

The SNWA GWD FEIS is inadequate and should not be used to make critical decisions that affect the driest state in the nation's groundwater sources in perpetuity.

The FEIS does not address an in-depth cumulative impact analysis that the SNWA GWD project will have on the natural environment in the five (5) valleys). The SNWA GWD project is being made based solely on speculation that will undoubtedly destroy the valleys along with its social and economic potential. A project of this magnitude should not be made on speculation or the unknowns.

The FEIS does not address the profound compound effect on a multitude of species and organisms and habitat types affected because they are chained and linked together in the five (5) valleys. The FEIS has only a sketchy understanding of the area's climate, growing seasons, and soil productivity.

The FEIS does not include monitoring and mitigation of Indian sacred and spiritual sites which are within the SNWA GWD project area, including the Swamp Cedars.

The FEIS does not address the creation of an ecosystem-wide problem that will leave a sad legacy of environmental destruction in the five (5) valleys.

The FEIS fails to recognize long-term drought impacts on the water availability in the five (5) valleys, it does

The FEIS does not address the additional impacts and uncertainties posed by the distributed pumping (lateral lines) that will cause a domino effect on the environment in the five (5) valleys.

The FEIS must address cumulative impacts the project will have on the local and regional ecosystem, including drought, related to reduced precipitation, increased evaporation, and increased water loss from plants in the five (5) valleys.

The FEIS does not address decrease of water quality as water table is being lowered and replaced by gypsum, anhydrite (calcium sulfate), and halite (rock salt) which are present in the deeper fine grained sediments of the central parts of the basins in the five (5) valleys.

The FEIS groundwater modeling assumes the ground water flows between basins through permeable carbonate rocks in the basins and may or may not flow from recharge areas in the mountains to local basins through permeable carbonate rocks bordering the part of the aquifer system in the five (5) valleys.

The FEIS does not address mitigation of the cumulative impacts of the environment by the SNWA GWD in the five (5) valleys. The practice of conservation and carefully utilization of the natural resources is acceptable, but exploitation of the water is not acceptable.

The FEIS does not recognize long-term drought impact, climate change, and its effects on water recharge.

The FEIS acknowledges that there will be substantial irreversible, irreparable injury and damage to the local and regional ecosystem and does not include preventive remedy in the mitigating plan in the five (5) valleys.

The FEIS does not describe if the local streams and aquifer are in direct hydraulic connection and does not indicate if the surface and ground waters function as an interdependent stream-aquifer system in the five (5) valleys.

The FEIS monitoring, mitigation, and supporting documents do not describe a clear set of conditions that will trigger shutting off the pumps in the five (5) valleys and is unenforceable. A “closed mind creates a closed heart”.

The FEIS does not include Environmental Assessment for each well site and for the capillary distributive water pipes. This indicates when the cone depression is starting and shows when the ground is starting to subside at the well site in the five (5) valleys.

I strongly recommend that the BLM select the “NO ACTION” alternative because of the uncertainties, its cost, its irreparable adverse affects on the natural environment and ultimately depleting of the water sources in the five (5) valleys.

There is value in the desolate valley areas left just as it is. The Indian Tribes should not be deprived of water while the other communities are protected and safe-guarded.

The development costs are not identified in the FEIS, the public is left without any information on the overall costs, which could be borne by those who will not benefit from the water, including the Tribes. There is nowhere in the FEIS that the BLM knows what the cost of developing the water will be?

The FEIS does not address the project cost-benefit ratio. There could be a lack of economic return for investments and the project would not be paid back for hundreds of years leaving the costs to be borne by the taxpayers (benefitting or not) .

No responsible person on Earth contends that the cumulative impacts should be ignored. The question that must be answered is: Is it a wise decision to allow a project that will make the area void of all life when the decision is made from speculation.

The Owens Valley groundwater drawdown eliminated desert plants which normally survives on meager capillary action of groundwater. The SNWA GWD will drawdown the water levels which will make the valleys an extension of the Bonneville Salt Flats.

I strongly recommend that the BLM deny the SNWA Right of Way (ROW) applications in White Pine County because the FEIS *assumes* that the SNWA GWD can be done in a safe and environmentally responsible manner. The SNWA GWD project is ill-conceived and is groundwater mining.

Name: Rupert Steele Title: Tribal member Organization: Confederated Tribes of the Goshute
Mailing Address: 1378 W 4200 S City, State, ZIP code: Taylorsville, UT 84123
E-mail: rupertsteele@yahoo.com Phone: 801-554-1440

Thank you for your interest and participation! •••