



**SALT LAKE
COUNTY**

PETER M. CORROON
Salt Lake County Mayor

2001 South State Street
Suite N-2100
Salt Lake City, UT 84190-1020

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June 9, 2008

BY CERTIFIED MAIL

Tracy Taylor, P.E.
State Engineer
Nevada Division of Water Resources
901 South Stewart Street, Suite 2002
Carson City, Nevada 89701

2008 JUN 12 11:35

State	'S EXHIBIT	15
DATE:	7-15-08	

Re: Recognition as Interested Person – Application Nos. 54022 – 54030, inclusive

Dear Mr. Taylor:

Pursuant to NAC §533.100, Salt Lake County hereby requests recognition as an Interested Person with respect to Application Nos. 54022 – 54030, inclusive. Enclosed is the \$25.00 fee required by NAC §533.100. Pursuant to NAC §533.100(2), Salt Lake County hereby sets forth the following grounds in support of its request for interested person status, and why Salt Lake County did not file a protest to Applications Nos. 54022 – 54030 in a timely manner:

1. Salt Lake County is a political subdivision of the State of Utah and home to Utah's capital Salt Lake City. Salt Lake County includes 764 square miles, is 35 miles long north to south and 35 miles wide east to west. Salt Lake County has approximately 910,000 residents, and many thousands more commute to the County daily for work and other purposes.

2. Though bounded by the Oquirrh Mountains to the west, Salt Lake County is situated in an air shed such that pollution and dust generated in Snake Valley is carried into the valleys of the Wasatch Front including Salt Lake Valley.

3. Salt Lake County includes part of the Great Salt Lake, which is the terminus of the Great Salt Lake Desert Groundwater Flow System. Ground water in Spring Valley and Snake Valley flows through the Great Salt Lake Desert Flow System toward the Great Salt Lake Desert and Great Salt Lake itself.



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4. The Southern Nevada Water Authority (SNWA) is the successor in interest to the Las Vegas Valley Water District (LVVWD), the entity that filed Application Nos. 54022 – 54030

5. Approximately twenty years ago when LVVWD filed the subject groundwater applications for Snake Valley, little was known about air quality impacts from large scale groundwater pumping. Hence Salt Lake County, who owned no water rights in Snake Valley, did not feel it was necessary to file protests to the applications in the required time frame.

6. Since then, experiences in other parts of the country with dust bowls caused by ground water pumping and the resulting air pollution, caused Salt Lake County become concerned about the potential air quality impacts of groundwater pumping on the Snake Valley. If Application Nos. 54022-54030 are granted and significant groundwater pumping occurs in Snake Valley, that would likely cause the ground water tables to drop significantly enough to destroy the ground water dependent vegetation in Snake Valley, thus creating a dust bowl.

7. Salt Lake County's concerns are amplified by the recent wildfire induced dust bowls in Millard County, Utah (in valleys situated due eastward from Snake Valley) which have produced wind-borne particulate matter pollution that has been carried to Salt Lake Valley, raising public health concerns for the approximate 1 million citizens who live and work here. Salt Lake County is concerned that the groundwater pumping that will occur in Snake Valley will produce a permanent dust bowl and provide a permanent source of wind-borne particulate pollution to be carried to the population centers of the Wasatch Front including Salt Lake Valley, causing chronic public health challenges for many of the citizens who live and work here.

8. Salt Lake Valley has become so concerned about the potential air pollution impacts from SNWA's proposed Snake Valley pumping, that it has formally requested cooperating agency status in the Nevada BLM NEPA EIS process on the SNWA ground water project.

9. Salt Lake Valley requests interested person status, in order to advise the hearing officer of the scientific basis for Salt Lake Valley's air quality concerns, and urge the hearing officer to protect the citizens

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Request for Recognition as Interested Person – Application Nos. 54022 -
54030
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of Salt Lake Valley against these potential impacts that will likely result
of the subject groundwater applications are granted.

Based on the grounds set forth above, request is respectfully made for
recognition as an Interested Person in proceedings to be held on
Application Nos. 54022 – 54030.

Sincerely,

SALT LAKE COUNTY

Mayor Peter Corroon

cc. J. Mark Ward, Utah Association of Counties

2009-04-12 10:11:35