BLM_NV_NVSO_GWProjects

From: John C. Tull <jctull@gmail.com> on behalf of John C. Tull <john.tull@wildnevada.org>
Sent: Tuesday, October 11, 2011 3:22 PM
To: Woods, Penelope D
Cc: BLM_NV_NVSO_GWProjects; Greg Seymour
Subject: SNWA Project DEIS comments
Attachments: NWP_SNWA_DEIS_Comments.pdf; ATT00001.htm

Dear Penny,

On behalf of the Nevada Wilderness Project, please accept our comments on the Clark, Lincoln, and White Pine Counties Groundwater Development Project. If you have any questions or problems with the attachment, please contact me directly.

Thank you,
John

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SNWA Project
Bureau of Land Management
Penny Woods,
1340 Financial Blvd.
Reno NV 89502

Dear Ms Woods:

On behalf of the Nevada Wilderness Project (NWP), I wish to provide comments for the Bureau of Land Management's (BLM) Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft Environmental Impact Statement. Due to the transformative impacts that the proposed project will have on vast landscapes, resources, and wildlife habitats in Nevada and Utah, NWP recommends that the BLM proceed with the "No Action" alternative for the reasons detailed below.

The Southern Nevada Water Authority (SNWA) of Clark County, Nevada, proposes to build a 306 mile long, 16-84 inch diameter pipeline and associated facilities to pump and export to southern Nevada up to 176,655 acre feet of groundwater each year from valley aquifers in east-central Nevada and western Utah. This is stated to be enough to supply water to 707,000 people. Included in this plan are up to 434 miles of collector pipelines, 431 miles of roads (not including roads to individual wells), 323 miles of power transmission lines (not counting lines to wells), seven electrical substations, five pumping stations one storage reservoir, and up to 5,537 acres of permanent Right of Way (ROW). The affected area encompasses 20,000 square miles, affects 35 hydrographic basins, five National Wildlife Refuges, four state wildlife areas, seven state parks, Great Basin National Park, 27 Areas of Critical Environmental Concern (ACECs), 12 Wilderness Study Areas and 29 Wilderness Areas. The proposed facilities will impact 1,650 acres in both the Kane Springs and Coyote Springs ACECs.

The DEIS analyzes the Proposed Action, five modifications of the Proposed Action (Alternatives A through E), and a No Action Alternative. The Proposed Action has the most severe environmental effects, with Alternatives A and C having similar impacts. Alternative D involves pumping at reduced quantities in Lincoln County only; Alternative E pumps from all basins except Snake Valley, UT.

General Comments: The proposed action and its alternatives will result in massive, irreversible impacts. Even lesser alternatives would serve as a foot-in-the-door to facilitate future water withdrawals that would ratchet up the impacts to resources in all of the impacted hydrographic basins. The BLM does not analyze other viable alternatives

to the project – such as desalination or improved conservation or use of recycled water in Las Vegas – claiming it is restricted by the Lincoln County Recreation and Development Act to examine only alternative alignments of the ROW and not the devastating impacts of the entire project. We believe that it is premature for the BLM to choose an alternative since actual well sites have not been approved and the Nevada State Engineer has yet to determine how much water SNWA can actually withdraw.

The effects on specially designated lands such as the Great Basin National Park and ACECs are unacceptable. For example, the Swamp Cedar ACEC was partially established to protect a unique, low-elevation population of juniper trees in Spring Valley that might be genetically distinct from other, similar juniper trees. The drawdown impacts from the alternatives A-E would likely lead to the die-off of these trees due to a lack of groundwater' this creates a direct conflict to a unique and important plant resource that the BLM manages.

Probably the biggest problem with the DEIS is the scope and nature of Chapter 4. The chapter is wholly inadequate in addressing specific effects to species and habitats. Instead Table 4.01 lists effects in a generalized manner. This is completely inadequate considering the scale of the proposed project and its potentially devastating effects on the landscapes of eastern Nevada. Chapter 4 should address effect in a similar manner as presented in Chapter 3.

Chapter 4, pgs 4-2 through 4-4 discuss "Irreversible and Irretrievable Commitment of Resources." These include a long-term increase in fugitive dust from pumping basins where pumping drawdown may result in a decrease in vegetation cover and density. The cumulative effects of these air quality changes may limit any other future use for resource development, recreation, and habitat.

Long-term flow reductions or drying of perennial springs and streams would have major impacts to habitats for wildlife and therefore would be considered an irreversible impact. The BLM believes that long-term pumping of groundwater from the aquifers is considered irretrievable. The long-term reductions or change in wetland/wet meadow and phreatophytic shrub/medium vegetation, and vegetation associated with springs and streams would be irretrievable. Because of the duration and expanse of the withdrawals and the resulting changes to habitats over large geographic areas, the effects are considered irreversible for at least 500 years. This indicates a complete sacrifice of vegetation communities and associated species in the impacted basins, largely on public lands managed by the BLM.

Subsidence of the ground surface caused by groundwater pumping in the proposed Preferred Alternative is estimated to be more than five feet over an area of 76 to 781 square miles at maximum pumping within 200 years. According to the BLM, this subsidence would be considered both irretrievable and irreversible. Again, this indicates that drastic changes to the landscapes of eastern Nevada would result from the SNWA project.

Wildlife : Many wildlife species of conservation concern are found within the ROW including sage-grouse, raptors, eagles, various hawks, shrikes, pygmy rabbits, numerous bats, Desert Valley kangaroo mouse, many reptiles, rare fish at isolated springs, and a variety of invertebrate species, many also unique and tied to isolated water resources.

Among the most important of these from a conservation perspective is the greater sage-grouse. The US Fish and Wildlife Service (USFWS) have determined that the greater sage-grouse is warranted for listing, but precluded, under the Endangered Species Act (ESA), but precluded due to higher priorities. One of the major factors contributing to the decline of the sage-grouse is loss of habitat. The DEIS points out irreversible effects to vegetation communities in impacted valleys from drawdown. These impacts are in direct conflict with the BLMs efforts to provide regulatory frameworks that would stabilize and increase sage-grouse populations.

Additionally, the DEIS recommends only 2-mile buffers on power lines. The best available science recommends 3-5 mile buffers on potential raptor perch and nest structures from known active leks. Further guidance is being drafted within the BLM and is planned to be released soon after the comment period for this document. This guidance will further restrict development options within identified sage-grouse habitats, and the Final EIS should comply with sage-grouse guidance in order to provide regulatory assurances to the USFWS for sage-grouse protections by the BLM, the primary public land management agency responsible for securing the species habitats in Nevada.

Caves: More data on the effects of cave systems and habitats within them should be collected before any groundwater pumping is allowed.

Aquatic Biological Resources: With full build-out, there will be an unacceptable impact on game fisheries and special status aquatic species. If construction and subsequent drawdown is allowed to occur, SNWA will be responsible for a loss of tourism to the local communities because of the loss of fisheries and for the potential extirpation of aquatic species tied to persistent water sources. Special status species include fish and amphibians in springs and streams along the entire length of the proposed project including the relict leopard frog, one of the rarest frog species in North America.

Vegetation: Thriving vegetation communities are the foundation for sustaining wildlife and their habitats. Predicted impacts to vegetation that are stated as irreversible and irretrievable are unacceptable. Long term of loss of phreatophytic shrubs, subsequent increase of invasive species, and potential increases of wildfires resulting from drier fuel loads will impact habitats and species across the entire project area. The DEIS reports impacts to vegetation that spell tremendous change across eastern Nevada that will deeply effect plant species and the wildlife associated with those vegetation communities. It is difficult to accurately state the how extensive the DEIS modeled impacts will have to vegetation and all the species that existing vegetation communities support on the landscape. Clearly, the approval of the SNWA pipeline and the associated water drawdown will forever change the face of those landscapes

in eastern Nevada, not to mention incur additional costs to the BLM to manage increased wildland fires due to increased invasive annual grasses being brought into the landscape.

Invasive species including cheat grass and red brome are major concerns in the Ely District of the BLM. Current control and restoration efforts do not appear to be working. According to the DEIS, the proposed SNWA pipeline will create conditions that accelerate the spread of invasive plant species, further exacerbating the impacts to native vegetation communities.

The cost of mitigation from all of this is likely incalculable as the obvious requirement for maintaining intact vegetation communities would be to return an equivalent amount of water back to these areas in hopes of maintaining current underground water resources for plants. Additionally, the cost to restore invasive to native plant communities is also extensive. The BLM should estimate these costs and require that SNWA post a bond for the full amount before construction can begin.

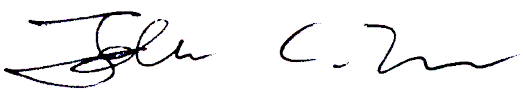
Summary

The Nevada Wilderness Project appreciates the opportunity to provide our comments on the Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft Environmental Impact Statement. We recognize the scope of the challenge faced by both the general public and the BLM to adequately address these issues in an effective and expeditious manner.

The mission statement on the first page inside of the cover of the DEIS state “the BLM’s multiple-use mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.” The Nevada Wilderness Project believes that if this project were to be approved, its effects would irreparably damage the health, diversity, and productivity of public lands in eastern Nevada; the land use would change from multiple-use to single use do to the dramatic transformation of vegetation and associated wildlife habitats; that the entire landscape would serve as an underground reservoir for SNWA with irreparable and unacceptable loss of habitat, economic, and aesthetic values. The BLM should approve the no project alternative. Effects of the majority of the alternatives would have an irreparable effect on Nevada and its natural habitats and must therefore be denied, or they will open the door for continued drawdown that will result in the same.

I or other NWP staff will be happy to make ourselves available to meet and discuss any of the information I have provided on behalf of the Nevada Wilderness Project.

Sincerely,



John C. Tull