



# SOUTHERN NEVADA WATER AUTHORITY

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November 7, 2012

Ms. Penny Woods, Project Manager  
Bureau of Land Management  
Nevada Groundwater Projects Office  
1340 Financial Boulevard  
Reno, Nevada 89502

Dear Ms. Woods:

**Subject:** Clark, Lincoln, and White Pine Counties Groundwater Development Project, Cave Valley Applicant Commitments

On September 13, 2012, the Southern Nevada Water Authority (SNWA) sent to you a letter describing additional applicant-committed measures for Cave Valley, as part of the for the Clark, Lincoln, and White Pine Counties Groundwater Development Project (GWD Project). By letter dated September 14, 2012, the Bureau of Land Management (BLM) indicated that it would include these additional measures in the Record of Decision, and has requested that the U.S. Fish and Wildlife Service (Service) include them in the Section 7 Consultation for the GWD Project.

The Service has identified some questions regarding these Cave Valley measures; thus, SNWA provides the following clarifications:

- 1) SNWA's commitment to install two additional groundwater monitoring wells to monitor for potential groundwater drawdown propagating from southern Cave Valley towards Flag Springs is not intended to preclude the potential for additional monitoring wells, and/or other hydrologic monitoring such as discharge monitoring, that may be determined necessary by the BLM and/or Service as part of future tiered National Environmental Policy Act (NEPA) or Endangered Species Act (ESA) processes. SNWA anticipates that the BLM and Service would conduct site-specific analyses of future groundwater production locations during the tiered NEPA and ESA processes and, as part of those processes, would review existing monitoring to determine if it is adequate or whether additional monitoring is needed.
- 2) SNWA committed to three stages of groundwater development in Cave Valley. The triggers, or early warning indicators, for management action to ensure that the long-term protection of the White River spinedace would apply to any level of groundwater development, from the initiation of groundwater development through the life of the

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project. Hydrologic and biological monitoring data collected from the beginning and throughout the life of the project would continue to be provided to the BLM and the Service, as required by the BLM and Service in future tiered NEPA and ESA processes and as described in the Delamar, Dry Lake and Cave Valleys Stipulated Agreement.

3) SNWA committed to development of triggers for management action associated with GWD Project pumping in Cave Valley. The purpose of the triggers would be to ensure that groundwater pumping would be modified, reduced, or ceased if necessary to ensure the long-term protection and survival of the White River spinedace. Other management actions could include biological measures, or other site- and species-specific measures as determined necessary and as approved by the BLM and the Service. SNWA understands that the triggers and management actions developed prior to future tiered NEPA and ESA processes for groundwater production may include an agreed process to receive input from external parties with specific expertise, such as the U.S. Geological Survey or Nevada Department of Wildlife.

If you have any questions, or we can provide any further clarification, please don't hesitate to contact me at (702) 875-7080 or Lisa Luptowitz at (702) 862-3789.

Sincerely,



John J. Entsminger  
Senior Deputy General Manager

c: Ted Koch, Nevada State Supervisor, U.S. Fish and Wildlife Service  
Amy Lueders, Nevada State Director, Bureau of Land Management