



Non-profit 501(c)(3) Organization

September 29, 2017

Office of the State Engineer
Attn: Susan Joseph-Taylor, Deputy Administrator
901 Stewart Street
Suite 2002
Carson City, Nevada 89701

Re: In the Matter of Protested Applications 54003 through 54021 (Spring Valley – Basin 184)

Dear Ms. Joseph-Taylor,

The Great Basin National Park Foundation Board of Directors is re-submitting and amending its 2011 statement regarding the Southern Nevada Water Authority's proposed groundwater pumping project.

September 2017 Statement (revised from November 2011 Public Statement)

The Great Basin National Park Foundation is a non-profit organization whose mission is "to support programs and projects that enhance the values of Great Basin National Park." The Foundation's vision, which we articulate in our Strategic Plan, is as follows:

"The natural and cultural heritage of the Great Basin will be enhanced, not compromised, by individuals or industries that understand and appreciate the beauty, diversity, or fragility of this high desert region. Future generations will enjoy wide open landscapes, clean air, dark night skies, vigorous and diverse native ecosystems, and thriving local cultures. Cheatgrass and other invasive weeds will have been eradicated, groundwater will be used locally and conservatively, and sixth and seventh-generation cowboys will still ride the range. ... The Great Basin is enjoyed for its space, silence, and solitude and given protection on par with its diverse and unique natural and cultural resources."

We are aware that the Southern Nevada Water Authority proposes to pump groundwater from rural eastern Nevada to the citizens of Southern Nevada. Two of the valleys from which groundwater is proposed to be pumped are situated on either side of Great Basin National Park. We know that scientists have studied and reported on this complex project and its potential impacts, and that the best science available is not yet conclusive with regard to potential adverse impacts on Great Basin National Park's treasured resources, in particular those values mentioned in our Vision statement: "wide open landscapes, clean air, dark night skies, vigorous and diverse native ecosystems, and thriving local cultures." We believe that when the science is undecided, we should adopt the precautionary principle. Therefore we believe that the project should not proceed in the valleys adjacent to Great Basin National Park until it can be demonstrated that the project will not impact the sustainability of the Park's ecological, economic, and social resources.

In 2016, the Great Basin National Park Foundation, together with its partners Great Basin National Park, University of Nevada Reno, Western Nevada College, Concordia University in California, and Southern Utah University, constructed and opened the Great Basin Observatory at the Great Basin National Park with an initial investment of

\$850,000, nearly all of it from private individuals and foundations. The Great Basin Observatory is the only research grade observatory in a national park. The Park has been declared an International Dark Sky Park. Its night skies are considered among the most stable, darkest, and clearest in the contiguous United States. Eminent astronomers and astrophysicists have endorsed the Observatory for its potential to partner in major future discoveries and contribute significantly to education in the STEM (Science, Technology, Engineering and Mathematics) fields. University students are already using the observatory to conduct and publish research. A web portal now in development will be accessible worldwide by astrophysics researchers, teachers, students, and the general public. Planning and fundraising is underway for the Observatory's education and outreach program, *Reach for the Stars*.

The Great Basin National Park Foundation Board of Directors believes that the term "environmental soundness" must take into consideration air quality and its effects on dark night skies as well as on other natural and cultural resources that are required by the Park's 1986 enabling legislation to be preserved in perpetuity for present and future generations. Specifically, with respect to the protested applications for Spring Valley, we believe that the project construction and ongoing maintenance activities, as well as the long term drying effects from groundwater pumping, will create dust in Spring Valley. Furthermore, should any industrial structures require lighting, we are concerned with potential light pollution. Any lighting needs to be assessed for its effects and should meet International Dark Sky Association standards for reducing light pollution.

Additionally, we believe there is insufficient information to assure that the groundwater pumping project will not cause water levels to fall enough to harm the Model Cave Amphipod *Stygobromus albanus*, a newly discovered species found nowhere in the world except in Great Basin National Park, or to impact the Park's famous Lehman Caves. Finally, science has not yet determined the long term effects of global warming on Great Basin hydrographic basins.

There is insufficient information to assure that the groundwater pumping project proposed by the Southern Nevada Water Authority will not harm the pristine dark night skies and other natural resources of Great Basin National Park. We request that our concerns be assessed and that, if any harmful effect is anticipated, monitoring and mitigation measures be proposed.

We continue to believe, as we stated in 2011, that "the project should not proceed in the valleys adjacent to Great Basin National Park" (specifically, with regard to this remand hearing, Spring Valley) "until it can be demonstrated that the project will not impact the sustainability of the Park's ecological, economic, and social resources."

Thank you. This statement was approved unanimously by all Board members except two who needed to recuse themselves. Voting for the statement were Paul Bath, Steven Brown, Maria Denzler, Briget Eastep, Kathryn Griffith, Rebecca Mills, Robert Morrill, Michael Niggli, Tyler Nordgren, Alicia Reban, and David Tilford.



Rebecca Mills, Chair
Great Basin National Park Foundation

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