

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

September 28, 2012

***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.

I am sending this letter because I am deeply troubled that any desert community officials, including the directors and board members of SNWA, have chosen, in a time in which we are already seeing the consequences of global warming across North America, to siphon water from vast areas of a fragile desert ecosystem before they have implemented all possible water conservation procedures and before they have taken far more serious measures to educate their communities, business leadership, and all visitors on the primacy of water conservation as appropriate behavior for persons living in and visiting desert communities.

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.

For indigenous communities, the severe changes in an ecosystem that are inevitably consequent to such a massive water siphoning project (dried up seeps, springs, and even the wells on ranches around which certain plants grow and many animals drink) are tantamount to the slaughter of the identities, of the spiritual heart, of those whose culture and religious traditions are inextricably tied to the plant and animal life of a particular ecosystem. I realize the identity of native persons as inseparable from place is difficult for many American officials to understand, but it is not an exaggeration to say that the drying up of a fragile ecosystem (be it through massive water siphoning or other means), the drying up of a place that is not seen as dry to those who depend upon it both physically and spiritually, is the desiccation of the hearts (our hearts are not dry organs) of those who are deeply tied to the land and that is a kind of genocide.

This SNWA project that plans to siphon desert water for an already over-consuming region such as Southern Nevada is consistent with the history and practice of Euro-Americans in North America for several centuries now. I am of Euro-American descent and am embarrassed at how my ancestors have historically colonized without understanding, and continue to dismiss or proceed on a journey to “civilize” Native American communities we did not and still do not or only poorly understand. Our racial and religious biases have allowed us to justify taking what is not ours to take and this project, should it be allowed to occur is one more disrespectful taking.

Should this project be implemented, where is the SNWA going to go when this project’s water sources dry up? It’s time to conserve, conserve, conserve.

SNWA’s proposal for this project is part of a trajectory that has devastated indigenous peoples and natural resources on this continent for centuries. It’s time to change the trajectory, before we ourselves and our children and grandchildren self-destruct as a consequence of the same kind of greed- and ignorance-based aggression we’ve imposed for four centuries on the lands, waters, and beings indigenous to this continent (and planet).

SNWA has an opportunity here to step off the road of endless expansion and over consumption. The SNWA has an opportunity at this moment to take a transformational lead, to move decisively into the practice of what one might call deep desert community sustainability. SNWA’s opportunity is not only to change history with respect to groups of tribal peoples some SNWA board members were probably raised to consider obscure and dismiss-able but to set new standards for the sustainable vitality of desert communities across the great basin and beyond.

If the SNWA takes this opportunity to turn around and focus on education and conservation of water, mineral, plant, and human resources, everyone will benefit in the long run. Interdependence exists between every being, human and otherwise on the planet. If SNWA acts at this time in accordance with an understanding of that, then their acts will respect and learn from the needs of peoples whose culture has survived on fragile desert lands not for decades or centuries but for a millennium or four (a basket-weave hat found in a cave in the great basin drainage area has been carbon dated to six thousand years old. I have seen the hat. It is made using techniques contemporary Washo basket weavers and their ancestors use).

From another perspective, 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,

Julie Bongers  
1089 57<sup>th</sup> Street, #52  
Oakland, CA 94608