

## **BLM\_NV\_NVSO\_GWProjects**

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**From:** Susan Hedgpeth <hedgpeth@berkeley.edu>  
**Sent:** Friday, September 28, 2012 5:49 PM  
**To:** BLM\_NV\_NVSO\_GWProjects  
**Subject:** FEIS - Environmental Justice and Tribal Concerns

Attn: Penny Woods, Project Manager  
Bureau of Land Management  
Nevada Groundwater Projects Office, Nevada State Office (NV-910.2)  
1340 Financial Blvd  
Reno, NV 89502  
FAX: 775.861.6689  
Email: [nvgwprojects@blm.gov](mailto:nvgwprojects@blm.gov)

**RE: *The Clark, Lincoln, and White Pine Counties Groundwater Development Project Final Environmental Impact Statement (FEIS) – Environmental Justice and Tribal Concerns***

Dear Ms. Woods:

The Southern Nevada Water Authority's (SNWA) proposed groundwater development project intends to siphon billions of gallons of groundwater per year from at least four valleys in central Nevada and pump it 300 miles to the Las Vegas valley. This project poses a grave threat to the water and cultural resources of all Tribes and Indian people in the State of Nevada.

SNWA's groundwater development project has been described as one of the biggest threats to traditional ways of life since colonization. The Bureau of Land Management (BLM) will not be able to adequately protect millions of acres of public and Tribal lands from massive water depletion, land subsidence, and harmful impacts to cultural resources. This project will result in significant, adverse impacts to the Tribes' ability to engage in traditional practices of hunting, gathering and fishing on ancestral lands. Moreover, the BLM has failed to honor its obligation to conduct meaningful consultation with Indian tribes on a government-to-government basis, and to protect Tribal resources, as required by law.

SNWA's project is an unsustainable groundwater mining project that places the present and future generations of all Tribes in the State of Nevada in jeopardy. I urge you to: 1) suspend this environmental review process until SNWA's water rights applications conclude; 2) engage in formal Tribal consultation with all Nevada Tribes on a government-to-government basis regarding cultural and water resources, including federally-reserved water rights; 3) revise the Programmatic Agreement to ensure that Tribal cultural resources, including human remains and sacred sites, are adequately protected in accordance with both the letter and spirit of federal and Tribal laws; and, 4) reinstate this environmental review process only once final information is available regarding the amounts of water SNWA will be authorized to pump, including more accurate locations of wells and associated infrastructure. Should BLM refuse to take these requested actions, it is my opinion that BLM has failed to take the "hard look" required by the National Environmental Protection Act (NEPA).

Sincerely,

Susan Hedgpeth  
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