNWA has no teeth in it and because of the consensus clause, give SNWA veto power over anything decided by the Executive committee. The neutral third party has no power and is nothing but an advisor. The only real control is exerted by the Nevada State Engineer and it will be up to him/her to enforce actions. As the Nevada State Engineer is appointed by the governor, it becomes a political hot potato to enforce anything against SNWA's wishes. There absolutely needs to be an independent entity who has the power to monitor and shut down pumping if the environment and other water rights are threatened	Please review Standard Resource Response MM-1 for information relevant to your comment.
Hill, Ken		
34506-1	The plans to pump only during drought years assumes the drought(s) that diminish water on the Colorado River do not also affect groundwater aquifers in the target basins.	Comment noted.
34506-2	The EIS should analyze how much water could be saved in southern Nevada by imposing reasonable restrictions and rationing.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
34506-3	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.	Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and the lack of BLM authority or need for the BLM to independently analyze project costs in conjunction with the ROW application. Comparative environmental and economic costs factored into the elimination of conveyance alternatives, e.g., rail haul, but were not a factor in eliminating alternative water supply sources from consideration (see Standard Comment Response Gen-3).
34506-4	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.	Thank you for your comment. Please see Standard Resource Response MM-1.
34506-5	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.	See response WR-5 regarding potential effects to Fish Springs; and WR-6 regarding establishment of the model boundary.
34506-6	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?	Thank you for your comment. Please see Standard Resource Response MM-1.
34506-7	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 Nevada State Engineer will make the final decision on what water is granted to SNWA based on their 1989 water applications.
34506-8	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.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34506-9	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.	Thank you for your comment. Please see Standard Resource Response MM-1.

Comments and Responses - Individuals

ID	Comment	Response
34506-10	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.	See Standard Resource Responses Gen-2 and Soc-Econ-2 for information relevant to your comment.
34506-11	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.	Information which would address your comment is included in section 1.3.6 and 3.18.
34506-12	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?	The BLM will make a determination of the type and timing of subsequent NEPA as appropriate to respond to currently unforeseen events.
34506-13	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?	Your comments are relevant to the current analysis to the extent that planning for changes in surface water availability for firefighting need to be considered, and may be addressed by the BLM in the ROD. You are correct that your comments are more applicable to future tiers, and that BLM will refer back to the prior analysis to identify issues of concern.
34506-14	"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?	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS. The SNWA Water Plan does describe their use of other water supply options currently in use and those being considered in the future.
34506-15	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 Irrecoverable impacts. It certainly does not require a ROW in White Pine County.	The EIS is a disclosure of impacts of the full project as proposed by SNWA and the 6 alternatives developed by BLM for analysis and/or decision-making purposes. Chapter 1 contains information on BLM's legal mandates and responsibilities.
34506-16	I cannot find anything in the DEIS about impacts to caves. Is that part of a future tier or is it an oversight?	Potential impacts related to groundwater pumping have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.
34912-1	In the current Nevada State Engineer hearings, SNWA witnesses have all but admitted that the stipulated agreement in Spring Valley is non-binding. It basically gives SNWA veto power to do almost anything they want. Third-party arbiter decisions are not binding. There are no penalties for not keeping the terms of the agreement. This is totally inadequate and unacceptable. The BLM must incorporate much higher standards of SNWA compliance to environmental safeguards in the EIS.	Please review Standard Resource Response MM-1 for information relevant to this comment.
34912-2	In the Nevada State Engineer (NSE) hearings currently underway, the hearing officer made it plain that the NSE hearing was only about the 19 wells in Spring Valley, not the well fields SNWA has portrayed in the DEIS. How can the EIS be based on one set of wells while the NSE is presented with a different set of wells? Is the DEIS programmatic analysis adequate if the NSE only grants 19 wells?	Based on your comment, text has been added to Chapter 2. Some alternatives in the EIS would require change applications and further action by the Nevada State Engineer.
34912-3	The transcript of any Nevada State Engineer (NSE) hearings should be included and studied as part of the EIS. Sworn statements of SNWA witnesses in particular should be analyzed to determine that the NSE and the BLM are being given consistent information. Data presented to the NSE must be evaluated. For example, CDD Biological Monitoring Plan apparently has been completed but not submitted to the NSE. These kinds of issues must be analyzed and correlated before a final ROW is made.	Portions of the NSE hearing evidence were submitted to BLM as part of the comment process. However transcripts were unavailable until after the EIS comment period was closed. Additionally, please see Standard Resource Response MM-1.
34912-4	In the Nevada State Engineer (NSE) hearings currently underway, the hearing officer made it plain that as far as Spring Valley is concerned, the NSE hearing was only about the 19 wells SNWA applied for, not the distributed-pumping well fields SNWA has portrayed in the DEIS.	Your comments on the Draft EIS have been considered. See chapter 1, section 1.3.6 of the FEIS on the NEPA process for this project and section 1.4 on the Nevada State Engineer's process. Also review section 3.20 which sets up a process for future analysis and decision-making. As these sections point out, there appears to be several things that will occur over the next few years: changes in points of diversion for distributed pumping is one of these future actions.
34912-5	Is the DEIS programmatic analysis adequate if the NSE only grants 19 wells?"	Please review the response to your comment #4 above.

Comments and Responses - Individuals

ID	Comment	Response
34912-6	This EIS definitely should wait until after the NSE hearings to properly analyze this project. And then allow a further round of comment (since this round was way too short, overlapping both the NSE hearings and critical farm work).	The NEPA and NSE processes are separate and controlled by different entities. An additional 30 days was added to the comment period to address requests such as yours.
Hinckley, Eric		
35308-1	The Socio-Economic portion of the Draft Environmental Impact Statement includes an in-depth analysis of the potential impacts the SNWA Groundwater Development Project may have on Lincoln Bud White Pine counties. The DEIS does not include, however, a detailed evaluation of the potential impacts to Clark County should the project not be constructed. As the economic engine of this state, Southern Nevada's economy must recover in order for the state's economy to begin thriving once again. This is not possible without sufficient water resources to manage drought conditions and future development.	Thank you for your comment regarding the potential implications for Clark County should the GWDP not proceed. The concern is identified in Section 3.18. See also Standard Comment Response SocEcon-4 which notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized. Furthermore, SNWA could pursue other sources of additional water should the project not proceed.
Hooper, Kiersten		
34078-1	Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34078-2	Demand a Supplemental EIS that addresses impacts from specific well locations.	Future facilities will be addressed under subsequent NEPA actions, see section 1.3.6.
34078-3	DEIS fails to adequately assess the purpose and need for project.	Based on your comment, additional information has been added to Chapter 1.
34078-4	DEIS fails to analyze potential environmental effects due to climate change	Your comments on the Draft EIS have been considered. Please see common response Air-15.
34078-5	All of the action alternatives will result in future efforts by SNW A to fill the 96 inch pipe with water from Snake Valley, the rest of White Pine County, Eureka County, Elko County and beyond.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34078-6	Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEPA and FLPMA.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34078-7	DEIS fails to analyze environmental impacts of actual well locations for "distributed pumping"	Your comments on the Draft EIS have been considered. Future facilities will be addressed under subsequent NEPA actions. See section 1.3.6. See chapter 1, section 1.3.6 of the FEIS on the NEPA process for this project and section 1.4 on the Nevada State Engineer's process. Please also review section 3.20 which sets up a process for future analysis and decision-making. As these sections point out, there appears to be several things that will occur over the next few years: changes in points of diversion for distributed pumping is one of these future actions.
34078-8	DEIS does not consider a sufficient range of alternatives.	Please review Standard Resource Response Gen-5 for information relevant to this comment. Chapter 2 contains a thorough discussion of the alternatives considered when developing this EIS.
34078-9	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.18 of the FEIS which has been updated concerning these issues. Please also review standard resource response SocEcon-5 for further information.
34078-10	DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.	Please review chapter 1 which contains information concerning BLM's legal responsibilities under NEPA. Please also review Standard Resource Response SocEcon-5 which discusses future rural development.
34078-11	DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley. DEIS provides insufficient information on impacts to Steptoe Valley.	See response WR-5 regarding potential effects to Fish Springs. The maximum extent of the model simulated drawdown area resulting from the GWD pumping scenarios occur at the full-build out plus 200 year timeframe. At this point in time, the nearest location of the simulated drawdown area resulting from project pumping is located in northern Spring Valley; located two hydrographic basins away from (approximately 20 miles southwest) of Deep Creek Valley; and approximately 15 miles from the Goshute Indian Reservation boundary. Therefore, impacts to water resources in Deep Creek Valley and the Goshute Indian Reservation are not anticipated. Drawdown related effects are estimated to eventually propagate into the southeast margin of the Steptoe Valley Hydrographic Basin as described in Section 3.3 and Appendix F3.3 of the EIS.
34078-12	DEIS fails to adequately analyze adverse impacts on and mitigation for ranching, wildlife habitat, local businesses, wild horses	Please review Standard Resource Response MM-1 regarding mitigation of impacts. Also, please review section 3.20 which sets up a process for future analysis and decision-making.
34078-13	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 SNW A Pipeline project is intended to operate indefinitely.	See response WR-1 regarding the use of the model simulated 10-foot drawdown, and WR-2 regarding the future time frames considered for the programmatic analysis of potential effects to water dependant resources.

Horning, Rich & Linda

Comments and Responses - Individuals

ID	Comment	Response
35023-1	The land developers will love this and it will never cost them a dime. It will be all the homeowners to pay for it.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Howard, Billy		
34434-1	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
34434-2	failure to disclose and independently analyze the full economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and the need for the BLM to independently analyze project costs in conjunction with the ROW application
34434-3	failure to disclose and analyze the cost of proposed mitigation and monitoring	Thank you for your comment. Please see SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34434-4	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 S. Nevada, outright purchase of water rights currently used for agriculture in S. Nevada and elsewhere on the Colorado River, and desalination options	Please review updated sections 1.2 (Purpose and Need), 1.7.1 (Scoping), and 2.7 (Alternatives Considered but Not Carried Forward for Detailed Analysis) for information relevant to your comment. Please also review Standard Resource Responses Gen-3 and Gen-5 for information on alternative selection and development of a range of alternatives relevant to this EIS.
34434-5	DEIS fails to identify the real purpose and need which is clearly to increase water availability for S. Nevada saying instead that it's the BLM's need to issue a right-of-way.	Based on your comment, text has been added to Chapter 1.
Hutchinson, Harvey L		
35221-1	I find that the proposed project is contrary to the reserved land laws for School Trust Lands and for the Indian Reservations.	As stated in information contained within Appendix E, no Indian Reservations will be crossed by the project requested by SNWA. In addition, Nevada does not have any School Trust Lands as are present in Utah. Nevada state lands involved in this project are the utility corridor in the Steptoe Wildlife Refuge and lands controlled by the Nevada National Guard in the Las Vegas Valley. SNWA would need to obtain a separate ROW to cross these Nevada State lands.
35221-2	I question the authority of the BLM to approve a request that dewater and causes subsidence to 100,000 acres of Utah School Trust Lands without the School Trust Fund being fully compensated for the mining of the minerals (water) under its lands, and the damage of its lands in perpetuity because of subsidence. (See attachment on opinion as to who owns the water on Utah School Trust Lands.) Before the EIS is approved, the Utah School Trust Lands benefits which are taken must be paid for. A cash flow of at least \$50,000,000 per year in perpetuity indexed for inflation should be considered as payment to School Trust Lands for the water and the damaged areas underneath their lands.	As stated in Chapter 1, no water can be transferred out of the Basin which underlies both Utah and Nevada (Snake Valley) unless there is a signed agreement between the two States. This is described more fully in Chapter 1 of the EIS as is BLM's legal responsibilities and mandates.
35221-3	Indian lands cannot be taken without violating the Supreme Court Decision Winter vs. United States, 207 U.S. 564, 28 S. Ct. 207, 52 L. Ed. 340 (1908)."The case, as we view it, turns on the agreement of May, 1888, resulting in the creation of Fort Belknap Reservation . . . the Lands were arid, and, without irrigation, were practically valueless . . . But extremes need not be taken into account. By a rule of interpretation of agreements and treaties with the Indians, ambiguities occurring will be resolved from the standpoint of the Indians . The power of the government to reserve the waters and exempt them from appropriation under the state laws is not denied, and could not be. (United States v. Rio Grande Dam & Irrig. Co. 174 U.S. 702, 43L. ed. 1141, 19 Sup. Ct. Rep. 770; United States v. Winans, 198 U.S. 371,49 L. ed. 1089, 25 Sup. Ct. Rep. 662) ... That the government did reserve them we have decided, and for a use which would be necessarily continued through years. This was done May 1, 1888 and it would be extreme to believe that within a year Congress destroyed the reservation and took from the Indians the consideration of their grant, leaving them a barren waste,-- took from them the means of continuing their old habits, yet did not leave them the power to change to new ones." The subsidence would destroy the land for their purposes and would violate the treaties with the Indians.	No Indian Reservations lands will be included in the ROW addressed by this EIS and potentially issued by BLM. Potential Impacts from the project, including to Indian lands, from projected drawdown are addressed in the EIS (this is described in Chapters 2 and 3). Potential impacts due to future facilities will be addressed in future tiers and additional ROW requests and associated NEPA review.
35221-4	Consequences of subsidence damage of lands above the aquifers has not been considered.	Potential impacts related to groundwater pumping have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.
35221-5	Because of my work on this project, I know that there is water available from return flows going into the Salton Sea. These flows could be collected and processed through a desalination plant (reducing the salt content in the water from 3000 ppm to 1000 ppm) and then the water could be used for irrigation in the IID. SNWA would then be credited with that amount of water in Lake Mead and could use it in Las Vegas through its diversion structure. This alternative should be investigated.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Issa, Eleanor Clinton		
33906-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalination.	Based on your comments, text has been added to Chapter 1.

Comments and Responses - Individuals

ID	Comment	Response
33906-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS.
33906-3	lack of specificity of well locations to gauge the environmental impacts.	Your comments on the Draft EIS have been considered. See Standard Resource Response WR-1.
Johnson, Abigail		
34868-1	The DEIS needs to address the impacts of pumping cessation after 75 years, for all alternatives and categories of impacts disclosed in the EIS. This might go in 3.3.2?	Additional cessation runs have not been added to this Final EIS, although they may be considered for addition in subsequent NEPA modeling. Please see Standard Resource Response Gen-1 which discusses programmatic analysis and subsequent NEPA.
34868-2	SNWA plans to interconnect the Gonder substation and Apex. The EIS should disclose the role of the North American Electric Reliability Corporation (NERC), Federal Energy Regulatory Commission (FERC), and Western Energy Control (WEC). The discussion of the national process related to the production and distribution of energy is totally missing from this EIS. Why wasn't FERC a Cooperating Agency in this EIS? If SNWA intends to generate non baseload electricity, scheduling issues should be addressed. This issue appears to have been overlooked or dismissed, and it may be significant. (Chpt 2.0 has several items on electrical power, but this is an overall comment.)	The project as outlined in this EIS contains no energy production or distribution. The project would be a consumer of electrical energy only. FERC may be the lead agency for subsequent NEPA when hydroelectric generation, at the option to SNWA, is considered during a future tier of the project.
34868-3	The DEIS lacks a clear description of pipe and pipe maintenance. Much of the soil is alkali, which is corrosive. What kind of pipe will be used, and how will the surrounding soil affect the pipe.	Page 3.-19-3 states that "New water transmission pipelines are designed, constructed, and operated to the best industry standards to maximize their efficiency and reliability over their service life." When the pipelines are fully designed, compliance with industry standards will require that pipe materials are designed to be appropriate for site conditions including corrosive soils.
34868-4	Please provide a description of the cathodic protection that will be provided. How do you intend to ensure the performance of the pipeline? What is the leak detection plan? How could leaks affect the accessible environment? This should be analyzed in the EIS.	The cathodic protection and leak detection plans will be detailed in the SNWA construction plan which BLM will be required to approve prior to construction.
34868-5	In the event of catastrophic failure of a portion of the pipe, how will the emergency be handled? For the purposes of handling emergencies, will their be a series of "off" switches?	Please see Applicant-Committed measure A.1.1 in the SNWA Plan of Development (Appendix E) for a discussion of plans that will be developed prior to the BLM granting a ROW. These plans include a Spill Prevention, Control, and Countermeasure Plan.
34868-6	Under the public health and safety section 3.19 Regarding air quality's affect on public health, please disclose the contributions for the PM 10 load. PM 10 will have a direct effect on the health of people downwind. Please provide a meteorological map for wind effects for dust distribution in the project area and downwind. This is absent from the DEIS, is a serious disclosure deficiency, and should be included in the public health section.	Please see common response Air-14. Locations of impacts will be summarized from modeling results in the FEIS.
34868-7	Do the participating water districts under SNWA have firm contractual agreements with SNWA to pay for the costs of the project? Are there agreements between SNWA and the water districts to purchase water at a particular cost? This agreement process should be disclosed in the EIS in Purpose and Need. Are there agreements in place for SNWA to sell to retail customers?	Please see Section 2.6.8 in the Final EIS for a discussion related to capital costs for the project.
34984-1	This DEIS is premature, does not disclose enough information about the impacts of pumping specific wells, and has major information gaps detailed in the myriad of comments received on this DEIS. The socioeconomic portion of the document was notably weak. In light of these deficiencies, BLM should withdraw this EIS and redo and reissue it for full public review once the information gaps have been filled, and when (if ever) the project is timely.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basine will be analyzed in subsequent NEPA. Information gaps related to the decisions to be made based on this NEPA assessment (including those in the Socioeconomic section of the document) that were identified in comments have been addressed in the FEIS analysis as appropriate.
34984-2	While the 30 day comment extension was helpful, it was not nearly enough time to review a document of this size, depth and complexity, six years in the making. It is evident that the full 180 days requested by Great Basin Water Network would have been a more practical and appropriate review period, given the controversial and multi-generational nature of the project and the number of individual and groups that have expressed interest in participating over the years.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34984-3	BLM must condition the Right of Way permits to ensure that BLM has authority to set triggers and enforce pumping cessation in order to limit effects on its resources.	An applicant-committed protection measure listed under Adaptive Management Measures would be an option for reducing or ceasing groundwater withdrawals. This measure would determine a reduction or cessation of pumping on a case-by-case basis for individual production wells or well fields using the technical and consultation process identified in the stipulated agreements. The BLM will include this ACM in the Record of Decision.
34984-4	The Executive Summary 2.9, page ES-10, states, "The BLM has no legal authority over water rights in Nevada or the SNWA water resource plan." The chart on the same page attempts to sort out the BLM and State Engineer responsibilities. The blue arrow is labeled "Time" but more appropriately should be labeled "The Public" because the public is caught in the middle between two agencies playing a shell game, hiding responsibility for the destruction and defoliation of rural Nevada from the public.	Thank you for your comment.

Comments and Responses - Individuals

ID	Comment	Response
34984-5	BLM has inappropriately comingled its separate responsibilities as a water user and as a protector of lands and resources. They are not the same. As a water rights holder, BLM has entered into a stipulated agreement in Spring and Cave, Dry Lake and Delamar Valleys years prior to the preparation of this EIS. BLM is choosing to carry those agreements forward and "check off the box" for monitoring, management and mitigation (3M) by using agreements forged in secret between SNWA and BLM prior to SE water hearings. It is inappropriate to use agreements forged in secret prior to the release of the DEIS to address impacts disclosed for the first time in the DEIS.	See Standard Resource Response MM-1.
34984-6	As a resource manager, it is BLM's responsibility to ensure that the proposed action and alternatives do not adversely affect BLM's claims. BLM's own studies show SNWA drawdowns will eliminate or adversely impact its public water reserves (PWRs). BLM should have similar concern for all other water rights or claims to water that are connected to resources under its jurisdiction. BLM cannot and must not disregard the stewardship of its resources.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
34984-7	Short of selecting the No Action Alternative, any of the proposed alternatives will result in permanent adverse affects to GBNP.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34984-8	There are many alternatives to this project, and BLM should consider them in the analysis of alternatives rather than rejecting them. These include and are not limited to the 17 alternatives cited by Mark Bird in his article, "17 alternatives to the water pipeline proposed by Nevada" published in the Salt Lake Tribune on March 2, 2008.	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to consider in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative has been added to the analysis for this Final EIS to expand the range of alternatives.
34984-9	In light of the listed incomplete or unavailable information, this DEIS is premature. The "known unknowns" and "unknown unknowns" confirm that this DEIS should be withdrawn and updated and resubmitted for full public review after the information described in this section is obtained.	Please review section 3.0.3 (Incomplete and Unavailable Information) and 3.3 (Water Resources) for discussions on how incomplete and unavailable data was compensated for during the analysis. Standard Resource Response WR-1 discusses how uncertainty in the water model was addressed in the analysis.
34984-10	Note that key Visual Resource Information was omitted, and that the Visual Resource section (3.15) suffers from the lack of visual simulations at 75 and 200 years of pumping.	Photographic simulations were prepared for project's Proposed Facilities as described in Section 2.5 using the methods described in Section 3.15.2.1 where sufficient locational and design information were provided to prepare an artistic rendering of the potential impacts at a given location. The known extent and degree of potential transitions from wetland/meadow, spring-fed communities, and basin shrubland communities to more drought-adapted and shallow rooted vegetation species are insufficient to prepare artistic renderings.
34984-11	The visual resources analysis is deficient. The section of text and related Appendix only address the visual impacts of the right of way, roads and power lines. While these ROW impacts are studied, in order to fully and accurately disclose the impacts of the proposed action and alternatives, the EIS should provide visual simulations at 75 and 200 years of the various alternatives from Key Observation Points (KOP). Visual resources are the lifeblood of tourism in the Pony Express Territory, at Great Basin National Park, and in the region. The lack of KOPs depicting the die-off of vegetation, presence of dust, and the extent of subsidence make it appear that BLM does not want the public to see the extent of destruction (comparable to Owens Valley.) For example, the DEIS should contain a KOP visual simulation from the Wheeler Peak road over Snake Valley after 200 years of pumping for each alternative. The same approach should be taken for a view from east Snake Valley and from Garrison. Special attention should be given to views from the Great Basin National Park into Spring Valley. Similar KOP simulations should be done for the other valleys. Full disclosure in the DEIS should include what the public and the Department of Interior needs to see and consider - the treasured valley and mountain vistas after 200 years of pumping, defoliation, and air quality impacts.	The visual resources analysis evaluates the impacts from Groundwater Development and Groundwater Pumping in Section 3.15.2.8. This section provides sufficient information to compare project alternatives and their impacts. The section also discloses that future site-specific impact assessments will assess visual impacts for specific project facilities in detail as the locations of facilities become better defined. Photographic simulations were prepared for the project's Proposed Facilities as described in Section 2.5 using the methods described in Section 3.15.2.1 where sufficient locational and design information were provided to prepare an artistic rendering of the potential impacts at a given location. Further, the known extent and degree of potential transitions from wetland/meadow, spring-fed communities, and basin shrubland communities to more drought-adapted and shallow rooted vegetation species are insufficient to prepare artistic renderings.
34984-12	Because the visual simulations of the drying up of the project area were not done and disclosed to the public during the Draft EIS review, BLM should complete the simulations and including them in a new DEIS or SEIS which will be subject to full public review and hearings.	Photographic simulations were prepared for the project's Proposed Facilities as described in Section 2.5 using the methods described in Section 3.15.2.1 where sufficient locational and design information were provided to prepare an artistic rendering of the potential impacts at a given location. Further, the known extent and degree of potential transitions from wetland/meadow, spring-fed communities, and basin shrubland communities to more drought-adapted and shallow rooted vegetation species are insufficient to prepare artistic renderings.
34984-13	Overall the socioeconomics section is weak and lacks the detail and specificity that the public expects. The analysis of economic impacts ignores the basic fact that without water everyone in the region will lose their livelihoods and will have to move away to survive. Most of the analysis centered on pumping costs for agriculture. Where is the analysis of effects on local tourist dependent businesses, for example. This section needs to be redone to provide the detail, information and analysis needed for decision-making.	Thank you for your comment. The primary purpose of this EIS is to disclose potential project impacts related to the right-of-way, access roads and ancillary facilities. The proposed pipeline routes, as submitted by the applicant, have been analyzed in this EIS and the impacts associated with the proposed alignment have been presented therein. Impacts related to well locations, pumping, and groundwater drawdown, including those cited in this comment, are analyzed on a programmatic level in Section 3.18 and would be analyzed in further detail in future NEPA. See Standard Resource Responses Gen-1 and Gen-2 for more information on tiering. The characterization of the potential effects of the GWD on water availability, "...without water everyone..." contained in the comment is inconsistent with the water analysis in Section 3.3 which portrays the areal and vertical extents and the general time horizon of long-term drawdown, given the assumed pumping regimes. Furthermore, an extensive monitoring and mitigation program (the COM Plan) would be put in place and Nevada water law recognizes and offers protections for senior water rights, including municipal water sources. Text has added to Section 3.18.2.8 describing the long-term drawdown, including reference to Figures 3.3.2.-7 and 3.3.2-8.

Comments and Responses - Individuals

ID	Comment	Response
34984-14	While the environmental justice analysis does not identify issues under the EJ executive order it is clear that this project is disproportionately affecting small rural communities whose ability to fight a \$15 billion project is limited, especially without BLM fighting for the survival of its resources including wildlife, fish, and plants. Members of the Goshute Tribe have testified before the State Engineer that this project threatens their ability to survive and thrive. That is an environmental justice issue that must be addresses, really addressed in this DEIS.	The underlying subject of this comment relates to the allocation of water resources in the state (see Standard Resource Response Gen-8). As noted in the Executive Summary (paragraph 2.7 and 2.8), Section 1.4 and elsewhere in the EIS, the responsibility for administering water in Nevada rests with the Nevada State Engineer, and consideration of public interest is a factor to be considered in the water rights appropriation. Given the state's authority in this matter, the subject is beyond the scope of the EIS.
34984-15	The monitoring management and mitigation (3M) plans proposed will not protect BLM's public water reserves or the other water rights in the valleys; they will only document their destruction. BLM is using the stipulated agreements it forged with SNWA to protect its water rights in Spring and Cave, Dry Lake and Delamar Valleys as the 3M plans for this EIS. This is inappropriate and unacceptable.	BLM water rights and public water reserves will be protected through the State of Nevada Water Engineer's office and the stipulated agreements. BLM multiple use, NEPA and right-of-way regulations assist BLM continue to manage then public land. Please review Standard Resource Reponse MM-1 for a discussion of how public land resources will be mitigated and monitored through use of a COM plan (section 3.20 of the FEIS).
34984-16	BLM's stipulated agreement with SNWA cannot and must not be used to abrogate BLM's responsibilities as a land manager. These responsibilities include but are not limited to water, air, habitat, wildlife, aquatic life, and recreation.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
34984-17	BLM has a commitment to public involvement at the local level but there is little evidence of it in the plans attached to the EIS for monitoring, management and mitigation. The Snake Valley draft includes representation from the States of Nevada and Utah, but no involvement at the local level. We strenuously object to this top down process which excludes local involvement and participation. The 3M process should be open rather than a secret cabal of federal agencies and the applicant, SNWA. At a minimum, the management committee and technical working group should have representation from County government officials and their technical experts from the basins of origin, and should also include representation of other affected parties including local water rights holders and representation from local agriculture.	Your comments on the Draft EIS have been considered. Please review section 3.20 which has been revised and includes information and provisions for local involvement in the mitigation and monitoring processes. Please also review Standard Resource Response MM-1 and MM-2.
34984-18	The 3Ms for Spring and Cave, Dry Lake, and Delamar Valleys were forged in secret. By endorsing them as done deals, BL.M is endorsing a secret process- a back room deal with SNWA - that did not have the advantage of public involvement or scrutiny. 3M plans for this project must stand the test of time, and be inclusive. If BLM does not require local representation from Counties and other affected parties in the 3M agreements for the EIS process and the Record of Decision, BLM is complicit in imposing a paternalistic and feudalistic structure where decisions that affect local communities are made at a distance by parties not affected by the outcome, to the detriment of local interests. BLM must reopen the 3M process to include public involvement and the involvement of the Nevada State Engineer in drafting of the documents and participation in 3M. This is one of the many areas where a new DEIS or a Supplemental EIS with full public involvement will be necessary.	See Standard Resource Response MM-1.
34984-19	Cooperating agencies are explained, but not listed here, although they are listed in the very beginning of the entire document. A list of "involved agencies, entities or individuals" is shown at 5.5, but not all of these were Cooperating Agencies. Please list them here again for clarity or refer the reader to Chapter 6.	Based on your comment, text has been added.
34984-20	Southern Nevada Water Authority is not listed as an involved agency. Why? They certainly seem to be involved. Wasn't much of the information and material obtained from them?	SNWA is discussed throughout the EIS as the applicant. This list of involved agencies in section 5.5 only include those who have been actively involved in the development of this EIS by providing information and expertise.
34984-21	We note that SNWA is listed as receiving a copy of the EIS under "Companies and Businesses" rather than under "Local Government and Agencies." Why?	Based on your comment, text has been changed.
34984-22	For Media, only one newspaper in Utah was provided a copy. At a minimum, the newspaper of record for each County affected by the project should have been provided a copy of the document as well as the newspaper for Nevada's capital, the Nevada Appeal in Carson City. Why only one newspaper for Salt Lake City?	The mailing list is developed from inquiries and requests for additional information. No newspapers beyond the Salt Lake Tribune had asked to be placed on the mailing list. The news releases on the project were distributed to all newspapers and radio/TV stations in Western Utah and Eastern Nevada.
34984-23	Chapter 6 lists the Cooperating Agencies. Please reference this in Chapter 5.3.1 to provide clarity for the reader.	Based on your comment, text has been added.
34984-24	Page F3.18-22: EskDale is in Millard County, not Juab County.	Comment Noted.
34984-25	Page F3. 18-42 Paragraph 2 combines worship and community events and lacks key information about both in Snake Valley. The researcher has failed to recognize the School of the Natural Order, an intentional community located for over 50 years in Baker at Home Farm off the highway leading to GBNP. BLM, please note that Home Farm depends on the health of springs as a source of water in order to survive.	Thank you for your comment. The oversight was unintentional. Appendix F3-18 has not been updated for the FEIS. However, the text in Section 3.18.1.7 has been revised to acknowledge the School of the Natural Order.
34984-26	When the appendix is updated, it will be important add that the newest building in Baker is a church. In August, 2011, the first non denominational church building in Baker was dedicated, and is now used for weekly services. Paragraph 2 also omits recognition of the annual summer Snake Valley Festival which raises funds to support community preservation in the Snake Valley.	Thank you for your comment. The description of communities and events was not intended to be comprehensive, but rather to convey the sense of place and community that exists in Snake Valley. The completion and utilization of a non denominational place of worship, subsequent to the release of the DEIS, and the annual Snake Valley Festival provide further evidence of that sense of community, and the availability of this updated information does not alter the results of the analysis. Text has been added to Section 3.18.1.7 to provide more description of the social and community organization characteristics of the Snake Valley.

Comments and Responses - Individuals

ID	Comment	Response
34984-27	Appendix G lists the meetings that BLM representatives attended regarding the development of this document. As a matter of clarification, many of the meetings where representatives of the Great Basin Water Network were present were initiated by GBWN. The list gives the impression that BLM arranged outreach in all cases. Many times, BLM staffers were available to meet but representatives of Great Basin Water Network initiated the contact. This is likely to be true for others on the list as well.	Your comments on the Draft EIS have been considered.
34984-28	In light of its many deficiencies and information gaps, BLM should withdraw the DEIS. If necessary, BLM could revise and resubmit the DEIS to the public for a full review if BLM wants the EIS to serve the required institutional role and be legal.	The BLM believes that the NEPA process has been fully satisfied and has moved forward with this FEIS. Thank you for your comment.
34984-29	I request a series of public meetings in the project area to explain to the public how the document has changed as a result of comments received.	Changes between the DEIS and FEIS will be described in the executive summary for the FEIS.
Jones, Terry		
34148-1	If the aquifers are drained in the rural areas, which surely will happen, how will they be refilled since no large reservoirs are available to do so and Mother Nature can't do it?	Potential effects to groundwater resources is provided in Section 3.3.
34148-2	Why are areas like Las Vegas, allowed to continue to build when the supply of water is such a problem? A example of this is the new proposed building in Red Rock Area of residential houses. Common sense would tell you that you wouldn't even think of expanding, especially with the economy the way it is and a shortage of water is present.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34148-3	I know that the pipe line will not only drain our aquifers, but will indirectly effect the residents of all areas by increasing fees, taxes, and contribute to debts that are accumulated through the large expense involved that allows the large entities to put a financial burden, by a few, to benefit those at the expense of others.	Please review section 3.18 for an analysis of your concern.
Juhl, Gregory		
33980-1	failure to disclose the economic cost of the project,	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33980-2	lack of specificity of well locations to gauge the environmental impacts	See Standard Comment Response WR-1.
33980-3	substantiate the Southern Nevada Water Authority's need for the project by dismissing out-of-hand the other viable options for the Authority to meet its water supply needs such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
Kahl, Elise		
33972-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
33972-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33972-3	lack of specificity of well locations to gauge the environmental impacts.	See Standard Comment Response WR-1.
Kirkegaard, Matthew		
34930-1	I am concerned about the proposed project's effects on Fish Springs National Wildlife Refuge as well as on Deer Creek Valley; I feel the DEIS provides insufficient information on the effects to these areas.	Thank you for your comment. See Standard Resource Response WR-5 for a discussion of effects at Fish Springs.
34930-2	Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEPA and FLPMA.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Klawitter, Alan		
34121-1	USGS Professional Paper #1628, " Regional Ground-Water Evapotranspiration and Ground-Water Budgets, Great Basin, Nevada" clearly show that the water budget of the valleys of eastern Nevada are presently in equilibrium e.g., there is no excess water (see Tables C11 and C15).	Comment noted.
Koot, John H		
33957-1	Please extend the public comment period for the dEIS to 180 days to allow sufficient time for a public review of this huge document.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.

Comments and Responses - Individuals

ID	Comment	Response
<u>Law, Candace</u>		
34155-1	Please request a 90 day extension on the DEIS comment period. They had 6 years to prepare! Please delay decisions; there are so many unknowns about this project!	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
<u>Lehtinen, Martin A</u>		
34049-1	The expansion is not for the improvement of Southern Nevada but to increase the wealth of already wealthy businessmen and politicians.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34049-2	I do not believe Ms. Mulroy's assurances that the LVVWD would not take water if there was a detrimental impact to eastern Nevada. She cannot speak for future politicians or whomever assumes her job when she retires. Once the pipeline is built, our "Leaders" will suck eastern Nevada dry in order to enrich themselves at the cost to the citizens of Nevada.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
<u>Linder, Gene</u>		
33827-1	I would like to state my total opposition to any pipeline to send more water to Las Vegas. It makes no sense to me to pipe water from remote locations to an unsustainable city growing like a cancer in the middle of a significant desert. When does the growth of Las Vegas cease? Do you eventually pipe in water from north of the Arctic Circle? Would it not be reasonable to limit water importation to a 40 - 50 mile radius of the city? I think so. I would hope the BLM recognizes the limitations of clean water in the western states of the U.S. The coming conflicts over water use may well result in problems far beyond just lawyers arguing in court. Please do not aggravate an increasingly serious issue by giving Las Vegas even more water. I urge you to create responsible, sustainable limits.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
<u>Lish, Christopher</u>		
34436-1	Several species of desert fish and springsnails would likely be driven to extinction, while others, such as the greater sage grouse, Bonneville cutthroat trout, Columbia spotted frog and others, would face immense threats and risk to their survival and viability.	Impacts to aquatic and terrestrial species are disclosed in Sections 3.7 and 3.6, respectively. The impact analysis identifies situations where populations could be at risk due to limited distribution such as springsnail species.
34436-2	But the document is deeply flawed because it fails to examine viable alternatives to the project, such as enhanced conservation in the Las Vegas Valley, as well as ocean water desalinization, which the SNWA admits will be part of Las Vegas' water supply in the future.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
34436-3	A recent Pacific Institute study concluded that greater water-use efficiencies and improved conservation measures would meet Las Vegas' needs for the foreseeable future, making the pipeline unnecessary.	Thank you for your comment. This information will be provided to SNWA for their use in future water resource planning.
<u>Loffler, Susan L</u>		
34362-1	It is not at all scientifically known nor can it be even accurately estimated what the far reaching negative effects of this proposal will have on the depletion of groundwater in the areas affected, nor can such pumping be adequately controlled to prevent excessive water withdrawals with undetermined negative consequences as yet understood for generations to come.	Please review section 3.3 (water resources) for an analysis of the potential water impacts and the uncertainty of the analysis. The science used in this FEIS is the best science available to determine potential impacts of this project. During subsequent NEPA, these impacts will be better defined based on new data and an analysis of specific basin information that will be provided in the future. Please also refer to section 1.3.6 and Standard Resource Responses Gen-1 and Gen-2.
<u>Lynn, Susan</u>		
35739-1	I request the "NO ACTION" alternative because you do not have an actual pinned-down project; only a speculative conceptual project with too many changing evolving parts and too much missing information.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
35739-2	The tiered process is flawed from the beginning. NEPA requires full disclosure. This DEIS does not do that. And tiering does not do that	Please refer to standard resource responses Gen-1 and Gen-2 for information on this topic.
35739-3	The Purpose of the project cannot be for the BLM to provide legal access across public lands and the Need should not be for the BLM to comply with Congressional action: LCCRDA.	Based on your comment and others, the purpose and need statement has been revised
35739-4	This DEIS is premature. The project is not firm, nor have the water rights been approved. The construction timeframe is projected, but it does not appear to be imminent.	Please refer to standard resource responses Gen-1 and Gen-2 for information on this topic.
35739-5	The Project Costs for construction, bonding and financing, repayment methods, operations and maintenance, and management, monitoring, and mitigation are absent and need to be outlined as well as the timeline for initiating each. Seriously absent is a plan for how SNWA will pay for this project.	Please see standard resource responses SocEcon-1 and Gen-8.

Comments and Responses - Individuals

ID	Comment	Response
35739-6	The Hobbs and Bonow Report (attached) also fails to cover management, monitoring and mitigation costs.	This information will be provided to SNWA for their use in future water resource planning. Refer also to Standard Resource Response SocEcon-1.
35739-7	The cumulative impacts of this project and other regional water projects have not been studied except piecemeal.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
35739-8	The Stipulated Agreement lacks true public participation. A number of groups have been specifically excluded. At the very least, the basins of origin must have representation from the counties and from the specific Tribes.	Thank you for your comment. BLM has assembled all comments on the stipulated agreements and have provided them to the Executive Committee which oversees the implementation of the agreements. Please refer to standard resource response MM-1, MM-2 and MM-3.
35739-9	This DEIs gave lip service to socio-economic impacts at each end of the pipeline. There are positive and negative impacts in rural areas that were not addressed: amount of grazing AUM's, acreages and number of allotments, impacts on small rural communities when ranches disappear, impacts on tourism (see attachment by Dr. Maureen Kilkenny), hunting and fishing, camping and sightseeing to suggest a few.	Potential effects of pumping on rangelands and grazing are addressed in Section 3.12 and the effects on recreation in 3.9. An indication of the timing and magnitude of drawdown effects can be gain from the water resources section (3.3) including Figures 3.3.2-7 and 3.3.2-8. These effects, along with the associated timing and uncertainties are considered in the socioeconomic assessment in Section 3.18. Text has been added in Table 3.18-38 further describe the potential linkages between drawdown and socioeconomic effects, and the uncertainties involved.
35739-10	In urban areas: air quality and increased health care costs, crowded transportation corridors and infrastructure costs, and the costs of growth. Consistent population figures should accompany this. Pick one or the other, but use the figures consistently.. SNWA's figures are different from the State Demographers. Use or revise population statistics that seems more reasonable considering the current economic slowdown.	The subsection entitled "Relationship of the GWD Project to Potential Growth Inducing Effects" in Section 3.18.2.9 addresses the role of water in enabling but not causing economic development. Standard Resource Responses Gen-3 and SocEcon-2 each address aspects of this comment. As noted in Sections 1.1 and 1.6, SNWA is acting within its statutory obligations in the development of its water plan, recognizing the long lead-times and uncertainties associated with securing additional water resources and major capital facility development. Consequently, the specifics of SNWA's projected water demand and alternative sources of water are outside the scope of this EIS.
35739-11	While I know you've met with tribes, BIA in its effort to sign and substantiate the Stipulated Agreement, has failed to adequately listen to and consider local tribal considerations.	Thank you for your comment. BLM has assembled all comments on the stipulated agreements and have provided them to the Executive Committee which oversees the implementation of the agreements. Please refer to standard resource responses MM-1, MM-2 and MM-3.

Lytle, Farrel

35338-1	the DEIS is premature. The plan, the actors, the possible results change almost every week. Whatever the original scope of the EIS effort, it no longer exists.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
35338-2	The biggest change is the Las Vegas economy. The LV game has changed, moved away to the east coast, to Indian reservations and most significantly, to Asia. The LV game may never return. Has anyone, can anyone given the present world economy and isn't trying to sell something, hazard a guess for the future of LV? That uncertainty must be accounted for in an EIS.	Thank you for your comment. The subject of this comment is beyond the Draft EIS scope and does not require further agency response. However, your comment topic will be considered by the BLM during preparation of the Final EIS and Record of Decision.
35338-3	Water rights have not been granted. At the present time hearings before the state engineer are in progress. The EIS can't be completed until the water rights are granted or denied. Whatever action the SE takes will change the game. No matter what the SE does there will be litigation that may take years to settle.	Comment noted. Water rights for four of the five basins were adjudicated the Nevada State Engineer in March 2012.
35338-4	The rights of the Indian tribes have been neglected. Their claims and considerations must be included in the EIS.	Text has been added to Chapter 3.17 and Chapter 1 to address this comment.

MacEachem, Sandy

33986-1	If the Las Vegas Valley is running out of water, the most important step Clark County could take is to declare a moratorium on all new development. Rather than looking north for a solution to the heretofore unrestrained growth and consequent depletion of this critical and least abundant natural resource of any desert community (water), the Valley should take more stringent measures to live within its means: for example, besides controlling growth, rules regarding wasteful water use should be strictly enforced; limits could be placed on water consumption regardless of the deep pockets of the richest residents with their lavish landscaping, pools and ten-bathroom mansions; and more public education, including in the schools, should emphasize the need for water conservation.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
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Mack, Corbin

35310-1	The Socio-Economic portion of the Draft Environmental Impact Statement includes an in-depth analysis of the potential impacts the SNW A Groundwater Development Project may have on Lincoln and White Pine counties. The DEIS does not include, however, a detailed evaluation of the potential impacts to Clark County should the project not be constructed. As the economic engine of this state, Southern Nevada's economy must recover in order for the state's economy to begin thriving once again. This is not possible without sufficient water resources to manage drought conditions and future development.	Thank you for your comment regarding the potential implications for Clark County should the GWDP not proceed. The concern is identified in Section 3.18. See also Standard Comment Response SocEcon-4 which notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized. Furthermore, SNWA could pursue other sources of additional water should the project not proceed.
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Comments and Responses - Individuals

ID	Comment	Response
<u>Malon, Patrick</u>		
33861-1	let me just say that any sane person should know that this pipe line is a very bad idea, aside from the impact on wild life & land, every drop of water will be pumped out. There will be no stoppage for any reason.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review sections 3.3 (water resources) and 3.6 (wildlife) for an updated analysis of your issues.
33861-2	One plan would be a declination system built on the California coast to be used in place of water from the Colorado river.	Thank you for your comment. Information on desalination has been added to Appendix A.
<u>Mardula, Sharon</u>		
34031-1	Tapping into reservoirs deep underground has a high potential of effecting groundwater and wells throughout the Bonneville Basin. This will cause undue hardship on cities, farms and ranches. They historically deal with this in one of two ways. First choice is to drill deeper wells at great expense. However, given the far reaching grasp of the SNWA project, even deep wells may not restore water sources and they will be forced to go to the second choice of creating a "Special Service District" and then watch their water rates creep ever higher year after year.	Please see section 3.3 (water resources) and 3.18 (SocioEconomics and Environmental Justice) for an updated discussion of your issues.
34031-2	Las Vegas should cut back on it's use of water by reducing grasscaping and getting rid of fountains, ponds and lakes, reducing the inventory of golf courses and enacting a moratorium on building until the inventory of existing properties is depleted.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
<u>Marshall, Sam</u>		
34050-1	Please don't bring this shame upon the Bureau and this damage upon us, which includes financial ruin upon the ranchers and others in those valleys.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
<u>Martin, Marianne</u>		
34027-1	The cost to Clark County citizens-now and in the future. I think it is too expensive of a project and will promote growth we do not need.	Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS.
34027-2	Effects in White Pine County on the active caves that need groundwater. Also, the detrimental consequences to lower water tables in NV and UT on ranches and the cost from future wildfires in the forests that will result.	The potential effects to water resources in caves within the GBNP are discussed in Section 3.3.2.8 in the DEIS (and FEIS); potential impacts to caves within the study area are provided in Section 3.2.2 in the DEIS (and FEIS). See section 3.18 for the potential effects to socioeconomic resources.
34027-3	The exact, true cost is only an estimate. Huge projects like this often run into huge cost overruns that will hurt our future.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
<u>McKenzie, Roderick G</u>		
37968-1	Because of the great amount of controversy over this water export plan (Water Grab), such a dedicated power utility could be continually tarketted with vandalism. The counties could be greatly burdened with security and court costs.	Thank you for your comment. The underlying concern of this comment is with specific operational issues related to the proposed project that are outside the scope of this EIS. SNWA addresses general security in its Conceptual Plan of Development (Appendix E).
<u>McTigue, Lawrence J</u>		
33953-1	failure to disclose the economic cost of the project	Thank you for your comment. Please see Standard Resource Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS. Please also see section 3.18 (Socioeconomics and Environmental Justice).
33953-2	lack of specificity of well locations to gauge the environmental impacts	Your comments on the Draft EIS have been considered. See Standard Comment Response WR-1.
33953-3	substantiate the Southern Nevada Water Authority's need for the project by dismissing out-of-hand the other viable options for the Authority to meet its water supply needs such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
<u>Merino, Carl</u>		
33840-1	I am requesting the hearing period for this project be extended and urge you to do everything in your power to expose this project for the fallacy it is.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
<u>Merriman, Rob</u>		
33991-1	Moving forward, the focus should be on developing a sustainable community through policies that reward more dense urban development, eliminates profligate water consumption, and accounts for the real value of water through a tired rate structure.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.

Comments and Responses - Individuals

ID	Comment	Response
Meyer, Cheryl		
37978-1	The DEIS contains important weaknesses. For instance, the impact of water removal of the magnitude proposed in each of Alternatives A thru E has not been adequately addressed in the DEIS.	Potential impacts associated with groundwater pumping for all alternatives was provided in Section 3.0 of the DEIS.
37978-2	I don't see a thorough disclosure of the project's full cost, including mitigation tactics and future monitoring.	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application. Additionally, please see Standard Resource Response MM-1.
37978-3	Most importantly, the DEIS suffers from tunnel vision: it only considers depleting another area's life-giving water supply and not actual alternatives to solve southern Nevada's water deficit. What about conservation or desalination?	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
37978-4	Where in the DEIS are existing surface and groundwater rights addressed in depth?	Potential impacts to surface and groundwater rights are summarized in Section 3.3.2.8 (Groundwater Development and Pumping); additional information showing the locations of water rights by manner of use and number of water rights by basin located within the projected drawdown areas was provided in Appendices F3.3.12 to F3.3.15 of the DEIS.
37978-5	I would like to see a Supplemental EIS, for instance, that speaks in depth to such concerns as impacts from the proposed well locations, the predicted massive land subsidence, and depopulation of rural areas.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. Please see section 1.3.6.
Miller, Mark		
34094-1	If the springs dry up from a water level drop after the SNWA pipeline overdrafts the aquifer's water coming to the surface, the spring snails have no more habitats and disappear, eventually being forced into extinction. This is not natural selection of evolutionary based extinction, simply wrongful and thoughtless actions against viable watersheds by human powered bureaucracies like SNWA and their supposed needs to appease developers.	Please see updated sections 3.3 (water resources) and 3.7 (aquatic biological resources) for information concerning your issue.
34094-2	The SNWA seems to feel that gambling can be used to determine the outcomes of this proposal, as evidenced by their lack of willingness to run computer models more reliable than gambling. SNWA director Pat Mulroy claims that gambling and guesswork is the only way to go, "Until there are test wells drilled and the system is stressed, there's no way to know for sure what the impact will be." However, this statement was put to an actual computer model test by Dr. Paula Cutillo, a hydrologist at the National Park Service whose results show that pumping would draw down groundwater levels by approximately 200 feet over a 75 year period. U.S. Fish and Wildlife hydrologist Roger Congdon found the same results when he ran the computer tests. (Sabel, Next American City)	Comments noted. The EIS used the CCRP model developed specifically for the analysis as described in Section 3.3.2.8 of the EIS. The BLM's technical review team determined that the CCRP model was the best available tool for evaluating potential drawdown related effects associated with the project.
34094-3	However, the needs for the pipeline may be exaggerated and mostly serves developers like Harvey Whitemore whose latest planned community of "Coyote Springs" is conveniently located directly on the SNWA pipeline route on the intersection of the U.S. Highway 93 and State Road 168 to Moapa.	Based on your comment, additional information has been included in Chapter 1.
34094-4	On an average rate of 200 feet over 75 years, it follows that within only two decades the drop in water levels will be significant enough to dry up the majority of the springs permanently, resulting in mass extinctions as the spring food pyramid collapses, from snails to Bonneville trout and everyone in between. The net export of water away from the valleys will result in a net decline year after year, as the infiltration rate into the aquifer cannot match the export rate out of the valleys into Las Vegas and eventually the Lower Colorado River system.	See section 3.3 (water resources) for a discussion of the risk and potential loss of water from springs in the project area. Each alternative identifies how many springs could be impacted and the risk of this occurring based on an analysis of geologic structures. In sections 3.6 (wildlife resources) and 3.7 (aquatic biological resources), the potential impacts to springs are analyzed based on wildlife present and disclosed in the environmental consequences discussion.
34094-5	As the net water export rate continues to overmatch the recharge infiltration rate, the aquifer caverns themselves will become emptied and filled with air instead of water. The results of this process can be witnessed firsthand at Great Basin National Park's Lehman Caves in the Talus Room, where prehistoric water levels lowered as a result of climate change and emptied the limestone carbonate aquifer of its water. With the water removed from the chamber, there was nothing remaining to support the limestone roof under the overburden of materials above, and the roof collapsed into the cavern. Though the limestone is slightly metamorphosed into marble, the tremendous overburden of sediment fill above the aquifer caverns will overwhelm the caverns once the water is removed, and the result will be subsurface collapse and subsidence of the overburden. The long term result of aquifer cavern collapse and overburden subsidence is inability of the aquifer to store as large an amount of water as prior to the collapse.	See section 3.2 (geology) and 3.3 (water resources) for potential effects to the resources you have identified.
34094-6	Some alternative methods to reliable water savings includes rainwater catchment barrels and converting non-native water dependent landscaping like lawns into drought tolerant ground covers and landscaping with native plants.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
34136-1	1) The water in the Snake and Spring Valley aquifer system is residual groundwater from an earlier climate before the Ice Age when there was significantly more rainfall than there is now. At the rate of extraction proposed by the SNWA, the groundwater will lower below the current level as the rate of recharge in our modern climate is not anywhere near the original recharge rate during the time when the aquifer was filled. 2) Based upon the premise of #1, the lowering groundwater level (rate of discharge > rate of recharge), would result in several springs and seeps no longer being low enough for the groundwater to emerge at these sites. Since the springs and seeps are now above the groundwater level, they will soon dry out.	The potential effects to flow in springs is evaluated in Section 3.3 of the EIS.

Comments and Responses - Individuals

ID	Comment	Response
34136-2	3) Based upon the premise of #2, the now dry springs and seeps will no longer be able to support the endemic species such as spring snails and others who previously adapted to the unique conditions of their home spring or seep. Endemic species such as spring snails are found no place else on Earth and their species depends upon certain conditions of their habitat to remain intact or they face extinction. In the case of Snake and Spring Valley, there are spring snails there that adapted over many generations to the specific chemistry and temperatures of these particular springs. Many are descended from ancient snails who once inhabited glacial Lake Lahontan, and after it dried out from a changing climate, only the oasis of these springs have given the snails enough water needed to survive the harsh desert conditions. In the case of the SNWA water extraction, several endemic species of spring snails would most likely become extinct as the springs and seeps they need for survival are now just bowls of dust.	Impacts to springsnails and their habitats are disclosed in the EIS. Additionally, please see Standard Resource Response MM-1.
34136-3	In addition to drying out springs and seeps, lowering the groundwater can have other geological consequences such as aquifer cavern collapse, subsidence and loss of aquifer capacity. The metamorphosed limestone caverns of the Snake and Spring Valley is underneath a large overburden of unconsolidated sedimentary basin fill debris. The tremendous weight of the sediments rests on top of the limestone caverns, and the upwards pressure of the aquifer water supports the aquifer cavern ceiling as an arch supports the roof of a cathedral. Remove the upwards support pressure of the aquifer water by significantly lowering the water table from overdrafting as the SNWA plans, then the consequence will be loss of upwards pressure and eventual collapse of the aquifer cavern roof from the tremendous weight of the overburden. This same geological event can be witnessed in Lehman Cave's Talus Room, where ancient climate change lowered the water table, later causing the collapse of the ceiling.	See updated sections 3.2 (geology) and 3.3 (water resources) for an analysis of your issues concerning caves.
34162-1	At the rate of extraction proposed by the SNWA, the groundwater will lower below the current level as the rate of recharge in our modern climate is not anywhere near the original recharge rate during the time when the aquifer was filled.2) Based upon the premise of #1, the lowering groundwater level (rate of discharge > rate of recharge), would result in several springs and seeps no longer being low enough for the groundwater to emerge at these sites. Since the springs and seeps are now above the groundwater level, they will soon dry out.	The groundwater model used for the water resources derived recharge utilized the average precipitation rates for the region as discussed in Section 3.3.2.8 of the DEIS (and FEIS) under the heading "Model Development". The EIS acknowledges (within this same section) that there is uncertainty regarding the future recharge rate and discusses model limitation with respect to using the results for future predictions.
34162-2	Based upon the premise of #2, the now dry springs and seeps will no longer be able to support the endemic species such as spring snails and others who previously adapted to the unique conditions of their home spring or seep. Endemic species such as spring snails are found no place else on Earth and their species depends upon certain conditions of their habitat to remain intact or they face extinction. In the case of Snake and Spring Valley, there are spring snails there that adapted over many generations to the specific chemistry and temperatures of these particular springs. Many are descended from ancient snails who once inhabited glacial Lake Lahontan, and after it dried out from a changing climate, only the oasis of these springs have given the snails enough water needed to survive the harsh desert conditions. In the case of the SNWA water extraction, several endemic species of spring snails would most likely become extinct as the springs and seeps they need for survival are now just bowls of dust.	Potential impacts to springs and endemic species in Spring and Snake valleys are disclosed in the EIS.
34162-3	In addition to drying out springs and seeps, lowering the groundwater can have other geological consequences such as aquifer cavern collapse, subsidence and loss of aquifer capacity. The metamorphosed limestone caverns of the Snake and Spring Valley is underneath a large overburden of unconsolidated sedimentary basin fill debris. The tremendous weight of the sediments rests on top of the limestone caverns, and the upwards pressure of the aquifer water supports the aquifer cavern ceiling as an arch supports the roof of a cathedral. Remove the upwards support pressure of the aquifer water by significantly lowering the water table from overdrafting as the SNWA plans, then the consequence will be loss of upwards pressure and eventual collapse of the aquifer cavern roof from the tremendous weight of the overburden. This same geological event can be witnessed in Lehman Cave's Talus Room, where ancient climate change lowered the water table, later causing the collapse of the ceiling.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34189-1	The report "Rainwater Harvesting Solutions for Las Vegas Flooding and Drought Problems" describes the risks of Snake and Spring Valley aquifer depletion and then provides the solution to getting more water access by harnessing rainwater.	Thank you for your comment. The literature you cited has been carefully reviewed by the BLM but has not resulted in changes to the analysis in this Final EIS.
Mitchell, John		
34157-1	Poisoning of air, ground and water exposed to some kinds of radiation exposure, especially that of the "bomb" variety, has a half life of thousands of years.	Please see sections 3.2 (geology) and 3.4 (soils) for a discussion of radionuclide and erionite potential effects from the project.
34157-2	I think it would be wise for the BLM to contact the NRC or any other (private or government sector) entity that knows how to test for radiation levels in the areas of Nevada and Utah from which you intend to obtain water for densely populated Clark County lest resident and tourist populations on receiving end of such water allocation end up glowing-in-the-dark.	Please see sections 3.2 (geology) and 3.4 (soils) for a discussion of radionuclide and erionite potential effects from the project.
Mora, Graciela		
35897-1	In addition to addressing environmental concerns, the project will provide a much-needed boost the region's economic prospects by preserving jobs and vital tax revenues generated in Southern Nevada.	Please see updated section 3.18 (socioeconomics and environmental justice) for a discussion of these issues. See also SocEcon-4.

Comments and Responses - Individuals

ID	Comment	Response
<u>Morlan, Thomas M</u>		
34073-1	In a time when there are more empty homes and condo's in the Las Vegas Valley than in any time in history one has to wonder why the LVWD wants to proceed forward with such a project. While economic growth is a mantra in the United States, based on the rate of growth projected for this valley in the next ten years one has to ask the question, isn't this project premature?	Please review section 1.6 and Appendix A for information on SNWA's planning for this project.
34073-2	In conclusion based on the current economic circumstance in Southern Nevada when weighed against the adverse environmental impacts to the plant life ,birds animals and rural way of life in the valleys here the spring water will be draw down this project should be abandoned until the state and LVWD is able to demonstrate the need for additional water in the Las Vegas Valley to sustain its 2 million residents.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
<u>Moss, Robert</u>		
33893-1	We can't keep drawing water out of aquifers which will not renew as quickly as water is withdrawn from them.	Please review updated section 3.3 (water resources) for a discussion of these issues.
33893-2	The only solutions are conservation of water and long-term limitations on population.	This information will be provided to SNWA for their use in future water resource planning.
<u>Mulle, Robert</u>		
33976-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
33976-2	failure to disclose the economic cost of the project, and the lack of specificity of well locations to gauge the environmental impacts	Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
33976-3	lack of specificity of well locations to gauge the environmental impacts.	Your comments on the Draft EIS have been considered. See Standard Comment Response WR-1.
<u>Mulvihill, Tim</u>		
34052-1	failure to disclose the economic cost of the project	Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS. There is a lack of BLM authority or need for the BLM to independently analyze project costs, or the potential long-term implications on ratepayers, in conjunction with the ROW application.
34052-2	lack of specificity of well locations to gauge the environmental impacts.	See response MM-1 regarding monitoring; and Section 3.20 regarding BLM's proposed monitoring, management and mitigation plan for the GWD project.
<u>Murray, Jane</u>		
34122-1	request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34122-2	Demand a Supplemental EIS that addresses impacts from specific well locations	Future facilities will be addressed under subsequent NEPA actions, section 1.3.6.
34122-3	DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. Please see SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34122-4	DEIS fails to analyze potential environmental effects due to climate change	Your comments on the Draft EIS have been considered. Please see Standard Resource Response Air-15.
34122-5	Approval of any alternative other than the "No Action" alternative would conflict with the BLM's duties under NEP A and FLPMA.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34122-6	DEIS does not consider a sufficient range of alternatives.	Your comments on the Draft EIS have been considered. Please review Standard Resource Response Gen-5 for information relevant to this comment. Chapter 2 contains a thorough discussion of the alternatives considered when developing this EIS.
34122-7	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.18 of the FEIS which has been updated concerning these issues. Please also review standard resource response SocEcon-5 for further information.
34122-8	DEIS has inadequate, ineffective or missing mitigation measures.	Please review Standard Resource Response MM-1 and MM-2, as well as the revised section 3.20 for a discussion of the mitigation process to be used during implementation of this project.

Comments and Responses - Individuals

ID	Comment	Response
34122-9	DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.	Please review the updated sections 3.16 (cultural resources) and 3.17 (Native American concerns) for additional information on potential impacts regarding these issues.
34122-10	DEIS fails to take a hard look at indirect & cumulative impacts, including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
<u>Nappe, Tina</u>		
34923-1	There is no assurance that Las Vegas 1) will recover economically, or 2) expand beyond its current water use.	Please review section 1.6 and Appendix A for information on SNWA's planning for this project. Also see Standard Resource Response SocEcon-2 and the updated section 3.18 and in the FEIS.
34923-2	The cost of the project will be burden on Clark County tax payers, and maybe the rest of us, whether Clark County recovers or expands.	Please see Standard Resource Response SocEcon-1 regarding the inclusion of project cost information in the FEIS. Please also review the updated section 3.18 (Socioeconomics and Environmental Justice).
<u>Neace, M B</u>		
33975-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses, out-of-hand, other viable options the Authority can use to meet its water supply needs: such as increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
33975-2	failure to disclose the economic costs of the project	Thank you for your comment. Please see Standard Resource Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS. Please review section 3.18 (Socioeconomics and Environmental Justice).
33975-3	lack of specificity of well locations to gauge environmental impacts.	See Standard Comment Response WR-1.
<u>Nickerson, Joyce Brown</u>		
34085-1	As a concerned property owner and future businessperson in Baker, Nevada, I am requesting that the Bureau of Land Management give a 90-day extension on the comment period regarding the Environmental Impact Statement on SNWA's \$3.5 Billion pipeline project.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34085-2	Southern Nevada must address the issue of water efficiency before depleting the arid North of its limited supply of ground water. SWNA needs to consider new water storage prospects, conservation efforts, desalination, and the most promising solution maybe found in wastewater recycling projects.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
<u>Nickerson, Robert</u>		
34178-1	As a commercial property owner in Baker, Nevada since 2002, I would choose to deny Southern Nevada Water Authority access to any groundwater in the Snake Valley and adjacent valleys to the Great Basin National Park (including Utah). The degradation this would cause my economic interests in operating a business would be devastating if future water needs for conducting my planned interest was caused by lack of local available water.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34178-2	Please extend the DEIS comment period for another 90 days and please support the No Action alternative.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
<u>Nidess, Rael</u>		
34941-1	Production of dust will be heavy metals like mercury, radioactive isotopes (like uranium), cobalt, americurium, and ironite, an asbestos like material that causes the same type of lung scarring and cancers when inhaled.	At the end of Section 3.4.1.2, two references are described and cited (Converse Consultants 2007 and Sweetkind 2009) that discount the dangers of erionite and radionuclides in the soil in the study area. ACMs and mitigation measures to be implemented would minimize blowing dust during and after surface disturbance from construction.
34941-2	The projected costs are astronomical –ranging from 4 billion to 10 billion or more. Probably no one really knows!	See also SocEcon-1 regarding the inclusion of project cost information in the FEIS; see also updated section 3.18 (Socioeconomics and Environmental Justice).
<u>Nielson, Grant</u>		
33855-1	I think I know what will happen if the groundwater is taken and the water table drops. The natural vegetation dies out and the surface it turns into a dust bowl and the food supply for game, birds, and fish disappears and so will the above mentioned natural life.	See section 3.5 (Vegetation) for potential effects of this project based on groundwater withdrawals.

Nitschke, James

Comments and Responses - Individuals

ID	Comment	Response
34243-1	Several species of desert fish and springsnails would likely be driven to extinction, while others, such as the greater sage grouse, Bonneville cutthroat trout, Columbia spotted frog and others, would face immense threats and risk to their survival and viability.	See section 3.3 (water resources) for a discussion of the risk and potential loss of water from springs in the project area. Each alternative identifies how many springs could be impacted and the risk of this occurring based on an analysis of geologic structures. In sections 3.6 (wildlife resources) and 3.7 (aquatic biological resources), the potential impacts to springs are analyzed based on wildlife present and disclosed in the environmental consequences discussion.
34243-2	Several species of desert fish and springsnails would likely be driven to extinction, while others, such as the greater sage grouse, Bonneville cutthroat trout, Columbia spotted frog and others, would face immense threats and risk to their survival and viability.	Thank you for expressing your concerns regarding effects on special status species. Potential effects on these species are disclosed in Section 3.7. Applicant-committed measures and additional monitoring and mitigation are recommended for environmental resources including aquatic species to avoid the loss of species.
34243-3	A recent Pacific Institute study concluded that greater water-use efficiencies and improved conservation measures would meet Las Vegas' needs for the foreseeable future, making the pipeline unnecessary.	This information will be provided to SNWA for their use in future water resource planning.
Noyes, Linnea		
35734-1	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
35734-2	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.	Please review the updated section 3.18 (Socioeconomics and Environmental Justice) for a discussion of the potential effects mentioned in your comment.
35734-3	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 S. Nevada, outright purchase of water rights currently used for agriculture in S. Nevada and elsewhere on the Colorado River, and desalination options.	Thank you for your comment. See SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application. With respect to the alternatives water sources listed, see Gen-3. The BLM is processing an application by SNWA for a right-of-way. Processing that application does not provide a reasonable nexus or need for the BLM to examine alternatives to groundwater development.
35734-4	Likewise, the DEIS fails to identify the real purpose and need which is clearly to increase water availability for S. Nevada saying instead that it's the BLM's need to issue a right-of-way.	Based on this comment, text has been added to Chapter 1.
Ordway, John		
33845-1	I really feel that more time and evaluation needs to be given to this project. In the first place the summertime is the busiest time of the year for those it will affect most - the ranchers and farmers. They don't have time right now to be able to prepare lengthy arguments as to how this will adversely affect them. They are too busy in the fields.	The BLM provided an extended review period for the DEIS when it was released to the public for review and then added an additional 30 days to the review period in response to public requests. The timing of the release of the DEIS was coincidental to a busy period of farming.
Pattani, Fern J		
34087-1	I would assume that the prior water users in the affected water basins have water rights way older than Las Vegas. After all, Las Vegas only grew after Boulder Dam was built and after world war two.	Comments noted. The Nevada State Engineer is responsible for the allocation of water rights and protection of senior water rights.
34087-2	What happened to the water rights of ranchers and others that probably precede SNWA by 50 to 75 years?	Potential impacts to water rights are discussed in Section 3.3 of the EIS. GW-WR-6 is provided as a general mitigation measure to address potential impacts to water rights. The protection and mitigation of effects to water rights is the responsibility of the Nevada State Engineer (and UDWRi in Utah). In Nevada, the State Engineer would oversee the groundwater development project and monitor effects to existing surface and groundwater rights and take necessary actions to prevent or mitigate impacts if they occur.
34087-3	Somebody suggested they should ship in ocean water and desalinate it.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Pew, Randy		
33854-1	Additionally the under ground lake they want to tap into would be sucked dry by them in no time and could kill all the towns for a 100 mile around. It could take decades for the underground lake to return to Any where near normal levels after the pumping was stopped.	See section 3.3 (water resources) for the potential effects of this project. The analysis includes potential impacts based on groundwater withdrawals.
Phillips, Scott H		
34344-1	The BLM itself has estimated that the DUST created by sucking out all the underground water and springs would generate untold hundreds of tons more particulate pollution. In that dust will be heavy metals like mercury, radioactive isotopes (like uranium), cobalt, americium, and ironite, an asbestos like material that causes the same type of lung scarring and cancers when inhaled. There would be profound debilitating polluted air impacts on the heavily populated Salt Lake City and Wasatch Front population centers with increased respiratory illness and an upward death rate.	Please see common responses Air-1, Air-2, Air-3, and Air-8.
34344-2	The affected area includes high mountain wilderness, 5 national wildlife refuges, 4 state wildlife refuges, 7 state parks, and Great Basin National Park.	Thank you for your comment.

Comments and Responses - Individuals

ID	Comment	Response
34344-3	Ranchers exercising stewardship for their lands for decades in northern rural Nevada would be ruined.	The potential adverse economic effects to the agriculture industry and individual ranchers are addressed in Section 3.18.2.8. The text has been revised to describe additional potential economic effects to agriculture that may arise in conjunction with drawdown.
34344-4	Other viable options as I understand it are desalinization.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Philpott, Steve		
34034-1	The impact on the climate east of the affected valleys in Utah and further.	Please see Standard Resource Responses Air-9 and Air-14.
34034-2	The loss of the evaporation to the environment could affect food production to the east of the project.	Thank you for expressing your concerns related to the Draft EIS. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document.
34034-3	The comparison of the project in the Owens Valley and this project. The Owens Valley was a disaster. How will those results be prevented in this study?	Thank you for your comment. The subject of this comment is beyond the Draft EIS scope and does not require further agency response. However, your comment topic will be considered by the BLM during preparation of the Final EIS and Record of Decision.
Pierson, Alicia		
34873-1	Please consider alternatives that do not involve a groundwater depleting pipeline.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Piper, Holly		
34017-1	The cost for the project, both now and in the future to Clark County citizens.	Your comments on the Draft EIS have been considered. Thank you for your comment. Please see Standard Comment Responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS. Please review the updated section 3.18 (Socioeconomics and Environmental Justice).
34017-2	The effects on the active caves in White Pine County.	Potential impacts related to groundwater pumping have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.
34017-3	How can we know the effects on the active caves/environment if there are still undiscovered caves? This is asking scientists to predict the future. We are not a part of the country that has been explored so much that it is possible to predict future effects.	Potential impacts related to groundwater pumping have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.
Pittman, Carol		
37013-1	What does the transport of that water from the local area to a burgeoning urban area do to those two areas? The water would go to the Las Vegas Valley, where it would promote and facilitate unsustainable urban growth in the driest desert in the country. Obviously it benefits Las Vegas, but for how long? Short-term - and by that I mean a 40-year period - solutions abound, including this one, but what will this solution mean for the long term?	Thank you for your comment. The subject of this comment is beyond the Draft EIS scope and does not require further agency response. However, your comment topic will be considered by the BLM during preparation of the Final EIS and Record of Decision.
37013-2	The really pertinent question then becomes: are there other solutions to the water need? The answer is a resounding YES! And the other solutions should be tried first: 1) Limit unsustainable development; 2) Put conservation measures in place; 3) Price water nearer its true value.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
37013-3	Several species of desert fish and springsnails would likely be driven to extinction, while others, such as the greater sage grouse, Bonneville cutthroat trout, Columbia spotted frog and others, would face immense threats and risk to their survival and viability.	The EIS discloses potential impacts on fish, amphibian, and invertebrate species. Some of the aquatic habitat for aquatic species were predicted to be at high risk from groundwater pumping. The EIS also discloses potential impacts on greater sage grouse. A combination of applicant-committed measures and additional monitoring and mitigation measures are recommended to avoid the total loss of habitat or species. Subsequent NEPA would focus on these areas and develop specific measures to protect their habitat.
37013-4	But the document is deeply flawed because it fails to examine viable alternatives to the project, such as enhanced conservation in the Las Vegas Valley. as well as ocean desalting, which SNWA admits will be part of Las Vegas' water supply in the future.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
37013-5	A recent Pacific Institute study concluded that greater water-use efficiencies and improved conservation measures would meet Las Vegas' needs for the foreseeable future, making the pipeline unnecessary. Please choose the No Action Alternative and deny the permits for this wrong-headed and destructive groundwater mining project. Help Las Vegas find a more sustainable water future.	This information will be provided to SNWA for their use in future water resource planning.
Ports, Mark and Lois		
33958-1	We notice that there has been no mention of terrestrial snails in this draft in spite of the fact that Oreohelix nevadensis is currently included on the Nevada BLM list of sensitive species.	This species is not currently on the Nevada BLM sensitive species list and is not analyzed in the FEIS, however, numerous other species are analyzed and impacts to these species are disclosed in the EIS.

Comments and Responses - Individuals

ID	Comment	Response
33958-2	There are many other species of this genus which need to be further evaluated as to their status. These are endemic species and like the springsnails require water resources which will be impacted by any drawdown of water in these areas.	The FEIS includes both a project-specific analysis for the pipeline and related facility rights-of-way as well as a programmatic analysis to address potential impacts from future groundwater pumping facilities and from groundwater pumping. Subsequent NEPA analysis would be conducted in the future and species whose status has changed in the intervening period would need to be addressed.
Public, Jean		
33867-1	WHY THIS CRUCIAL NEED FOR WATER????	Information regarding this comment is contained within Chapters 1 and Appendix A.
Puca, Robert		
33891-1	This project should not happen. It will harm sacred Indian sites.	Please review the updated sections 3.16 (cultural resources) and 3.17 (Native American concerns) for additional information on potential impacts regarding these issues.
Purdy, Jerry		
33813-1	A comprehensive network of monitoring wells and computerized data collection must be installed well in advance of pumping to accurately determine the existing water table elevation and seasonal variations.	Thank you for your comment. Please see Standard Resource Response MM-1.
33813-2	While the lawyers argue, pumping continues and irreparable environmental damage occurs. Over pumping can drop the water table several feet a year. In a desert environment where rainfall is a few inches per year, it could take a decade or more to restore the water table to its pre existing condition.	Please review Standard Resource Response MM-1 and MM-2, as well as the revised section 3.20 for a discussion of the mitigation process to be used during implementation of this project.
33813-3	In the end when the water table falls around 6 feet all native grasses die. At 40 feet trees, bushes, and all other vegetation die, and you have the beginning of a wasteland like the Owens Valley.	Please note response above to your comment #2. See also the updated section 3.5 (vegetation) for a discussion of potential effects to that resource from groundwater withdrawal.
33813-4	Local communities are entitled to generous payment for every acre foot of water exported from their area, to compensate for the loss of resources and potential for irreparable environmental damage.	Issues related to the trans-basin diversion of water in Nevada, any fees associated therewith, and the uses of such fees fall under the authority of the State of Nevada, and thus, are outside the BLM's authority. The topic of interbasin transfer fees associated with the proposed GWD Project is addressed in Section 3.18.2.8
38039-1	Owens Valley Markleyville Ft of water/yr 6 years to replace what is taken in one yr. Plants dies.	Comment noted. An evaluation of the impacts in Owens Valley is outside the scope of this EIS.
38039-2	Dust storms started.	Please see common response Air-4.
Rapp, Chyler		
37992-1	In addition to addressing environmental concerns, the project will provide a much-needed boost the. region's economic prospects by preserving jobs and vital tax revenues generated in Southern Nevada.	Section 3.18 addresses the role of water in enabling but not causing economic development and Standard Resource Response SocEcon-4 notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized.
Rawlings, Merle		
34432-1	Construct a desalinization treatment plant somewhere on the West Coast of California. Give the desalinized water to California and allow Southern Nevada to have a corresponding credit for California water from the Colorado River. The pipeline would never have to be constructed!	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
34432-2	Should there ever be a necessity to enter discussions regarding mitigation for any reason, there is little hope that people being shortchanged could receive a fair, impartial hearing about their grievances. The SNWA can and would prolong any hearing process to keep the pipeline filled 24X7. The enormous legal fees alone would be an insurmountable obstacle to farmers and ranchers trying to "have their day in court."	Please review Standard Resource Response MM-1 and MM-2, as well as the revised section 3.20 for a discussion of the mitigation process to be used during implementation of this project.
34432-3	In addition, who pays for the financial costs involved when expert testimony is required to establish a cause and effect relationship like excessive drawdown of irrigation wells for example?	Thank you for your comment. The concern identified in your comment was considered in the assessment and underlie proposed mitigation measure SE-6. Text has been added in Section 3.18.2.8, specifically to identify the potential cost implications.
34432-4	How will mitigation prevent a continual drawdown of culinary wells so necessary for citizens in the valleys being pumped by the SNWA?	Please see Section 3.20 and Standard Resource Response MM-1 for a discussion of monitoring, management, and mitigation.
34432-5	Who pays for the ever increasing costs of deepening water wells and modifying pumping systems due to constantly lowering water tables as a result of SNWAs insatiable pumping program?	Please review Standard Resource Response SocEcon-6, WR-6, MM-1 and MM-2 for relevant information to this comment. Administrative procedures of the NSE with respect to existing water rights and possible provisions contained in any bi-state agreement between Nevada and Utah addressing these basins also pertain to this comment. Text changes have been made in Section 3.18.2.9 [and elsewhere] to further address this topic.
Rhea, Mary Susan		

Comments and Responses - Individuals

ID	Comment	Response
33887-1	This is a desert area without much rainfall so the aquifers can only recharge slowly. Those irrigating in Spring and Snake Valley haven't really noticed the need for deeper wells before pumping starts. The Owens Valley in California is a famous example which planners say they will avoid. However this is also repeated in other areas. The Ogallala Aquifer near Garden City Kansas per the Kansas Geological Survey has dropped 5 ft in places in last yr with 0.5 inch recharge. Pumping to irrigate. Per Fed Court data aquifer in Harris Co. Texas dropped 10-50 feet before drought, pumping for city, sink holes have resulted. LSU Ag center study shows 10-50 feet pumping has some town wells dry, not enough rain to recharge.	Please review the updated section 3.3 (water resources) in the FEIS for a discussion of potential effects.
33887-2	Desalinization is the answer.	Thank you for your comment. This information will be given to SNWA for their use in future development of water resource planning. Please review Appendix A which has been updated with additional information on desalination.
Rhodes, Janet		
34152-1	Request a 90 day extension on the DEIS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34152-2	Demand a Supplemental EIS that addresses impacts from specific well locations.	Subsequent NEPA analyses will evaluate specific project component locations including well locations. Please review section 1.3.6.
34152-3	DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. Please see SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34152-4	DEIS fails to adequately assess the purpose and need for project.	Based on your comment, additional text has been included in Chapter 1.
34152-5	DEIS fails to analyze potential environmental effects due to climate change	Your comments on the Draft EIS have been considered. Please see Standard Resource Response Air-15.
34152-6	DEIS does not consider a sufficient range of alternatives.	Please review Standard Resource Response Gen-5 for information relevant to this comment. Chapter 2 contains a thorough discussion of the alternatives considered when developing this EIS.
34152-7	EIS-provides -inadequate analysis-of socioeconomic impacts but still-shows that impacts will put ranchers out of business and depopulate rural areas.	The potential adverse economic effects to the agriculture industry and individual ranchers are addressed in Section 3.18.2.8. The text has been revised to describe additional potential economic effects to agriculture that may arise in conjunction with drawdown.
34152-8	DEIS has inadequate, ineffective or missing mitigation measures.	Please review Standard Resource Response MM-1 and MM-2, as well as the revised section 3.20 for a discussion of the mitigation process to be used during implementation of this project.
34152-9	DEIS inadequately analyzes impacts to sacred sites, cultural resources of American Indian Tribes.	Please review the updated sections 3.16 (cultural resources) and 3.17 (Native American concerns) for additional information on potential impacts regarding these issues.
34152-10	DEIS fails to adequately analyze adverse impacts on and mitigation for ranching, wildlife habitat, local businesses, wild horses	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review sections 3.18 (socioeconomics and environmental justice), 3.6 (wildlife resources) and 3.13 (wild horses) of the FEIS which have been updated concerning these issues.
Robertson, Glenn		
33973-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization	Based on your comments, text has been added to Chapter 1.
33973-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33973-3	lack of specificity of well locations to gauge the environmental impacts.	See Standard Resource Responses WR-1, Gen-1, and Gen-2.
Robison, T J		
34128-1	I believe that desalinated seawater transported in from California would offer the greatest longevity and the most effective, most efficient, and least disruptive solution to Clark County's water needs, rather than robbing rural Nevada of crucial water supplies to slake Clark County's apparently insatiable thirst for state resources.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Roper, Alan & Mira		
33852-1	It is our feeling that there will be irreparable damage to: 1) the water table, 2) local way of life for people that live in the west desert, 3) and the soil.	The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please see updated sections 3.3 (water resources), 3.4 (soils), and 3.18 (socioeconomics and environmental justice) which describe potential impacts of the proposed project.

Comments and Responses - Individuals

ID	Comment	Response
33852-2	We own a small farm just outside of Delta and fear the water table will drop so much that our current well will have to be re-drilled and even then, there is no guarantee that we will find water.	Delta Utah is located over 50 miles east of the nearest proposed pumping included in the Proposed Action (i.e. Snake Valley). Based on the results of the numerical modeling and impact evaluation presented in Section 3.3.2 in the DEIS significant impacts to wells located in the vicinity of Delta Utah are not anticipated.
Ross, Troy		
34082-1	In addition the Las Vegas Metropolitan area wastes an incredible amount of water so to me has not demonstrated the need for additional water resources.	Based on your comment, additional information has been added to Chapter 1.
Rothenberg, Robert H		
33997-1	While not a subject matter expert, from numerous articles I have read about the proposed wells and pipelines, I believe that the effects from this project would likely be irreparable damage to the Basin and an unacceptable lowering of the quality of life for the million-plus people who live along the Wasatch Front.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
33997-2	The fountains, pools, ponds and waterfalls at numerous Las Vegas venues are water wasters that should be tapped before any attempt to acquire additional water in this arid area. The numerous golf courses and other huge areas of green, green grass do not fit into the desert landscape and should be replaced with native flora, enabling the redirection of vast flows of water for more productive uses.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Options for other water sources is beyond the scope of this Final EIS.
Rountree, Katherine		
34339-1	Concerning the monitoring of springs. I would like to see some ironclad guarantee that if the spring levels begin to drop, pumping would stop immediately and mitigation would begin immediately. As we all know the process of getting the pumping stopped by any kind of litigation would mean the death of any plant, animal or human life dependent on that spring. Of course we also know that regeneration of the water table would take almost as long as it took to go down and the spring might never regenerate. SNWA has been monitoring our spring flow as per the State Engineers ruling, but in the last year they have gone from every month to once a quarter. I have been told this is due to budget constraints. Think about what would happen if they are pumping and have budget constraints. No matter what SNWA promises, WE have no guarantees!!! for our property and way of life. Can you craft a document that absolutely protects the owners of water rights?	An applicant-committed protection measure listed under Adaptive Management Measures would be an option for reducing or ceasing groundwater withdrawals. This measure would determine a reduction or cessation of pumping on a case-by-case basis for individual production wells or well fields using technical and consultation process identified in the stipulated agreements.
34339-2	How will the loss of the evapotranspiration from phreatophytes that are killed by the water drawdown affect the climate and precipitation stream in down wind locations such as Salt Lake City? Will the loss of this humidity affect the local climate? How will lower humidity affect fire suppression?	<ul style="list-style-type: none"> • No data exist to indicate any significant change in climate or weather downwind of the proposed Project area due to groundwater development. It is anticipated that phreatophytic vegetation will be replaced with more xeric species in some areas subject to drawdown (See Standard Resource Response VEG-5 for a full discussion of potential species replacement and associated variability). While this floristic change will likely alter both the amount and timing of evapotranspiration at local spatial scales, it is not anticipated to affect climate or weather at either local or regional levels. Regional climate drivers (synoptic-scale drivers) include air masses, fronts, pressure systems, wind patterns, ocean surface currents, and regional topography. These factors have a far greater effect than local drivers (e.g. flora) on downwind climate. • A potential “loss of humidity” is speculative, as per the discussion above. The proposed project area is located in arid and semi-arid ecosystems. Relative humidity levels in these regions are generally low and can be extremely variable; fluctuating with regional weather conditions, season, length of day, and other factors. The relative contribution of existing phreatophytes in the region of study to relative humidity values is likely greatest at the scale of an individual plant, and declines exponentially with increasing spatial scale. • Wildland fire behavior is affected by weather, fuel characteristics, and topography. Humidity is an important component of fire weather. Low relative humidity can increase the rate at which fine fuels dry or cure, which may potentially increase probability of ignition or rates of fire spread.
34339-3	What is the result on local temperatures from the loss of the phreatophytes communities that provide more shade than shorter and sparser replacement vegetation. What is the impact on species dependant on greasewood?	Overall vegetation cover is not expected to change, please see the Vegetation, Assumptions for Groundwater pumping section for a description of the sequence vegetation changes anticipated with pumping. The composition of terrestrial wildlife species could shift to species that use plant species that rely primarily on shallow soil moisture rather than habitats that are dominated by deep-rooted phreatophytes. Local temperature impacts are explained in general comment response Veg-6.
34339-4	As regards radionuclides on page 3.1-35, you cite no studies of what fallout might or might not be in the soil. And you make a pretty general statement that there would be no effect. Would you address this question more thoroughly, with studies etc?	The study (Converse Consultants 2007) is discussed and cited at the end of Section 3.4.1.2.
34339-5	On pg 3.20-p 9 About the Shoshone Ponds It is stated that there would be LIKELY impact and one of the mitigations proposed is to drill a new well in the aquifer currently used as a source of water for the ponds. Huh, if the source of water has already been drawn down what good will drilling a new well into the same aquifer?	The new well would intersect a water source that would not be affected by groundwater pumping.

Comments and Responses - Individuals

ID	Comment	Response
34339-6	I haven't yet found any discussion of the impact on insect communities dependant on the surface water in Spring Valley. What! you say "that's a good thing", but other species in the valley depend on them, particularly bats, birds, etc, In other words the whole web of life in the valley should be considered, including humans.	Section 3.6.2.9, Pumping Effects General Terrestrial Wildlife Discussion of the FEIS, describes the general impacts of groundwater pumping including impacts on prey availability.
<u>Rutemoeller, Robert A</u>		
34154-1	Among the faults are a failure to disclose the economic cost of the project	Economic information has been added to Chapter 2 and section 3.18. Please also refer to standard resource response SocEcon-1, SocEcon-3, and SocEcon-6 regarding the inclusion of project costs information in the FEIS.
34154-2	lack of specificity of well locations to gauge the environmental impacts	See Standard Comment Response WR-1 regarding programmatic assessment.
34154-3	substantiate the Southern Nevada Water Authority's need for the project by dismissing out-of-hand the other viable options for the Authority to meet its water supply needs such as through increased conservation and re-use of gray water and waste water.	Based on your comments, text has been added to Chapter 1.
<u>Ruth, Barb</u>		
34120-1	There are alternatives to draining northern Nevada's precious water resources. Desalinazation is one possibility that is going to have to be developed.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
<u>Sacrison, Ralph R</u>		
34200-1	Fresh water supply could be provided either through a revisited North American Water and Power Alliance or by oceanic transshipment. The political complications of NAWAPA or variants such as the Tilley Plan may remain prohibitive. Though locally valid for premium (i.e., bottled) water, economic transshipment of municipal water may require additional technical efficiencies to consistently compete with desalination. Alluvial intake is among those, analogous to buried sublittoral intakes for desalination systems. These techniques can significantly reduce filtration requirements while minimizing environmental impacts.	Thank you for your comment. This information will be provided to SNWA for their use in future water resource planning.
34200-2	Desalination uses currently working technologies, providing substantial drinking water across the globe. Two alternatives present themselves. Plants in California provide a possibility of simply swapping Colorado River allocations for the desalinated water. That eliminates the need for overland piping. Since coastal industrial development commonly is discouraged in California, funding plants in Mexico may be attractive.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
<u>Schmutz, Revella</u>		
34259-1	What effects would the SNWA Pipeline Project building/maintenance have on the existing roads that are already under maintained and abused by off-road races etc.?	SNWA would be required to develop a transportation plan which would cover road construction, operation and maintenance. This plan would be implemented by the COM plan, see the updated section 3.20 in the FEIS and standard resource responses MM-1 and MM-2.
34259-2	Is pipeline underground so irrigation and movement of the wildlife, cattle, and sheep are not jeopardized?	Yes, the pipeline would be buried.
34259-3	Groundwater dropping and quantity as well as quality jeopardized for surrounding ranches, lakes, ponds, and streams.	Please review updated sections 3.3 (water resources) and 3.18 (socioeconomics and environmental justice) which describe potential impacts from water withdrawals.
34259-4	A real concern that once SNWA has pipeline in place and water transfer started and if #3 above happens as a result...SNWA will not stop or alter amount of water transferred-the demand will be in place and Las Vegas will outweigh a lesser voice.	An applicant-committed protection measure listed under Adaptive Management Measures would be an option for reducing or ceasing groundwater withdrawals. This measure would determine a reduction or cessation of pumping on a case-by-case basis for individual production wells or well fields using technical and consultation process identified in the stipulated agreements.
34259-5	BLM has the responsibility to protect water on lands they manage. If the BLM manages in a judicial manner, they need to manage for the good of the land as well as users of the land. This includes watersheds, wildlife, forage, soil, livestock permit holders, hunters, etc.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
34259-6	Page ES-39 shows the rangeland drawdown in critical areas (Dry Lake Valley) and (Delmar Valley). In showing the devastating effect on the quality of the springs in those areas, how can these NOT affect Hiko, Ash, and Crystal Springs?	The potential effects to flow in Hiko, Crystal and Ash Spring in Pahrnagat Valley is evaluated in Section 3.3 of the EIS.
34259-7	The eventual changes in water sources and forage resulting in fewer AUMs allocated to a "Livestock Grazing Permitted" is a takings of his rights and should not be allowed to happen. The Livestock Permittee pays for and depends on that BLM permit as part of his livelihood and welfare of his animals.	Please see updated section 3.12 (grazing) where impacts to grazing and AUM allocations is discussed.
<u>Schmutz, Roy</u>		
34245-1	It seems to be a bias political based date and model that may not be accurate. The effects on residents, wildlife, environment, livestock and resources are greatly under estimated.	Standard Resource Response WR-1 explains how the model was developed. Please also review updated FEIS sections 3.3 (water), 3.12 (grazing), 3.5 (vegetation), and 3.6 (wildlife) for a description of the impacts mentioned in this comment.

Comments and Responses - Individuals

ID	Comment	Response
34245-2	The long term effects this entire project will have on quality of life for current and future dependents of involved lands and resources.	Thank you for your comment. Text has been added in Section 3.18.2.8 recognizing the potential long-term adverse effects on quality of life for residents of the rural areas arising from the indirect long-term environmental effects from groundwater drawdown.
34245-3	I feel a 90 day comment period is only fair considering it took 6 years to prepare this DEIS.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34245-4	It is the BLM's duty not to approve a project that will impose harmful irreversible impacts on public land and resources.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
34245-5	I feel a supplemental EIS that addresses impacts from specific well locations such as the Lincoln County well sites is required.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA, see Standard Resource Response Gen-1.
34245-6	This DEIS fails to disclose project costs and/or sources of funding. Nor does it address the cost of funding this project.	Please see Section 2.6.8 and 3.18 for discussion on project costs.
34245-7	I feel SNWA as well as this DEIS does not fully address the purpose and need for this project.	Based on your comment, text has been added to Chapter 1.
34245-8	Because of the large number of unknowns and remaining questions, the BLM should delay any decisions on granting approval of this pipeline.	NEPA analyses and permitting decisions are made on the best available data and information, please see section 3.0.3 for further information. Please review standard resource responses Gen-1 and MM-1.
34245-9	Analyze any environmental effects due to climate change.	Please see common response Air-15.
34245-10	Analyze environmental impact of actual well locations. Such as draw down effects on existing springs in Pharaganut Valley with accurate science.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. Please see standard resource responses Gen-1, Gen-2, and WR-1.
34245-11	A hard look should be given at indirect and cumulative impacts including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
34245-12	Provide sufficient information on impacts to Hiko, Crystal and Ash Springs as well as the endangered species there.	Hiko, Ash, and Crystal springs were included in the pumping effects analysis. No impacts were predicted for these springs, as discussed in Federally Listed Aquatic Species section for each alternative.
34245-13	Provide sufficient information on impacts for Steptoe Valley.	Steptoe Valley was included in the model analysis area. Impacts in this valley are discussed if effects were predicted from the analysis.
34245-14	This DEIS provides insufficient justification for failing to study draw downs and impacts only to 200 years after building when in fact the SNWA Pipeline Project is intended to operate indefinitely.	Please see Standard Resource Response WR-2.
<u>Shestople, Nick</u>		
35552-1	Several species of desert fish and springsnails would likely be driven to extinction, while others, such as the greater sage grouse, Bonneville cutthroat trout, Columbia spotted frog and others, would face immense threats and risk to their survival and viability.	Impacts to desert species and special status aquatic and wildlife species are disclosed in the EIS.
35552-2	But the document is deeply flawed because it fails to examine viable alternatives to the project, such as enhanced conservation in the Las Vegas Valley, as well as ocean desalting, which SNWA admits will be part of Las Vegas' water supply in the future.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
35552-3	A recent Pacific Institute study concluded that greater water-use efficiencies and improved conservation measures would meet Las Vegas' needs for the foreseeable future, making the pipeline unnecessary.	This information will be provided to SNWA for their use in future water resource planning.
<u>ShortJones, Judith PWade C</u>		
33849-1	Las Vegas should stop allowing people to move there, and immediately begin rationing water, if that is how dire the amount of water is. They should eliminate the golf courses, which are a HUGE source of water usage.	This information will be provided to SNWA for their use in future water resource planning.
33849-2	Once an aquifer is drained, the water is gone. We cannot ever guarantee that the water will be replaced.	Updated FEIS section 3.3 (water) discusses the potential impacts from groundwater withdrawal.
33849-3	If you allow the aquifer to draw down, it will dry up the land above, which means that any vegetation which is now there on the West Desert of Utah, and Eastern Nevada, will dry up for lack of water.	This potential impact is addressed in the updated sections 3.5 (Vegetation) and 3.3 (Water Resources). Please also see standard resource responses Veg-1 and Wr-8.
33849-4	That means when the storms come, the dust will blow across that desert and make life miserable for those of us who live in Utah. We already have terrible air pollution, but adding dust to the air will make that many times worse.	Please see standard resource responses Air-8, Air-9, Air-10 and Air-14.

Comments and Responses - Individuals

ID	Comment	Response
33849-5	If the land around us, including the farms in the west desert of Utah, cannot produce crops or sustain animals, we will be forced to import food from other states or countries.	Thank you for expressing your concerns related to the Draft EIS. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document.
Silva, Frank J		
34093-1	Why doesn't SNWA take the money they want to spend on the pipeline and build a couple of desalination plants on the Pacific coast in Southern California. SNWA could trade the desalination plants for California's share of the Colorado River. It's a win win situation. They could build some co-generators for electricity and use the waste heat to generate electricity. These gas turbines operate on natural gas, which is very clean and efficient. The excess generated electricity could be sold back to the California utilities which is done in the Las Vegas area this very day.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
Simpson, Lili		
34924-1	I am also concerned about the elements of the DEIS that seem poorly addressed: there are no well analyzed costs of the project.	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
34924-2	the cost and efficacy of proposed mitigation and analysis of true alternatives, such as conservation and recycling of existing water, has not been well analyzed or even considered.	Thank you for your comment. Please see Standard Comment Responses Gen-1 and Gen-3 regarding the scope of this EIS and decisions to be made by the BLM based on this EIS, and Standard Comment Response SocEcon-1 regarding the inclusion of cost information in the EIS.
Smith, Noel		
34150-1	the DEIS fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization	Based on your comments, text has been added to Chapter 1.
34150-2	disclose the economic cost of the project,	Thank you for your comment. Please see SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34150-3	lack of specificity of well locations to gauge the environmental impacts.	See Standard Comment Response WR-1 regarding programmatic assessment.
Sonkens, Stephen		
33844-1	We can run out of ground water if more water is discharged than recharged. For example, during periods of dry weather, recharge to the aquifers decreases. If too much ground water is pumped during these times, the water table can fall and wells may go dry. In such an arid location typically the replenishment rate is extremely low.	Comments noted. Potential effects to water resources associated with the GWD project pumping was evaluated in Section 3 of the EIS.
33844-2	After the Utah/ Nevada, Skull Valley aquifer is dry and the water has been used up, Las Vegas and Nevada will still be searching for a more long term solution to their problem, while the farming communities that rely on those wells and that ground water for their livelihood will be left unable to sustain the way of life they have lived since the late 1800's.	The Skull Valley hydrographic basin lies outside the scope of the water resource study area. Furthermore, results of the water resource modeling do not indicate effects in the northern extent of the region that would affect the Skull Valley.
Sorensen, Clare		
34498-1	I am requesting a 90 day extension on the DEIS, in order to allow as many comments, as possible,before proceeding with the DEIS.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34498-2	I am requesting a supplemental EIS, that addresses impacts from specific well locations.	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. See Standard Resource Responses Gen-1, Gen-2 and WR-1.
34498-3	I am requesting DEIS disclosure of project costs and sources and cost of funding.	See Standard Resource Responses SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34498-4	I am requesting the DEIS adequately assess the purpose and need for the project.	Based on your comment, text has been added to Chapter 1.
Spotleson, Vinny		
34036-1	Most importantly there are victims of the project who you are hearing from meetings throughout Eastern Nevada and Western Utah — ranchers who's livelihood land depend on this water, ranchers who don't have millions of dollars to drill deep wells, or pay Vidler to pipe them water.	. Section 3.3 (Water resources) and 3.18 (Socioeconomics) both note that groundwater development poses potential risks to existing water rights, creating the possibility of adverse social and economic consequences in the areas affected by drawdown. Please review standard resource response SocEcon-6, which suggests additional mitigation to address some potential consequences.
34036-2	Native American communities like the Shoshone and Southern Paiutes who have ancestral water rights that Southern Nevada Water Authority is currently ignoring, or, in a continuation of imperialism, litigating against.	Please review the updated sections 3.16 (cultural resources) and 3.17 (Native American concerns) for additional information on potential impacts regarding these issues. Section 3.3.17 of the updated FEIS discusses tribal water rights.
Stazeski, Theodore		

Comments and Responses - Individuals

ID	Comment	Response
33818-1	This glossy color publication is a waste of money. There is not a lot of new information. A simple business letter and envelope would do just the facts please.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
<u>Steadman, Terry & Debbie</u>		
37997-1	DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. The underlying concerns in your comment are outside the scope of the EIS. However, because of comments received to the EIS, information on project costs are included in the FEIS. See also Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6. Additional information regarding SNWA's cost estimates and potential financing can also be found on the Nevada State Engineer's website: www.water.nv.gov/hearings/past/springetal/documents.cfm?DIR=exhibits.SNWAExhibits
37997-2	DEIS fails to adequately assess the purpose and need for project.	Based on this comment, text has been added to Chapter 1.
37997-3	DEIS fails to analyze potential environmental effects due to climate change.	Please see common response Air-17.
37997-4	DEIS fails to analyze environmental impacts of actual well locations for "distributed pumping"	Specific pumping locations will be analyzed as part of subsequent NEPA.
37997-5	DEIS does not consider a sufficient range of alternatives.	Please review Standard Resource Response Gen-5 for information relevant to this comment. Chapter 2 contains a thorough discussion of the alternatives considered when developing this EIS.
37997-6	DEIS provides inadequate analysis of socioeconomic impacts but still shows that impacts will put ranchers out of business and depopulate rural areas.	Thank you for your comment. The purpose of the NEPA (EIS) process is to disclose potential project impacts. Please review section 3.18 of the FEIS which has been updated concerning these issues. Please also review standard resource response SocEcon-5 for further information. The potential adverse economic effects to the agriculture industry and individual ranchers are addressed in Section 3.18.2.8. The text has been revised to describe additional potential economic effects to agriculture that may arise in conjunction with drawdown.
37997-7	DEIs has inadequate, ineffective or missing mitigation measures.	See Standard Resource Response MM-1.
37997-8	DEIS inadequately analyzes impacts to sacred site, cultural resources of American Indian Tribes.	Impacts to cultural resources, water resources, plants, animals, and Native American traditional values are discussed in sections 3.16, 3.3, 3.5, 3.6, 3.7, and 3.17 of the DEIS.
37997-9	DEIs fails to take a hard look at indirect and cumulative impacts, including future local development.	The EIS has evaluated cumulative impacts for past, present, and foreseeable projects in accordance with BLM NEPA manual guidance. Local development has been considered wherever such developments overlap with the resource study areas. It should be noted that the majority of the cumulative study areas are located on public lands, which limits the opportunities for private development.
37997-10	DEIS provide insufficient information on impacts to Fish Springs NWR and Deep Creek Valley.	Thank you for your comment. See Standard Resource Response WR-5 for a discussion of effects at Fish Springs.
37997-11	DEIs provides insufficient information on impacts to Steptoe Valley.	Steptoe Valley was included in the model analysis area. Impacts in this valley are discussed if effects were predicted from the analysis.
37997-12	DEIS fails to adequately analyze adverse impacts on and mitigation for: ranching, wildlife habitat, local businesses, and wild horses.	The EIS discloses impacts on ranching, wildlife, wild horses, and socioeconomics. See Standard Resource Response MM-1 regarding mitigation.
37997-13	DEIS fails to adequately analyze adverse impacts on and mitigation for: ranching, wildlife habitat, local businesses, and wild horses.	The EIS discloses impacts on ranching, wildlife, wild horses, and socioeconomics. See Standard Resource Response MM-1 regarding mitigation.
37997-14	In addition to the aforementioned, we request a 90 day extension on DEIS Comment Period (it took the BLM six years to prepare this document. The public deserves an adequate response time).	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
37997-15	Further, we demand a SUPPLEMENTAL EIS that addresses impacts from specific well locations, and request the BLM to delay decisions because of "unknowns" and "uncertainties".	Additional assessment of the impacts associated with specific well locations and pumping defined quantities of water from specific basins will be analyzed in subsequent NEPA. A conceptual analysis of distributed pumping and other alternatives is contained in the FEIS. Please review standard resource responses Gen-1, Gen-2 and WR-1.
<u>Stephens, Tom</u>		
33832-1	Any drawdown in the aquifer will most likely cause a deterioration of the surface area, resulting in a more arid environment, causing prevailing winds from the south to blow dust into the Salt Lake valley. Projections / studies of the amount of water available for Las Vegas that will not result in negative air quality impacts are largely conjectures and suppositions.	Please see standard resource responses Air-7, Air-8, and Air-9.
<u>StoberBucklen, PaulaBill</u>		

Comments and Responses - Individuals

ID	Comment	Response
34229-1	Several species of desert fish and springsnails would likely be driven to extinction, while others, such as the greater sage grouse, Bonneville cutthroat trout, Columbia spotted frog and others, would face immense threats and risk to their survival and viability.	Impacts to desert species and special status aquatic and wildlife species are disclosed in the EIS.
34229-2	But the document is deeply flawed because it fails to examine viable alternatives to the project, such as enhanced conservation in the las Vegas Valley, as well as ocean desalting, which SNWA admits will be part of las Vegas' water supply in the future.	Please review Standard Resource Response Gen-5 for information relevant to this comment. Chapter 2 contains a thorough discussion of the alternatives considered when developing this EIS. Appendix A has been updated to include additional information on desalinity.
34229-3	A recent Pacific Institute study concluded that greater water-use efficiencies and improved conservation measures would meet las Vegas' needs for the foreseeable future, making the pipeline unnecessary.	This information will be provided to SNWA for their use in future water resource planning.
Stuart, Randi		
37991-1	To prepare for the future, despite unpredictable conditions like drought and climate change, Southern Nevada must diversify its water resources and reduce its reliance on the drought plagued Colorado River. The Southern Nevada Water Authority's (SNWA) Groundwater Development Project is a critical component of this resource diversification.	This information will be provided to SNWA for their use in future water resource planning.
37991-2	I support the Bureau of Land Reclamation's Draft Environmental Impact Statement. However, I noted that it does not address what the economic impact will be to Southern Nevada should the SNWA's applications be denied. As Nevada's largest producer of tax revenue, it is imperative to the entire state that Southern Nevada remain economically stable. If Southern Nevada continues to rely mainly on the Colorado River for its water supply, more than Lake Mead will run dry. So will its real estate industry, its development and construction industry, its tourism industry- Just to name a few.	Thank you for your comment regarding the potential implications for Clark County should the GWDP not proceed. The concern is identified in Section 3.18. See also Standard Comment Response SocEcon-4 which notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized. Furthermore, SNWA could pursue other sources of additional water should the project not proceed.
Thompson, Nancy		
33851-1	We are already subjected to dust storms where I live and they will only get worse if this project is approved. I have a son who has asthma and any increase in dust storms would greatly worsen his condition.	Please see standard resource responses Air-9 and Air-10.
33851-2	If Nevada is running low on water then they should start conserving this precious resource, not try stealing it from other states.	This information will be provided to SNWA for their use in future water resource planning.
Tilford, Dave		
35887-1	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
35887-2	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	Thank you for your comment. The underlying concerns in your comment are outside the scope of the EIS. However, because of comments received to the EIS, information regarding project costs are included in the FEIS. See also Standard Comment Responses SocEcon-1, SocEcon-3 and SocEcon-6.
35887-3	failure to include real alternatives to the pumping project - alternatives that the public demanded during scoping	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to consider in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative has been added to the analysis for this Final EIS to expand the range of alternatives.
35887-4	the DEIS fails to identify the real "purpose and need" which is clearly to increase water availability for S. Nevada saying instead that it's the BLM's "need" to issue a right-of-way.	Based on this comment, text has been added to Chapter 1.
Tilford, Edith		
35892-1	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.
35892-2	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,	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
35892-3	failure to include real alternatives to the pumping project - alternatives that the public demanded during scoping	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to consider in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative has been added to the analysis for this Final EIS to expand the range of alternatives.
35892-4	the DEIS fails to identify the real "purpose and need" which is clearly to increase water availability for S. Nevada saying instead that it's the BLM's "need" to issue a right-of-way.	Based on this comment, text has been added to Chapter 1.
Tilford, John D		
35889-1	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	Chapter 1 contains a thorough explanation of BLM's legal mandates and responsibilities.

Comments and Responses - Individuals

ID	Comment	Response
35889-2	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,	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
35889-3	failure to include real alternatives to the pumping project - alternatives that the public demanded during scoping	The BLM carefully considered the input from the public and other agencies while making a decision on alternatives to consider in the Draft EIS. Those alternatives cover a wide range of location and pumping options. An additional alternative has been added to the analysis for this Final EIS to expand the range of alternatives.
35889-4	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.	Based on this comment, text has been added to Chapter 1.
<u>Tingey, Brent W</u>		
37989-1	To prepare for the future, despite unpredictable conditions like drought and climate change, Southern Nevada must diversify its water resources and reduce its reliance on the drought plagued Colorado River. The Southern Nevada Water Authority's (SNWA) Groundwater Development Project is a critical component of this resource diversification.	This information will be provided to SNWA for their use in future water resource planning.
37989-2	I support the Bureau of Land Reclamation's Draft Environmental Impact Statement. However, I noted that it does not address what the economic impact will be to Southern Nevada should the SNW A's applications be denied. As Nevada's largest producer of tax revenue, it is imperative to the entire state that Southern Nevada remain economically stable. If Southern Nevada continues to rely mainly on the Colorado River for its water supply, more than Lake Mead will run dry. So will its real estate industry, its development and construction industry, its tourism industry-just to name a few.	Thank you for your comment. Your comment regarding reliance on Colorado River water is beyond the scope of this analysis. See SocEcon-4 regarding the issue of social and economic implications for Clark County/LVV if the proposed GWP does not move forward.
<u>Tingey, Orson</u>		
34343-1	The proposed water withdraws greatly exceed hydrogeographic basin recharge.	Please review updated section 3.3 (water resources) which discusses potential impacts of the project's water withdrawal.
<u>Trexler, Mark & Sarah</u>		
34044-1	2. Approving this project would raise water rates to the highest level possible to pay for it and maintain it for as long as it's used.	Please review standard resource response SocEcon-1.
34044-2	3. Approving this project would encourage SNWA as well as local governments to approve building expansion in the Las Vegas Valley. Summerlin already wants to expand west along Charleston Blvd. Jim Rhodes wants to build around 5,000 houses above Red Rock. Although there is serious questions about these future projects, the County and SNWA, being in need of money would most likely approve them creating the need for the pipeline.	See the subsection entitled "Relationship of the GWD Project to Potential Growth Inducing Effects" in Section 3.18.2.9 regarding the role of water in enabling but not causing economic development. Furthermore, the issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized (see standard resource response SocEcon-4).
<u>Tusting, Paul</u>		
34934-1	Approving ROW into the northern regions of the proposal will adversely affect a population significantly larger than the one it is meant to benefit.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
34934-2	Data seemingly as simple annual precipitation can have subtle but crucial factors hidden within the numbers. For example, in deserts this far north, precipitation that falls in the winter months as snow can be lost to sublimation, having never made it into the soil. During spring and summer cloudbursts, which make up a large percentage of the annual perception, the short and intense storms make it difficult for hillsides to absorb much of the moisture as it travels to the hardpans. Together these phenomena could make a given precipitation rate seem a lot higher than it actually is.	Please review the updated section 3.3 (water resources) which discusses the conceptual model and water balance of the project area. See also updated section 3.1 (air) which discusses climate change in 3.1.1.4 and the potential changes during the life of the project.
34934-3	For example, a certain plant's root system could extend deep enough to reach a slightly lower water table, but this is not the whole story. Nitrogen is just as critical to the plant's growth as the water itself, and if the moisture content of the upper layers of soil containing the Nitrogen is depleted, the plant cannot access it.	Although water is the single most limiting factor for vegetation growth in arid environments, nutrient availability is also important for plant establishment and survival. Phreatophytic vegetation will often extend its root system to access deeper sources of water. This does not mean, however, that shallower roots of the same plant cease to function. Rather, roots existing nearer the surface serve to anchor the plant and absorb both nutrients and any available surface water, while the primary role of deeper roots is the absorption of groundwater and its conveyance to other parts of the plant.
34934-4	Another example of how a slightly lower water table can have hard to predict consequences involves rodents, which make up a significant percentage of the mammal population in these regions and serve a critical role in the area's food chain. Much of their water is absorbed through their food, specifically seeds. When stored in a humid burrow, seeds can double their water content through osmosis, providing a key source of moisture for rodents. Slight changes water table could change this dynamic, impacting the birds of prey and larger carnivores which depend on this food supply.	Thank you for expressing your concerns related to hard to predict consequences of groundwater pumping. The FEIS has been updated to include additional discussion on predators as well as interactions between predators and prey base.
34934-5	Section 3.13 of the Draft EIS limited impact to two Wild Horse Herd Management Areas (HMA), yet the map below from the former Nevada BLM website shows far more than two HMA in the region in question.	Several HMAs in Nevada and Utah are partially or wholly within the region of study; however, only the Eagle and Silver King HMAs would be affected by surface disturbing (construction) activities. Only the Antelope, Eagle, and Silver King HMAs would be affected by groundwater drawdown as predicted by the 10 foot or greater drawdown model.

Comments and Responses - Individuals

ID	Comment	Response
34934-6	I mention Utah because the projected drawdown contour crosses into a number of Utah counties, including Beaver and Iron, although they are not listed in the agencies cooperating with the SNWA Ground Water EIS. I bring up these counties specifically, because there is a special resource in this region that does not appear in the EIS. The Sulphur Herd Management Area contains one of the most (if not the most) genetically pure populations of Spanish Mustangs in America. Not only is their protection mandated by Congress by the 1971 Wild Free-Roaming Horse & Burro Act, but this specific herd is monitored and studied by a number of civil groups including: *Sulphur Springs Horse Registry (sulphurspringshorseregistry.com); *Sulphur Horse Registry (sulphurhorseregistry.com); *American Sulphur Horse Association (americanspanishsulphur.org); *Save Our Sulphurs (saveoursulphurs.com); *Sulphur Horse Ranch (sulphurhorseranch.com); *KW Mustang Ranch (kwmustangranch.com)	The genetic traits of the Sulphur herd is acknowledged in section 3.13.1.1. This HMA is not discussed in the Environmental Consequences section because it is not affected by surface disturbing (construction) activities. Additionally, there are no HMAs in Utah that have springs, streams, or areas of wetland/meadow or basin shrubland vegetation that occur within the 10 foot or greater drawdown contour as predicted by the water model.
34934-7	What is within the scope of this discussion is how the proposed action would impact air quality of the 80+% of Utah's population that lives downwind of White Pine County along the Wasatch Front. Salt Lake City is already ranked sixth in the country for cities most polluted by short-term particle pollution according to ABC News. A drawdown in water table in Snake Valley will inevitably reduce plant ground cover and allow more dust to be blown by the prevailing westerly winds towards a population much larger than the one the water will supply. Being an agency of the federal government, the BLM's responsibility does not stop at state boundaries. In this particular scenario, the modest benefit for a few hundred thousands people in Southern Nevada could severely impacted the air quality for millions in Utah.	Please see common responses Air-14, Air-8 and Air-3.
34934-8	The "Desert Islands" of the Range and Basin landscape were formed as the Ice Age receded and dry valley floors separated genetically isolated populations. The result is a number of endemic species in the region which are particularly sensitive to changing environments. A drop in water table will put further pressure on these populations, likely decreasing the region's diversity.	The BLM appreciates your comment regarding the sensitivity of endemic species to groundwater pumping. Impacts to aquatic habitat and species are disclosed in the EIS. Please see the discussion in Section 3.20 in the FEIS regarding the COM Plan.
34934-9	Due to its geographic location (sandwiched between Lake Mead and mountains), the growth of Las Vegas is inherently limited yet it still cannot live within its own means (Colorado River Allocation). The current proposal will put the health of a much larger population at risk for the short-term benefit of a much smaller population.	This information will be provided to SNWA for their use in future water resource planning.

Unguren, Brian

35309-1	In addition to addressing environmental concerns, the project will provide a much-needed boost the region's economic prospects by preserving jobs and vital tax revenues generated in Southern Nevada.	See Section 3.18 which addresses the role of water in enabling but not causing economic development. See also Standard Comment Response SocEcon-4 which notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized.
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Ursu, John

33816-1	Las Vegas is losing population and has high unemployment and does not need additional water.	See Standard Resource Response SocEcon-2 for additional discussion of this topic. This information will be provided to SNWA for their use in future water resource planning.
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Wagner, Mike

38043-1	To prepare for the future, despite unpredictable conditions like drought and climate change, Southern Nevada must diversify its were resources and reduce its reliance on the drought-plagued Colorado River. the Southern Nevada Water Authority's (SNWA) Groundwater Development Project is a critical component of this resource diversification.	Thank you for your comment.
38043-2	However, I noted that it does not address what the economic impact will be to Southern Nevada should the SNWA's applications be denied. As Nevada's largest producer of tax revenue, it is imperative to the entire state that Southern Nevada remain economically stable. If Southern Nevada continues to rely mainly on the Colorado River for its water supply, more than Lake Mead will run dry, So will its real estate industry, its development and construction industry, its tourism industry--just to name a few.	See Section 3.18 which addresses the role of water in enabling but not causing economic development. See also Standard Comment Response SocEcon-4 which notes that issuance of a ROW grant does not assure the project would go forward, or that the anticipated economic benefits would be realized.

Wallace, Pete

34079-1	This is a long shot, but why not bite the bullet now, before construction costs rise, and look into de-salinization of sea water? There is a pipeline from the coast now that transports fuel to Las vegas. Does this flow 24/7 ? ships use seawater in the fuel tanks for ballast, without a problem. How about the hotels saving water? when I was in the U.S.Navy, and stayed in hotels in Las vegas, I used more water in one shower than I did taking 3-4 showers at home. I have a low flow shower head.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
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Wetmore, Susan

34950-1	Although the DEIS is extremely thorough, the bottom line for me is that the impacts of this project on White Pine County and the other areas affected simply cannot, in the end, be "mitigated" in any meaningful way.	See Standard Resource Response MM-1 regarding mitigation.
34950-2	Furthermore, the groundwater project will only supply enough water for several decades.	Information regarding this comment is contained in Appendix A.

Comments and Responses - Individuals

ID	Comment	Response
Whitman, Frank		
33810-1	How come they need the right of way when they don't got the water locked up yet? Save the tax payers money. Steal the water first then build the pipe line.	Based on this comment, text has been added to clarify this issue.
Wilson, Bill and Holly		
35007-1	SNWA's need for the proposed action is out of date. The 2008CBER population forecast is no longer applicable since the perceived population boom is now a bust trend. SNWA needs to submit more than conjecture that the need still exists. Section 3.18 needs to be updated to reflect this reversal.	See Standard Comment Response SocEcon-2 regarding the topic of population forecasts and the relevance of those forecasts to the EIS.
35007-2	SNWA's plight is depicted by the lowering of Colorado River inflow. There are many other alternatives available to help satisfy their water concerns, but none have been presented as alternatives in conjunction with the proposed action.	The action before the BLM relates to granting a right-of-way for groundwater conveyance. Determining options for other water sources is beyond the scope of this Final EIS.
35007-3	There needs to be an economic analysis to determine the cost to SNWA, rate payers, the BLM and SE. This should be compared to alternative solutions.	Thank you for your comment. Please see SocEcon-1, SocEcon-3 and SocEcon-6 regarding the inclusion of project cost information in the FEIS and lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
35007-4	Neither SNWA nor the EIS recognizes that the oncoming drought, so potentially devastating to SNWA is also the same drought which would decrease recharge to the affected basins and exacerbate the damage documented in this EIS. Recharge in drought years may be insufficient to ensure that sufficient pipeline water would be available for SNWA's needs.	Please review the revised climate change section 3.1.1.4 and standard resource responses Air-15, Air-16 and Air-17.
35007-5	Alternatives A, B, C, D, and E are at best variations on a theme. These are apparently sized according to guesses as to how much water the State Engineer will allocate. Lower pumping rates would basically just prolong the time before the aquifers are depleted and ultimate environmental damage is achieved. Surface disturbance and reclamation would be essentially the same. It is hard to call these "Alternatives".	Thank you for your comment. General combined response Gen-1 responds to this comment. Additional NEPA tailored to the alternative chosen by the BLM and presented in the Record of Decision will be performed after the BLM rules on the ROW grant.
35007-6	Like a bad disease, monitoring will likely not show the need for mitigation until the damage is far along and irreversible. Can the EIS somehow rate the effectiveness of each of the mitigation measures as to what damage would occur on a proposed monitoring schedule? How will the BLM and the SE coordinate and enforce compliance?	An effectiveness statement is provided for each mitigation measure. Please see Standard Resource Response MM-1.
Wilson, Daniel		
33858-1	If the groundwater and well project can not be stopped, I recommend more monitor wells than now proposed, a minimum of 4 monitor wells per groundwater well.	See response MM-1 regarding monitoring; and Section 3.20 regarding BLM's proposed monitoring, management and mitigation plan for the GWD project.
Winkler, Don		
33859-1	When I think about the billions of dollars we are spending on the wars in the middle east and the flooding taking place in the mid-west every spring, the thought comes to my mind that an Aqueduct could be built over a couple thousand miles and fill Lake Mead to its capacity.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Witt, Jose		
33974-1	fails to substantiate the Southern Nevada Water Authority's need for the project. It dismisses out-of-hand viable options for the Authority to meet its water supply needs, such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
33974-2	failure to disclose the economic cost of the project	Thank you for your comment. Please see SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33974-3	lack of specificity of well locations to gauge the environmental impacts.	See Standard Comment Response WR-1.
Wolfe, Jim		
33996-1	failure to disclose the economic cost of the project	Thank you for your comment. Please see standard resource responses SocEcon-1, SocEcon-3, and SocEcon-6 for additional information regarding the inclusion of project cost information in the FEIS
33996-2	lack of specificity of well locations to gauge the environmental impacts	See response MM-1 regarding monitoring; and Section 3.20 regarding BLM's proposed monitoring, management and mitigation plan for the GWD project.
33996-3	substantiate the Southern Nevada Water Authority's need for the project by dismissing out-of-hand the other viable options for the Authority to meet its water supply needs such as through increased conservation and ocean desalinization.	Based on your comments, text has been added to Chapter 1.
Woodyard, John		

Comments and Responses - Individuals

ID	Comment	Response
33898-1	The impact to life is Sake and Spring valley e.g.: Wildlife most species needing water to survive “quality” of life in residents?	Impacts to wildlife in Spring and Snake valleys are discussed in Section 3.6, Wildlife Resources.
33898-2	White Pine Co pipeline would impact life on the ROW human and wildlife “uncertainties”	Thank you for your comment. As noted in numerous locations, the long-term uncertainties associated with the project stem primarily from the effects of groundwater drawdown, rather than the construction and operation of the main pipeline and ancillary facilities.
33898-3	Socioeconomic analysis impact on people and communities e.g. effect on quality of life. Delay because of unknowns.	Thank you for your comment. Section 3.18 addresses the potential short and long-term socioeconomic consequence of project construction and groundwater production and recognizes the uncertainties associated with the extended timeframes involved. No changes to the analysis were made in response to this comment.
33898-4	Soils study needed.	The soils analysis in the Draft EIS utilizes the detailed and most recent soil survey data from the NRCS. These data are appropriate for impact analysis and no further detailed soil studies are planned or needed.
33898-5	To protect NE Nevada life. I would demand a supplemental EIS to evaluate impacts on certain well areas, etc. and to determine “true” costs of impacts on wildlife and cultures.	Future facilities will be addressed under subsequent NEPA actions. Please review standard resource responses Gen-1, Gen-2, and WR-1.
Young, Janie		
34072-1	Request a 90 day extension on the DEJS comment period. It's only fair; they had 6 years to prepare.	Thank you for your comment. The BLM extended the comment period on the Draft EIS by 30 days in response to requests such as yours.
34072-2	Demand a Supplemental EIS that addresses impacts from specific well locations.	Future facilities will be addressed under subsequent NEPA actions. Please review standard resource responses Gen-1, Gen-2, and WR-1.
34072-3	DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. Please see SocEcon-1 and SocEcon-6 regarding the inclusion of project cost information in the FEIS.
34072-4	DEIS fails to adequately assess the purpose and need for project.	Based on your comment, additional information has been added to Chapter 1.