

Penny Woods
Bureau of Land Management
Nevada Groundwater Projects Office
Nevada State Office
1340 Financial Blvd.
Reno, NV 89502

October 1, 2012

nvgwproject@blm.gov

RE: Clark, Lincoln, and White Pine Counties Groundwater Development Project Final Environmental Impact Statement (FEIS)

Dear Ms. Woods,

Thank you for the opportunity to comment on the FEIS for the Clark, Lincoln and White Pine Counties Groundwater Development Project.

After reading through this very extensive document we are very favorable impressed with the thorough job the BLM and its contractors have done in evaluating the impacts of the proposed project. However, we are astounded and disappointed at the selection of Alternative F as the preferred alternative. It is hard to believe that the decision makers actually looked at the data presented and the projections on lowering of the water tables in the affected groundwater basins when they selected Alternative F. We recognize that the LCCRDA directed the BLM to issue a Right of Way (ROW) in Clark and Lincoln Counties, but Congress did not pass any law ordering the BLM to issue a ROW for a pipeline in White Pine County. Given the mandates in FLPMA to manage the land under the purview of the BLM in a sustainable manner it seems to us that the Bureau has ignored that statutory requirement in this case. Clearly, water table draw downs of 100 feet or more over the next 75 years with consequent loss of more than 22,000 acres of hydric soils and their associated groundwater dependent vegetation cannot be considered either sustainable or responsible management.

The US Fish and Wildlife Service is evaluating the status of the Greater Sage Grouse to determine whether it should be listed as endangered or threatened under the Endangered Species Act requirements. While the FEIS discusses Sage Grouse, the preferred alternative doesn't seem to seriously consider impacts to Sage Grouse habitat in Spring Valley and the Snake and Schell ranges on either side of that valley.

If the models of future impacts of Climate Change are even close to accurate then we will see a significant increase in aridity in the areas affected by this proposed project. With the decreasing average winter snow pack and increasing variability in annual

precipitation we have seen during the past decade and that is predicted to persist into the future we think that your preferred alternative does not represent a sustainable approach to resource management.

Sincerely,

A handwritten signature in black ink, reading "John E. Hiatt". The signature is written in a cursive style with a large, sweeping initial "J" and a distinct "H".

John E. Hiatt
Conservation Chair
Red Rock Audubon Society
8180 Placid Street
Las Vegas, NV 89123
702-361-1171