

REC'D - BLM - NSO
9:00 A.M. SEP 19 2012

N-4 State Grazing Board
P.O. Box 461
Panaca, Nevada 89042
775-728-4682
September 6, 2012

Penny Woods
SNWA Project BLM
Box 12000
Reno Nevada 89520

Re: N-4 State Grazing Board comments to the Clark, Lincoln, and White Pine Counties Groundwater Development Project Final Environmental Impact Statement (FEIS) August 2012

Dear Ms Woods

The N-4 State Grazing Board, herein called "the Board" is a legal entity of the State of Nevada organized under NRS chapter 568 "Grazing and Ranging". The Board represents the grazing interests in White Pine and Lincoln Counties in eastern Nevada in the Ely BLM District. This Board has previously commented on the Draft EIS for this GDP, please pay attention to the Board's attached comments dated September 22, 2011.

The Board maintains our position of supporting the "No Action" alternative because the negative impacts of this project will be seriously detrimental to our way of life; and degrade the environment, the flora and fauna, the people's lives and the several industries of eastern Nevada. As we study the Final EIS for this project, the Board once again finds major omissions and flaws in your impact analysis and a complete lack of sufficient mitigation actions.

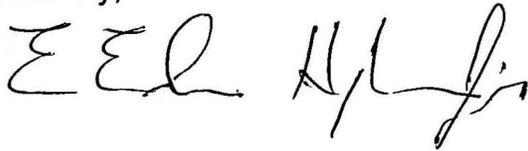
Once again the Board has spent time reviewing the Vegetation Resources section 3.5 and Rangelands and Grazing 3.12 sections. While we note some new information such as green stripping, these sections remain very inadequate in portraying accurately the impacts to these vital resources. Major omissions include the lack of temporary irrigation to assure success in seeded vegetations in disturbed areas along this project; grazing during growing season to reduce or slow wild fire movements; visual impacts should play second priority to successful plant establishment; accurate portrayal of reduction of rangeland

carrying capacity; and coordination of construction and mitigation actions with individual permittees prior to the start of construction are all vital measures that must be incorporated.

Mitigation measures are essential to offset the impacts brought on by the loss of water and forage. The very best and exclusive way to identify the most effective mitigation measures is to meet directly with the impacted permittees. This board does not trust the figures in any of the project alternatives and feel that any large volume pumping is going to have catastrophic negative impacts on native vegetation, biodiversity, wildlife, wild horses, recreation, hunting, and grazing. The long term impacts will be incomparable with this project serving as a glaring example of *how not to* protect our resources.

This Board strongly urges the BLM to use the information on irreversible and irretrievable negative impacts already described in your Chapter Four of this FEIS to do the right thing for the resources of this public land; that is, in your upcoming Record of Decision, DENY the application of Southern Nevada Water Authority because of the ruination it will cause. If you have any questions in regards to these comments, please feel free to contact us. The Board is looking forward to remaining engaged in this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Edwin Higbee, Jr.', written in a cursive style.

E. Edwin Higbee, Jr, Vice Chairman
N-4 State Grazing Board

Enclosure: Sept 22, 2011 Comment letter to Draft EIS GDP SNWA

cc: Nevada Governor Brian Sandoval
US Senator Harry Reid
US Senator Dean Heller
Congressman Mark Amodei
Congresswoman Shelley Berkley
Congressman Joe Heck
Jeff Fonatine, Nevada Association of Counties
J. J. Goicoechea, President, Nevada Cattlemen's
Doug Busselman, Nevada Farm Bureau
Jason King, Nevada State Water Engineer
Steve Boies, Chairman, Central Comm Grazing Boards
George T. Rowe, Chairman, Lincoln Co Commission
John Lampros, Chairman, White Pine Co Commission