

## **Woods, Penelope D**

---

**From:** B&K Rountree <sjironworks@gmail.com>  
**Sent:** Wednesday, October 05, 2011 3:53 PM  
**To:** Woods, Penelope D  
**Cc:** BLM\_NV\_NVSO\_GWProjects  
**Subject:** Comments on Groundwater Development Project DEIS  
**Attachments:** Comments on DEIS.doc

Please see attached letter. Also coming by mail.

Katherine Rountree  
HC 64 Box 64510  
Ely, NV 89301  
775-234-7111

Penny Woods, Project Manager  
Bureau of Land Management  
Nevada Groundwater Projects Office  
Nevada State Office (NV910-2)  
P.O. Box 12000  
Reno NV 89520-0006

I have lived in Spring Valley for 36 years at the D-X Ranch and WPCo for 56 years. We hold the water permit for Turnley Springs.

I am an expert at living and working in Spring Valley and White Pine County. I have watched the many changes in the valley for 50 years from drought to "high water" years and what happens to the valley's environment. I feel more than qualified to speak about the conditions that will change if the water is taken from the valley.

I have several questions and observations about the Draft EIS:

#1. Concerning the monitoring of springs. I would like to see some ironclad guarantee that if the spring levels begin to drop, pumping would stop immediately and mitigation would begin immediately. As we all know the process of getting the pumping stopped by any kind of litigation would mean the death of any plant, animal or human life dependent on that spring. Of course we also know that regeneration of the water table would take almost as long as it took to go down and the spring might never regenerate.

SNWA has been monitoring our spring flow as per the State Engineers ruling, but in the last year they have gone from every month to once a quarter. I have been told this is due to budget constraints. Think about what would happen if they are pumping and have budget constraints. No matter what SNWA promises, WE have no guarantees!!! for our property and way of life.

Can you craft a document that absolutely protects the owners of water rights?

#2 How will the loss of the evapotranspiration from phreatophytes that are killed by the water drawdown affect the climate and precipitation stream in down wind locations such as Salt Lake City? Will the loss of this humidity affect the local climate? How will lower humidity affect fire suppression?

#3 What is the result on local temperatures from the loss of the phreatophytes communities that provide more shade than shorter and sparser replacement vegetation. What is the impact on species dependant on greasewood?

#4 As regards radionuclides on page 3.1-35, you cite no studies of what fallout might or might not be in the soil. And you make a pretty general statement that there would be no effect. Would you address this question more thoroughly, with studies etc?

#5 On pg 3.20-p 9 About the Shoshone Ponds It is stated that there would be LIKELY impact and one of the mitigations proposed is to drill a new well in the aquifer currently used as a source of water for the ponds. Huh, if the source of water has already been drawn down what good will drilling a new well into the same aquifer?

#6 I haven't yet found any discussion of the impact on insect communities dependant on the surface water in Spring Valley. What! you say "that's a good thing", but other species in the valley depend on them, particularly bats, birds, etc, In other words the whole web of life in the valley should be considered, including humans.

This project will irretrievably and irrevocably change the ecosystems of many acres, about 1/6 of the state of Nevada and extend many acres into the state of Utah. Existing bio communities will disappear, as water is diverted to Las Vegas.

Is this my opinion? No it is written out for all to see in the many scientific studies, documents, and appendices of this Draft Environmental Impact Statement.

This massive pumping project will precipitate the destruction of communities of plants, the lives of invertebrates and animals. It will alter and ultimately destroy the present way of life of the humans who are part of this particular landscape.

In fact the only way SNWA can make this scheme work is by destroying the plant communities called phreatophytes that use the ground water that SNWA so avariciously covet. This is stated in their documents. Dry up the surface water, kill the plants, pump the "saved" water to Vegas.

When they have done that the die offs will begin. Aquatic species in springs and wetlands first, then the species dependant on the greasewood and swamp cedars and salt grasses will disappear, followed by the species dependant on the species that are gone, the bats and birds and small rodents and reptiles. Larger predator species will have to move or starve or die of thirst. The grazing animals may still have enough to eat but what will they drink?

It matters not that most of these species are not "rare and endangered". What really matters is the whole matrix of this landscape will be irretrievably and irrevocably changed. Whole ecosystems are in danger of annihilation.

How to mitigate the destruction is discussed at great length in the document. How can you possibly save or avert the damage to this large an area? By putting back what you take away? It makes no sense.

The State Water Engineer had this statement in his rulling:

IN THE MATTER OF APPLICATIONS )  
54003 THROUGH 54021, INCLUSIVE, FILED )  
TO APPROPRIATE THE UNDERGROUND ) **RULING #5726**  
WATER OF THE SPRING VALLEY )  
HYDROGRAPHIC BASIN (184), )  
WHITE PINE COUNTY, NEVADA )

*Page 48 para. 3*

"The ecological impact to the ecosystem from the transition of a ground-water dependent ecosystem to a precipitation-dependent ecosystem is unknown.

However, while it is evident that rainfall and ground-water dependent plant communities can exist in an area with similar ET and precipitation, there was no evidence or testimony presented which supported the concept that a plant community can transition from a ground-water dependent to precipitation-dependent without significant impacts to that ecosystem. "

The only way to mitigate the damage, to save this exquisite environment is to not allow this tragedy to happen by a finding of NO ACTION and a denial of the ROW's.

Thank You

Katherine Kaiser Rountree  
HC 64 Box 64510  
Ely, Nevada 89301

Sent also by e-mail to Penny\_Woods @ blm.gov

& [nvgwprojects@blm.gov](mailto:nvgwprojects@blm.gov)