



COMMENTS ON THE BLM'S "CLARK, LINCOLN, AND WHITE PINE COUNTIES GROUNDWATER DEVELOPMENT PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT"

The Coalition of National Park Service Retirees (CNPSR) is a non-partisan, non-profit organization comprised of former employees of the National Park Service, whose mission is to defend the parks and programs of the National Park Service. Rebecca Mills, a Coalition member and former Superintendent of Great Basin NP, spoke at the August 3, 2011 public hearing conducted in Baker, NV, stating that the Coalition would submit written comments.

C1 A groundwater pumping scheme is likely to affect a multitude of resources in the Great Basin region. Because National Park resources are to be protected for future generations, we are concerned about this project. There is not yet enough information to assure that Park resources will not be adversely affected, precluding the National Park from fulfilling its mission. Our comments are focused on Great Basin National Park but we recognize that this project may have consequences for other Parks in the area (e.g. Lake Mead National Recreation Area). We want to register our concern and underscore a few selected points.

C2 Mission of Great Basin National Park

Great Basin National Park was established "in order to preserve for the benefit and inspiration of the people a representative segment of the Great Basin of the Western United States possessing outstanding resources and significant geological and scenic values..." (Public Law 99-565). In establishing the Park, Congress provided that its mission would include interpreting the entire Great Basin region. This is a large geographic area extending from eastern California through western Utah and including most of Nevada. Since the Park boundaries preserve only the "range" resources of the Great Basin, protection of the "basin" portions outside Park boundaries is essential to interpret properly the Great Basin of the Western United States.

Air Quality, Atmospheric, and Visual Resources, including Visual Intrusion

C3 The DEIS notes that air pollutant emissions will occur during the 11-year construction, disturbance, and reclamation phase of the project. There will also be a "minor increase in air pollutant emissions" from operation and maintenance. In addition, the DEIS notes that there is a "dust generation risk from soil surface drying" as well as "loss or reduction of basin shrubland vegetation" as a long term pumping effect.

C4 The DEIS also notes that "changes in vegetation communities could gradually change the scenic views in terms of color, texture, density, and vegetation patterns."

- C5 Groundwater pumping in Spring Valley and Snake Valley will likely result in air pollutant emissions and dust over the short and long term--during construction, operation and maintenance, and cumulatively into the future. While the specific effects on air quality/visibility in the vistas of Spring and Snake Valleys and within Great Basin National Park are unknown, it is probable there will be a diminution in the air quality. Night sky interpretation, which depends on clean air, is one of the Park's major interpretive programs.

C7 Air quality monitoring demonstrates that the air quality and visibility of Great Basin National Park is among the best in the country. This significant asset is very susceptible to deterioration. The Park website (www.nps.gov/grba) states: "Studies of the effect of visibility on park visitors show that slight increases in air pollution are much more distinct and objectionable when and where the air is cleanest (O'Leary 1988)."

C8 Not only will the ability to see be affected, but this project will also alter what will be seen. The industrial nature of the project infrastructure will change the Park's current rural, natural, and agricultural viewsheds.

Plant and Wildlife Resources

- C9 The DEIS notes that "the project would potentially reduce available moisture in the root zones of vegetation communities that transpire (evaporate) large quantities of soil water through plant leaves... The greatest risk would occur under the Proposed Action and Alternatives A and B in Spring and Snake Valleys."
- C10
- C11 Changes outside the park in composition of plant communities in both Spring and Snake Valley could have effects on wildlife inside the Park. Reductions in groundwater levels and inputs to surface flows would affect wildlife habitats. It is not known at present what wildlife, including special status bird and bat species that migrate to and from the Park, would be affected.
- C12
- C13 More studies are needed to determine what effects the changes in the valleys would have on plant and wildlife resources within the Park.

Water Resources

The U.S. Geological Survey has reported that water resources, both surface water and springs, within the Park boundaries could potentially be susceptible to groundwater pumping in Snake Valley. Studies to determine more specific possible effects are ongoing.

Monitoring and Mitigation

- C15 Currently the Park and other agencies, including the Southern Nevada Water Authority, are establishing baseline inventories of water and other resources and monitoring potential effects of groundwater

C15 cont'd

C16

pumping in Spring and Snake Valleys. This effort is ongoing concurrent with other studies taking place. We believe that not enough is yet known to be able to predict accurately the effects on Great Basin National Park resources. And we are concerned, if and when monitoring reveals a significant impact, it could be too late to mitigate the impact.

Interbasin Water Flow

C17

Studies have shown that there is interbasin water flow between Spring and Snake Valleys at the south end of the Park.

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This information is contained in the full DEIS but not reflected in the Executive Summary. We recommend that this important information be included in the Executive Summary. Again, further studies are needed to determine what effects groundwater pumping in Spring Valley could have on Snake Valley.

C19

Recommendations

As a result of our concerns, we strongly recommend the "No Action" alternative. If, however, BLM decides to pursue an action alternative, our strong recommendation would be Alternative D.