

Jason King, Nevada State Engineer  
Nevada Division of Water Resources  
901 S. Stewart St., Suite 2002  
Carson City, NV 89701

2011 DEC -1 PM 4: 26

STATE ENGINEER OFFICE

November 30, 2011

David and Pamela Sturlin  
675 Circle Drive  
EskDale, Utah 84728

Dear Mr. King,

We submit the following comments related to the Spring Valley applications under consideration by your office.

1. The water we pump is essential to our existence. It is the resource that made the community's existence possible. Agriculture is the basis of our community, and water is the basis of agriculture.
2. We have a relatively shallow aquifer layer to get our water from—approximately 100 feet. Any drawdown greatly affects our ability to get water, and the costs of getting that water, and therefore our future as a self-supported community.
3. Some of our groundwater supply comes from Spring Valley, and there is great uncertainty about the quantities and flow paths of this interconnection. Much more research is needed to identify the inter-basin flows before pumping water out of the Spring Valley Basin. Even the experts can't agree on what may happen.
4. Spring Valley is the foundation and cornerstone of the SNWA groundwater project in eastern Nevada. Any amount of withdrawal of water from Spring Valley enables SNWA to pursue additional water from Snake Valley and other portions of Nevada, in addition to impacting Snake Valley's groundwater supply directly. This project was originally described by Pat Mulroy as the dumbest idea she ever had, then as drought emergency supplies, and now as an essential part of the economic future of Las Vegas. It will never stop once the pumps are turned on.
5. The impacts from pumping are unknown, even if they are being studied. This project has the possibility to cause irreversible damage to the areas involved, the holders of water rights in the area, and the economic opportunities of the residents.
6. The proposed project is really water mining, which never reaches equilibrium or sustainability. Even if the pumping stops, the effects of pumping will take decades or hundreds of years to begin recovery. The effects of this project will cover multiple generations.
7. There are no guarantees that the "monitoring and mitigation" plans will be effective or honored over the extended duration of the project. There are no penalties, it's just a "best efforts" process based on the "adaptive management" philosophy, which really means "we'll try it and if it doesn't work we'll see if we can fix it". There is a very large error range for the values being used to justify these applications, so my advice would be "low and slow" to the State Engineer.

8. There are tremendous costs associated with the construction, operation, and monitoring/mitigation portions, which Las Vegas area residents will be committed to pay for through water charges. We estimate that this project could add \$300 to \$500 million dollars per year to SNWA's costs just for the construction of the facilities included in the current conceptual estimate. The commitment would be for a minimum of 75 years. That translates to \$1200 to \$2000 per family of four if Las Vegas area population stays around 2 million where it is now.

These costs provide impetus for additional growth in order to spread the costs across a larger base, but this isn't enough water to meet the needs of a larger population, anyway. So you have to go find more water, spend more money, spread the costs over more people,....the cycle continues. Eventually even the government will tire of subsidizing these costs.

9. With the economic downturn, there is not a demonstrated immediate need for this project. SNWA has said that it intends to keep the project "on the shelf" until it is warranted from their perspective. This approach means that the regulatory and environmental processes will always be underfunded and on the defensive as Federal budgets tighten and residents react to higher water bills. It also means that the effects of inflation will increase over time, and that continuing project readiness costs will be incurred.

10. This is a socially connected region, even though SNWA has bought out most of the Spring Valley ranches. The loss of economic opportunity affects our local social fabric (families, schools, jobs), which is based on the available groundwater. People who live here don't have the mobility options of urban populations, nor the desire or resources to relocate.

11. SNWA's most effective alternative is to acquire additional water from the Colorado River, even if they regard that as an unpalatable option. It requires no additional facilities beyond Las Vegas, and it is the equitable solution. What it will take is the political will and statesmanship to pursue it. We still believe they want this effort to fail so they can go back to the Colorado River Commission and say "we did what you told us, and we can't get enough water. Can we talk now?"

12. A minimum project size has never been identified by SNWA, so there is no way to know what makes the project feasible. "Give me everything you have" is not an expression of need.

Sincerely,



David Sturlin



Pamela Sturlin

STATE RECORDS DIVISION

2011 DEC -1 PM 4:25

RECORDED