

BLM_NV_NVSO_GWProjects

From: Kerry Kelly <kerrykel@hotmail.com>
Sent: Sunday, October 09, 2011 11:12 PM
To: BLM_NV_NVSO_GWProjects
Subject: Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft EIS

Dear Ms. Woods,

I am writing to express my concern about several aspects of the draft EIS.

C1 → 1. Figure 3.3.1-1 appears to be blank, making it difficult to frame my comments.

C2 → 2. You have not adequately considered air quality impact of groundwater removal (dewatering) these regions, which would lead over the long term to loss of vegetation and higher levels of windblown dust (PM10 and PM2.5) and visibility impairment. I believe that once you consider the effect of dewatering on windblown dust, you could very well be above the conformity threshold levels.

C3 → 3. I disagree that the proposed project will have no effect on Utah because none of the right of ways extend in to Utah. Several counties in Utah are in non-attainment for PM10, and EPA recently proposed to disapprove Utah's redesignation request for PM10. This disapproval was based, in part, on PM10 levels in Utah during high-wind events, when dust can be transported 100s of miles. The proposed project will exacerbate current problems with achieving PM10 NAAQS in Utah.

Sincerely,

Kerry E. Kelly, PE
Utah Air Quality Board Member