

November 28, 2011

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

From: Great Basin Business and Tourism Council (GBBTC)
Corner of NV. HWY. 487 and Elko Street
P.O. Box 54
Baker, NV 89311

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2011 NOV 30 AM 11:21
STATE ENGINEER

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 and that 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 is project for the following reasons:

Most of the impacts from the proposed project are deemed **IRREVERSIBLE and IRRETRIEVABLE**.

There is substantial **INCOMPLETE or UNAVAILABLE INFORMATION** on this project to make a decision at this time.

Analysis shows that this project would eventually destroy fishing in the area, and jeopardize hundreds of thousands of acres of winter and summer habitat for mule deer, pronghorn antelope, elk, and sage grouse.

SNWA has failed to disclose project costs and sources and cost of funding.

SNWA has failed to adequately assess the purpose and need for the project.

SNWA has failed to analyze and address the potential environmental effects due to climate change.

Approving SNWA water right applications will 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.

SNWA has failed to analyze and address the environmental impacts of actual well locations for “distributed pumping.”

The predicted massive land subsidence associated with this project of 5 + ft. is an unacceptable irreversible impact of unlawful groundwater mining.

This project will produce unacceptable adverse impacts on hundreds of existing surface and groundwater rights.

SNWA has not considered 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.

SNWA has failed to provide adequate analysis of socioeconomic impacts. The facts demonstrate that impacts from this project will put ranchers, farmers and ecotourism based businesses out of business and depopulate rural areas.

SNWA has failed to provide adequate and effective mitigation measures.

SNWA has failed to adequately analyze and address the impacts to sacred sites and cultural resources of American Indian Tribes.

SNWA has failed to analyze and address the indirect & cumulative impacts, including future local development.

This project would lead to major loss of game species, extinction of rare plant & animal species.

There is insufficient information on impacts to Fish Springs NWR and Deep Creek Valley.

There is insufficient information on impacts to Steptoe Valley.

SNWA has failed to adequately analyze adverse impacts on and mitigation for: ranching, wildlife habitat, local businesses, and wild horses.

This project provides insufficient justification for failing to study impacts of drawdowns of less than 10 feet longer than 200 years after build-out when the SNWA Pipeline Project is intended to operate indefinitely.

In conclusion, we demand that the Nevada State Water Engineer require SNWA to address impacts from specific well locations, and request the Nevada Division of Water Resources deny all SNWA water applications associated with this project because of unknowns" and "uncertainties".

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

Sincerely,



Terry Steadman
President
Great Basin Business and Tourism Council

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