

BLM_NV_NVSO_GWProjects

From: Alan de Queiroz <alandqz@yahoo.com>
Sent: Tuesday, October 11, 2011 12:27 AM
To: BLM_NV_NVSO_GWProjects
Subject: Comments on DEIS for Groundwater Development Project
Attachments: GWDComments.doc

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My comments on the GWD Project DEIS are attached as a word file and also given below:

October 11, 2011

Penny Woods, BLM Project Manager
PO Box 12000
Reno NV 89520

Dear Ms. Woods,

As a biologist and former resident of Ely, I have for several years had strong concerns about the environmental and socioeconomic impacts of the proposed Groundwater Development Project. The DEIS confirms my fears that this project would have severe and likely irreparable negative effects on the natural resources of large areas of eastern Nevada and western Utah.

I will focus here on section 4.6 of the Executive Summary of the Draft EIS, which summarizes numerous environmental and socioeconomic impacts. Several statements/results in this section indicate impacts that strike me as completely contrary to the BLM's mission "to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations." These impacts include:

- Dust due to drying of soils and loss of vegetation. Figure ES-25 indicates that the amount of particulate matter that would be produced is substantial, and the accompanying statement that "The level and extent of these predicted dust emissions are highly uncertain..." gives even more cause for concern.
- Subsidence of the ground surface. Figure ES-26 shows the effects could be widespread, especially for 200 years after full build out.
- Reduction of Wetland/Meadow and Basin Shrubland vegetation types. The at-risk wetland/meadow acreages indicated in Figure ES-28 may seem relatively small, but these amounts probably represent a substantial percentage of such areas in this generally dry landscape. The Basin Shrubland acreage at risk is simply large in an absolute sense. The associated statement that this cover type "would retain its dominant shrubs, but shrub densities may decline, and there is a risk of invasion by invasive annual species" and that, therefore, "the overall risk of wildland fires would increase" is especially troubling. The invasion of fire-promoting annuals, especially cheatgrass, is obviously an enormous problem in the Great Basin and has extreme negative impacts on native plants and associated wildlife, including Sage Grouse, as well as livestock.
- Negative impacts on game fish, native fish and other aquatic species because of flow reductions (Figures ES-30 and ES-31). Springs in this region are like aquatic "islands" in an "ocean" of desert and, for that reason, often harbor endemic species, such as fishes and springsnails, that would be threatened by the proposed project.

These spring environments are part of what gives this region its unique ecological character and have been the subject of many ecological and evolutionary studies. Once damaged or destroyed, these environments cannot simply be re-created (even if water were made available again).

-- Adverse effects on wildlife in general (pages ES-58 to ES-59). A couple of quotes make the potentially wide-ranging impacts clear: "Species groups with potential adverse effects would include big game, small and large mammals, upland game birds, waterfowl, nongame birds, bats, reptiles, and invertebrates." "Pumping by all alternatives could conflict with recovery or conservation management objectives for federally listed species." The latter statement represents a particularly clear contradiction of the BLM's mission statement.

-- Adverse effects on forage and water for livestock (pages ES-59 and ES-60). This is an obvious socioeconomic problem and probably one of the main reasons why almost everyone I have talked with in Ely is opposed to the GWD Project.

-- Adverse effects on special designation areas (page ES-59). The statement about negative impacts on resources being protected by Areas of Critical Environmental Concern, like the quote about federally listed species, is another very clear example of how the GWD Project conflicts with the mission of the BLM.

Given the above and many other negative impacts, the GWD Project should not be approved if any credence is given to the BLM's mission. The DEIS indicates that the project would severely compromise rather than sustain "the health, diversity and productivity of the public lands." Of the alternatives presented, only the "No Action" alternative conforms to the BLM's mission.

Finally, turning to the other side of the equation, I notice that the Executive Summary includes the statement (page ES-60) that, for Las Vegas Valley residents, organizations, etc., the project "may provide a measure of assurance that additional water will be available to enable growth in the Las Vegas Valley and provide a buffer against future water shortages due to episodic drought or climate change." That measure of assurance would also be provided by desalination projects and, especially, by responsible growth and stronger water conservation policies. These alternatives would not threaten ecosystems and human communities in eastern Nevada and western Utah dependent on groundwater.

Sincerely,

Alan de Queiroz, Ph.D.
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