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Via email: Anne_Castle@ios.doi.gov

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DATE: October 1, 2012

REGARDING: **Final Environmental Impact Statement (FEIS)
regarding the Clark, Lincoln and White Pine Counties
Groundwater Development Project**

Dear Ms. Woods:

The National Parks Conservation Association (NPCA) provides the following comments outlining substantial concerns with the Final Environmental Impact Statement (FEIS) regarding the proposed Clark, Lincoln, and White Pine Counties Groundwater Development Project, and urges the Bureau of Land Management and Interior Secretary Salazar to issue a Record of Decision supporting the "NO ACTION" Alternative as outlined in the Draft and Final EIS.

As proposed, Southern Nevada Water Authority (SNWA) has requested a right-of-way (ROW) application to construct and operate a system of groundwater facilities which would build approximately 300 miles of main and lateral pipelines along with corresponding power lines, pumping stations, substation and pressure reduction stations, an underground water reservoir, water treatment plant and associated ancillary facilities located primarily within a 2,640-foot wide corridor that traverses Clark, Lincoln and White Pine Counties in the State of Nevada.

NPCA finds the Proposed Groundwater Development Project (GWD) to be inappropriately sited too close to a federally protected unit of the National Park Service, negatively affecting the Park's natural resources, cultural properties and visitor enjoyment. All of these characteristics are required to be protected under the provisions outlined in the National Park Service Organic Act, "which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."¹

The Proposed Groundwater Development Project, specifically a new hybrid alternative (Alternative F) which has been identified by the Bureau of Land Management (BLM) as the Preferred Alternative, would authorize pumping of up to 84,370² acre feet of water per year from Spring Valley, adjacent to the western boundary of Great Basin National Park – more than 23,243 acre feet per year from the Park's western adjacent valley than the 61,127³ acre feet per year currently granted by the Nevada State Engineer (NSE).

NPCA notes that groundwater pumping in Snake Valley, adjacent to the eastern boundary of Great Basin National Park, is not *currently* authorized under Preferred Alternative F because of expressed public concerns "due to its close proximity to (Great Basin National Park) GBNP."⁴

However, we note that the decision to not extend the pipeline into Snake Valley seems predicated on a lack of a necessary agreement between the States of Nevada and Utah⁵ and that the FEIS appears to allow opportunity for SNWA to extend the pipeline into Snake Valley at a later date if agreement between the two states occur. Thus Alternative F does not appropriately record the potential impacts that could exist – potential impact that could be reasonably foreseen – as demonstrated by the project applicant's well-documented desire to extend the pipeline into Snake Valley.

NPCA is opposed to the new Preferred Alternative (F) as well Alternatives A-E, identified in the Draft and Final Environmental Impact Statement(s), based on the bullet points below:

1) The mandates required of a National Park to protect and preserve "for the enjoyment of future generations" were not fully considered in the DEIS and the

¹ *The National Park Service Organic Act (16 U.S.C. 123, and 4), as set forth herein, consists of the Act of Aug. 25 1916 (39 Stat. 535)*

² *FEIS – Chapter 2., Agency Preferred Alternative 2.8.1, page 2-106*

³ *FEIS – Chapter 2., Agency Preferred Alternative 2.8.1, page 2-106*

⁴ *FEIS – Chapter 2., Agency Preferred Alternative 2.8.1, page 2-106*

⁵ *FEIS – Executive Summary, 2.4 Laws, page ES-7*

FEIS as specifically regards the Park's unique cave system and scenic, visual resources particularly its night skies;

- 2) The need for the GWD is based on SNWA's outdated water plan⁶ which projected unrealistic growth patterns in Southern Nevada through 2020;
- 3) SNWA has not diligently pursued the development of augmented water supply through Colorado River allocation as contemplated by the Basin States Agreement of 2007⁷;
- 4) The FEIS is premature in that it has not weighed the findings and recommendations of the anticipated "Colorado River Basin Water Supply and Demand Study," anticipated to be released for November 2012⁸;
- 5) The FEIS, while adding some discussion of project capital costs, is remiss in endorsing SNWA's underestimated costs for the GWD without scrutiny and is negligent in not addressing SNWA's outstanding general obligation debt⁹ necessary for funding the third intake straw¹⁰ into Lake Mead to assure access to 90 percent of Southern Nevada's current water supply;
- 6) The DEIS and FEIS have failed to provide comprehensive data regarding groundwater modeling, and the FEIS decision-making predates an anticipated U.S. Geological Survey requested by the NPS;
- 7) Drawdown of groundwater in Spring Valley has been acknowledged by the Environmental Protection Agency (EPA)¹¹ to hold grave potential to eradicate essential *phreatophytes* which could, in turn, create dust-bowl conditions that affect the Park's ecosystems, destroy the Park's clean air and night skies, as well as impact regional air quality; and

⁶ FEIS – Executive Summary, 2.1 Why Develop Groundwater, ES-5

⁷ FEIS – Executive Summary, 2.2 Colorado River, ES-5

⁸ Colorado River Basin Water Supply and Demand Study website:

www.usbr.gov/lc/region/programs/crbstudy.html#schedule

⁹ Southern Nevada Water Authority Comprehensive Annual Financial Report, pages 1-4 through '1-6, Website:

www.snwa.com/assets/pdf/about_reports_cafr.pdf

¹⁰ Southern Nevada Water Authority website:

www.snwa.com/about/regional_intake3.html

¹¹ BLM Website re Groundwater Development Projects, Public Comments, Environmental Protection Agency

www.blm.gov/pgdata/etc/medialib/blm/nv/groundwater_development/snwa/draft_eis0/public_comments/groups.Par.61684.File.dat/EPA.pdf

8) Because of the massive and significant scope of this project, a hybrid alternative (as outlined in the FEIS) should not be considered without opportunity for public comment and extended time for review.

Specifically in the comments that follow, NPCA focuses on the impacts of groundwater development in Spring Valley which is located on the western boundary of the National Park. NPCA bases these comments on analysis as pertains to “special designations” which include federal mandates to protect the resources of Great Basin National Park.

National Parks Conservation Association (NPCA)

NPCA’s mission is to protect and enhance America’s National Parks for present and future generations. Founded in 1919, NPCA has been the leading public voice for National Parks and currently represents more than 750,000 supporters who care deeply about America’s shared natural and cultural heritage preserved by the National Park System.

With a Nevada Field Office representing the interests of Great Basin National Park, regional field offices representing the interests of nearby National Park units – Lake Mead National Recreation Area, Mojave National Preserve, Death Valley, Joshua Tree and Grand Canyon National Parks – and with headquarters in our nation’s capital, NPCA plays a crucial role in protecting the natural and cultural resources of America’s federally legislated special places – extraordinary places that have been intentionally provided with the permanence of protection and are expected to be preserved for perpetuity.

To this mission, one of NPCA’s strategic initiatives recognizes the need for review and oversight of large landscape ecosystems in the protection of National Parks. As such, NPCA submits comments that holistically evaluate the impact SNWA’s proposed groundwater pumping plans on landscape within and near the Park boundaries.

We thank the BLM for continued oversight in appropriately reviewing and analyzing proposals such as the Clark, Lincoln, and White Pine Counties Groundwater Development Project. As such, we appreciate thorough evaluation and outcomes regarding the protective mandates of the National Park Service.

Great Basin National Park

In Nevada, there are three National Park units: Great Basin National Park, a portion of Death Valley National Park and Lake Mead National Recreation Area (NRA). Nevada’s combined Park units in 2011 generated over \$195 million in revenues within Nevada’s local economies.¹²

Great Basin National Park, which currently encompasses 77,082 acres, is one of 397 National Parks within the National Park system, and is considered among an exclusive hierarchy of exceptionally scenic and National Parks which includes Yosemite, Yellowstone, and Grand Canyon National Parks.

¹² NPS economic reporting, website: <http://www.nps.gov/state/nv/index.htm?program=all>

Great Basin National Park is one of the country's youngest, established in 1986. Public Law 99-565 established Great Basin National Park "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."¹³

NPCA maintains that the DEIS and subsequent FEIS have not adequately addressed Great Basin's Congressionally-mandated status as a "special designation." Furthermore, we maintain that the DEIS-FEIS have failed to assure that groundwater pumping will leave Great Basin "unimpaired and for the enjoyment of future generations," as mandated by the NPS Organic Act of 1916.

Great Basin National Park is an isolated mountainous Park in the heart of the Great Basin, the largest area of contiguous endorheic watersheds in North America, extending from central Utah through central Nevada an into Badwater Basin of Death Valley National Park.

Great Basin National Park forms a division between two hydrologic sub-regions of the Great Basin – the Bonneville Basin Sub-region, to the east, and the Central Basin Sub-region, to the west.¹⁴ Because of the Park's elevation gradient, water sources, underground caves, and distance from urban centers (the nearest major cities of Salt Lake City and Las Vegas are 250 and 300 miles away, respectively), the Park serves as a sanctuary for several ecosystems, diverse wildlife and vegetation. Ecosystems vary from desert to alpine and endemic species like 4,000 to 5,000 year-old bristlecone pine are found in the Park and nowhere else.

In addition, the Park's pristine air quality and dark night skies are among the best in the nation. In 2004 and 2005, the National Park Service's Night Sky Team determined that Great Basin National Park to be one of the darkest places in the country, giving visitors rare and uncommon opportunities to experience clear, starry night skies.

As acknowledged in the DEIS and FEIS: "Congress established Great Basin National Park (GBNP) in 1986, elevating the status of the former Lehman Caves National Monument, originally designated in 1922 by Presidential proclamation. The GBNP encompasses significant natural and geologic resources, expansive scenic vistas, and dark night skies serving important scientific purposes and providing visitors with opportunities for education, recreation, inspiration and introspection. In part, due to its remote location, GBNP has an active year-round astronomy program for visitors and scientists."¹⁵

Also as acknowledged in the DEIS and FEIS: "Annual recreation visits to GBNP over the past decade ranged from a low of 69,235 in 2008 to high of 88,870 in 2010."¹⁶ Visitors to GBNP and NPS employees contribute significantly to the economy of Baker, Nevada.

¹³ *Great Basin Enabling Legislation, Public Law 99-565*

¹⁴ *Great Basin Water Resources Management Plan, 1994*

¹⁵ *FEIS – Chapter 3, Tourism and Recreation, pages 3.17-17 and 3.18-18*

¹⁶ *FEIS – Chapter 3, Tourism and Recreation, page 3.18-18*

¹⁷ *FEIS – Executive Summary, page ES-4*

Some of the Park's assets include:

- Wheeler Peak, which towers above the surrounding valleys at 13,063 feet in elevation
- Three known and confirmed rock glaciers (Lehman, Theresa and North Fork Baker)
- Seventy-seven mammal species including mountain lions, bob cats and coyote
- Unique, and never-been-seen-before cave species
- Sixty miles of developed trails and 12-mile scenic paved drive to Wheeler Peak
- Lehman Caves and Visitor Center
- Visitor Center located in Baker and other ancillary facilities

The Proposed Project and Preferred Alternative F

SNWA, established in 1991 as a political subdivision of the State of Nevada through agreement among seven municipal water providers serving the Las Vegas metropolitan area¹⁷, proposes to build a system of groundwater facilities including: approximately 300 miles of main and lateral pipelines along with corresponding power lines; pumping stations, substation and pressure reduction stations; an underground water reservoir, water treatment plant and associated ancillary facilities located primarily within a 2,640-foot wide corridor that traverses Clark, Lincoln and White Pine Counties in the State of Nevada.

The BLM has selected Preferred Alternative F, a hybrid Alternative based on analysis was not included in the DEIS¹⁸. The Preferred Alternative does not permit pipeline build-out in Snake Valley at this time, but does not permanently or authoritatively reject this scenario to ensure it is not a reasonably foreseeable action.

Notably, and of question, the BLM has provided for considerably more acre-feet of water to be withdrawn from Snake Valley near Great Basin National Park, and in Cave, Dry Lake and Delmar Valleys than the Nevada State Engineer has granted. In Spring Valley on the western boundary of the Park, Alternative F allows more than 23,243 acre feet per year to be withdrawn exceeding the allotment of 61, 127¹⁹ acre feet per year currently granted by the Nevada State Engineer (NSE).

Proximity of the Proposed Groundwater Development Project to the National Park

SNWA proposes to pump considerable groundwater – enough to fill a sizeable lake – from Spring, Cave, Dry Lake and Delmar Valleys in Nevada. Spring Valley borders Great Basin National Park and, as such, is the focus of NPCA's comments.

#1) The mandates required of Great Basin National Park to protect and preserve Great Basin National Park “for the enjoyment of future generations” were not fully considered in the DEIS-FEIS as specifically regards the Park's unique cave system and the Park's scenic, visual resources particularly its night skies.

¹⁸ FEIS – Executive Summary, Added Alternative, page ES-9

¹⁹ FEIS – Chapter 2., Agency Preferred Alternative 2.8.1, page 2-106

Water Resources are Essential to the Survival of the Park

Notably, Great Basin National Park has limited federal water rights. This is a point that the DEIS and FEIS has not addressed, specifically in relation to this mission of the National Park Service to preserve and protect natural and cultural resources worthy of National Park status.

Federal reserved water rights, in the Park's enabling legislation, was assigned to Humboldt National Forest and for some use for Lehman Caves. In October 1989, after the Las Vegas Water District filed for large quantities of groundwater, the National Park began more than a year process of protesting water applications in the area.²⁰

NPCA points out that the DEIS does not address adequately address the fact that the Park was not, when it was established, given appropriate water rights and, thus, faces magnified potential if groundwater is over pumped of too-little water to sustain the Park.

As noted in a Park resource assessment report, "Great Basin owes much of its ecological value and diversity to the water in streams and springs. Unfortunately, water withdrawals to serve populations in Las Vegas and southern Nevada are threatening groundwater that feeds Great Basin's water sources."²¹

Three precipitation regimes occur in Great Basin— Pacific, Continental and Gulf with accompanying storm types. Elevation heavily influences precipitation throughout the Great Basin. Annual rainfall is, notably, only six inches annually in the lower part of the National Park, where a wild and vast cave system is located.

The Park contains ten perennial streams, six subalpine lakes, five of which are located above 10,000 feet elevation, and 425 perennial springs. Water resources support abundant ecosystems that include montane and subalpine conifer forests and a cave system.

Water that originates in the Park drains through eight major drainages into two basins, Snake and Springs Valleys, respectively to the east and west.

Within the Park, water resources are essential to the survival of numerous vegetation types – desert shrub, mountain shrub, evergreen shrub, pinyon-juniper woodland, coniferous forest, and deciduous forest, meadow, alpine and riparian. Approximately 550 vascular plants occur within the Park's vegetation.

Water resources also are essential to the survival of a wide array of fauna representing a mixture of Sierran, Great Basin and Rocky Mountain species including birds, amphibians, mammals including mule deer, elk, badgers and several species of fox.

²⁰ *Great Basin Water Management Plan, 1994*

²¹ *Center for State of the Parks, Great Basin National Park Report, 2009*

In 1994, an exhaustive report produced by the National Park Service entitled the “Water Resource Management Plan” distinguished surface and groundwater resources and reported that the “characteristics of groundwater flows in the Park are largely unknown.” While the USGS and NPS have ramped up collection, analysis and modeling of water resources over the past three years, much still remains unknown. At the request of the NPS, a USGS modeling report is forthcoming. That report should be included in this decision-making process for the public and agency to assess.

According to a resource assessment conducted by the Center for State of the Parks in 2008 and published in 2009, “the Park’s streams and springs are threatened by the increasing water needs of Las Vegas and the communities in southern Nevada.

The report stated that “the Park’s unique geology makes it difficult to predicate how groundwater withdrawals could affect the Park’s ecosystem, but any decreases in flow of Park streams and springs could have far-reaching adverse effects on Great Basin’s water dependent biological and geological systems. Four groundwater monitoring wells were installed just outside the Park entrance, with plans for addition of three monitoring wells inside the Park following appropriate environmental processes.

The National Park’s Cave System is Dependent on Water

Protection of Great Basin National Park’s natural resources, as mandated in establishing legislation, is dependent on groundwater resources. “Limestone deposits are of special importance in the Park as they contain numerous cave systems.²²”

In the mid-1880s Absalom Lehman, one of the first settlers in the area, stumbled upon a hole in the ground leading to an intricate and vast cave system with unique formations. By fall of 1985, Lehman had installed stairs, ladders and led curious travelers through the cave by the light of dimly lit caverns. In 1922, President Warren G. Harding created Lehman Caves National Monument by proclamation, a 640-acre site.

The monument was, in 1986, elevated to a National Park and boundaries were vastly expanded to more than 77,000 acres. Currently, Lehman Caves is one of the most popular visitor amenities in the Park. In addition to stalactites, helictites, and cave formations known as *draperies* and *soda straws* Lehman Cave has 300 rare formations called *shields*.

“In addition to the famous Lehman Caves, Great Basin National Park contains more than 45 additional wild caves (caves with no lighting and no paved thoroughfares), most of which are closed to protect their fragile ecosystems.” Groundwater flows are known to support the Park’s cave system. Model Cave, for instance, is flooded every year with snowmelt but also there is evidence of moisture through the groundwater table.

²² Center for State of the Parks, Great Basin National Park Report, 2009

The DEIS has not fully examined, nor can current groundwater modeling establish, at what level the National Park's cave system may be irreparably harmed or at what level cave species may be threatened and or endangered. Without this essential data, it can be foreseen that the FEIS has not adequately addressed mitigation.

Notably, several of these cave systems are important hibernacula and maternity roosts for several species of bats. And within the past five years, the National Park Service has identified at least seven possible new cave species. Park staff has mapped and surveyed most caves, and through this work have discovered several endemic and new species of cave-dwelling fauna.²³

A 2003 inventory uncovered a never-before-seen millipede (*Idogona lehmanesis*), another new species of millipede that is still being described and also represents a new genus, and a new species of globular springtail that is still being described (Model Cave springtail, *Arrhophilates*).”

The Proposal May Result in a “Dust Bowl” Conditions, Affecting Public Health and Impairing Dark Skies.

Great Basin National Park has exceptional data on air quality, with monitoring sites in the National Atmospheric Deposition Program, Clear Air Status and Trends Network, and Interagency Monitoring of Protected Visual Environments program present in the Park. Currently, the Park enjoys exceptional air quality – on most days visitors can see more than 186 miles and occasionally views exceed 230 miles.²⁴

Of note, the DEIS-FEIS acknowledged that lowered groundwater tables and potential impact on *phreatophytes* - deep-rooted vegetation in Snake and Spring Valleys that thrives on groundwater. NPCA maintains that modeling research, to date, had not yet adequately addressed varied levels of phreatic zones and the cumulative impact of reduced vegetation, soil erosion and subsequent air pollution created by “dust bowl conditions.”

NPCA points to the significant concern expressed by the Environmental Protection Agency (EPA) in comments regarding the GWD²⁵. In brief, the EPA noted “severe magnitude” of the GWD and commented: “The DEIS describes extensive hydrological modification over 5,000 square miles of Nevada and Utah – an area larger than the state of Connecticut – lowering groundwater levels and depleting aquifers, altering vegetation regimes, and eliminating high-quality habitat ...”

²³ *Great Basin National Park reports including The Midden, Summer 2011*

²⁴ *Center for State of the Parks, Great Basin National Park Report, 2009*

²⁵ *BLM Website re Groundwater Development Projects, Public Comments, Environmental Protection Agency*
www.blm.gov/pgdata/etc/medialib/blm/nv/groundwater_development/snwa/draft_eis0/public_comments/group_s.Par.61684.File.dat/EPA.pdf

Following the EPA's strong caution about affecting wetlands and non-wetlands vegetation, along with expressed possibility for "adverse economic and social effects," the EPA continued: "We are (also) concerned with the estimated releases of wind-blown particulate matter projected for the 5,000 square mile 10-foot+ drawdown area. Because no air modeling was performed, the DEIS does not provide an estimate of how these impacts will affect air quality and public health, including the ability of Provo, Salt Lake City, and Ogden Utah and Clark County, Nevada to attain air quality standards for these pollutants. Portions of these areas already do not meet air quality standards for PM-10 and/or PM-2.5. Windblown dust emissions could also impair visibility conditions at Great Basin National Park."

In 2004 and 2005, the National Park Service's Night Sky Team, formed in response to alarming increase of light pollution and its effects on National Parks, visited Great Basin to test light levels. The sky team reported that Great Basin's night skies are among the darkest in the National Park system, making it an ideal location for stargazing.

The Park has, since, developed a strong, astronomy program that attracts thousands of people to star talks and an annual astronomy festival, the result of which is a fledgling and promising eco-tourism "hook" on which to appeal to travelers to bolster the area's tourism economy. Organizations like the Great Basin Foundation are currently working on developing the area's reputation for night skies and recently made a decision to fund an observatory that will be made available to universities and colleges.

NPCA maintains that the DEIS has not addressed eco-tourism benefits in the area fully, as it regards current travel patterns and anticipated and increasing travel inspired by dark night skies. NPCA again points out that Visual Resource Inventory, as outlined in the DEIS and remains unchanged in the FEIS, should have included more research on impact to night sky viewing.

2) The need for the GWD is based on SNWA's outdated water plan²⁶ which projected unrealistic growth patterns in Southern Nevada.

As acknowledged in the DEIS-FEIS, application for the GWD has been based on the SNWA Water Resource Plan 09 which was "based on expected growth in demand at the time."²⁷ However, within of producing the Water Resource Plan, SNWA's Annual report cited a downturn in demand.²⁸

NPCA notes that projections of water demand, along with a thorough evaluation of conservation measures employed in the Las Vegas metropolitan area, should be the foundation of the GWD

²⁶ FEIS – Executive Summary, 2.1 Why Develop Groundwater, ES-5

²⁷ FEIS – Executive Summary, 2.1 Why Develop Groundwater, ES-5

²⁸ Southern Nevada Water Authority Comprehensive Annual Financial Report, pages 1-4 through '1-6, Website: www.snwa.com/assets/pdf/about_reports_cafcr.pdf

to, first, justify the Project. Because these projections are now flawed and because conservation measures have not been fully examined, base need for the Project is questioned.

- 3) SNWA has not diligently pursued the development of augmented water supply through Colorado River allocation as contemplated by the Basin States Agreement of 2007²⁹, and**
- 4) The FEIS is premature in that it has not weighed the findings and recommendations of the anticipated “Colorado River Basin Water Supply and Demand Study,” anticipated to be released for November 2012³⁰.**

As mentioned in the FEIS: “In May 2005, in response to continuing drought in the Colorado River Basin and reduced storage in Lakes Powell and Mead, the Secretary of the Interior initiated a process to develop Lower Basin shortage guidelines and explore coordinated management operations (for both lakes).³¹”

In 2007, under the Seven States Agreement, “the Basin States recommended the Secretary conjunctive management of Lake Powells and Mead.³²” Furthermore, the 2007 Interim Guidelines adopted by the Secretary defined criteria for reducing the possibility of Lake Mead’s surface water elevation falling below 1,000 feet.³³” In January 2010, the Bureau of Reclamation, in collaboration with the seven Colorado River Basin States initiated the ‘Colorado River Basin Water Supply and Demand Study,’” which is anticipated to be released in November 2012.

NPCA questions why the above-mentioned initiatives seem to have been given only cursory thought and why the FEIS has preceded the findings of the “Colorado River Basin Water Supply and Demand Supply.” Furthermore, we ask why effective water-producing/water-sharing collaboratives such as the Yuma Desalting Plant³⁴ have not been mentioned as viable options in the decisions outlined in the GWD DEIS-FEIS.

- 5) The FEIS, while adding some discussion of project capital costs, is remiss in endorsing SNWA’s underestimated costs for the GWD without scrutiny and is negligent in not addressing SNWA’s outstanding general obligation debt³⁵ necessary for funding the third intake straw³⁶ into Lake Mead to assure access to 90 percent of Southern Nevada’s current water supply.**

²⁹ FEIS – Executive Summary, 2.2 Colorado River, ES-5

³⁰ Colorado River Basin Water Supply and Demand Study website:
www.usbr.gov/lc/region/programs/crbstudy.html#schedule

³¹ FEIS – Executive Summary, 2.1, Colorado River, ES-5

³² FEIS – Executive Summary, 2.1, Colorado River, ES-5

³³ FEIS – Executive Summary, 2.1, Colorado River, ES-6

³⁴ Bureau of Reclamation, AOP

³⁵ Southern Nevada Water Authority Comprehensive Annual Financial Report, pages 1-4 through ‘1-6, Website:
www.snwa.com/assets/pdf/about_reports_cafr.pdf

³⁶ Southern Nevada Water Authority website:
www.snwa.com/about/regional_intake3.html

Currently, SNWA has a \$2.5 billion debt commitment to finance the third intake straw into Lake Mead, a new water treatment plant and new 8-inch fire lines,³⁷ and SNWA General Manager Pat Mulroy has expressed that the agency is strapped for cash as connection fees have dropped from \$188 million to \$3 million annually.

NPCA questions why the DEIS-FEIS have not scrutinized SNWA's current financial situation and the agency's ability to fund the GWD, and the agency's projected capital expenses. We note that the FEIS acknowledges that SNWA's cost estimates are "expressed in terms of 2007 dollars" and that the "sum does not include contingencies, long-term financing costs, of implementation of the COM Plan."³⁸ NPCA respectfully asks that BLM to consider public interests and the potential of public fall-out should the GWD be started and not completed.

- 6) The DEIS and FEIS have failed to provide comprehensive data regarding groundwater modeling, and the FEIS decision-making predates an anticipated U.S. Geological Survey requested by the NPS; and**
- 7) Drawdown of groundwater in Spring Valley has been acknowledged by the Environmental Protection Agency (EPA)³⁹ to hold grave potential to eradicate essential *phreatophytes* which could, in turn, create dust-bowl conditions that affect the Park's ecosystems, destroy the Park's clean air and night skies, as well as impact regional air quality.**

As mentioned in the DEIS-FEIS and pointed out in comments provided by the Environmental Protection Agency (EPA), not enough is known as regards cumulative impacts on the valleys, the adjacent National Park, and region as regards impacts from the GWD, specifically groundwater pumping in designated valleys. When is enough, enough? And, if/when resources are "tapped out," will the ecology of the area be retrievable, able to be restored? These important considerations have not been fully, adequately addressed in the Draft or Final versions of the GWD Environmental Impact Statement.

- 8) Because of the massive and significant scope of this project, a hybrid alternative (as outlined in the FEIS) should not be considered without opportunity for public comment and extended time for review.**

While NPCA realizes that the BLM does have a right to develop a hybrid Preferred Alternative in response to comments from 460 sets of written comments and oral statements, and 20,000

³⁷ Las Vegas Review Journal, September 21, 2012, Mulroy: Time for businesses to start sharing costs for water infrastructure." www.lvrj.com/business/mulroy-time-for-businesses-to-start-sharing-costs-for-water-infrastructure-170774536.html

³⁸ FEIS, Chapter 3, Costs and Finances, pages ES-23 and ES-24.

³⁹ BLM Website re Groundwater Development Projects, Public Comments, Environmental Protection Agency www.blm.gov/pgdata/etc/medialib/blm/nv/groundwater_development/snwa/draft_eis0/public_comments/group_s.Par.61684.File.dat/EPA.pdf

letters,⁴⁰ we submit that the scope of the GWD and its potential for long-term impacts demands additional time for review and public comments.

We thank you for this opportunity to comment.

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⁴⁰ FEIS, Chapter 2, Comments on Draft, page ES-9