



**SALT LAKE
COUNTY**

PETER M. CORROON
Salt Lake County Mayor

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Mr. Mike Styler
Utah Department of
Natural Resources
PO Box 145610
1594 W. North Temple
Salt Lake City, UT 84114-5610

Dear Mr. Styler:

Thank you for this opportunity to make comment on the Snake Valley Water Authority Draft agreement. We appreciate the time and effort you and your staff put into this process. Your dedication is apparent.

After review of the agreement, Salt Lake County has several comments regarding the agreement as currently drafted. These comments fall into two categories. First, the impact the loss of water could have on Salt Lake County's air quality and, second, the impact it could have on areas in the Snake Valley.

Air Quality

Salt Lake County has struggled with air quality over the past 20 years. The State of Utah continues to issue "Air Alert" days because of the impact hazardous air has on our citizen's health. For this reason, it is important to Salt Lake County that air quality weigh heavily in the decision making process. Though the agreement addresses air quality in an unprecedented manner, we believe that additional steps must be taken in the agreement to protect against any air quality deterioration.

First, the County believes that a single air monitoring system is insufficient to determine the actual impact particulates from this project may have on the Salt Lake Valley. We would encourage the negotiating team to at least double the number of monitoring systems to a minimum of two. Second, the County is concerned that the agreement specifically excludes third party interests, denying Salt Lake County the standing to enforce the agreement's terms and conditions. Third, with a focus only on *owners of existing permitted uses* of groundwater, there are limits to the impact and mitigation component of the agreement. We believe that the agreement should be expanded to include impacts to other "regional" environmental resources, i.e., ambient air quality. Fourth, the County is concerned that if the agreement is finalized and the Snake Valley segment is put on "hold" until 2019, it will be necessary for the BLM to complete the pending project EIS limited to Nevada in order to approve the permits for the pipeline rights-of-way. It will not be possible to include Snake Valley in the overall project EIS due to the extension of time under the agreement. If the EIS is completed for the Nevada side of the project only, regional air quality impacts in Utah may not be considered in a subsequent EIS limited to Utah.

Millard County/Snake Valley Impacts

Salt Lake County is also concerned with the potential impacts this agreement as currently drafted could have on Millard County, the farmers and ranchers in the Snake Valley and the flora and fauna native to the area. Millard County contends, and we agree, that too much water is being given to Nevada through this agreement, to support the more than 220,000 acres of groundwater dependant land in the Utah portion of the valley. We believe it is unfair to provide Nevada with 36,000 af/y and Utah with only 5,000 af/y, when the predominant acreage, discharge and use are in Utah. Further, if allocating portions of water deplete the water table, these waters may be irreversibly lost to agricultural and natural use. Depleting the water source will dramatically disrupt the areas way of life and could extinguish the beauty of this area. We encourage the negotiating team to reconsider the allocations provided in the agreement and provide a much smaller portion for Nevada's use.

Thank you for your time. Please feel free to contact us should you have thoughts or concerns.

Regards,



Peter M. Corroon
Salt Lake County Mayor



Joe Hatch
Salt Lake County Council, Chair