

Mr. Jason King
Nevada State Engineer
901 S. Stewart St., Suite 2002
Carson City, NV 89701

December 1, 2011

Dear Mr. King:

In my opinion, approval of groundwater applications by SNWA for groundwater rights in Spring, Cave, Dry Lake, and Delamar Valleys is not in the public interest. The project has been examined over the past 20 years or more by hydrologists, biologists, engineers, a variety of public servants, and many of the rural and urban people who will be affected. The scrutiny makes it obvious that the project is not sustainable, and will therefore simply permit another boom, followed by another bust in southern Nevada!

If the applications are approved, the groundwater system would not reach equilibrium for several hundred years. Springs, streams, wetlands and biodiversity throughout eastern Nevada would shrink or disappear, vegetation communities would undergo major changes, and costs for water in the Las Vegas Valley would skyrocket. These generalizations are supported by hydrologic modeling presented to you during the hearing by both SNWA and GBWN. They are further supported by US National Park Service hydrologic modeling (Elliott et al. 2006), the regional RAZA model completed by USGS, the early application of the RAZA model to the SNWA project (Schaefer and Harrill, 1995), and the many additional hydrologic investigations completed in the area over the past 50 years.

Modeling results further demonstrate that groundwater applications for Cave Valley are especially threatening to regional springs in White River and Pahranaagat Valleys. When combined with applications for Dry Lake and Delamar Valleys, flow in the White River flow system may stop, and flow from Pahranaagat Valley into the Death Valley flow system will be reduced. Wildlife refuges, wildlife management areas, recreation areas, and regional springs supported by these flow systems are critically important to recreational opportunities, migratory birds, local wildlife, and a large number of native endemic fish species and other aquatic dependent wildlife.

Because Climate Change will substantially reduce recharge in the project area in the near future, your consideration of groundwater availability in the area must also be reduced in a way that realistically reflects those changes. Fortunately, a recent synthesis of the available literature by the US Bureau of Reclamation (<http://www.usbr.gov/climate>) offers an excellent opportunity to objectively reevaluate recharge estimates. The report shows substantial risks to water resource availability throughout the western United States in the 21st century. Specific projections important in your consideration of available recharge in the affected area include an 8 to 20% decrease in average annual stream flow throughout the Southwest. A second authoritative report, "Global Climate Change Impacts in the United States" (2009), by the US Global Change Research Program (<http://www.globalchange.gov/>) projects an

even greater 20-40% reduction in precipitation during the spring (March through May) by 2080-2099 from levels seen in 1961-1979. This report also indicates that confidence in the projected changes throughout the SNWA project area are higher than for other places in the southwest. These reports obviously indicate that recharge estimates based on past data are seriously deficient. They suggest the possibility that SNWA may spend \$15.5 billion to get 40% less water, or have a 40% greater adverse impact than is presently anticipated.

My objections to the proposed project are further validated by comments submitted in October, 2011 by the Nevada Division of Wildlife to BLM in response to the recently released BLM DEIS. For example, NDOW points out that the project would increase the risk to 29% of the endangered Bonneville Cutthroat Trout populations in the state as well as to endangered/threatened or native species in Shoshone Ponds, Stateline Springs, Stonehouse Springs, Big Springs, Keegan Spring, and Big Springs Creek. It would adversely affect recreational sport fishing in Silver Creek Reservoir and Lehman, Silver, Bastian, McCoy, Meadow, Negro, Shingle, Willard, and Geysler Creeks. NDOW states that these "losses are unacceptable." I agree, and again point out that these objections, along with adverse effects to a variety of terrestrial species and habitats also noted by NDOW, emphasize the overwhelming degree to which this proposed project is not in the public interest.

Sincerely yours,

A handwritten signature in black ink that reads "James E. Deacon". The signature is written in a cursive style with a large, prominent "E".

James E. Deacon
968 Camelia Dr.
Henderson, NV 89011