

REC'D - BLM - NSO  
9:00 A.M. OCT 01 2012

**Dennis Ghiglieri**  
619 Robinson Court  
Reno, NV 89503

Routing	
	Copies Received
1	SD
2	ASD
	LE
	EEO
	Office of Comm.
	Fire
	Support Services
	Minerals
	Resources
	Special Records

September 27, 2012

Amy Leuders, Director  
Nevada Bureau of Land Management  
1340 Financial Blvd.  
Reno, NV 89502  
Email: [nvgwprojects@blm.gov](mailto:nvgwprojects@blm.gov)

RE: Final Environmental Impact Statement on the SNWA pipeline proposal

Dear Director Leuders,

3 Penny

The Final EIS for the SNWA Pumping and Pipeline project, like the draft, reveals that the public lands, the environment, the citizens of southern Nevada and rural Nevada will suffer irrevocable harm if the proposed action or any of the alternatives "A" through "F" is chosen. The BLM should select the "No Action" alternative.

Inexplicably, the BLM has added a new alternative "F" to the FEIS, which excludes a Snake Valley right-of-way, but allows SNWA to pump 45% more groundwater than alternatives "D" and "E" that also exclude Snake Valley and substantially more water than is currently permitted to SNWA in the four valleys (Spring, Cave, Dry Lake, and Delamar). Further, since SNWA can submit a request to the BLM for a ROW to Snake Valley at any time, the exclusion of Snake Valley is temporary at best. Alternative "F" allows an increase of impacts to public land and all springs, seeps and surface water resources due to "F"s higher permitted amount of groundwater to be pumped.

Despite the BLM's attempt to improve the effectiveness of mitigation requirements in the Final EIS, the serious, negative impacts to public land, water resources, and groundwater dependent plants and trees in the 5 targeted valleys are scientifically certain to occur. The contradiction that is inherent in the Final EIS is that the project will be shipping up to 177 thousand acre-feet annually through the ROW but also claims that mitigation which could curtail or stop pumping will be able to prevent the most serious impacts because of monitoring. The science, documented in the FEIS, shows that negative impacts to groundwater dependent resources continues to increase as pumping continues and that the only effective way to deal with these negative impacts is to cease pumping which is in direct conflict with the purpose of the project.

The project in the Final EIS no longer has a start date. Clearly there is no basis for making a decision now on what appears to be a highly speculative project. Nevertheless, the BLM is poised to make an irrevocable decision to grant a perpetual ROW based on FEIS information which is almost assuredly going to be out-of-date

should the project actually begin to move forward at some undefined time in the future. With little opportunity for financing and no need for the water in southern Nevada and many far less expensive alternatives to increase water security for Las Vegas Valley residents, this project has no reason to proceed. The lack of a start date only confirms all of the above. They represent sufficient reasons to reject granting the ROW and select "No Action".

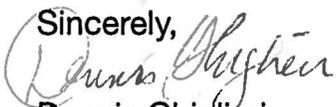
The Final EIS fails to define scientifically quantifiable ways to achieve the objective of protecting the public land, water resources, and water dependent vegetation using the FEIS proposed mitigations. The idea that you can "adapt" management in some way to make up for the continued decline in groundwater due to pumping is absurd. It deceptively claims to protect public resources that the BLM is required by law to protect, but mitigation will fail to do so as long as pumping continues. The only mitigation for a declining water table and the extinguishing of vegetation, springs, and seeps is to stop pumping, but once the effect is seen the recovery time is very long. The project cannot operate and also protect public land and resources. The two things are incompatible. There are numerous examples around Nevada where groundwater pumping has extinguished surface water resources even though far less groundwater is being pumped.

The Final EIS fails to evaluate the reliability of the proposed groundwater supply that could be tapped without affecting public lands and resources – which is a claimed goal of the proposed mitigations. How does the reliability of the proposed groundwater supply compare to other alternatives? In order to protect resources that both the BLM and the SNWA claim will be protected is the amount of groundwater significant to SNWA's existing supply? There are substantial losses which will accrue to public lands and resources should this project ever move forward, but there is no evaluation in the FEIS whether this supply is any more reliable than the Colorado River or existing groundwater resources in the Las Vegas Valley.

The Final EIS is silent on whether or not there will be sufficient resources available to SNWA (or to the BLM) to implement any of the mitigation, monitoring, or voluntary measures talked about in the FEIS. Even if the monitoring is setup initially what assurance is there that mitigation and monitoring will continue? How will the BLM enforce and ensure compliance should the project be implemented in the future?

The BLM should reject signing a ROD for the proposed action or any of the alternatives "A" through "F" and select the "No Action" alternative.

Thank you for the opportunity to comment.

Sincerely,  
  
Dennis Ghiglieri