

BLM_NV_NVSO_GWProjects

From: Janice Huebner <janicehuebner@hotmail.com>
Sent: Monday, October 10, 2011 8:24 PM
To: BLM_NV_NVSO_GWProjects
Subject: Comments on CLARK, LINCOLN AND WHITE PINE COUNTIES GROUNDWATER DEVELOPMENT PROJECT Draft Environmental Impact Statement

nvgwprojects@blm.gov

RE: CLARK, LINCOLN AND WHITE PINE COUNTIES GROUNDWATER DEVELOPMENT PROJECT Draft Environmental Impact Statement

Dear Nevada Groundwater Projects,

Great Salt Lake Audubon (GSLA) appreciates the opportunity to comment on the Clark, Lincoln and White Pine Counties Groundwater Development Project Draft Environmental Impact Statement (dEIS) and we also appreciate the U.S. Bureau of Land Management granting an extension to the comment period.

GSLA has a mission to *protect and enhance habitat for wild birds, animals and plants, and to maintain healthy and diverse environments for wildlife and people throughout the State.*

C1 Based on GLSA's mission, we have provided several comments to the dEIS. Western Resource Advocates, on behalf of FRIENDS of Great Salt Lake, submitted comments on the dEIS and GSLA supports these comments. The following comment is in addition to the comments provided by Western Resource Advocates.

C2 Overall, GSLA is concerned with impacts to wildlife and wildlife habitat from the proposed action and alternatives posed in the dEIS. We are concerned with Utah's populations of migratory birds and raptors that depend on the water resources in the proposed project area and, specifically, the Snake and Hamblin Valleys. Birds, in particular, that depend on these habitats in the proposed project also use the Great Salt Lake basin for breeding and migration.

C3 GLSA is concerned that the dEIS does not address the loss of birds protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (BGEPA) as a result of the reduction of water flows in the limited riparian and aquatic habitats outside of the Right-of-Way (ROW).

C4 All of the affected desert valleys documented as being impacted by the proposed project have a limited area of aquatic and/or wetland habitat and these habitats are extremely important to preserve. These desert valleys encompass valuable wildlife habitat such as Important Bird Areas and Great Basin National Park. Specifically, we are concerned that water flows to Big Springs will be impacted and therefore reduce the flow to Lake Creek and Pruess Lake. This riparian corridor is extremely important to a variety of wildlife including migratory birds, raptors, and bald and golden eagles. This area is part of the Intermountain Flyway and tens of thousands of birds, including raptors, pass through this desert valley during migration. Riparian and wetland corridors such as Lake Creek provide vital feeding and resting areas for migratory birds and raptors. Golden eagles use this habitat year round and a number of bald eagles winter in this area and feed on wintering waterfowl. This region is already heavily degraded by livestock grazing and agricultural practices and the cumulative impact of additionally reducing water flows would be disastrous to the wildlife habitat in this and other desert riparian areas and wetlands. Importantly, we understand the U.S. Fish and Wildlife Service manages eagles under the BGEPA for stable and increasing populations. GSLA is concerned that the proposed project does not meet the management obligations of BGEPA.

Sincerely,

