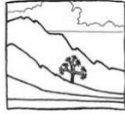
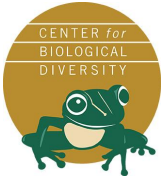




**CONSERVATION  
LANDS  
FOUNDATION**



Basin and Range Watch



**INSTITUTE FOR A  
PROGRESSIVE  
NEVADA**



*Great Basin  
Resource Watch*

*Working with Communities to Protect  
Their Land, Air, and Water*



**SIERRA CLUB**  
TOIYABE CHAPTER



EARTHWORKS



**CALWILD**



CALIFORNIA  
NATIVE PLANT  
SOCIETY



**NEVADA CONSERVATION LEAGUE**



**NATIVE AMERICAN  
LAND CONSERVANCY**

2/13/2024

The Honorable Debra Haaland  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

The Honorable Tracy Stone-Manning  
Director  
Bureau of Land Management  
1849 C Street, NW  
Washington, D.C., 20240

The Honorable Martha Williams  
Director  
U.S Fish and Wildlife Service  
1849 C Street, NW  
Washington, DC 20240

The Honorable Charles Sams III  
Director  
National Park Service  
1849 C Street, NW  
Washington, D.C. 20240

*The Amargosa Conservancy works toward a sustainable future for the Amargosa River and Basin through science, stewardship, and advocacy.*

Dear Secretary Haaland and Directors Stone-Manning, Williams, and Sams:

Our organizations, representing tens of thousands of Nevada residents, formally request that the Department of the Interior withdraw the public lands around Ash Meadows National Wildlife Refuge (NWR) due to the imminent threats posed by exploratory drilling and other proposed extractive projects on adjacent federally managed public lands.

Ash Meadows NWR, situated in Nevada's Amargosa Valley, is a vital component of the Amargosa River watershed, extending from outside of Las Vegas into Death Valley National Park. This refuge, a significant discharge point for the vast carbonate aquifer, spans nearly 24,000 acres of diverse habitats including spring-fed wetlands and alkaline desert uplands, managed by the U.S. Fish and Wildlife Service. With over 30 perennial seeps and springs, it supports an array of habitats in one of the most extreme environments in North America.

The refuge is unparalleled in biodiversity, sheltering at least 26 unique plant and animal species and 12 species listed as threatened or endangered under the Endangered Species Act. Notably, it surrounds Devils Hole, a disjunct unit of Death Valley National Park and home to the critically endangered Devils Hole pupfish. The existence of these species is fundamentally dependent on the perennial groundwater discharge, underscoring the refuge's global ecological importance, as recognized by its designation as a Ramsar Convention Wetland of International Importance in the United States in 1986.

Ash Meadows holds a deep cultural significance as part of the ancestral homelands of the Timbisha Shoshone, Southern Paiute, and other Tribes of the Newe and Nuwu peoples. The aquifer that sustains springs in Ash Meadows extends into reservation lands around Death Valley Junction and Furnace Creek, CA, and is a crucial water resource for over 40,000 residents in the Amargosa Basin who depend on this groundwater for various uses.

### **Threats facing Ash Meadows and Devils Hole**

The integrity of Ash Meadows is currently threatened by a range of development proposals that pose a substantial risk to the refuge's sustaining groundwater aquifer. The refuge is surrounded virtually on all sides by lode (open-pit mining) and placer (shallow mining and/or brine) claims in the Amargosa Desert.<sup>1</sup> Recent proposals entail the potential for future development of open-pit mining operations within 2,000 feet of springs in Ash Meadows that provide critical habitat for multiple endangered endemic species. Drilling into the aquifer outside Ash Meadows NWR could dewater springs inside the area, causing significant harm to endemic species that rely on this habitat.

Not only may many of these projects be non-viable, in part due to pumping and point of diversion restrictions surrounding the Devils Hole, but they are individually and collectively misaligned with the missions of land management agencies to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.

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<sup>1</sup> See Appendix II. map for illustration of existing claims near Ash Meadows

## Immediate need for protection

As the largest oasis in the Mojave Desert, the health and safety of Ash Meadows depends on the management of the groundwater that sustains it. Ash Meadows and the significant biodiversity and cultural values supported by the refuge remain highly vulnerable to impacts and disturbances to groundwater flowing beyond its designated borders. In light of this vulnerability and the pending threats associated with it, we strongly urge the Department of the Interior to withdraw the adjacent public lands in the Amargosa Desert with hydrological connections to Ash Meadows and to local communities.

Given the need to act quickly, we ask the managing federal agencies to cooperatively initiate a mineral withdrawal process to be executed through the authority of the Secretary of the Interior. We propose consideration of BLM lands within Nevada hydrographic basin #230 as the conceptual withdrawal study area given the basin's established hydrological connectivity with Ash Meadows and its current status as overdrafted.<sup>2</sup> This withdrawal area will be better defined following robust hydrological analysis and a mineral examination, and through meaningful consultation with Tribal nations, relevant communities, and stakeholder groups.

The future of Ash Meadows and its diverse inhabitants hinges on swift, decisive actions grounded in science. We hope to work together with Department of the Interior representatives, providing essential information and facilitating stakeholder and community outreach where appropriate, toward a shared goal of ensuring Ash Meadows remains safe for generations to come.

Sincerely,

Mason Voehl  
Executive Director  
Amargosa Conservancy

Geoffrey L. Haskett  
President  
National Wildlife Refuge Association

Mike Senatore  
Senior Vice President of Conservation Programs  
Defenders of Wildlife

Shaaron Netherton  
Executive Director  
Friends of Nevada Wilderness

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<sup>2</sup> See appendix 230 for a map of Nevada hydrographic basin #230 and adjacent basins

Jose Witt  
Mojave Desert Landscape Director  
The Wilderness Society

Bertha Gutierrez  
Program Director  
Conservation Lands Foundation

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Linda Castro  
Assistant Policy Director  
CalWild

Vinny Spotleson  
Chair  
Sierra Club Toiyabe Chapter

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Kelly Herbinson  
Executive Director  
Mojave Desert Land Trust

Kevin Emmerich  
Co-Founder  
Basin and Range Watch

Cameron Mayer  
Executive Director  
Friends of the Amargosa Basin

Wendy Schneider  
Executive Director  
Friends of the Inyo

Nick Jensen  
Conservation Program Director  
California Native Plant Society

Suzie Reynolds  
President  
Lahontan Audubon Society

Kristee Watson  
Executive Director  
Nevada Conservation League

Cassandra Pino  
Policy Manager  
Native American Lands Conservancy

## Appendices

### I. Protected and Endemic Species of Ash Meadows NWR

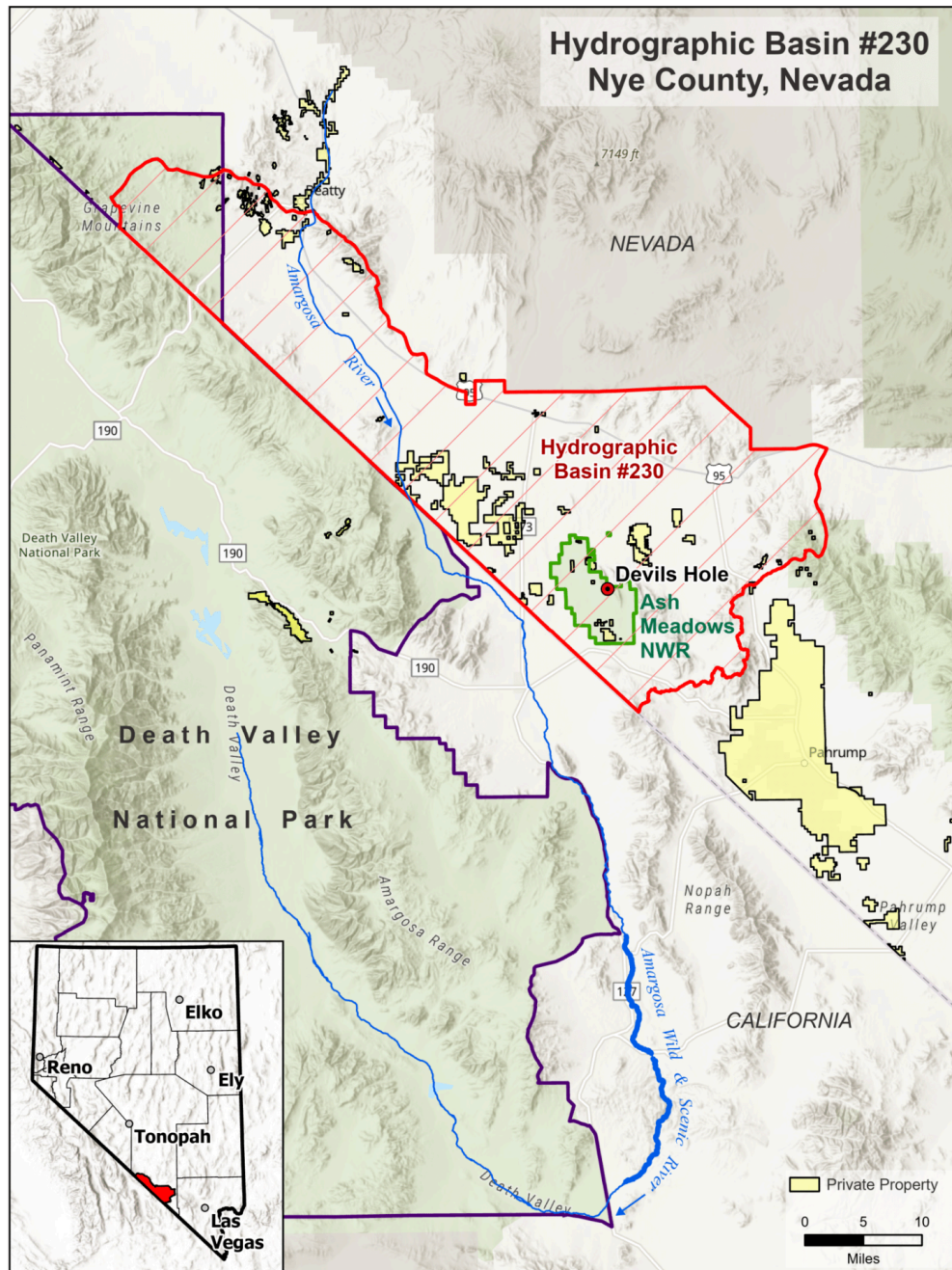
#### Ash Meadows NWR endemic or near-endemic species protected under the ESA:

- Ash Meadows Amargosa pupfish (*Cyprinodon nevadensis mionectes*), endangered;
- Ash Meadows speckled dace (*Rinichthys osculus nevadensis*), endangered;
- Warm Springs pupfish (*Cyprinodon nevadensis pectoralis*), endangered;
- Ash Meadows blazing star (*Mentzelia leuciphylla*), threatened;
- Amargosa niterwort (*Nitrophila Mohavensis*), endangered;
- Ash Meadows milkvetch (*Astragalus phoenix*), threatened;
- Ash Meadows sunray (*Enceliopsis nudicaulis corrugata*), threatened;
- Ash Meadows gumplant (*Grindelia fraxinoperatensis*), threatened;
- Ash Meadows ivesia (*Ivesia Kingii* var. *eremica*), threatened;
- Spring-loving centaury (*Zeltnera namophila*), threatened;
- Ash Meadows naucorid bug (*Ambysus amargosus*), threatened;

#### Additional endemic or near-endemic non-protected species found at Ash Meadows NWR:

- Warm Springs naucorid bug (*Ambysus relictus*)
- Devils Hole warm spring riffle beetle (*Stenelmis calida calida*)
- Ash Meadows pebblesnail (*Pyrgulopsis erythropoma*)
- Crystal Spring springsnail (*Pyrgulopsis crystalis*)
- Distal-gland springsnail (*Pyrgulopsis nanus*)
- Elongate gland springsnail (*Pyrgulopsis isolatus*)
- Median-gland Nevada springsnail (*Pyrgulopsis pisteri*)
- Fairbanks Spring springsnail (*Pyrgulopsis fairbankensis*)
- Minute tryonia (*Tryonia ericae*)
- Point of Rocks tryonia (*Tryonia elata*)
- Sportinggoods tryonia (*Tryonia angulata*)
- Amargosa tryonia (*Tryonia variegata*)
- *Pyrgulopsis licina*
- *Pyrgulopsis sanchezi*
- Death Valley blue eyed grass (*Sisyrinchium funereum*)
- Ash Meadows ladies-tresses (*Spiranthes infernalis*)

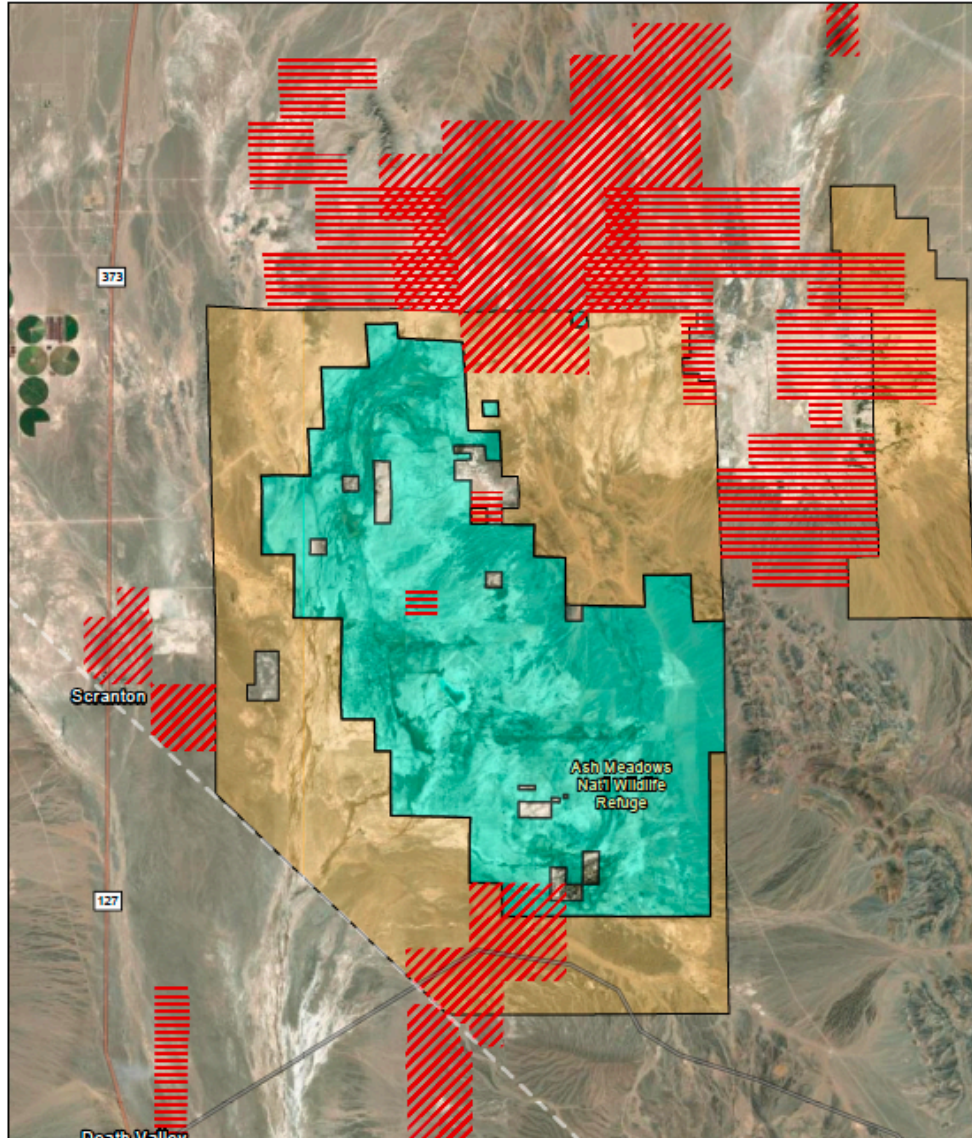
## II. Conceptual Study Area – NV Hydrographic Basin #230



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III.

### Mining Claims surrounding Ash Meadows





9/11/2023

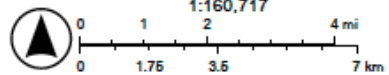
BLM Natl MLRS Mining Claims Not Closed

 Lode Claim

 Placer Claim

 BLM NV Areas of Critical Environmental Concern (ACEC)

 Fish and Wildlife Service



California State Parks, Esri, HERE, Garmin, SafeGraph, METANASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

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