BLM_NV_NVSO_GWProjects

From: Lynn Carroll <bradlynnc@comcast.net>
Sent: Tuesday, October 11, 2011 9:10 PM
To: BLM_NV_NVSO_GWProjects
Subject: SNWA Groundwater Development and Conveyance Project
Attachments: SNWA Project comments to BLM.doc

The text below can also be found in the attachment.

October 11, 2011

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

Dear Ms Woods and Others Whom It May Concern:

I am taking this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Southern Nevada Water Authority (SNWA) Groundwater Development and Conveyance Project. I would, however, appreciate a further extension of the comment period till this December, to allow further study. My primary objective is to speak for the many species of wildlife that would be impacted by this project.

The threatened Desert Tortoise would suffer long-term loss of 2,350 acres of habitat, about 1760 of these critical, and permanent loss of 245 acres of critical habitat, according to page 3.6-39 of the DEIS. The draft correctly notes that the recovery time for the disturbed desert habitat is great (100-200 years), which might not be soon enough for the continued viability of the species. In spite of several measures meant to reduce impacts to the tortoises, significant numbers of tortoises and tortoise eggs would be crushed by construction equipment and worker vehicles. These in combination with the anticipated indirect impacts are incompatible with the goal of delisting this species.

A great deal of the project area is habitat for Greater Sage-Grouse, so these birds would be subject to even greater potential impacts. Although no active leks are known within a quarter mile of the ROW, sage-grouse are sensitive to all sorts of disturbance. The ACMs and mitigation measures listed would be helpful, but the habitat fragmentation related to the project would still be considerable. This is just one of numerous projects across the west that threaten the Greater Sage-Grouse.

Even greater than the effects of the pipeline and facility construction, though, are the effects of the actual pumping of the groundwater—the main purpose of the project. The water in these basins has allowed species to survive which couldn't if the water weren't available. The importance of water, and the groundwater in particular, can't be over-stated. The DEIS makes the case pretty well:

> The habitat associated with naturally occurring springs, seeps, and perennial stream reaches and associated perennial pools encompass riparian vegetation (both woody and herbaceous plant species), wetland areas, mesic habitats (wet meadows), and groundwater dependent vegetation communities (phreatophytic vegetation). Reduction or loss of habitats associated with water sources would impact terrestrial wildlife dependent on these sources, resulting in a possible reduction or loss of cover, breeding sites, foraging areas, and changes in both plant and animal community structure. Naturally occurring seeps, springs, and perennial stream reaches provide important wildlife habitat in the region of study. These habitats and their associated plant communities contribute to greater wildlife species diversity, as compared to the adjacent upland areas. Since surface water and associated habitats are limiting factors for wildlife in the study area, loss of these habitat features would alter the available habitat for species that depend on these areas, resulting in: 1) a reduction of available water for consumption; 2) a reduction in amount or quality of

> groundwater dependent vegetation types for breeding, foraging, and cover; 3) a reduction in the regional carrying capacity; 4) displacement and loss of animals; 5) a reduction in the overall biological diversity; 6) a potential long-term impact to the population numbers of some species; and 7) reduction in prey availability.

This is where the greatest impact on the Greater Sage-Grouse would come. Survival of young grouse depends on forbs and insects found in wet meadows or around springs or streams. It wouldn't take a 10-ft draw-down of the water table to have an impact—any draw-down will reduce production of young in a drought year; the effect just becomes more widespread as the pumping continues.

Migrating birds, raptors, and the other bird species of concern would all be competing for smaller habitats and food supplies (vegetation or prey populations) when some seeps and springs dry up. As a bird-watcher, I have mentioned birds especially, but I'm also aware that amphibians are declining in a large portion of the world. I hate to see any action that would dry up springs where frogs and/or toads are living. Amphibians are also sensitive to changes in water quality, which the DEIS mentions would result from reduced flows in springs that don't dry up completely. I question whether it will be possible to prevent or mitigate the resulting harm.

Given that the groundwater effects are of greatest import, I might support Alternative A, C, D or E over the proposed alternative. However, the DEIS doesn't show any alternative to be reasonably safe for the maintenance of sensitive species. The SNWA would try later to add to the lesser alternatives. No Build is the proper choice.

There are great uncertainties about the degree to which the pumping of groundwater in these basins will affect Utah water bodies. I am told that the Utah Division of Wildlife Resources was concerned that additional pumping for irrigation in Idaho would adversely impact Locomotive Springs in Northern Utah. They were told there was no connection, but within a few years after that irrigation began, the springs were dry. Now I hear concern expressed that reduced hydraulic pressure at springs in Nevada will permit salty water from the Great Salt Lake basin to migrate into previously fresh water bodies and wells.

These and other uncertainties about the project are supposed to be prevented or mitigated through an adaptive management process. I don't believe this will be adequate to protect sensitive wildlife species. First because the reaction time of the agencies involved is likely to be two slow. By the time a problem is detected, then confirmed, it is likely to have become critical. Then there will be delay as funding is sought for corrective measures. Second, if increasing the water available to the habitat is needed, will it be available? From where?

Finally, I will mention a question of fairness. Is it fair for the need SNWA customers think they have for growth to take away the potential for rural areas to grow and develop? I think not, yet that impact appears certain if the proposed pipeline and groundwater pumping project is completed.

I believe the BLM should choose the **No Build** alternative. The extensive impacts to wildlife outlined in the DEIS, many of which are unavoidable and permanent, cannot be justified by the need for Las Vegas to have more water for future growth.

Thanks for your attention to these comments.

Lynn Carroll
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