

James Scott
1400 S. Valley View Blvd.
Apt. 1058
Las Vegas, NV 89102

October 20, 2011

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STATE ENGINEER'S OFFICE

Susan Joseph Taylor, Chief Hearing Officer
Office of the State Engineer
901 South Stewart St., Ste. 2002
Carson City, Nevada 89701

RE: Southern Nevada Water Authority [SNWA] applications 53987-53992 and 54003-54021 to appropriate underground water from Spring, Cave, Dry Lake and Delamar Valleys.

In reviewing these applications please consider the following issues:

- If approved the water should be for replacement of the Colorado River allotment [CRA] water NOT in addition to. Remember Fatehpur Sikri, Babylon and Persepolis they no longer exist.
- If approved the water removed must not affect the lively hood or life styles of the local residents nor the wild life of the areas.
- Historically the Clark County Commissions [Woodbury, Reid & Brager] have made no effort to control growth within the limits of our CRA, nor have they encouraged water conservation. "It's a desert out there!" says the SNWA. Fact is we have lots of grass growing in both the Lakes and Summerlin areas. Also golf courses must be converted to recycled water or shut down.
- The water produced must be done in a economic manner and affordable manner to a given schedule and budget. Not with a "build it and the residents will pay for it at any cost" attitude. This seems to be the SNWA's current mode of operation! I do NOT consider **thirteen billion dollars** reasonable in any way shape or form.
- I believe SNWA's request for 126,000 acre feet per year (acre-ft/yr) [78,115 gallons US per minute (gal/min)] is unreasonable and intended to allow the Las Vegas area to grow beyond it's CRA which is unacceptable. The fact is that the population forecast prepared by UNLV is vexing for several reasons.

A- It is not possible to forecast for 35 years, maybe five at best and that is born out by the current recession vacant homes, vacant commercial space and unfinished casinos. A mathematical formula does not work! Or to put it another way no tolerance range is given such as +0/-50% at 35 years.

B- No ceiling equal to the CRA was used to cap growth.

C- Further growth is very unlikely because of casinos being built across the Untied States, in China and perhaps India. People do not need to travel here to loose their money.

D- If the baseline years include the transient construction workforce of steel workers, plumbers, electricians, carpenters and home builders and so inflate the curve.

- If the BLM's the proposed facilities associated with this Project, as are described below, are any where near correct this project will be nothing short of a nightmare and a rape of the country side.:

Water Facilities

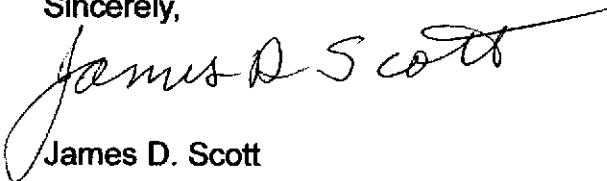
- Pipelines: approximately 306 miles of buried water pipelines, between 16 and 84 inches in diameter
- Pumping Stations: five pumping station facilities
- Regulating Tanks: six regulating tanks, anticipated to have a capacity of between 3 and 10 million gallons each
- Pressure Reducing Stations: three facilities
- Water Treatment Facility/Buried Storage Reservoir: one facility site with the Water Treatment Facility anticipated to be a 150 million-gallon per day facility and the buried storage reservoir a 40-million gallon buried facility

Power Facilities

- Power Lines: approximately 323 miles of 230 kilovolt (kV), 69 kV, and 25 kV overhead power lines
- Electrical Substations: two primary electrical substations (230 kV to 69 kV) and five secondary substations (69 kV to 25 kV)

Frankly when all is considered I believe the Las Vegas areas growth should be stopped at once rather than allow a project of this uncontrolled magnitudes proceed!

Sincerely,



James D. Scott

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