

10/11/2011

To: Susan Joseph-Taylor
Chief Hearing Officer
Office of the State Engineer
901 South Stewart Street
Suite 2002
Carson City, NV 89701

From: William Belknap
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Boulder City, NV 89005
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Re: Comment on the Clark, Lincoln, and White Pine Counties Groundwater Development Project

Dear Officer Joseph-Taylor,

The Clark, Lincoln, and White Pine Counties Groundwater Development Project DEIS considers the reduction of evapotranspired water from the valleys where groundwater removal is being contemplated, but does not consider the consequential reduction in relative humidity in the air above the project. The increases of the drying effect beyond present state conditions from winds passing over the project area would add greater stress on plants and animals. Of particular concern would be effects during times of low humidity on organisms near their margin of survival. This could be a serious oversight of deleterious effects both within the project area of study and beyond.

The DEIS states that the groundwater outflow from the total project area is 56,193 afy, and the reasonably foreseeable future actions will take 47,465 afy. Thus there is only about 9,000 afy that could be considered surplus from the study area, which of course ignores the downstream effects of such withdrawal. Yet the proposed action is to withdraw 176,655 afy, clearly an amount that requires mining subsurface water. Soon the projected water needs of SNWA will be greater than the ability of the Colorado River to supply, so the chances of the allowing the project area to naturally recharge while the SNWA utilizes non-project sources appears to be nil. Thus the project is unsustainable, and will clearly have seriously negative effects on the existing natural communities of the basins proposed for supply.

Because of the projected effects noted in the DEIS on the natural ecosystem, and the incomplete nature of the analysis, I do not think the Nevada State Engineer can approve this project and also fulfill the obligation to deny applications detrimental to the public interest.

Sincerely,



William Belknap

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