

Jim Steitz
564 Esslinger Drive
Gatlinburg, TN 37738

REC'D - BLM - NSO
9:00 A.M. SEP 07 2012

September 2, 2012

Amy Leuders, Nevada State Director
Bureau of Land Management
1340 Financial Boulevard
Reno, NV 89502

Dear Ms. Leuders,

I urge you **to deny the right-of-way request of the Southern Nevada Water Authority for pipelines to mine the groundwater of eastern and central Nevada** in service of the cancerous, unsustainable suburban growth of southern Nevada. This water theft would devastate the ecosystems from under which it is evacuated, and any right of way permit the BLM issues would constitute a blatantly illegal and immoral death warrant for those ecosystems.

The SNWA has no right to confiscate the 37 billion gallons of water annually that it demands, and to deprive that water from the non-human inhabitants of Nevada with morally antecedent rights to this ancient groundwater. The BLM's own Final Environmental Impact Statement makes plain the biological genocide that would follow, and provides an irrefutable legal and moral **mandate that BLM select the "no action" alternative. Federal agencies are barred from causing the extinction of a single species** in one desiccating pipeline permit, let alone the 39 species the BLM has identified as likely to be eradicated. It may be impossible to recall a parallel in American history of an agency choosing deliberately to destroy such a multitude of biodiversity in a single act. To issue this permit would be no mere "environmental impact," but rather a biological genocide.

No arid ecosystem could be reasonably expected to survive a 200 foot drop in the regional water tables, as the FEIS predicts. This would destroy over 137,000 acres of shrubland ecosystem, as well as 3,600 acres of wetlands, over 70 springs and 145 miles of perennial streams. These latter aquatic ecosystems are the oases of a semi-arid ecosystem around which native plants and animals congregate with an astounding density and diversity. A multitude of dace, chubs, and springsnails, precious and endowed with an inviolable right to existence, would be wiped from the Earth. To even consider this act of violence exemplifies a moral depravity on the part of the SNWA that the BLM must not countenance, and which the passage of **the Endangered Species Act does not envision any federal agency aiding and abetting.**

The gratuitous, obscene waste of water in the Las Vegas commercial empire must be resolved, and must not be either retrospectively rewarded and prospectively facilitated with a new water supply, stolen from those species which it has sustained for thousands and possibly millions of years. The mismatch between the avaricious, gluttonous human lust for this water and the timeless biological right to this water claimed by dozens of fish and invertebrate species that require it could not be starker. The BLM's job is to reasonably manage the country's natural

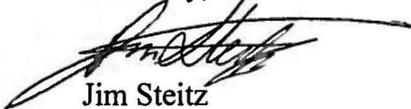
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resources under its jurisdiction, including the consideration of all indirect impacts of its actions. In the case of the SNWA pipelines across BLM land, the indirect impact would be biological genocide of an order that the BLM, I hope, would never contemplate conducting directly. **BLM must therefore reject an action, a permit grant, that would cause the same impact indirectly.** The distinction between a direct and indirect biological genocide is entirely irrelevant.

Again, I urge you to immediately **reject the right-of-way request of the Southern Nevada Water Authority.** If BLM cannot refrain from blessing and facilitating the destruction of entire ecosystems, then BLM's resource-management mandate will be stripped of any facade of substance or balance, and America's biological diversity will be diminished by another 39 precious forms of life that will never exist on this Earth again. Thank you for your attention to this urgent issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Steitz", with a long, sweeping horizontal stroke extending to the right.

Jim Steitz

cc: Interior Secretary Ken Salazar