

Baker Water and Sewer General Improvement District
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Baker, NV 89311

Penny Woods, BLM Project Manager
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Dear Ms. Woods:

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

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

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

The DEIS contains many flaws and inadequacies that must be addressed before any fully informed Record of Decision can be reached. C1 Among the faults are a failure to disclose and independently analyze the full economic cost of the project, a failure to disclose and analyze the C2 cost of proposed mitigation and monitoring, and a failure to include real alternatives to the

C2 cont'd

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. 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.

C3

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

The Baker Water and Sewer General Improvement District (herein referred to as "GID") is concerned that the pipeline will hurt the local economy due to decreased visitation because the area will become a less desirable place to visit. The GID is dependent on a healthy economy in order to maintain the current water system.

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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 GID water rights need to be protected for the Baker residents. The pipeline stops south of the town of

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Baker. We are concerned about where it will go around and what size will the pipeline be? What perennial creeks will be crossed and what cultural areas will be affected? SNWA needs to supply more information.

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. A representative from the GID should be included all of these areas.

C6

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. Local springs, wetlands and even some wells will go dry with a smaller drawdown. A much more detailed model is needed.

C7 → 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?

C8 → 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.

C9 → How long will this EIS be good for - Five, ten, twenty years? An alternative that doesn't affect Snake Valley water rights must be included. It is against the law to harm senior water rights.

C10 → We would like to see a 90 day extension on the DEIS comment period. We would support the BLM with a NO ACTION alternative, the only one that we believe conforms to the BLM's mission "to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations." The BLM should not approve a project that will impose harmful, irreversible and irretrievable impacts on public lands and resources.

C11 → We would also like to see a Supplemental EIS that address impacts from specific well locations. This DEIS fails to disclose project costs and sources and cost of funding. It also fails to adequately assess the purpose and need for the project. We would like to see the BLM delay their decision because of the large number of unknowns and uncertainties.

Thank you for your time and consideration.

Sincerely,

Tom Baker
Chairman, Baker Water and Sewer GID