

# Washoe Tribe of Nevada and California

## Environmental Protection Department



REC'D - BLM - NSO  
9:00 SEP 12 2012  
A.M.

Penny Woods, Project Manager  
Bureau of Land Management  
Nevada Groundwater Projects Office  
Nevada State Office (NV-910.2)  
1340 Financial Blvd  
Reno, NV 89502

September 4, 2012

**Re: Clark, Lincoln, and White Pine Counties Groundwater Development Project Final EIS**

Dear Ms. Woods,

Thank you for allowing the Washoe Tribe the opportunity to comment on the Clark, Lincoln, and White Pine Counties Groundwater Development Project Final EIS. The Washoe Environmental Protection Department (WEPD) remains concerned with the negative effects the proposed project will have on tribal traditional territory, hunting and gathering areas, and cultural resources. 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 Tribe does not support projects that will destroy or damage these traditional lands and resources. The WEPD does not support the risks listed in the EIS document that clearly show degradation to the land. The WEPD does not agree or support the purposed project that would deplete the resources of one area in order to transfer them and sustain a different geographic region. The depletion of the ground water will create a cumulative negative affect on the vegetation, wildlife and the people that live within the projects regional scope.

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 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 shrubland, 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 call me at 775-265-8682 or email [marie.barry@washoetribe](mailto:marie.barry@washoetribe).

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'M' followed by a horizontal line and a 'B' with a horizontal line extending to the right.

Marie Barry, Environmental Director

CC: WEPD file/BLM/ Clark, Lincoln, and White Pine Counties Groundwater Development Project Final EIS

Lynelle Hartway, General Counsel  
Rob Beltramo, Tribal Planner  
Darrel Cruz, Tribal Historic Preservation Officer  
Tahnee Praiswater, ES II Water Resources