



REC'D - BLM - NSO

AUG 17 2011

9:00 A.M.

**From the Desk of:
Don Duff
President, Great Basin Chapter
P.O. Box 32
Baker, NV 89311**

August 15, 2011

Penny Woods, Project Manager
BLM Nevada State Office (910-2)
P.O. Box 12000
Reno, NV 89520-0006

Dear Ms. Woods:

Subject: DEIS Southern Nevada Water Authority (SNWA) Clark, Lincoln, and White Pine Counties Groundwater Development Project (GWDP).

The Great Basin Chapter Trout Unlimited (GBC) supports the No Action Alternative and the denial of the SNWA Right of Way Request.

The GBC Trout Unlimited (TU) is one of some 500 Chapters across the Nation of the national, non-profit conservation group of TU, a 501(c)(3) organization. TU has several hundred thousand members nation-wide. The GBC is one of three TU's chapters in Nevada. The GBC covers a land area encompassing White Pine County, portions of Nye and Lincoln Counties, and four counties in Western Utah's West Desert.

The GWDP will have irreversible and irretrievable impacts on the some 112 miles of perennial streams, 305 springs, and 8,000 acres of wetlands in 35 hydrographic basins within the project area. Native and game aquatic species, such as, native salmonids, game salmonids, amphibians, mollusks, and macroinvertebrates would be impacted, reduced, and/or lost due to the massive groundwater mining and pumping of the GWDP. TU members in Nevada as well as those visiting from other States regularly fish for native and game fish species in the Project area waters especially in the Baker, NV area. The GWDP would adversely affect these recreational anglers by the loss of fish habitat and populations on Federal, State, and private lands impacted by the dewatering of streams due to the mining of groundwater resources.

Documented studies, State and Federal agencies, and Academia across the Nation on the impacts of groundwater pumping have shown deleterious impacts to aquatic dependent resources and

perennial stream waters. Studies in Wisconsin, Maryland, Montana, Maine, and Arizona, for example, have documented the drawdown of the groundwater aquifer's from groundwater pumping and subsequent loss of perennial streamflow, habitat loss, and population loss of native and game salmonid species and other dependent aquatic species.

C1

Headwater reaches of perennial streams within the pumping area of influence have dried up and been lost with their accompanying species populations. The same can be expected to occur with the massive pumping of the SNWA GWDP, especially in the perennial streams of the North & South Snake Range and the Schell Range. The DEIS fails to address these impacts and the accompanying socio-economic and recreational impacts.

C2

In the Snake Valley portion of the GWDP area there are some 15 perennial streams of at least 40 stream miles that would be impacted. These streams contain occupied habitats for native fish, especially the Bonneville Cutthroat Trout (BCT) and numerous other game species. These species and their habitats would be impacted by groundwater pumping and subsequent dewatering of occupied habitat with accompanying loss of populations, either partially or totally. This would have a serious impact on the recreational economy of White Pine County, the Baker area especially, and adjacent counties affected by the GWDP. These biological and socio-economic impacts are not covered adequately or at all in the DEIS.

C3

The DEIS fails to incorporate and analyze the GWDP impacts associated with the northern portion of Snake Valley, including the Fish Springs NWR, and the Deep Creek Valley with the Goshute Indian Reservation (GIR). Hydrologic studies have shown definite connectivity of these areas to the aquifers in Spring and Snake Valleys, and therefore perennial streams and springs on the GIR can be expected to be impacted by the GWDP.

C4

The Deep Creek Range, in northern Snake Valley, has some 33+ miles of perennial streams with BCT occupied habitat on its East Slope. The West Slope of the Range encompassing the Deep Creek Valley and Goshute Indian Reservation (GIR) has another 30+ miles of occupied BCT habitat in seven perennial streams. Most of the streams occur on the GIR. These streams on the GIR have cultural and religious significance to the Tribe and their loss due to dewatering and streamflow reduction would seriously affect the Tribe and its socio-economic viability. The DEIS fails to address these areas and resources. Also affected and subject to loss of resources within the Range on both slopes are six brood ponds and four spawning channels for BCT restoration in the Western Bonneville Basin under the partnership with the Utah Division of Wildlife Resources (UDWR), the U.S Fish & Wildlife Service (FWS), BLM, TU, and the Goshute Tribe (GT).

C5 The DEIS fails to adequately address the impacts of soils erosion, wind blown dust, radioactive materials in the dust, and mercury particulates which would enter perennial waters from land disturbance activities associated with the pipeline and pumping/well site construction activities. We fail to see how the BLM can make a decision without analysis of essential information from SNWA about the project.

The BLM is a signator regulatory agency party to the existing "Range-Wide Conservation Agreement and Strategy for the Bonneville Cutthroat Trout", along with the NDOW, UDWR, FWS, USFS, and GT. TU is also a participating signator organization to the Agreement. The GBC TU has provided key leadership and funding for over a decade toward the implementation of these Agreements and the BLM approval of the SNWA GWDP would negate the achievements of restoration and financial investments that TU and the agencies, of which BLM is a part, have provided.

C6 The Conservation Agreement and Conservation Strategy for the BCT in the State of Nevada is tiered to the Range-Wide Agreement and covers the area and waters within the area of influence of the GWDP of SNWA. BLM must adhere to Authorities governing the implementation of these Agreements. Nevada BLM management for sensitive species, i.e. BCT and other species, must adhere to management consistent to not contributing to the need to list any species as Threatened and Endangered, as cited in BLM Manual 6840.06, the FLMA 1976, as amended (Sections 5,6,7, and 10), the ESA (Section 6(c)(1), as amended, and the Fish & Wildlife Coordination Act 1956. The other signator agencies under this Agreement are also subject to laws, i.e. USFS under the NFMA 1976, 16 U.S.C.1604 (g)(3)(B) and FSM 2670 for species management to sustain native species; and the NDOW through NRS 503.351 & 503.584 for the State's obligation to conserve and protect imperiled native species. Any BLM decision that would subsequently allow the GWDP to proceed would have serious consequences to the survival of these sensitive and/or candidate species and their occupied habitats and therefore violate the Authorities that BLM must adhere to under the Law.

We feel it is premature for the BLM to choose an Alternative since actual well sites have not been approved and SNWA has no approved water rights. BLM is required to uphold its public trust to protect, conserve, and care for public lands. Therefore, its only choices are to select the No Action Alternative and deny the SNWA Right of Way Request.

We appreciate the opportunity to comment on the DEIS at this time. Please keep us informed of the status of your analysis for the Final EIS.

Sincerely,



Don Duff, President