



GREAT BASIN WATER NETWORK

P.O. Box 75

Baker, NV 89311

(775) 881-8304

<http://greatbasinwaternetwork.org>

August 30, 2014

Groundwater Directive Comments

USDA Forest Service

ATTN: Elizabeth Berger - WFWARP201 14th St. SW
Washington DC 20250

Via email: fsm2500@fs.fed.us

Dear Ms. Berger:

Thank you for the opportunity to submit comments on the proposed directive on groundwater resource management for the US Forest Service. On behalf of the Great Basin Water Network, I am pleased to express our appreciation to the Forest Service for recognizing the importance of groundwater as part of watershed management on national forests. GBWN believes in protecting watersheds and local communities that depend on them for subsistence as well as opposing huge groundwater transfers.

We especially appreciate the USFS assumption that ground and surface water are hydraulically connected, unless demonstrated otherwise using site-specific information. Unfortunately, the current interpretation of Nevada water law assumes the opposite which, we believe, has led to over-appropriation of groundwater basins as well as adverse impacts to both senior water rights holders and to the environment, especially to groundwater-dependent ecosystems.

Also, unfortunately, the current interpretation of Nevada water law by the State Engineer does not require the state's consideration of the effects of groundwater withdrawals on national forests - we are told that's the federal agency's job. It also does not always require monitoring and mitigation for major groundwater withdrawals before water permits are issued. And it requires no public participation in developing and implementing monitoring and mitigation plans, even for local communities affected by massive interbasin transfers in our state. Nor is there currently any consideration at the state level of climate change impacts on future water availability before water applications are approved.

We would urge the USFS to incorporate transparency and provide for public participation in its groundwater management programs, including any "stipulated agreements" between the USFS and water developers in resolving USFS protests of applications for water rights. We thank you also for providing flexibility in USFS special use authorizations of groundwater withdrawals by recognizing the uncertainty in evaluating impacts on groundwater resources and changing availability and distribution of groundwater resources due to climate change.

Thank you for considering our comments.

Sincerely,

s/s

Abigail Johnson
GBWN

cc: Jason King, Nevada State Engineer