

BAKER AREA CITIZENS ADVISORY BOARD

101 Elko Street; PO Box 15; Baker NV 89311

November 28, 2011

TO: Jason King, Nevada State Engineer
Nevada Division of Water Resources
Attn: Susan Joseph-Taylor
901 South Stewart Street, Suite 2002
Carson City, Nevada 89701-5250

RE: Public Comment – SNWA Ground Water Development Project-Spring, Cave, Dry Lake, and Delmar Valleys.

Dear Mr. King,

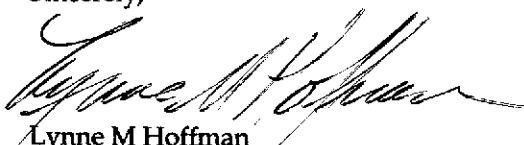
Please be advised that the Baker Area Citizens Advisory Board opposes the Southern Nevada Water Authority's (SNWA) Ground Water Development Project. We request that this communication be entered into the official record. Further, we request that the State Engineer deny all of SNWA water applications associated with this project for the following reasons.

- The SNWA Ground Water Development Project is not in the public interest.
 - The proposed pipeline would hurt local economy due to decreased visitation because area would become a less desirable place.
 - Impacts from this project might put ranchers, farmers and ecotourism-based businesses out of business and depopulate rural areas.
 - Pipeline would have too much impact to Great Basin National Park, the area's biggest attraction.
 - Analysis shows that this project would eventually destroy fishing in the area, and jeopardize hundreds of thousands of acres of habitat for mule deer, pronghorn antelope, elk, sage grouse and lead to major loss of game species, and extinction of rare plant and animal species.
 - Dust is a major health hazard. With it, there is the potential for radioactive soils to be distributed, further endangering the health of local residents.
- The SNWA Ground Water Development Project would harm other water rights.
 - This project would produce unacceptable adverse impacts on hundreds of existing surface and groundwater rights.
 - Senior Water Rights would not be protected. How can the Nevada State Water Engineer have authority to okay a project that will break state statutes?
 - There is insufficient information on impacts to Fish Springs NWR, Deep Creek Valley, and Steptoe Valley.
 - Most of the impacts from the proposed project are deemed irreversible and irretrievable.
 - Subsidence. The DEIS predicts that 525 square miles will subside 5 feet or more. Such a massive land subsidence associated with this project is an unacceptable irreversible impact of unlawful groundwater mining. Will this cause the pipeline to break? Decrease property values? Who will pay for damages?
- SNWA has failed to:
 - Adequately assess the purpose and need for the project.
 - Disclose project costs and sources and cost of funding.
 - Provide adequate and effective mitigation measures.
 - Provide adequate analysis of socioeconomic impacts.
 - Provide sufficient justification for failing to study the impact of drawdowns of less than 10 feet or of operation longer than 200 years after build-out when the SNWA Pipeline Project intends to operate indefinitely.
- SNWA has failed to analyze and address:
 - Impacts from specific well locations.
 - Adverse impacts on and mitigation for ranching, local businesses, wildlife habitat, and wild horses.
 - The potential environmental effects due to climate change.
 - The environmental impacts of actual well locations for "distributed pumping".
 - The indirect and cumulative impacts, including future local development.
 - The impacts to sacred sites and cultural resources of American Indian Tribes.
 - A sufficient range of alternatives. For example, building desalinization plants in Southern California in exchange for a larger portion of California's Colorado River water.
- Approving SNWA water right applications is very likely to result in future efforts by SNWA to fill the 96 inch pipe with water from Snake Valley, the rest of White Pine County, Eureka County, Elko County and beyond.

In conclusion, we request the Nevada Division of Water Resources deny all of SNWA water applications associated with this project because of the multitude of adverse impacts and a litany of "unknowns" and "uncertainties."

We appreciate the opportunity to comment on the proposed SNWA Ground Water Development Project.

Sincerely,



Lynne M Hoffman
Chairman, Baker Area Citizens Advisory Board