



**SALT LAKE
COUNTY**

COUNTY COUNCIL

David A. Wilde, Chair
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Randy Horiuchi
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At-Large B

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District #1

Michael H. Jensen
District #2

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District #4

Steven L. DeBry
District #5

Max Burdick
District #6

September 25th, 2012

Penny Woods, Project Manager
Bureau of Land Management
Nevada Groundwater Projects Office
Nevada State Office (NV – 910.2)
1340 Financial Boulevard
Reno, NV 89502
Fax: 775.861.6689
Email: nvgwprojects@blm.gov

Dear Ms. Woods,

The Salt Lake County Council appreciates the opportunity to submit comment for the Clark, Lincoln, and White Pine Counties Development Project Final Environmental Impact Statement (EIS).

In 2008, the County Council submitted feedback at the onset of the environmental impact study process (see attached letter). At that time the council expressed concerns about the air quality impacts that would potentially result in the Salt Lake Valley from ground water pumping in the Southern Nevada Pipeline project.

Upon acquisition of the EIS, the council requested the Salt Lake Valley Environmental Health Department to consider whether our air quality concerns had been addressed. The Environmental Health Department determined “the study does not address any potential increase in PM (particulate matter) arising from ecological impacts due to drawdown of the aquifer but is limited to construction and maintenance of the site project with mitigation activities to control those impacts”.

As you know, the geographic position of Salt Lake County creates unique air quality challenges for the residents in our valley. Problems with particulate matter (PM) are aggravated by winter inversions and soot from wildfires. Environmental Health Director, Dr. Royal DeLegge, states that “Salt Lake County has PM₁₀ that is generally below the EPA standard and so we are in compliance. For PM_{2.5} we are not in compliance. The 2008 (last year reported) inventory for Salt Lake was approximately 17,800 tons/year for PM₁₀ and 3,800 tons/year for PM_{2.5}.” Additional PM generated from the proposed project could add burden to

these other air quality challenges we face in the Salt Lake valley resulting in negative impacts for our residents.

The Council requests that your project team include an ecological impacts study for air quality in the Salt Lake Valley due to the drawdown of the aquifer and include it in the EIS.

Thank you for helping the council to protect the health and safety of Salt Lake County residents.

Sincerely,

A handwritten signature in blue ink that reads "David A. Wilde". The signature is written in a cursive style with a blue ink color.

David Wilde, Chair



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Jennifer Wilson
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Jim Bradley
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Joe Hatch
District #1

David A. Wilde
District #3

Mark Crockett
District #4

Jeff S. Allen
District #5

Marvin L. Hendrickson
District #6

June 17, 2008

Senator Orrin Hatch
United States Senate
8402 Federal Office Building
125 South State Street
Salt Lake City, Utah 84138

Dear Senator Hatch:

The Salt Lake County Council recently discussed the Southern Nevada Water Authority's plan to tap as much as 16 million gallons of underground water per year from the Snake Valley for use in the Las Vegas area.

Our Council is concerned about many aspects of the proposal, but particularly the potential that ground water pumping in the Snake Valley will impact air quality in the Salt Lake valley. Salt Lake County is situated in an air shed where pollution and dust generated in Snake Valley carries into the valleys of the Wasatch Front. Exporting ground water from the Valley to southern Nevada may result in dust storms increasing in frequency and intensity as springs and seeps dry up and vegetation that holds the fine alkali soils in place dies back.

The U.S. Geological Survey's Basin Area Regional Carbonate Aquifer System Study (BARCASS) offers new data and outlines the potential impacts of the Southern Nevada Water Authority's plan on Central Nevada. However, the BARCASS does not predict what might happen to the extended Great Basin area if millions of gallons of ground water are annually removed from the aquifer.

The Salt Lake County Council encourages you to vigorously support funding for BARCASS II. The intent of BARCASS II is to expand BARCASS and to gather additional information regarding potential dust bowl effects of ground water removal on the Great Basin. Far from answering questions as to whether substantial pumping might create semi-permanent dust-bowl conditions in the west desert, the original BARCASS study raised additional questions and only tangentially addressed the major questions by stating: "further work was warranted to quantify both the hydro-geologic framework and hydrologic balance of the Snake Valley to accurately predict the effects of the proposed wells." We agree that more study is needed.

Salt Lake County's concerns are amplified by recent dust storms that originated in the west desert and Snake Valley and blanketed Salt Lake County last April. The dilatory health effects of wind borne particulate pollution are well documented. Further, a [Deseret News](#) editorial on June 9, 2008, came out strongly against the Southern Nevada Water Authority's groundwater pumping proposal.

SALT LAKE COUNTY GOVERNMENT CENTER

2001 South State Street, Suite N-2200 • Salt Lake City, Utah 84190-1010 • 801 / 468-2930 • 801 / 468-3029 fax

Every precaution must be taken to avoid repeating the fate of the Owens Valley, where de-watering has created the single largest source of particulate pollution in the United States.

Thank you for your assistance in protecting the health and safety of Salt Lake County residents by supporting funding for BARCASS II.

Sincerely,

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Michael H. Jensen, Chair
Salt Lake County Council



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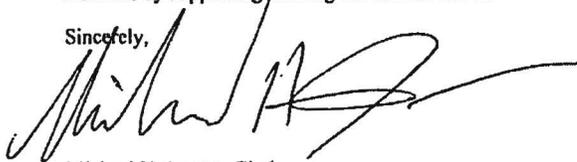
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Michael H. Jensen, Chair
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