

## Comments and Responses - Businesses

ID	Comment	Response
<b>A Calculated Response LLC</b>		
34045-1	The flow will come from aquifers in areas with already dry lakes, and will likely affect cattle grazing, wildlife, and the various hot springs as well as residential use in those counties.	Please review updated section 3.3 (water resources) for information on the potential impacts of groundwater pumping. See also standard resource response SocEcon-5.
<b>Baker Ranches, Inc.</b>		
34850-1	The BLM cannot permit the right-of-way for the pipeline because it would violate the laws governing public lands.	BLM's responsibility in considering this right-of-way (ROW) application would be governed by the Federal Land Policy and Management Act of 1976 (FLPMA) and the Lincoln County Conservation, Recreation and Development Act (LCCRDA) of 2004. FLPMA requires BLM to carefully weigh the environmental consequences and community enhancements represented by the ROW application and use the information in rendering a decision. LCCRDA requires BLM, in the case of this particular ROW, to authorize the ROW within Lincoln and Clark counties.
34850-2	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.	See standard resource response SocEcon-5 for information on this topic.
34850-3	Among the faults are a 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 lack of authority or need for the BLM to independently analyze project costs in conjunction with the ROW application.
34850-4	a failure to disclose and analyze the cost of proposed mitigation and monitoring	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 continue into subsequent NEPA analyses. Budget projections for the applicant's commitment to monitoring and mitigation will be added to the FEIS.
34850-5	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.
34850-6	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 and others, the purpose and need statement has been revised.
34850-7	The senior water rights are not protected under the DEIS. Big Springs has flow eliminated in most of the alternatives and other springs are greatly affected, which is against NRS. How can the BLM have the authority to approve a project that will break state statutes? The water rights need to be protected for the Baker residents.	Potential impacts to water rights are discussed in Section 3.3.2 and 3.3.3 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.
34850-8	The pipeline stops south of the town of Baker. We are concerned about where it will go around and what size will the pipeline be?	The pipeline terminates south of Baker at a pumping station and would not go around the town. The pipeline in this area would be 54 inches.
34850-9	What perennial creeks will be crossed and what cultural areas will be affected?	The perennial creeks crossed by the pipeline or potentially affected by ground disturbance related activities during construction of the groundwater development are described in Section 3.2 of the DEIS (and FEIS). As described in Section 3.16 of the DEIS (and FEIS), Class III cultural resources inventories have not been conducted as of this date, but would be conducted prior to project construction. Therefore, it is unknown at this time as to how many NRHP-eligible cultural sites would be affected by the proposed project.
34850-10	The Snake Valley MMM Plan is inadequate and makes it sound like private property holders will have virtually no say in forming the plan, reviewing it or making sure that it is implemented correctly.	Please refer to standard resource responses MM-1 and MM-2 for information on this topic.
34850-11	Dust is a major health hazard and we are concerned about how the area residents will be protected. The model shows a drawdown of ten feet or more.	Please refer to standard resource responses Air-9 and Air-10 for information on this topic.
34850-12	Local springs, wetlands and even some wells will go dry with a smaller drawdown. A much more detailed model is needed.	Comment noted. See response WR-1 regarding the request for additional modeling.
34850-13	Information in Chapter 2 needs to be more specific so that the DEIS analysis can be better. It should specify where the wells go, the number of wells, the size of the pipelines, timelines involved, etc. The information being presented to the Nevada State Engineer at this time is different than that presented in the DEIS and is severely lacking in information. The timeline varies in the DEIS in different sections and sometimes even within the same sections. What is the real timeline?	Specific information regarding well numbers and locations are not known at this time. Further NEPA analysis will be conducted in the future to analyze these impacts. The Nevada State Engineer process is separate from the BLM NEPA process and therefore this comment is not within the scope of the Final EIS. Inconsistencies regarding construction schedules and timelines have been corrected where found and a table has been added to section 2.5.1.6 that further clarifies the construction milestones for the Proposed Action. See the Final EIS for text changes that provide additional information on this topic.

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34850-14	Why is a Snake Valley right of way being pursued before a Snake Valley hearing? If a right of way is granted, it could unduly influence the Nevada State Engineer.	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.
34850-15	How long will this EIS be good for - Five, ten, twenty years?	The time frame of the conditions for this EIS will be described in the Record of Decision.
34850-16	An alternative that doesn't affect Snake Valley water rights must be included. It is against the law to harm senior water rights.	Your comments on the Draft EIS have been considered. Updated sections 3.3 (water resources) and 1.4 discuss potential impacts from groundwater pumping.
34850-17	We would like to see a 90 day extension on the DEIS comment period.	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.
34850-18	We would like to see a 90 day extension on the DEIS comment period.	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.
34850-19	This DEIS fails to disclose project costs and sources and cost of funding.	Thank you for your comment. Please see SocEcon-1 regarding the inclusion of project cost information in the FEIS.
34850-20	It also fails to adequately assess the purpose and need for the project.	Based on your comment and others, the purpose and need statement has been revised.

### **Bank of America**

34239-1	However, the Draft Environmental Impact Statement does not adequately address the potential impacts to Sothern Nevada should the project not move forward.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
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### **Bank of America Nevada**

34220-1	As it is currently written, the Draft Environment Impact Statement for the SNWA's project fails to include any kind of analysis of the potential negative ramifications for Clark County is the project is not allowed to go forward. This is unfortunate and does a great disservice to the important role Southern Nevada plays in our state's economic well-being.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
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### **Bird, Mark**

34334-1	My article contends the costs of desalting water for the Colorado River system is \$000 per acre-foot if the indirect benefits are considered.	This information will be provided to SNWA for their use in future water resource planning.
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### **Boyd Martin Construction LLC**

35025-1	detailed evaluation of the potential impacts to Clark County should the project not be constructed.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
35214-1	However, I noted that it does not address what the economic impact will be to Southern Nevada should the SNWA's applications be denied.	The economic and tax linkages between Clark County and the remainder of the state are noted in Section 3.18.1.7. Also see standard resource response SocEcon-4 regarding the issue of social and economic implications for Clark County/ LVV if the proposed GWP does not move forward.

### **BoydGaming**

34257-1	Studies clearly indicate that uncertainty over the longterm availability of adequate water resources in southern Nevada - whether real or perceived would severely undermine our region's ability to attract new industries and companies.	The economic and tax linkages between Clark County and the remainder of the state are noted in Section 3.18.1.7. Also see standard resource response SocEcon-4 regarding the issue of social and economic implications for Clark County/ LVV if the proposed GWP does not move forward.
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### **Castle Ridge Ranch**

34355-1	What about this environmental analysis are you specifically concerned about?Large unknowns and uncertainties!Harmful and irreversible long range impacts to livestock, wildlife, and people.	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.
34355-2	What is missing from this environmental document?Project costs and long range maintenance costs.	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 (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: <a href="http://www.water.nv.gov/hearings/past/springetal/documents.cfm?DIR=exhibits.SNWAExhibits">www.water.nv.gov/hearings/past/springetal/documents.cfm?DIR=exhibits.SNWAExhibits</a>

### **Ceasars Entertainment**

34338-1	However, I noted that it does not address what the economic impact will be to Southern Nevada should the SNWA's applications be denied.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
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### **College of Southern Nevada**

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34159-1	<p>* Farm water. One California farm district gets 10 times as much Lake Mead water as all of Nevada. If Nevada got a tiny percentage of this highly subsidized farm water, it could supply water needs for decades.* Desalting. At least three new techniques may each reduce desalting costs by 75 percent. Based on historical trends, SNWA's pipeline cost estimate may increase by over 75 percent. Improved desalting has clear benefits for over a billion people with inadequate water.* Air-to-water technology. Every day over 200 cubic miles of water evaporates into the atmosphere. There may be improvements in current air-to-water technology.* Columbia River water. Israel has negotiated to buy imported water from a river in Turkey. Similarly, SNWA could transport water by tankers or large plastic bubbles from the Columbia to California, and then obtain a similar amount of California water from Lake Mead.* Columbia River canal. A canal could supply many cities and wetlands with water. Unused water would go into Lake Mead.* Other canal options. A canal from the Arkansas, North Platte, or the South Platte to the Colorado River. Once water from one of these rivers reached the Colorado, it is all downhill to lakes Powell and Mead.* Five percent water reduction. Nevada politicians could urge the secretary of Interior to cut 5 percent of the water delivered to every Colorado River state. This sends a conservation message to every state, helps power production, helps lake recreation, helps lake water quality, helps wildlife and gives Nevada more time.* Cloud seeding. Former Nevada Gov. Kenny Quinn said cloud seeding should be examined in the upper Colorado River basin.* Buy from Mexico. Mexico owns five times as much water in Lake Mead as Nevada. Mexico may be delighted to temporarily sell some of this water.* Desalting in Mexico. SNWA and the United States could finance a state-of-the-art desalting plant for any coastal city in Mexico. In exchange, Nevada gets an equivalent amount of Mexican water in Lake Mead.* More water banking. SNWA could bank more water in Nevada aquifers, other states and Indian reservations.* Buy river water. Upstream users have previously tried to sell water rights to downstream users. Some water may be for sale from upstream states and/or Indian reservations.* Water conservation contest. Uncle Sam could buy Colorado River farmland water and then announce this new water will go to a large city that attains the greatest percentage water conservation.* Do nothing. Nevada politicians could declare it is a federal problem. The feds created Lake Mead, built hundreds of water projects, have more expertise and have had over a decade to pursue many of these options.* Politicians call for a 10 percent cut. All major Nevada politicians could jointly urge all southern Nevada residents to reduce water consumption by at least 10 percent.* Slow growth to 2 percent. Southern Nevada's 5 percent annual growth rate in recent years is higher than any country on the planet. The rate for all of Africa is 2.5 percent. The rate for the entire United States is 1 percent. * Combinations of the above options.</p>	<p>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.</p>
<b>D Bar X Enterprises LLC</b>		
33894-1	<p>Lowering water table may "dry up" our spring on our property. We have a domestic well we need for drinking water. Turning the valley into a dust bowl.</p>	<p>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. Updated sections 3.3 (water resources) and 1.4 (NSE role) discuss potential impacts from groundwater pumping.</p>
<b>Danair, Inc.</b>		
34075-1	<p>The pipeline money should be spent on a desalination in California to trade for California water.</p>	<p>The action before the BLM relates to granting a right-of-way for groundwater conveyance. Options related to development of other water sources is beyond the scope of this Final EIS.</p>
<b>Delamar Vly Lvstock + LDS Bishop Corporation</b>		
35604-1	<p>As currently written, the CPB does NOT believe that this DEIS accurately or completely describes the potential impacts to its public lands grazing allotments and water rights held within those allotments, nor to its private property and associated water rights.</p>	<p>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.</p>
35604-2	<p>CPB also believes that the mitigation options described in this DEIS are inadequate to address the anticipated major impacts of this project.</p>	<p>Please refer to standard resource responses MM-1 and MM-2 for information on this topic.</p>
35604-3	<p>CPB would request that a supplemental DEIS or modified DEIS be issued to address the shortfalls of the current DEIS and to allow further review and comment.</p>	<p>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.</p>
35604-4	<p>Please include the enclosed report in the formal record for this DEIS and modify any future supplemental, revised DEIS, or final EIS to describe the impacts identified in the report. It is of paramount importance to note that because of the deficiencies in the SNW A model and reports, many of the impacts described in this DEIS are inaccurate or not properly described. These inaccuracies should be corrected, the modeling changed, and further reports issued in order to fully and accurately disclose all potential impacts.</p>	<p>The requested report was entered into the administrative record. Other comments noted.</p>
35604-5	<p>The water model depicting drawdown in the depth-to-ground water is flawed and not sufficiently calibrated. Therefore, the arbitrary drawdown of 10 and 50 feet used to "predict" potential impacts to vegetation do not result in a full or adequate description of the impact (see related Aquaveo report).</p>	<p>Please see Standard Resource Response WR-1, which addresses the principal concern raised in this comment.</p>

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35604-6	The use of only two drawdown depths to predict potential vegetative impacts may dramatically underestimate such impacts.	Please see Standard Resource Response WR-1, which addresses the principal concern raised in this comment. Additional analyses will be performed during subsequent NEPA to address specific areas with specialized plant communities and specific soil conditions.
35604-7	The SNWA model, and the analysis used in this Chapter, do NOT adequately address many of these confounding factors, particularly as it relates to the "timing and rate of change in groundwater" and climate change influences. This is a major omission, particularly since the SNWA's purpose and need for this project is to stabilize its water supply due to the potential for long-term drought conditions. If increased pumping is required during times of drought, then impacts to vegetation are likely to be much worse than described in this section.	Please see comment response WR-1 for a full discussion on the regional scale groundwater flow model. To facilitate information synthesis, the text related to the climate change analysis was reorganized in the Final EIS. Information previously presented in the Air Resources Section 3.1 has been reorganized into the cumulative effects section of each resource potentially affected by climate change (including those pertinent to Vegetation Resources, Section 3.5.3). Section 3.1 still presents an overview of regional climate and potential future trends to the project area, as well as an estimate of potential greenhouse gas emissions associated with the project. It is important to recognize that the current state-of-the art for climate change science reflects considerable uncertainties associated with future trends and potential effects to specific regions or species. This uncertainty is qualified in the Final EIS text.
35604-8	Finally, the CPB requests that some proposed wells be deleted from the project, that quantities of water from remaining wells be limited, and that a more robust set of mitigation measures be established to limit impacts to vegetation, especially in north Spring Valley. Also, every effort should be made to avoid impacts to white sage vegetation in Dry Lake and Delamar Valleys. This is critical forage that does not respond well to disturbance.	Please refer to standard resource responses MM-1 and MM-2 for information on this topic.
35604-9	In addition, the BLM should require the use of temporary irrigation in any disturbed area that is revegetated to allow for stand establishment of desired species rather than being outcompeted by annual invasive species such as cheat grass and red brome.	Please refer to standard resource responses MM-1 and MM-2 for information on this topic. Updated section 3.12 (grazing) discusses the potential impacts from surface disturbance and reclamation.
35604-10	This conclusion does not adequately describe the impact to the private property and water rights that will be impacted, nor does it adequately describe the loss of potential grazing allotments associated with these private lands that will be impacted.	Please refer to standard resource responses SocEcon-5 and GR-1 for information on this topic.
35604-11	The DEIS doesn't adequately quantify the potential impacts to grazing, particularly in regards to loss in forage capacity, loss of water and associated livestock distribution, nor the potential impact to range improvements.	Acres impacts to individual vegetation communities by per allotment are summarized in Tables 3.12-7, 3.12-9, 3.12.11, and 3.12-15. Actual reductions to AUMs would be impractical to assess for such a large area due to the variation in production across the area. Impacts to water sources (number of springs and miles of streams) and acres of phreatophytic vegetation are summarized in Tables 3.12-16 through 3.12-23. ACMs A.8.1 and A.8.4 discuss pre-construction coordination with grazing permit holders and the provision of supplemental water sources to ensure proper distribution of livestock during construction activities (pg. 3.12-19). Due to the size of the project area it is impracticable to identify all the rangeland improvements that are located within the effected allotments, however ACM A.8.2 states "preconstruction conditions would be documented and range improvements disturbed by construction activities would be restored to their previous condition upon construction completion" (pg. 3.12-19).
35604-12	The other major deficiency in this analysis is that it does not properly disclose projects currently under construction or in the planning stages.	Projects known to be in the construction state (e.g. the ON transmission line) were included. Projects in the planning stage need to have sufficient documentation (e.g. a ROW application) to be included in the cumulative effects analysis. See revised text for project inclusion in section 2.1.9.2 of the FEIS.
35604-13	CPB requests that the BLM EIS Team members responsible for this section meet with DVL Ranch Managers to discuss project modifications and potential mitigation measures or processes that could be used to minimize potential impacts. We believe that these items MUST be included in a supplemental or, revised DEIS, and final EIS.	ACM A.8.1 states that "In advance of construction, the SNWA will coordinate with the BLM and grazing permit holders regarding access and grazing practices." These discussions could result in additional, site specific mitigation measures but may not be included in the final EIS or supplemental EIS'. Please see Standard Resource Response MM-1.
<b><u>Dougall Financial Group</u></b>		
35198-1	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 application be denied. As Nevada's largest producer of tax revenue it is imperative to the entire state that Southern Nevada remain economically stable.	The economic and tax linkages between Clark County and the remainder of the state are noted in Section 3.18.1.7. Also see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>ECCO Equipment Corporation</u></b>		
35014-1	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.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>IBEW Local Union 357</u></b>		
34238-1	However, the DEIS does not include the same evaluation on the potential impacts to Clark County should the project not be constructed.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>KB Home Nevada</u></b>		
34230-1	However. our quality of life could suffer quite dramatically if we don't have water supply options available to the community. Particularly during periods of shortage.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.

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ID	Comment	Response
<b><u>Lander Co, Public Lands Board</u></b>		
34067-1	Better cost info about DE-SAL alternatives.	Thank you for your comment. Please see Standard Resource Responses 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, or the costs thereof, is beyond the scope of this Final EIS.
34067-2	Better info, what if L.V. grows again and this water project does not deliver. Where will the water come from then.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
34067-3	Because expansion of this project is a possibility, there should be more hearings in the remote rural towns.	This NEPA action (EIS) addresses the proposed project area. The BLM conducted hearings in rural towns throughout the project area.
<b><u>Lander County Public Lands Commission</u></b>		
33965-1	You need to extend the comment period another 90 days.	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.
33965-2	More study needs to be done on each well site – what impacts each one will have.	Subsequent NEPA will analyze the impacts of individual project components.
33965-3	Where is Vegas getting al its money – will it eventually be the state of Nevada? All us tax payers	Please refer to standard resource responses SocEcon-1, SocEcon-2 and SocEcon-3 for information on this topic.
33965-4	Why can't Vegas buy farmers water rights from the Colorado River – a renewable resource. Instead of a Finite resource in the desert.	These issues were discussed in the DEIS (and FEIS) Section 2.7 Alternatives Considered But Not Carried Forward for Detailed Analysis.
33965-5	More wild life impact studies need to be done.	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.
33965-6	Effects on existing water rights. Once the water is gone, its gone for ever. Is this the “best” use for this water resource	The EIS is intended to evaluate the potential effects associated with the Proposed Action and alternatives to the Proposed Action identified by the lead agency. As described in Section 1.5.4 of the DEIS, the NDWR is responsible for appropriation and management of the state's surface and groundwater resources. An evaluation of the "best" use of the water resource is outside the scope of the EIS.
<b><u>Lawn Council</u></b>		
35017-1	I strongly support the Bureau of Land Reclamation's Draft Environmental Impact Statement, but I am concerned that it does not address the economic impact to Southern Nevada if the SNWA's application is denied.	Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>Liberty Land &amp; Livestock</u></b>		
33977-1	Furthermore these projected draw downs will have significant impacts on existing water rights, including agriculture, mining and quasi-municipal rights, as well as a vast array of plant communities ranging from meadow lands to the ever present phreatophyte populations in all valley bottoms.	Updated section 3.3 (water resources) discusses potential impacts from groundwater pumping.
33977-2	Although the fact that these draw downs are recognized, as well as some potential impacts on the environment, the reader is left wondering what the long term impacts on the socioeconomic structure of Lincoln and White Pine Counties might be. Certainly a massive amount of "socioeconomic" data appears in the 110 pages of the socioeconomic chapter (3.18 - 3.18.3.12), however, on close examination the preponderance of these data involve Clark County, or the short-term economic impact the rural counties might enjoy during the construction phase of the project. The real long term impacts, both environmentally and socioeconomic, that invariably have happened to other similar rural areas where water has been removed (Owens Valley) are simply ignored for the most part,	The purpose of the NEPA (EIS) process is to disclose potential short-term and long-term project-related impacts. The BLM appreciates that you have identified your concerns regarding how the long-term environmental and socioeconomic impacts are addressed. Each resource section of the EIS includes an assessment of potential long-term effects, the majority of which would be associated with long-term pumping and drawdown. However, many of those impacts are addressed programmatically due to limitations and uncertainties associated with the modeling results that carryover to other resources (see Section 3.3.8.2). These long-term effects are subject to further assessment in future NEPA, as well as under the proposed COM Plan.
33977-3	The fact that Lincoln and White Pine Counties currently support an agriculture industry that generates annually somewhere around sixty million dollars (\$60,000,000) of both direct and indirect dollars into the region and the State economy seems to go unnoticed in the Draft. Furthermore, the fact that water, surface, pumped, or adequate ground water, is absolutely essential for the continuation of this industry is completely ignored.	The economic importance and contributions of the agriculture industry are described in Section 3.18.1.3 and its social importance is noted in Section 3.18.1.7. The reliance on irrigation is also alluded to in Table 3.18-9 and the text following Table 3.18-10. A statement regarding the dependency on irrigation has been added to Section 3.18.1.3.
33977-4	The phreatophyte plant populations of the many valleys of Lincoln and White Pine Counties are extremely fragile. Any permanent disruption of present water tables, as outlined in the Draft, will ultimately result in their complete destruction. Ample scientific information is available to clearly document what happens next; a gradual change to annual communities, followed by fire, then massive amounts of fugitive dust, all at a monumental cost to the local community. It is these types of essential information that has been ignored in the present EIS.	Updated section 3.5 (veegetation) discusses potential impacts from groundwater pumping.
33977-5	Depletion of existing water tables will spell doom to the areas pump irrigated agriculture. Additionally, it will also impact the future availability of water resources for mining as well as quasi-municipal uses.	Please refer to standard resource response SocEcon-5 for information on this topic.

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33977-6	Despite the thousands of words involved in this Draft EIS as well as the hundreds of charts and figures, there is no supportive information to realistically show the long-term impacts of the proposed project. Plainly put, a proposed project that places an existing industry in jeopardy that produces sixty million dollars annually, and directly or indirectly supports thousands of people in the potentially impacted counties, must, absolutely must come to grips with the economic impact of such decisions. The present Draft EIS basically completely ignores that fundamental fact. Without that essential chapter, this Draft EIS is essentially meaningless, and must not be approved in its present form.	The economic importance and contributions of the agriculture industry are described in Section 3.18.1.3, including reported countywide farm employment. Text describing the approximate geographic distribution of agricultural lands within the potentially affected counties has been added. Section 3.18.2.8 describes the long-term risk to agricultural production and the potential indirect effects on local communities.
<b><u>Living Rivers and Colorado Riverkeeper</u></b>		
34906-1	The EIS as presented should be terminated because the need and purpose is speculative.	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.
34906-2	We strongly suggest that the Department of Interior take a position to terminatethis EIS	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.
<b><u>Long Now Foundation</u></b>		
34540-1	the Draft EIS fails to consider publically available soil and plant data from eastern Nevada. It is likely that alternative conclusions and mitigation measures would have resulted from the environmental analysis if these datasets had been considered during development of the Draft EIS.	All publicly available SSURGO spatial and tabular data from NRCS that cover the affected areas were used to characterize the affected environment and to perform the impact analyses. The soil surveys used are displayed on Figure 3.4-2 of the Draft EIS and are cited as the source of the tables listing soil characteristics, such as Tables 3.4-1 and 3.4-2. The use of SSURGO is also stated as the data source in the description of the Methodology for Analysis in Sections 3.4.2.1 and 3.4.2.8. Additionally, reclamation plans and the BLM's COM Plan will address these issues.
34540-2	Review of the Draft EIS indicates that the NRCS data was not appropriately utilized or considered during environmental review of the proposed project.	All publicly available SSURGO spatial and tabular data from NRCS that cover the affected areas were used to characterize the affected environment and to perform the impact analyses. The soil surveys used are displayed on Figure 3.4-2 of the Draft EIS and are cited as the source of the tables listing soil characteristics, such as Tables 3.4-1 and 3.4-2. The use of SSURGO is also stated as the data source in the description of the Methodology for Analysis in Sections 3.4.2.1 and 3.4.2.8. The tabular data were used in conjunction with the spatial data to summarize the extent and types of soils that would be affected by surface disturbance and drawdown.
34540-3	In addition to publically available data in the project area, additional baseline soils data should be collected and analyzed for dust generation before the Draft EIS is finalized. The enclosed comments provide recommendations for collecting these baseline data in playa areas so that reasonable evaluations can be drawn regarding the effects of groundwater level drawdown on dust generation.	Due to the programmatic level of the impact analyses related to groundwater pumping and the interaction of many soils, climatic, and land use factors that contribute to potential changes in wind erosion over the long term, collecting more detailed soils information than what is available in the NRCS soil surveys would not lead to better analyses or different conclusions from what is in the Draft EIS. More site-specific conclusions cannot be drawn at this stage.
34540-4	The Draft EIS also fails to adequately address the effect of groundwater pumping on wetlands in the project area. Sufficient data from the NRCS exists to reasonably predict the effects to the environment; however, the actual impacts will likely differ greatly from those presented in the Draft EIS since these data were also not considered.	The purpose of this EIS is to analyze impacts related to the right-of-way, access roads and ancillary facilities. Impacts to related to specific wetlands, well locations, and groundwater drawdown are analyzed on a programmatic level and will be analyzed in greater detail in future NEPA.
34540-5	Groundwater level drawdown will effectively eliminate the anaerobic soil conditions required for wetlands. Similar to the impact analysis of dust generation from the playa due to the proposed project, the conversion of these ecosystems has not been properly addressed in the Draft EIS.	It is correct that some hydric soils will be modified by the elimination of anaerobic conditions due to groundwater drawdown. The extent of these changes are discussed in the EIS. The changes to hydric soils would not result in increased dust generation primarily due to the fact that there would be little or no change to the percentage of vegetative cover, just changes to the composition of plant communities in the affected areas. This vegetation change is discussed in detail in the Final EIS.
34540-6	Although there is existing data to conduct an evaluation to phreatophytes, environmental impacts to plant species have not been adequately addressed in the Draft EIS.	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. Impacts to vegetation resources, including impacts to phreatophytes, have been addressed in Section 3.5.

## Comments and Responses - Businesses

ID	Comment	Response
34540-7	Groundwater drawdown and the resultant desiccation of the soils will likely have some impacts upon the playa soils. Impacts cannot be assumed away in this manner, thereby removing this "ET unit" from further consideration of windblown dust emissions.	Soil moisture from groundwater is only one variable affecting wind erosion generating windblown dust. Soil surveys rate the erodibility of soil map units based on soil texture, soil structure, content of organic matter, carbonates, and rock fragments, mineralogy, moisture, surface cover and roughness, wind velocity and direction, and the length of unsheltered distance. Wind erodibility ratings are assigned to soil map units in the soil surveys using the surface conditions and characteristics of the soils, which, for most of the year and for most hydric soils, do not include high surface moisture conditions. This is because most hydric soils in the region have saturated conditions up to one foot below the soil surface so surface soil moisture is not the primary factor for prevent blowing soil particles. While groundwater drawdown of hydric soils, such as the playa soils referenced in the comment, is one factor that may contribute to the susceptibility of soils to wind erosion, in most of the project area it is a relatively minor contributor for several reasons: 1) some of the hydric soils are supplied by moisture from localized perched water tables or ponding due to precipitation rather than from the groundwater table; 2) according to the soil survey data (SSURGO), most of the soils identified as playas are frequently ponded, but most of the other hydric soils are not ponded at all or are occasionally ponded, indicating that the source of water to form hydric soils is not from groundwater but from precipitation or flood events; 3) as pointed out in the soils impact analysis section, groundwater drawdown may cause changes to plant communities if the hydrophytic vegetation cannot be supported but overall plant cover, which is a key to minimizing wind erosion, likely would remain similar to baseline conditions; 4) physical and biological crusts would remain to control wind erosion even with groundwater drawdown. Therefore, in this region, other soil characteristics than soil moisture derived from groundwater would continue to keep windblown dust from playa surfaces at baseline levels.
34540-8	The prediction that soils in areas of phreatophytes will remain bound continuously" by living and dead root systems is likely erroneous. More likely is that some portions of this ET unit will develop dry saline wetland conditions and barren soil conditions as the areas undergo medium altered hydrology and changes in species composition.	Please see Standard Resource Response Veg-5, which addresses the concern raised in this comment. Additional analyses will be performed during subsequent NEPA to address specific areas with specialized plant communities and specific soil conditions.
34540-9	The change to drought tolerant vegetation is also likely to be accompanied by alterations in soil conditions that affect the soils' propensity to yield windblown dust. The section states that "None of the surface area composed of this ET unit would be susceptible to wind erosion." Impacts cannot be assumed away in this manner, thereby removing this "ET unit" from further consideration of windblown dust emissions.	While some of the ET units, in particular those that are wetlands or riparian areas, are susceptible to wind erosion, this condition is not anticipated to change as a result of groundwater drawdown. See response to Comment 7 above for more detail.
34540-10	The change to drought tolerant vegetation is also likely to be accompanied by alterations in soil conditions that affect the soils' propensity to yield windblown dust. The section states that "None of the surface area composed of this ET unit would be susceptible to wind erosion." Impacts cannot be assumed away in this manner, thereby removing this "ET unit" from further consideration of windblown dust emissions.	While some of the ET units, in particular those that are wetlands or riparian areas, are susceptible to wind erosion, this condition is not anticipated to change as a result of groundwater drawdown. The types of vegetation is likely to change, especially on hydric soils, but the overall extent of plant cover that affects wind erosion is not projected to change. See response to Comment #7 above for more detail.
34540-11	Wetland/meadow: It is predicted that this cover type may change in species composition toward a greater fraction of shrubs and drought tolerant grasses and forbs. It is assumed that the soil binding properties of this cover type would not change, even though species composition may change. None of the surface area composed of this ET unit would be susceptible to wind erosion.	For a complete discussion of vegetative cover and potential erosion due to drawdown, please see Standard Comment Response Veg-5.
34540-12	Wetlands are much more insulated to wind erosion than "drought tolerant grasses and forbs". When one also takes into account the changes in soil chemical properties (especially salinity), the statement in the Draft EIS is much too general.	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.
34540-13	As the grass cover decreases, phreatophytic shrubs might invade, causing transition away from meadow (grass-dominated) to shrub-dominated communities. McLendon concludes "productivity and plant cover may decrease" due to a 10-ft decrease in the water table, which is in direct opposition to the Draft EIS report that "overall plant cover would likely remain similar to baseline conditions over time" (p. 3.4-32, BLM 2011). This statement contradicts the Draft EIS discussion of Phase 3 in the vegetation chapter, "Bare interspaces among shrubs would increase and some of these interspaces could be invaded by annual native and exotic species" (p. 3.5-40, BLM 2011).	Thank you for your comments. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document. There is ample scientific evidence indicating that while species shifts are very likely to occur as a result of groundwater drawdown, this does not necessarily correspond to an absolute reduction in cover (see Standard Comment Response Veg-5). The apparent contradiction between the two chosen statements fails to acknowledge Phase 4, which immediately follows Phase 3 in the text of Section 3.5. Phase 4 discusses an increase in dominance of upland species following a gradual decline in the dominance of phreatophytes. Without acknowledgement of the fourth phase, Phase 3 may easily be taken out of context.
34540-14	This paragraph states that "The major effect of future groundwater field development would be an expansion of surface disturbance activities over a large area within each hydrographic basin." For the reasons discussed in the preceding 3 comments, this disturbed area is likely to be larger than is characterized within this Draft EIS.	Please refer to standard resource responses Gen-1 and Gen-2 for information on this topic.
34540-15	The estimated increases in windblown dust in Tables 3.1-15 through do not include those associated with changes in playas and wetlands/meadows as discussed in the preceding comments.	Please see common response Air-11.
34540-16	The monitoring program should carefully consider siting in a location to sample potential windblown dust from playas as discussed in preceding comments.	Please see common response Air-13.

## Comments and Responses - Businesses

ID	Comment	Response
34540-17	The magnitude of the mitigation costs associated with suppressing fugitive dust emissions at Owens Lake, and the resultant extraordinary mitigation costs were not foreseen in the early years of the Los Angeles Department of Water and Power water project. Lessons learned at other water development projects may aid in the development of potential mitigation requirements associated with groundwater development and exportation in eastern Nevada. These requirements and costs should be factored into decisions relating to the feasibility, value, and potential economic costs of the proposed project.	Thank you for your comment. Please see SocEcon-1 and SocEcon - 3 regarding the inclusion of project cost information in the FEIS.
34540-18	The LADWP operates its groundwater production program in accordance with a 1997 Owens Valley Memorandum of Understanding between LADWP and Inyo County (LADWP, 2010). The required mitigation includes extensive monitoring of hydrology, condition of vegetation and dust generation. The mitigation also includes a series of projects such as revegetation with native flora, reinstatement of river flows, water augmentation for ponds, surface spreading of water, pasture irrigation, maintenance of waterfowl habitat, and measures to suppress fugitive dust (PM-10) generation (LADWP, 2010). The California Air Resources Board and the Great Basin Unified Air Pollution Control District require that LADWP control the fugitive dust. Techniques tested include sand fences, chemicals, covering the lake with old tires, as well as a proposal to pump treated sewage from Los Angeles. The methods that worked best were shallow flooding, vegetation, and gravel (Anderson, 2006). Based on a review of publically available references, capital expenditures for the Owens Lake Mitigation project as of 2011 are approximately \$540 million and yearly recurring costs range between \$41-66 million. While a direct relationship should not be inferred between what occurred at Owens Lake and what may occur due to the proposed project, it is important to address the potential for expensive, long term mitigation of windblown dust.	Thank you for the list of potential mitigation measures. Some of these measures are recommended as part of this DEIS. The BLM will review this list of measures and consider their use if appropriate. See also Standard Resource Response Air-21 and Air-10 regarding revisions in the air quality modeling completed for the FEIS and the dissimilarities between dust generation from a lake bed and that expected from long-term groundwater drawdown, and MM-1 for other proposed mitigation measures.
34540-19	The Conclusion states that "it is possible that windblown dust emissions from groundwater drawdown could impair visibility conditions at GBNP. The extent of possible visibility impairment is highly uncertain." The analysis of impacts upon GBNP should incorporate estimates of windblown dust emissions originating from impacted playas and wetlands/meadows as discussed in previous comments. This concern also pertains to the analysis of the other alternatives, as well.	Please see common response Air-5, Air-9, and Air-11 to address your concerns regarding visibility impairment at GBNP and inclusion of wetlands/meadows in the calculation of windblown dust.
34540-20	For the reasons listed in the preceding comments, the discussion of overall air quality impacts and the figures contained in Tables 3.1-22 and 3.1-23 underestimate windblown dust emissions generated as a result of the project.	Please refer to standard resource response Air-7 for information on this topic.
34540-21	The analysis of cumulative impacts does not include consideration of windblown dust emissions generated by disturbance to playas and wetlands/meadows.	Please see common response Air-11.
34540-22	The analysis should consider the potential for impact by wind-blown desert soils on duration of mountain snow cover in GBNP as well as other mountains in Nevada and Utah. Mountain snow cover is a critical resource as these high elevation mountain regions provide the majority of fresh water supply in arid and semi-arid environments. It is well known that dust in snow enhances absorbed solar radiation and melt rates. Painter et al. (2007) and Kedrowski and Toomer (2010), provide relevant analyses of the impacts of dust upon snow cover duration in a seasonally snow covered mountain range.	Please refer to standard resource responses Air 9, Air-10 and Air-18 for information on this topic.
34540-23	analysis of affected soils generating windblown dust is limited to those locations projected to have at least a 10' groundwater drawdown. This constraint upon the analysis discounts potential impacts to soil moisture and associated binding properties and dust generation for locations within groundwater drawdown of less than 10 feet. This limitation upon the analysis appears to be imposed throughout the Air Quality section.	Please see WR-1 for information on the use of the 10-foot drawdown.
34540-24	estimated increases in windblown dust in Tables 3.1-25 through do not include those associated with changes in playas and wetlands/meadows as discussed in the previous comments. The total 66 emissions are likely to be higher than reflected in these tables.	Please refer to standard resource responses Air-9 and Air-11 for information on this topic.
34540-25	This section states that "at current levels of groundwater pumping and the addition of other projects, there would be an increase in current No levels of windblown dust generation due to changes in vegetation and groundcover." It seems inappropriate to assume some unplanned future projects (as part of No Action) that would cause changes in vegetation and soil conditions .... and then compare such changes to the Proposed Action and alternatives being considered by this Draft EIS. Rather, the No Action alternative should reflect no action. The project proponent should not set up a set of undefined "straw man" projects that are assumed also to negatively affect the study area, and then compare this set against the Proposed Action.	Please refer to standard resource response Veg-5 for information on this topic.

## Comments and Responses - Businesses

ID	Comment	Response
34540-26	One of the best sources of information that can be utilized in evaluating project impacts is the soil surveys prepared by the Natural Resources Conservation Service. It is evident that this resource was not appropriately utilized, and that considerable existing information on the site conditions of the Spring Valley lands was available which, if properly used, would have resulted in conclusions far different from those presented in the Draft EIS. It is not clear why this information was not used. The NRCS soil survey information is readily available on-line; it is extensive, comprehensive, site-specific, and is probably the most reliable data source available regarding soil and associated vegetation conditions.	All publicly available SSURGO spatial and tabular data from NRCS that cover the affected areas were used to characterize the affected environment and to perform the impact analyses. The soil surveys used are displayed on Figure 3.4-2 of the Draft EIS and are cited as the source of the tables listing soil characteristics, such as Tables 3.4-1 and 3.4-2. The use of SSURGO is also stated as the data source in the description of the Methodology for Analysis in Sections 3.4.2.1 and 3.4.2.8. The spatial and tabular data were used to evaluate the conditions of the soils in each basin, including Spring Valley, and to summarize the areas that would be likely to be affected by groundwater drawdown. The ecological site descriptions and predominant vegetation communities associated with the soil map units in SSURGO were also used as the primary source of data to project impacts.
34540-27	It is reasonable to conclude, in the absence of more site-specific information, that these playas are salt-encrusted wet areas that in many instances are frequently ponded. It should be noted that this is in strong contrast to the assumption stated in the BLM Draft EIS, which is presented on page 3.1-33: "Playas: It is assumed that the soil binding properties of this cover type would not change as a result of groundwater drawdown. It is assumed that windblown dust from playa surfaces would remain at baseline levels." This simple and single statement summarizes the conclusion reached in the Draft EIS. The statement that soil binding properties (the most important of which is moisture) would not change is without substance or support from any authoritative source. The logical assumption that follows states that "it is assumed that windblown dust from playa surfaces would remain at baseline levels" is likewise unsupported and without foundation.	While it is true that the playa soils are listed in the SSURGO data for this region as frequently ponded, the ponded water comes from localized perched water tables or precipitation rather than from the groundwater table. Note that, per the soil survey, one of the predominant soil series within the Playas map unit is the Chuffa Series, which is described as usually dry and moist for short periods, Soil moisture is not the primary factor in holding soil in place during winds high enough to cause erosion in this region. Other factors such as physical (salt crust) and biological crusts, vegetation, rock fragments, and soil texture and structure would continue to control windblown dust from playa surfaces even with groundwater drawdown.
34540-28	The EIS only addressed potential impacts to wetlands in terms of declining water tables on vegetation and aquatic biological resources, with no mention of the role of wetlands in protecting the environment, shallow aquifer recharge, flood mitigation, and surface water quality. No discussion of the natural filtering processes and environmental role of wetlands ecosystems is included.	Thank you for expressing your concerns related to the Draft EIS. Potential impacts to wetland vegetation are discussed in Section 3.5 of the EIS, and are quantified in terms of total disturbance acreage. Impacts to water resources are discussed in detail in Section 3.3. Your suggestions have been carefully considered by the BLM, but have not resulted in changes to the analyses presented in this document.
34540-29	Only groundwater quality is addressed in the Draft EIS; surface water quality is not. Loss of wetlands will result in surface water quality degradation. Dense wetland vegetation slows water velocity in channels during runoff events. If vegetation density decreases due to groundwater drawdown, downstream flooding is more likely, and less aquifer recharge will occur as the residence time in the recharge area is decreased.	The potential effects to surface and groundwater quality are evaluated in Section 3.3 of the EIS.
34540-30	Draft EIS does not address the potential impact of salinization on the vegetative community as the water table declines.	Thank you for your comment. Additional analyses will be performed during subsequent NEPA to address specific areas with specialized plant communities and specific soil conditions.
34540-31	It is our opinion there will be a decrease in vegetative production and plant cover that accompanies the shift in species composition on much of the area currently supporting phreatophytes. These changes will leave more soil surface area exposed, increasing the potential for wind and water erosion. These effects have not been fully evaluated in the Draft EIS. Current information is likely sufficient to make a reasonable evaluation of the effects of the project.	Please see Standard Resource Response Veg-5, which addresses the concern raised in this comment. Additional analyses will be performed during subsequent NEPA to address specific areas with specialized plant communities and specific soil conditions.
<b>Natural Resources Project Management</b>		
34951-1	the one reference by Hinds is grossly inefficient in light of hundreds of articles in the literature on particulate transport stating travel in the hundred and thousands of miles RECOMMENDATION: postpone this DEIS until a thorough study is done	Please see common responses Air-7, Air-8 and Air-9 to address your comments regarding the transport of particulate matter.
34951-2	erionite - due to the massiveness of the construction project and the millions of acres affected by increased dust events, a study with soil sampling needs to be conducted along the construction track and the impacted areas. Postpone the DEIS until this is completed	Please see common response Air-2.
37009-1	Herein is additional literature that makes the case that long-range transport of particulate matter will reach the Wasatch Front if groundwater pumping desiccates Spring and Snake Valleys. Academic documentation of annual migration of Saharan Dust to the Caribbean and the SE US have been around for more than a decade, based in part on satellite data and IMPROVE network speciation. African Dust and the Demise of Caribbean Coral Reefs <a href="http://www.rsmas.miami.edu/assets/pdfs/mac/fac/Prospero/Publications/Shinn_Prospero_dust%20corals_GRL00_2000GL011599.pdf">http://www.rsmas.miami.edu/assets/pdfs/mac/fac/Prospero/Publications/Shinn - Prospero_dust%20corals_GRL00_2000GL011599.pdf</a> Saharan dust transport over the North Atlantic Ocean and Mediterranean: an overview <a href="http://books.google.com/books?hl=en&amp;lr=&amp;id=7vOJ9l9uwroC&amp;oi=fnd&amp;pg=PA133&amp;dq=transatlantic+saharan+dust&amp;ots=g4IR0AHjNA&amp;sig=K5TzkaSRXGQ-wXbp1Ww77axKTnwMeasuring Trans-Atlantic Aerosol Transport From Africa">http://books.google.com/books?hl=en&amp;lr=&amp;id=7vOJ9l9uwroC&amp;oi=fnd&amp;pg=PA133&amp;dq=transatlantic+saharan+dust&amp;ots=g4IR0AHjNA&amp;sig=K5TzkaSRXGQ-wXbp1Ww77axKTnwMeasuring Trans-Atlantic Aerosol Transport From Africa</a> <a href="http://sunburn.aoml.noaa.gov/phod/docs/Morris_etal_EOS06.pdf">http://sunburn.aoml.noaa.gov/phod/docs/Morris_etal_EOS06.pdf</a> Dust altitude and infrared optical depth from AIRS <a href="http://hal.archives-ouvertes.fr/docs/00/32/83/70/PDF/acp-4-1813-2004.pdf">http://hal.archives-ouvertes.fr/docs/00/32/83/70/PDF/acp-4-1813-2004.pdf</a>	Please refer to standard resource responses Air-8, Air-10 and Air-14 for information on this topic.
37009-2	Gobi Desert Dust can also impact North America, but not necessarily as frequently as Saharan: Asian dust events of April 1998 <a href="http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.11.2987&amp;rep=rep1&amp;type=pdf">http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.11.2987&amp;rep=rep1&amp;type=pdf</a> Trans-Pacific Air Pollution <a href="http://www.sciencemag.org/content/290/5489/65.full">http://www.sciencemag.org/content/290/5489/65.full</a> The impact of transpacific transport of mineral dust in the United States <a href="http://www.sciencedirect.com/science/article/pii/S1352231006009915">http://www.sciencedirect.com/science/article/pii/S1352231006009915</a>	Please see common response Air-10.

## Comments and Responses - Businesses

ID	Comment	Response
37009-3	Within the US, satellite images occasionally show dust plumes originating in the desert south west (Arizona, New Mexico, Texas) and impacting the upper Midwest or east coast. Also within the US, a lot of attention is currently being placed on dust storm transport from the desert floor into the high Rockies, where the dust can deposit and lead to early snow melt by changing the color of the snowpack. Dirty Snow: Documenting the 2009 Dust Storm Events in Colorado's San Juan and Elk Mountains with Repeat Photography and Historical Snow Pack Data <a href="http://www.nwas.org/ej/2010-EJ7/http://earthobservatory.nasa.gov/IOTD/view.php?id=39164">http://www.nwas.org/ej/2010-EJ7/http://earthobservatory.nasa.gov/IOTD/view.php?id=39164</a> NASA Study Shows Desert Dust Cuts Colorado River Flow <a href="http://www.jpl.nasa.gov/news/news.cfm?release=2010-306">http://www.jpl.nasa.gov/news/news.cfm?release=2010-306</a> Impact of disturbed desert soils on duration of mountain snow cover <a href="http://www.colorado.edu/admin/announcement_files/1649-uploaded/announcement-1649-4670.pdf">http://www.colorado.edu/admin/announcement_files/1649-uploaded/announcement-1649-4670.pdf</a>	Please see common response Air-10 and Air-18.
37009-4	Within Utah, it is not unusual to see very pronounced dust plumes extending more than 100 miles; this image was from the April 19, 2008 high wind exceptional event demonstration from the Utah DEQ.	Please refer to standard resource responses Air-8, Air-10 and Air-14 for information on this topic.

### **Nevada Bureau of Mines and Geology**

34186-1	In reading the draft EIS, I noticed that no mention was made of the groundwater subsidence studies that have already been completed for the basins under consideration for water rights applications, and I would like to bring your attention to these studies. I conduct groundwater subsidence research using InSAR (interferometric synthetic aperture radar) methodologies, and our lab has completed a number of such studies throughout Nevada, including subsidence studies in Las Vegas, Pahrump, Mesquite, Reno, in agricultural basins such as Diamond Valley, and in mine dewatering basins of the Carlin gold trend. In 2009 we completed a one-year baseline subsidence study for SNWA of all the groundwater basins traversed by the proposed project pipeline, including the basins with pending water rights applications: Spring, Cave, Dry Lake, Delamar, and Snake. I have attached a location map showing the InSAR data used to study the pipeline route (shown in red).	In response to the comment, the report by Bell et al (2009) was obtained and its conclusion was included in the Final EIS, Section 3.2.2.9, p. 3.2-30, Groundwater Pumping. The EIS text was revised to indicate that baseline measurements indicate there is little to no subsidence in basins to be developed under the proposed action and alternatives, but the amounts of water being pumped from these basins is much less than the proposed groundwater development project.
34186-2	The title of the final technical report provided to SNWA is "Baseline InSAR Study of Groundwater Basins in Eastern Nevada", and the SNWA Project Manager for this study was David Donovan. The purpose of the study was to develop an aquifer response baseline for the basins prior to the initiation of pumping by SNWA. InSAR has the capability to detect sub-centimeter-scale ground movement associated with aquifer- system response, and the study was intended to provide SNWA with baseline data beginning from about 1992 of the impacts of current water withdrawals in these basins. In addition, we looked for indicators of groundwater pumping in three basins that have earth fissures, which are commonly associated with subsidence: Garnet, Delamar, and Dry lake Valleys. The results of the study showed that little to no significant evidence of groundwater pumping impacts was present in any of the basins between 1992-2007, and we were unable to detect any subsidence that could be associated with the areas of earth fissures. I believe that SNWA would be happy to provide you with a copy of our report, or I could make arrangements to send you a copy.	See response to comment #1 above.
34186-3	As a side note, I have looked over the groundwater drawdown maps contained in the draft EIS, and several of the maps show drawdowns of tens of feet depending on the projected time frame. Based on our studies of other Nevada groundwater basins, such drawdowns will almost certainly result in measureable aquifer-system compaction and subsidence.	See response to comment #1 above.

### **Nevada Mining Association**

34800-1	The Association has no position in favor of or in opposition to the proposed project. The Association does ask the BLM to consider the extensive mineral potential in the project area and ensure that those resources are not in any way impacted or removed for future consideration for exploration, extraction and beneficiation.	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.
34800-2	Additionally, sufficient water must be retained within the project areas to allow for future economic development in those areas (including mining).	Updated section 1.4 discusses the NSE process and potential water rights issues.

### **Nevada Partners, Inc.**

34234-1	A diverse water supply is essential for southern Nevada to continue rebuilding from the economic challenges facing the state. Without one, investors and tourists alike will lose confidence in the community.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
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### **Paxton Mineral Corporation**

33865-1	Exploration, development, establishment of production sites, and production on private mineral rights owned by me as an individual proprietor on private and public lands in the Utah counties of Millard, Sevier, and Paiute would be impacted by a lack of water and a dust hazard in what could be a totally destroyed environmental and echo system causing unanticipated impacts.	The action before the BLM is a request from the Southern Nevada Water Authority for a right-of-way. The Nevada State Engineer is responsible for decisions related to granting water rights. Potential impacts related to water and air quality have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.
33865-2	Because the huge aquifers left in the Great Basin when Lake Bonneville receded have almost insignificant recharge in relation to their size and are essential for the maintenance and sustainability of the environment	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 - Businesses

ID	Comment	Response
33866-1	[Concerned about] the adverse impact that the proposed Great Basin Pipeline of Southern Nevada Water Authority (SNWA) would have on geothermal prospects that our corporation owns on both sides of the Millard/Beaver county line around the junction of I 15 and I 70 and Cove Fort and Dog Valley in Utah.	Potential impacts related to water have been addressed at a programmatic level in this EIS. Subsequent NEPA will be required to determine and disclose site-specific impacts.
33866-2	Cove Fort is a historic site which would be adversely impacted by dust and a lack of water	Unavoidable adverse effects to historic properties will be avoided, reduced, or mitigated in accordance with the Programmatic Agreement.
33866-3	interstate commerce over interstate highways 15 and 70, which intersect near Cove Fort, would be adversely impacted by dust.	Dust impacts during construction would be mitigated by best management practices and applicant committed measures presented in the Final EIS.
33869-1	I wish to comment on prospective negative impacts on mineral holdings which we own in Millard (the Pahvant Valley, which is a neighboring valley to the Snake Valley, and the Pahvant Mountain Range), Beaver, Sevier, and Piute Counties in Utah. We believe that if the proposed Great Basin Pipeline of the Southern Nevada Water Authority (SNWA) were to be built it would cause environmental impacts, in the afore mentioned areas of the Great Basin, that would severely impair if not preclude exploration, development, and production of gas, oil, and minerals, which is vital to national economic prosperity and homeland security.	Thank you for expressing your concerns related to mineral exploration, development, and production. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in this document.
33869-2	Recent evidence that Spring Valley aquifers and Snake Valley aquifers are interconnected mandates our opposition to water being taken from Spring Valley aquifers.	Comment noted, interconnections between the valleys is addressed in the Water Resources section of the FEIS (3.5).
33869-3	Our corporation is vitally interested in insuring the health, wellbeing, safety, and living and working environment of anyone who we might employ.	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.
33869-4	We oppose destroying thousands of acres of wetlands, hundreds of springs, hundreds of miles of streams, and hundreds of thousands of acres of vegetation.	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.
33869-5	Adding tens of thousands of tons of windblown dust containing radioactive materials deposited downwind from earlier above ground nuclear testing in Southern Nevada to our environment on an annual basis is unacceptable.	Please see common response Air-1.
33901-1	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.
33901-2	Tell BLM you support the No Action alternative, which is the only one that conforms to BLM's mission: "to sustain the health diversity and productivity of the public lands for the use and enjoyment of pre-sent and future generations." BLM should not approve a project that will impose harmful irreversible and irretrievable impacts on public lands and resources.	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.
33901-3	Tell BLM you support the No Action alternative, which is the only one that conforms to BLM's mission: "to sustain the health diversity and productivity of the public lands for the use and enjoyment of pre-sent and future generations." BLM should not approve a project that will impose harmful irreversible and irretrievable impacts on public lands and resources.	Thank you for expressing your concerns. While statements of opinions 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.
33901-4	All of the action alternatives will result in future efforts by SNWA 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.
33901-5	Predicted massive land subsidence area of 5 ft. + is an unacceptable irreversible impact of unlawful groundwater mining.	Please review revised section 3.18 (socioeconomics and environmental justice) which discuss potential subsidence from groundwater pumping.
33901-6	DEIS projects unacceptable adverse impacts on hundreds of existing surface and groundwater rights.	Please refer to updated sections 3.3 (water) and 1.4 (NSE requirements) for information on this topic.
33901-7	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 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.
33901-8	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 response SocEcon-5 for information responsive to this comment.
33901-9	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.
33901-10	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.

## Comments and Responses - Businesses

ID	Comment	Response
33901-11	DEIS provides insufficient information on impacts to Fish Springs NWR and Deep Creek Valley.	The FEIS discussion on impacts to these areas has been improved.
33901-12	DEIS provides insufficient information on impacts to Steptoe Valley.	Impacts to Steptoe Valley related to ground disturbance from power line installation are disclosed as a component of the total disturbance. Steptoe Valley is not a pumping basin, therefore, additional ground disturbance is not anticipated. Any impacts anticipated to occur from groundwater pumping for the alternative chosen by the BLM in the Record of Decision will be addressed in subsequent NEPA actions specific to that region, as appropriate.
33901-13	EIS fails to adequately analyze adverse impacts on and mitigation for X ranching X wildlife habitat X local businesses ___ wild horses ___ Other Hydrological impacts on mineral extraction.	Impacts for the referenced resources were analyzed in the EIS with a combination of BMPs, applicant-committed measures, and additional mitigation to be implemented through BLM's COM Plan for the protection of these resources.
33901-14	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.
33901-15	DEIS is inadequate in scope. Since there is some evidence that aquifers of the roughly 200,000 square mile Great Basin which covers areas of Nevada, Utah, California, Oregon, Wyoming, and Idaho are interconnected and there is no evidence that they are not interconnected, it is logical that pumping and piping that would carry water from any of these aquifers would have adverse environmental impacts on the entire Great Basin.	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.
33901-16	I am concerned about the impacts on me, as a mineral rights owner, impacts on Paxton Mineral Corp as a mineral rights owner and me as an irrigator. I am also concerned about impacts on drinking water, locally grown foods, animals, wildlife, and scenic attractions.	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.
33901-17	The scope of this project needs to include the entire 200,000 square miles of the Great Basin. Impacts on geothermal projects such as pressure and the separation of steam need to be addressed. Impacts on hydrogeological pressure affecting production of gas and oil need to be addressed.	Text has been added to address this comment. Please refer to section 3.11 (mineral resources).
33901-18	Hydrological pressure affecting gas, oil, and geothermal production may be affected by massive pumping down of the inter-connected aquifers of the Great Basin. The entire Great Basin should be included in the Draft EIS. If this project were to be built, there would be less impact on fewer natural resources until there would be little impact to be concerned about. I favor the no action alternative.	Text has been added to address this comment. Please refer to section 3.11 (mineral resources).
<b>Silver Jack Inn &amp; LectroLux Café</b>		
34266-1	BLM' s discussion of particulate transport is seriously flawed and I recommend that the DEIS decision be delayed until a full study is done on this issue. Hundreds of articles on particulate transport over vast areas in the hundreds of miles (e.g., Saharan desert duct to Europe) are noted and available. The statement ("Most emissions in the PM10 size range will decrease exponentially during downwind transport as they are removed from the atmosphere due to gravitational forces (Hinds 1999). Ultra fine particles, less than 0.1 micron in diameter, are June 2011 BLM Chapter 3, Page 3.1-60 Chapter 3, Section 3.1, Air and Atmospheric Values Cumulative Impacts removed from the atmosphere by diffusion to surfaces and also do not travel very far downwind (Hinds 1999). Only a very small fraction of wind erosion emissions from the cumulative project area are expected to be transported Into Salt Lake County, Utah, which is over 50 miles from the closest area expected to be impacted by groundwater drawdown") cannot be supported by extensive literature on the transport of particulates which state they can travel hundreds of miles and certainly to the Wasatch Front in Utah.	Please see common responses Air-7, Air-8, and Air-10.
34266-2	This project will generate 34,742 TONS of windblown dust PER YEAR, containing radioactive materials deposited downwind from the nuclear testing as well as heavy metals that impact human health such as asbestos, zinc, cadmium and selenium.	Please see common responses Air-3, Air-1, and Air-2.
34266-3	The DEIS quotes Professor Hinds' textbook on aerosol particles (dust) and insinuates they fall out rapidly. I spoke with Dr. Hinds yesterday and this was what he stated. First it depends on the extent and force of a dust storm. He acknowledged the incident where dust was settling in Los Angeles carried hundreds of miles from the dry Owens lakebed. There is a volume of research on dust being carried for hundreds of miles such as comes to the Wasatch Front from the west desert.	Please see common responses Air-7, Air-8 and Air-9 to address your comments regarding the transport of particulate matter, and Air-10 to address your concerns regarding potential similarities with Owens Lake.
34266-4	I also asked Dr. Hinds about this statement in the DEIS: "Ultra fine particles, less than 0.1 micron in diameter, are removed from the atmosphere by diffusion to surfaces and also do not travel very far downwind (Hinds 1999)." Dr. Hinds called this statement "a stretch".	Please see common response Air-7.
34266-5	It is clear to me from these citations that your analysis cannot be supported by the literature.	Please see common response Air-7.
34266-6	It is my expert opinion that these potential impacts be fully investigated prior to any decision to withdraw any water from desert valleys, and if as I suspect such problems will occur, withdrawals can not be tolerated without violations of federal air quality statues.	Thank you for expressing your concerns. While statements of opinions 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.

## Comments and Responses - Businesses

ID	Comment	Response
<b>Slash X Ranch</b>		
34349-1	The analysis does not provide specific impacts to Hiko, Crystal, and Ash Springs in Pahrnagat Valley.	The potential effects to flow in Hiko, Crystal and Ash Spring in Pahrnagat Valley is evaluated in Section 3.3 of the EIS.
34349-2	It does not provide sufficient information on the long term effects this entire project will have on quality of life for current and future residents of Pahrnagat Valley, their livestock and resources.	Thank you for your comment. The water resources assessment does indicate a potential for long-term drawdown in the eastern portions of the Pahrnagat Valley under the Proposed Action, Alternatives A through C, E and F. In addition the effects in Delamar and other valleys could contribute to adverse impacts on the quality of life of residents. Text to this affect has been added in Section 3.18.2.8.
34349-3	1. This DEIS fails to disclose project costs and sources of funding	Thank you for your comment. Please see SocEcon-1 regarding the inclusion of project cost information in the FEIS.
34349-4	2. This DEIS establishes no reasons for granting approval to a project that will improve harmful, irreversible impacts on public lands and resources.	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.
<b>Solar Power &amp; Water Inc.</b>		
33850-1	The proposed SNWA pipeline will not be necessary.	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.
33896-1	The Water Pipeline Project is unnecessary. We, Solar Power&Water® Inc., will be able to supply Pat Mulroy's Southern Nevada Water Authority's 2025 goal of 400,000 afy as outlined in a presentation to her Board of Directors on 2/16/2006. No pipeline in Nevada will be necessary. See <a href="http://www.solarpowerandwater.com">http://www.solarpowerandwater.com</a> and read it thoroughly.	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. This information will be provided to SNWA for their use in future water resource planning.
33900-1	We, Solar Power&Water® Inc., plan to supply the Wellton Mohawk Irrigation and Drainage District its 400,000 acre feet per year diversion water amount with new water extracted from the Gulf. The diversion water can instead be drawn by SNWA from Lake Mead with no grab pipeline needed.	Other sources of water are outside the scope of the EIS analysis. Other sources of water are considered in the SNWA Water Plan, of which the GWD project is an element.
34123-1	Among the faults are a failure to disclose the economic cost of the project, and the lack of specificity of well locations to gauge the environmental impacts.	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 more detail in future, tiered NEPA.
34123-2	the DEIS fails to 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."	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.
34123-3	Anyone the least bit interested in the Groundwater Development Project should be very interested in our alternative and should be talking with us about it.	Your comment is noted regarding an alternative water source.
<b>Southern Nevada Building and Construction Trades Council</b>		
34223-1	The Draft Environmental Impact Statement does not address the economic implications to Clark County should the SNWA's Groundwater Development Project be constructed. However, without this project, there will be not only be no growth and development in Southern Nevada, the sustainability of the existing community will be in jeopardy.	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, and that SNWA could pursue other sources of additional water should the project not proceed (as noted in Section 3.18.2.17.)
34240-1	The Draft Environmental Impact Statement does not address the economic implications to Clark County should the SNWA's Groundwater Development Project be constructed. However, without this project, there will be not only be no growth and development in Southern Nevada, the sustainability of the existing community will be in jeopardy.	Thank you for your comment regarding the potential implications for Clark County should the GWDP not proceed. The concern is acknowledged 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 (as noted in Section 3.18.2.17.)
<b>Stewart-Nevada Enterprises</b>		
35009-1	When considering the SNW A's project, be sure to keep in mind the businesses and citizens who call Clark County home and the considerable fiscal support they provide for the entire Silver State.	Thank you for your comment.
<b>Terrible Herbst</b>		
33988-1	The DEIS does not include impacts of well locations nor any alternatives to this proposal	Please refer to standard resource responses Gen-1 and Gen-2 for information relevant to this comment.
<b>The Old Mill Ranch</b>		

## Comments and Responses - Businesses

ID	Comment	Response
38044-1	Estimated cost projections by others than SNWA exceed estimates. SNWA guesstimates not fully substantiated. Funding is available per SNWA through bonds, etc. What equity will the bond holder require & at what Interest Rate? If SNWA defaults who will be responsible to pay the debt? Is the Most likely answer "the public"?	See also Standard Resource Response SocEcon-1 regarding the addition of project cost information in the FEIS.
38044-2	Should the areas surrounding the wells have drawdown who will guarantee recovery and how long will it take to accurately measure environmental impact?	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.
<b><u>The School of the Natural Order, Inc.</u></b>		
34144-1	In short, the survival of Home Farm, its homes Lead history, its natural beauty', and everything we have done here for almost 50 years to carry on Vitvan's legacy, is dependent on our water. If the proposed drilling and piping of water out of Snake Valley dries up our springs, as it almost certainly will do, this little community will cease to exist and an irreplaceable natural environment will be lost forever.	The text in Section 3.18.1.7 has been revised to acknowledge reliance by some residential users in Snake Valley on springs and shallow groundwater wells for potable water.
<b><u>The Wilkins Company</u></b>		
35210-1	I strongly support the Bureau of Land Reclamation's Draft Environmental Impact Statement, but I am concerned that it does not address the economic impact to Southern Nevada if the SNWA's application is denied. As Nevada's largest producer of tax revenue, it is imperative to the entire state that Southern Nevada remain economically stable.	The economic and tax linkages between Clark County and the remainder of the state are noted in Section 3.18.1.7. Also see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>Tivoli Village</u></b>		
37987-1	I strongly support the Bureau of Land Reclamation's Draft Environmental Impact Statement, but I am concerned that it does not address the economic impact to Southern Nevada if the SNWA's application is denied. As Nevada's largest producer of tax revenue, it is imperative to the entire state that Southern Nevada remain economically stable.	The economic and tax linkages between Clark County and the remainder of the state are noted in Section 3.18.1.7. Also see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>UI Technologies</u></b>		
35015-1	However, I noted that it does not address what the economic impact will be to Southern Nevada should the SNWA's applications be denied.	Thank you for your comment. Please see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.
<b><u>Univeristy of Utah</u></b>		
34053-1	Further, the remote and arid lands where the aquifer resides can ill afford to give up its only substantial source of water to one of the most water- and energy intensive population centers in the United States.	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.
<b><u>University of Utah Health Sciences Center</u></b>		
38007-1	Draining the ancient water from the Snake Valley will dry up the landscape there putting ranchers out of business and endangering the communities that live downwind. The soil in the Snake Valley contains erionites, specifically zeolite, a mineral similar to asbestos, that can cause a cancer known as mesothelioma as well as other diseases of the membrane that covers the lungs. This has been noted in Turkey, in the Cappadocia area. Also, the fine particulates will be blown into the Salt Lake Valley, an area that already exceeds EPA standards for levels of PM2.5. The soil may also contain radioactive fallout from the 1950's nuclear testing.	Refer to Section 3.12.3 for an assessment of Rangelands and Grazing cumulative impacts. Please see common responses Air-1 and Air-2 to address your concerns regarding the health effects of the dust that may be generated from the project. Please see common responses Air-8 to address your concerns regarding the transport of dust into Utah's Wasatch Front.
<b><u>Western AgCredit</u></b>		
34145-1	We are concerned that the proposed transfer of water will not only negatively impact available groundwater levels, but the resulting local negative environmental changes will likely disrupt storm patterns that provide critical surface water to the area.	Please refer to standard resource responses Air-15 and Air-16 for information relevant to this comment.
34145-2	If the SNWA is allowed to remove the large quantities of water from the Great Basin, it is doubtful that Western AgCredit would be able to continue to approve loans on the same terms and conditions as we historically have, because we won't know if the availability of water will be adequate to support the production of products to repay the loan(s).	Section 3.18 describes potential risks to local agriculture associated with long-term drawdown. The text in Section 3.18.2.8 will be revised to include credit access as a potential effect.
34145-3	It is difficult for agriculture located in the Great Basin to expand production to meet the growing demand for more food because of the current shortage of water. If SNWA is successful in gaining additional water (that is currently unappropriated) and/or they are able to build their pipeline, it will be next to impossible for the Great Basin farmers and ranchers to expand because the water has been moved to Las Vegas. In 2008, the agricultural industry contributed \$3.3 billion dollars to the economic output of the State of Utah. Most businesses in our rural communities rely very heavily on their agricultural customers to stay in business.	The underlying subject of this comment relates to the allocation of water resources in Nevada, as well as the implications of those allocations for Utah. As noted in Section 1.3.1, the LCCRDA requires agreement between Nevada and Utah on the diversion of water resources from interstate groundwater flow systems.

## Comments and Responses - Businesses

ID	Comment	Response
34145-4	In 2008, the agricultural industry contributed \$3.3 billion dollars to the economic output of the State of Utah. Most businesses in our rural communities rely very heavily on their agricultural customers to stay in business.	The value of the agricultural industry is included in Section 3.18, Socieconomics.
<b>Whipple Ranch</b>		
35305-1	There is not enough studies that this will not effect the growing water in Pahrnagat Valley.	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. Please review updated section 3.3 (water) for potential impacts from groundwater pumping.
<b>White Rock Outfitters</b>		
33904-1	The incredible and irreversible negative effects this project will cause in Dry Lake, Cave, Lake, Spring Valleys.	Thank you for your comment regarding impact concerns.
33904-2	Economical impacts to cattle ranching, farming and wildlife (outfitting) industries in Ln County.	The economic effects of the proposed project on cattle ranching and farming is addressed in Section 3.18, Socieconomics. Project effects on wildlife including big game are address in Section 3.6, Wildlife.
33904-3	A supplemental EIS that addresses impacts on all specific well locations.	Thank you for expressing your concerns related to the Draft EIS. Your suggestions have been carefully considered by the BLM. Additional NEPA will address specific well locations and other future facilities.
33904-4	The BLM cannot fulfill its obligation to protect the public trust resources under its management. Compliance with NEPA criteria is crucial for the preservation of the public land and resources for future generations.	Thank you for expressing your concerns. While statements of opinions 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.
<b>Williams College</b>		
35359-1	Please consider alternatives that do not involve a groundwater depleting pipeline.	Other alternatives were considered in the EIS but they were eliminated from further analysis, as discussed in Section 2.7.
<b>Zephyr Partners</b>		
37988-1	I strongly support the Bureau of Land Reclamation's Draft Environmental Impact Statement, but I am concerned that it does not address the economic impact to Southern Nevada if the SNWA's application is denied. As Nevada's largest producer of tax revenue, it is imperative to the entire state that Southern Nevada remain economically stable.	The economic and tax linkages between Clark County and the remainder of the state are noted in Section 3.18.1.7. Also see SocEcon-4 regarding the issue of social and economic implications for Clark County//LVV if the proposed GWP does not move forward.