Toiyabe Chapter
Sierra Club
PO Box 8096
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July 29, 2007

Daniel Bright
USGS Nevada
160 No. Stephanie St.
Henderson, NV 89074

Kimball Goddard
USGS Nevada
2730 No. Deer Run Rd.
Carson City, NV 89701

Dear Mr. Bright,

On behalf of the 5,500+ members of the Toiyabe Chapter of the Sierra Club in Nevada and the eastern Sierra, I am submitting these comments on the BARCASS, published June 1, 2007. These comments supplement the comments and technical review submitted by the Great Basin Water Network to the USGS on BARCASS on behalf of a number of organizations.

The Sierra Club agrees with the Water Network that BARCASS is providing much new information on the geology underlying the carbonate aquifer in eastern Nevada/western Utah and the interconnectivity of basins in the study area. Unfortunately, information on the hydrology of the carbonate aquifer is greatly limited by the high levels of uncertainty inherent in using methodology which may not be appropriate to the Great Basin study area, non-calibrated models, and the short time-frame and resources available for completing this study. Recommendations submitted by the GBWN would help the USGS address some of the problems identified in the draft BARCASS.

Other problems which the public (and the Sierra Club) identified in the scoping for BARCASS, such as the lack of information on impacts from proposed pumping schemes, the limitations of BARCASS because the study area was such a small part of the 4 state carbonate aquifer area, etc., cannot be addressed in the final report. But it would be helpful for the final BARCASS to recommend how problems (and opportunities) identified by the public for the BARCASS study can be addressed in the future.

The Sierra Club is especially concerned about the lack of information on regional springs in the draft report. Regional springs are extremely valuable biological resources, not simply hydrological "discharge" points. These springs provide critical habitat for unique species and are at risk from the impacts of proposed massive pump/pipe projects.

If the USGS identified and collected information on regional springs, but did not include it in the draft report, then we strongly suggest that the information be included in the final BARCASS report to address these and other questions: Where do regional springs occur in the study area? throughout the carbonate aquifer area? What are their flow rates and other characteristics (temperatures, etc.)? How do the flow rates vary over the season and over the years and why? What are the sources of their flows - both proximate and general? What is the interconnectivity of the springs with each other? Which springs have mixed water sources, i.e., a combination of water from the carbonate and alluvial aquifers?

Thank you for considering our comments.

Sincerely,

/s/
Rose Strickland, Coordinator

Dennis Ghiglieri, Chair