

# Washoe Tribe of Nevada and California

Environmental Protection Department



REC'D - BLM - NSO  
9:00 OCT 05 2011  
A.M.

September 12, 2011

The Bureau of Land Management  
Groundwater Projects Office  
P.O. Box 12000  
Reno, NV 89520-0006

**RE: Clark, Lincoln, and White Pine Counties Groundwater Development EIS**

To Whom It May Concern,

The Washoe Environmental Protection Department (WEPD) is submitting comments to the Draft Environmental Impact Statement (EIS) developed by the Bureau of Land Management (BLM) for the Clark, Lincoln, and White Pine Counties Groundwater Development Project. WEPD requests that the BLM takes the NO ACTION alternative and deny Southern Nevada Water Authority (SNWA) access across public lands held by the BLM. WEPD objects to the proposed Right of Way (ROW) and pipeline because of the affect on rural communities including regional Native American Tribes and the environmental impacts.

The SNWA desire to augment their future water supplies with over 300 miles of pipeline and requisite groundwater pumping will disaffect rural communities and regional Tribes which depend on water for their way of life and well being. The economic affect on existing water users in the area to be affected is not adequately examined in the EIS. As the groundwater levels drop, opportunities for the rural residents will also decline. There will be restricted economic development over a large geographic area in favor of water for Las Vegas.

The water use projections in the EIS are invalid because they are based upon pre-recession rates of growth in Clark County. The city of Las Vegas has led the nation in foreclosures for many years running, and the unhinged growth Las Vegas experienced in the housing bubble is what the water use projections are based upon in the EIS. Currently Las Vegas is projected for slow growth, population loss, and a continued poor housing market. These facts alone leave the question why the pipeline project is needed especially considering the environmental impacts.

According to the EIS, the proposed pipeline will remove approximately 20,570 acres (32 square miles) of wildlife habitat in an area which contains is vital for many protected species including the Desert Tortoise, Greater Sage Grouse, and Pygmy Rabbit. Looking toward the future, the EIS can only estimate the prolonged affect that ground water pumping will have on surface waters. The effects on perennial and ephemeral water ways could have a significant impact on sensitive water sources which plants and animals depend. The site-specific hydrologic conditions can't be fully modeled so regional effects are left to question in the EIS. The actual amount of lands affected will increase dramatically as aquifers are depleted, and plant communities, such as riparian and basin shrub land, will suffer irreversibly as groundwater levels drop permanently.

Please take the NO ACTION alternative and deny Southern Nevada Water Authority (SNWA) access across public lands held by the BLM.

Thank you for your consideration in review of this document. If you have any questions, please contact Andrew Rogers, Environmental Specialist II at 775-265-8684.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marie Barry', with a stylized flourish extending to the right.

Marie Barry, Environmental Director  
Washoe Environmental Protection Department

Cc:WEPD/file/CWA/Comments Clark, Lincoln, and White Pine Counties Groundwater Development EIS