GREAT BASIN WATER NETWORK
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October 1, 2012

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

Re: Submission of New Information and Comments on the BLM's Final EIS for the Clark, Lincoln, and White Pine Counties Groundwater Development Project

Dear Ms. Woods:

Thank you for providing this opportunity to offer new information on the Bureau of Land Management's Clark, Lincoln, and White Pine Counties Groundwater Development Project Final Environmental Impact Statement (FEIS). In addition to this letter from the Great Basin Water Network (GBWN or Network), a number of individuals and organizations who are participants in the Network may send their own respective additional information and comments to you.

Introduction:

The Network is a coalition of Counties, Tribes, ranchers, conservationists, business people, and urban and rural tax and ratepayers. As we have said previously, great uncertainty and frequently shifting circumstances concerning the purported purpose and need for the Southern Nevada Water Authority's (SNWA's) proposed Pipeline Project, and SNWA's ability to finance and maintain the Project, have rendered the Project too uncertain for the BLM to produce a solidly grounded, reliable EIS or ROD. New information and changed circumstances now make it clear that the FEIS already is based on out of date information, requiring preparation of a Supplemental EIS before the BLM can reach a sound final decision regarding the Project. These changes are explained in more detail below.

GBWN requests that this new information and comments, and all attachments hereto, be included as part of the administrative record. GBWN further requests that all documents, articles, and reports cited in these comments and attachments be included as part of the administrative record of this action. See County of Suffolk v. Secretary of Interior, 562 F.2d 1368, 1384, n.9 (2d Cir. 1977) (addressing scope of NEPA administrative record), cert. denied, 437 U.S. 1064 (1978); Silva v. Lynn, 482 F.2d 1282 (1st Cir. 1973) (same); see also Thompson v. United States Dep't of Labor, 885 F.2d 551, 555 (9th Cir. 1989) (administrative record consists of all documents and materials directly or indirectly considered by agency and includes evidence contrary to agency's position). GBWN has closely reviewed the new information and comments submitted by White Pine County, Nevada, and by the Center for Biological Diversity, and hereby incorporates that new information and those comments by reference.

1. **New Information**

A. Imminent New USGS Study:

The U.S. Geologic Service (USGS) is in the process of finalizing a new hydrogeology report on the potential impacts of the Project on the resources in and around Great Basin National Park, including Spring and Snake Valleys. This report is in the peer review stage and is expected to be finalized within the fall of 2012. This new USGS study will contain information critical to the assessment of potential impacts to Great Basin National Park. It also is likely to provide more precise and reliable information regarding the potential impacts of the proposed pumping in Spring and Snake Valleys. Accordingly, it is premature for the BLM to issue an FEIS let alone a ROD for the proposed Project until the study is available and reviewed by the BLM. After review of the study, the BLM should issue a Supplemental EIS for notice and public comment which incorporates this additional new information.

B. New Population Projections:

The 2008 population data on which the FEIS's analysis of purpose and need is based is outdated and fails to take account of southern Nevada's recent population decline during the economic depression of the past several years, which continues to afflict southern Nevada. A new June 2012 population forecast from the UNLV Center for Business and Economic Research (CBER) estimates that Clark County's population growth through 2035 will be close to 25% lower than the 2008 projection.[1] (The June 2012 CBER Report has been submitted by White Pine County and is incorporated by reference into these GBWN comments.) The current CBER population estimate is significant new information released since the notice and comment period for the Draft EIS. Given SNWA's past record of chronically misestimating Clark County's population growth trends and this substantial new information, the BLM must issue a Supplemental EIS that incorporates this information for notice and comment.

C. June 2012 NRDC Report:

In June of 2012, the Natural Resources Defense Council (NRDC) published a report titled *Pipe Dreams: Water Supply Pipeline Projects in the West* (Report), which analyzes large water pipeline projects from a policy perspective.[2] (The June 2012 NRDC Report has

[1] Center for Business and Economic Research, Population Forecasts: Long-Term Projections for Clark County, Nevada 2012-2050 (2012), *available at* http://cber.unlv.edu/reports/2012PopulationForecasts.pdf.
[2] Natural Resources Defense Council, Pipe Dreams: Water Supply and Pipeline Projects in the West (2012), *available at* http://www.nrdc.org/water/management/files/Water-Pipelines-report.pdf.

been submitted by White Pine County and is incorporated by reference into these GBWN comments.) The Clark, Lincoln, and White Pine Counties Groundwater Development Project is addressed a number of times in the Report. The Report contains significant new information that must be considered by the BLM in a Supplemental EIS.

Specifically, the Report recommends that all costs, including financing, planning, operating, energy costs, and mitigation costs, be included in project cost estimates in order to create a complete picture of project costs. Report, at 4. BLM has failed to include such costs in the project cost estimates that are addressed in the FEIS. Moreover, BLM policy requires the applicant to demonstrate the technical and financial capability to construct, operate, maintain, and terminate its project. On the one hand, the BLM suggests that SNWA has demonstrated that capacity, but on the other hand, BLM has not required SNWA to provide a cost estimate for mitigation, which in all likelihood will be necessary for continued operation of the Project. These mitigation costs could be prohibitively expensive as argued by the Long Now Foundation in the fall 2011 State Engineer hearings on SNWA's water rights applications. (The Long Now Report on Mitigation costs at Owens Valley has been submitted by White Pine County and is incorporated by reference into these GBWN comments.) BLM must consider mitigation costs as part of its determination of SNWA's ability to construct and operate the proposed Project. The FEIS cost estimates do not paint an accurate or reliable picture of the actual likely cost of the proposed Project to taxpayers or whether the Southern Nevada Water Authority truly has the financial ability to construct and operate the project as required by BLM policy.

Finally, the NRDC Report includes a discussion of pipeline alternatives, including voluntary water transfers, water recycling, improved water efficiency, and improved groundwater management, all of which are less environmentally disruptive, more reliable, and more cost effective than the proposed pipeline. As noted in GBWN's and other comments on the Draft EIS, the BLM has failed to engage in a meaningful evaluation of these reasonable, viable, more cost-effective, and more environmentally benign alternatives.

D. New Information on Air Quality Impacts and Mitigation Costs from Long Now Foundation Evidence in Fall 2011 Nevada State Engineer Hearing:

Finally, GBWN urges the BLM to consider the evidence concerning potential air quality impacts that was introduced by the Long Now Foundation, a substantial landowner in Spring Valley, during the fall 2011 Nevada State Engineer hearing on SNWA's water rights applications for the Pipeline Project. The documents and testimony introduced by the Long Now Foundation in that hearing contain significant additional information concerning the potential for the Project to cause severe air quality impacts which was not available at the time comments on the DEIS were due and has not been considered by the BLM. This new information about potential air quality impacts must be taken into consideration before a decision is made on the proposed Project. The Long Now Foundation also introduced evidence concerning the Pipeline Project's likely mitigation costs, which also must be considered by the BLM in order to gain a complete picture of project operation costs. 2011 hearing on the Southern Nevada Water Authority's water rights applications in the subject valleys. (Copies of the Long Now Foundation documents and testimony introduced in the fall 2011 State Engineer hearing on SNWA's Pipeline Project applications are being submitted by White Pine County, and GBWN hereby incorporates those materials by reference in these comments.)

2. **The Inclusion of New Alternative F as the Preferred Alternative Requires a New Supplemental Opportunity for Public Review and Comment:**

The inclusion of a newly added Alternative F as the Preferred Alternative in the FEIS requires a Supplemental EIS for notice and public comment pursuant to 40 C.F.R. § 1502.9(c)(1)(i) because it increases the amount of groundwater to be withdrawn from, and likely impacts to, Spring, Cave, Dry Lake, and Delamar Valleys while deferring any decision regarding a crucial large component of the project (Snake Valley). Selecting new Alternative F masks the full cumulative impacts of SNWA's Pipeline Project while effectively giving the green light to that Project. The Southern Nevada Water Authority has insisted over and over again that it must and will have the Snake Valley component of the Project water which ranchers and rural General Improvement and Irrigations Districts say is in decline.

In the context of the continuing potential for future withdrawals of water from Snake Valley, where the ultimate Project could exceed the amounts of water withdrawn under the Proposed Action, Alternative F does not fall within the scope of the alternatives considered in the Draft EIS, and therefore a Supplemental EIS must be issued for notice and comment pursuant to 40 C.F.R. § 1502.9(c)(1)(i). The sloppiness, and risks to the integrity of the NEPA analysis, of inserting a new alternative at this late stage of the process is illustrated by the fact that the description of Alternative F in the Final EIS was erroneous and required the BLM to issue a subsequent errata sheet correcting and more than doubling the acreage of hydric soils that would be affected by proposed Alternative F. The significant change in potentially affected acreage and the fact that an errata sheet was required strongly demonstrates the need for public review and comment to ensure that this new alternative and its potential impacts are properly vetted.

3. **Changes to the DEIS Adding the Costs and COM:**

Because the costs of the project and the COM are new additions to the FEIS, the Network offers the following brief comments on these new additions.

A. Costs:

Any project is dependent on the ability of the proponent to pay for it. SNWA has stated that the costs will be born by the ratepayers, but the ratepayers have rebelled at the most recent SNWA rate increase to pay for the 3rd intake from Lake Mead that is estimated to cost nearly $1 billion. SNWA has also lost hook-up fees, Southern Nevada Public Lands Management Act (SNPLMA) income, and sales tax income with the decreased population and the general economy. SNWA has not demonstrated and the BLM has not examined whether SNWA and its ratepayers will be able to afford the over $15.5 billion price tag for this Project. (See recent Las Vegas Review Journal article and others attached.) The BLM cannot make a reasoned decision about whether to permit the ROWs for the Project without some reasonable degree of certainty that the Project actually will move forward. An examination of the cost risks for this Project and this amount of water would reveal that they are too high. There are less expensive alternatives to the Pipeline Project that the BLM has not reviewed.

The BLM and SNWA finally have included the construction and financing costs in the FEIS but have failed to include the costs of monitoring, mitigation and management, and archeological clearances. What is missing from the FEIS is any provision for other project cost estimates and any analysis of the reasonableness of the Project's $15.5 billion cost, including the relative cost-effectiveness per gallon or acre foot of the Pipeline Project in comparison to available alternatives.

B. COM Plan:

While collaborative review is not a new concept, the introduction of it in the FEIS is new. While the participation of varied government agencies or subdivisions is welcome, the BLM must clarify and permit the public to comment on which governmental agencies or entities should participate. In particular, provision must be made for participation by local governmental entities comprising the areas and people who will be most directly affected by the Project, including White Pine County. Consideration also must be given to the participations of affected irrigation companies and districts or General Improvement Districts.

We are pleased that there will be a reporting mechanism to the public. Since the BLM is a public agency it should operate with full transparency, something it has not done in the Stipulated Agreement process. Therefore, progress on the full project (to include test pumping information, new biological findings, SNWA actions and expenses, demographic updates, purpose and need, anticipated further "tiered processes" and other relevant information) should be reported to the public annually.

C. Failure to Consider Reduced Availability of Ground Water Due to Climate Change:

Finally, this FEIS assumes that the water will always be there. This is a fatal assumption, especially since the BLM did not assess a best and worst case scenario in terms of climate change. What affects the Colorado River Basin also affects the Great Basin. Again the risk factors are very high. Local people can tell you that the water tables are dropping with their own senior water rights use. This water in SNWA's selected basins is simply unreliable over the 200 year projections that BLM selected as the timeframe.

4. **BLM's Response to Comments:**

The BLM's responses to many of GBWN's comments and to those submitted by other commenters on the Draft EIS are inadequate. While most of these comments were addressed at least superficially, genuine consideration must be given to the critiques and comments submitted in order to ensure the scientific integrity of the environmental review process. Moreover, these comments expose, and the FEIS discloses, serious long term, irreversible, irretrievable, and unmitigatable impacts, and reflects unsustainable practices. Neither SNWA nor the BLM has the capacity to do landscape restoration or mitigation at the grand scale that will be required by this Project. The affected acreages are simply too vast.

GBWN also finds that the FEIS's statement that the BLM has the authority to issue what amounts to a "Cease and Desist Order" when serious impacts occur provides no real protection to affected rural areas, because it is highly unlikely that the BLM will be able to turn off the pipeline once southern Nevada is dependent on the piped water. Additionally, a certain amount of water must be transported continually in order to maintain the pipeline's physical integrity. Shutting the project down could damage the pipeline infrastructure and would not be feasible.

There is no urgency to approve this pipeline. SNWA's own plans and statements at the State Engineer's hearing and in various public forums clearly reflect the fact that any concrete commencement of this Project is years off.

Conclusion:

For all the above stated reasons, GBWN urges the BLM to consider the significant new information that has been brought to its attention since publication of the FEIS and issue a Supplemental EIS. Further, because the BLM's own analysis clearly indicates the serious and damaging impacts that the Project would cause to a very large area that are irreversible, irretrievable, and cannot be not be mitigated on such a large landscape scale, we strongly urge you to choose the No Action Alternative as the Preferred Alternative, especially in light of the fact that the project is not needed at this time, nor is there a plan in place to pay for it.

In addition, because of all the uncertainty and continuously changing circumstances affecting southern Nevada and SNWA's proposed Pipeline Project, GBWN requests that the BLM define how long this, or a subsequent, Final Environmental Impact Statement and ROD are considered valid.

Sincerely,

Susan Lynn, Coordinator

Attachments:
Las Vegas Review Journal article: Hubble Smith: *Mulroy: Time for Businesses to Start Sharing Costs for Water Infrastructure,* September 21, 2012

http://www.vegasinc.com/news: Eli Segall: *Water Authority Could Reverse Bill Credits Promised to Businesses, Nonprofits,* September 21, 2012

BBC News Magazine: *Las Vegas Casinos Trumped by Chinese 'Sin City,'* September 28, 2012 http://www.bbc.co.uk/news/world-europe-19652918

Mulroy: Time for businesses to start sharing costs for water infrastructure

BY HUBBLE SMITH
LAS VEGAS REVIEW-JOURNAL

Posted: Sep. 21, 2012 | 4:40 p.m.

It's time for businesses to start sharing the cost for building water infrastructure in Las Vegas, Southern Nevada Water Authority general manager Pat Mulroy said Friday.

Developers are going to have to pay for something they got for free for 20 years, she added.

Mulroy said the authority had to develop a funding formula to pay for $2.5 billion in regional infrastructure such as the third intake at Lake Mead, a second water treatment plant and 8-inch fire lines. It was determined that more than half of that cost would have to come from connection fees.

"It was finally a duel between gaming and commercial on one side and residential on the other," Mulroy said at a real estate symposium presented by Commercial Alliance Las Vegas. "The only reason the (Wall) Street bought our bonds is because we have a debt service fund, and the only reason the rate increase didn't occur in 2008 is because money was sitting in that debt service fund."

The water authority had to dig into that $280 million fund to pay debt between 2008 and 2011 when connection charges went from $188 million a year to $3 million, Mulroy said.

The purpose of the reserve was to get through the economic downturn, she said. Las Vegas Valley Water District customers have had only two small rate increases during that time.

"We looked at our debt portfolio and did a lot of refinancing and restructuring," she said. "Your commodity charge went up a dime each year and unfortunately that wasn't enough. This has gone on so long those measures were not sufficient."

Mulroy has tightened the budget at the water authority, stopping $400 million in capital projects and laying off 25 percent of the work force.

All of the pieces are "on the table," and the community has to decided how to pay for it and meet the reserve, she said. Las Vegas residents are still paying 30 percent less for water than their California neighbors, Mulroy said.

At the same meeting, Tony Sanchez, senior vice president for NV Energy, said the utility's main challenge is meeting renewable energy goals. By 2025, the utility must meet renewable energy standards for 25 percent of its energy.

About 70 percent of Southern Nevada's power comes from natural gas plants, 14 percent from coal plants and 16 percent from renewable energy. In Reno, renewable energy is 24 percent.

The utility closed its coal plant in Ely, and now the biggest issue is the coal plant near Moapa, which has operated since 1965. NV Energy has invested $100 million since 2005 to make it the cleanest coal plant in the nation, Sanchez said.

"The PUC (Public Utilities Commission) told us to take a breather from renewables. I bring this up because there are cost implications to tearing down a plant that's paid for and producing energy," he said. "If we shut down a plant, we have to go on the open market to buy electricity. We're proud to say power rates are where they were five years ago."

Bob Coyle, vice president of government affairs for Republic Services, said 53,000 homes in North Las Vegas have converted from the red, white and blue recycling bins to 96-gallon roller carts, increasing recyclable materials from 3 percent to 30 percent of trash collection in the area. Henderson is looking at converting to roller carts next year.

That's allowed Republic to go from twice-a-week trash pickup to once a week, while recycling pickup increases from once every two weeks to once a week.

The current rate for Republic customers in Las Vegas is $13.61 a month, compared with $20 in Dallas and $26 in Phoenix, both of which have once-a-week collection. Portland residents pay $48 a month to have trash collected once every two weeks, he said.

Contact reporter Hubble Smith at hsmith@reviewjournal.com or 702-383-0491.

Find this article at:
http://www.lvrj.com/business/mulroy-time-for-businesses-to-start-sharing-costs-for-water-infrastructure-170774536.html

☐ Check the box to include the list of links referenced in the article.

Susan Lynn

From: "Susan Lynn" <sblynn@sbcglobal.net>
To: <Penny_Woods@blm.gov>
Cc: "Susan Lynn (work)" <sblynn@sbcglobal.net>
Sent: Monday, September 24, 2012 12:24 PM
Subject: Water authority could reverse bill credits promised to businesses, nonprofits

Penny, not a comment. just an FYI.

Water authority could reverse bill credits promised to businesses, nonprofits

By *Eli Segall* (contact)

http://www.vegasinc.com/news/2012/sep/21/water-authority-could-reverse-bill-credits-promise/

Friday
21 September 2012
4:06 p.m.

After complaining that a new water surcharge would sink them, Las Vegas business owners got some relief last month when they were promised credits for half the bill. But now, the region's water utility chief says rates could rise yet again — and the credits businesses were promised could be reversed.

Pat Mulroy, general manager of the Southern Nevada Water Authority, said Friday that all "rates and charges are back on the table" for consideration by the agency's Integrated Resource Planning Advisory Committee. The 21-person committee was formed in May to help the wholesale water supplier set policy on facilities, funding and other issues.

Mulroy said water authority officials will revisit the newly added surcharges and seek alternatives but predicted that no matter what is decided, people will likely be upset.

"There's going to be somebody who's going to scream," said Mulroy, who made the comments during a panel discussion Friday at a real estate conference presented by the Commercial Alliance Las Vegas at the Gold Coast.

Mulroy said afterward the agency is carrying more than $3 billion in debt and must keep at least $280 million of capital in reserves to prevent its credit rating from "going in the toilet." She said the committee can recommend eliminating last month's credit as long as the agency maintains its reserves.

Much of the agency's debt is related to the $800 million third intake pipeline being built into Lake Mead.

Despite its unpopularity, the surcharge is now a critical piece of the agency's finances. It accounts for a third of the authority's revenue this year, and Mulroy said it's needed to help pay for water services that previously were provided for free.

"This is a question for the community: Who pays?" she asked.

The authority's board of directors approved the surcharge in February to help finance large water-system projects. The three-year monthly increase took effect in April.

The charge is based on customers' meter size. The authority said residential customers would face a monthly increase of about $5, small retailers $36 and larger customers, such as casinos, about $2,200.

The water authority said it averted the increase for more than three years by cutting costs and tapping its financial reserves but eventually had to institute it because new customer connection charges, which finance most capital projects, plunged from $188 million in 2006 to $11 million last year. They had dropped to $3.2 million in 2010.

Nevertheless, the surcharge was met with widespread outcry, particularly from local businesses. Some companies saw monthly bills jump as much as 300 percent, and many said the hike would put them out of business.

The bulk of the complaints came from small-business owners, who were put on the hook to a surcharge for fire lines, a previously free service. While rarely used, fire lines provide added water pressure in case of a fire.

In July, the water authority approved a 50 percent credit for commercial fire line charges to reduce the costs for businesses and nonprofit groups. It also said the credit would remain in effect for three years or until a newly-formed citizens advisory committee recommended alternatives.

After that approval, the Las Vegas Valley Water District — one of seven districts that buys water from the Southern Nevada Water Authority — ratified the credit last month, granting $44 million of relief to commercial property owners. Those businesses were expected to start receiving the credit this month.

COMMENTS:

1. Where is the oversight?

   By flyinglow
   Sept. 22, 2012
   5:31 a.m.
   Flag

2. Where is the oversight??? LOL! That was a funny joke Flyinglow LOL! :D

   By abdrgnldy
   Sept. 22, 2012
   11:01 a.m.
   Flag
   Recommend

3. There is no oversight - the local electeds are too afraid of Mulroy and her supporters - the growth and development community.

The third straw is a needed project, and the bill for it must be paid.

HOWEVER, the ill-conceived eastern Nevada groundwater development project and pipeline are not needed, AND it will cost 5 times the price for the third straw - over $15.5 BILLION!

It is time to hold the SNWA and our elected officials accountable and to stop the pipeline before it bankrupts us!

BBC NEWS
MAGAZINE

28 September 2012 Last updated at 19:26 ET

Las Vegas casinos trumped by Chinese 'Sin City'

By Justin Rowlatt
BBC News

In the 1970s and 80s, Las Vegas grew at an astonishing speed, but the state of the global economy has seen the famous Strip temper its ambition and look enviously towards its Chinese counterpart.

Las Vegas illustrates just how varied casino design can be - pyramids, medieval castles, circuses - pretty much "anything goes", says Paul Steelman.

But there is one iron rule, he tells me - no mirrors.

Mr Steelman should know. He is a world expert on how to part punters from their cash. His architectural practice specialises in the art of casino construction.

Paul is an impish, irrepressible man. Across a table in his cavernous Las Vegas studios, he tells me how he designed his first casino fresh out of architecture school.

Since then Paul has designed casinos across America and the world.

So why no mirrors? I want to know.

"Because," Paul explains, with a mischievous grin, "casinos are all about illusion".

"You go to a casino to feel like James Bond. The last thing a casino owner wants is for you to catch a glimpse of yourself in the mirror. Then you will see your sagging gut or the pimples on your face and, in an instant, the illusion explodes and you stop playing."

Down on Las Vegas's famous Strip, I discover that the casino industry is - just like that gambler catching himself in the mirror - being forced to face up to its shortcomings.

It still heaves with people. The volcano at the Mirage still erupts on the hour, the gondolas still drift down the Venetian's counterfeit canals and the Wynn - thanks to Prince Harry - can presumably now put "By Royal Appointment" on its letterhead.

Nevertheless, all is not well in Sin City.

Look up from the parade of party hats and take-away margaritas and you see the garish glamour of the Strip reflected back in the blue glass of the tallest casino complex of them all, the Fontainebleau - or Fountain Blue, as they call it here.

This behemoth was supposed to boast 3,889 hotel rooms, 24 restaurants and - inevitably - a vast casino. But the Fountain Blue never opened.

Its backers went bankrupt having blown $3bn (£2.3bn) on the place. Now the Fountain Blue stands empty, its steel skeleton rusting in the desert wind.

Its construction - and Las Vegas's winning streak - came to an abrupt end with the financial crisis when, after decades of unbroken growth, Sin City became the foreclosure capital of America.

Yet, Paul Steelman has been working hard. That is because, like so many American originals, Las Vegas's top spot in the world market has been taken by a Chinese competitor.

Paul has been busy designing casinos in Macau, the tiny territory in the South China Sea.

Macau eclipsed Vegas in terms of gambling revenues back in 2006. Now the island rakes in an incredible five times the city's total pot, over $30bn (£23bn) a year, compared to the $6bn (£4.5bn) earned in Vegas.

But this year, Macau's growth dipped for the first time since gambling was deregulated a decade ago. A visit to virtually any of China's provincial cities will go some way to explaining why.

I spent three weeks travelling in China's vast hinterland earlier this year and passed through a number of smaller towns and cities.

Almost all were ringed with giant dead-eyed hulks - small-scale versions of Vegas's Fontainebleau, apartment buildings built at huge expense (often with borrowed money) but never occupied.

Nowhere is this more obvious than at Kangbashi in Inner Mongolia - China's ghost city.

There are literally hundreds of empty buildings here, street after street of vacant tower blocks.

The city, designed to house more than a million people, appears to have just one bar and, on the night we visited, we were the only ones drinking.

One Vegas property entrepreneur commented to me that, before the crash, it had seemed that the city's key industry had become growth itself.

He said that by 2006, more than a third of the working population was in construction. Vegas was, he joked, "gambling on growth".

Of course, the bet did not pay out.

We all know what happened next - the magic circle of growth broke and the city's wealth evaporated as property prices collapsed.

As the process played out across America, the world's banks were left with debts that still threaten to bring the entire financial system to its knees.

China has been one of the few bright spots in the world, as its economy has continued to expand.

I walked down the Strip at sunset on my last day in Vegas and looked up once again at the silent shell of the Fountain Blue and I remembered those tens of thousands of empty apartments I had seen in China.

I could not help thinking of Paul Steelman's warning about mirrors in casinos.

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