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November 27, 2011

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

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2011 NOV 30 AM 11:10
STATE ENGINEER DIVISION

Dear Mr. King,

Thank you for providing access to the public for the hearing on the SNWA water applications and for allowing the public to make comments. I have followed the hearing closely on streaming video. There is a tremendous amount of information to absorb and sort through provided by the presenters at the hearing - and you have added to your incredibly busy schedule the job of reading all our letters. Thank you.

I am a protestant for the water applications made by SNWA for Spring Valley because my life has been impacted by the applications – even before a single drop of water has been withdrawn. We have spent much time and money to protest these water applications. Our property value has declined because of the uncertainty of future available water. I have family and friends that have been even more directly impacted. My sister and her husband purchased some property for a guest ranch and couldn't put down a single well to provide water to meet criteria for drinking water until a local rancher gave up some of his water rights. Another local business had to get SNWA approval before they were granted water rights. I have friends who want to expand their farming and ranching enterprises, but are unable to get water rights because of the SNWA applications. During the hearing I listened to many personal stories from people I don't know, but with whom I sympathize. This issue has impacted nearly every resident of the valleys where the applications have been made. We know that it is only the beginning of the end of the lifestyle which we have enjoyed in the past. The process of protesting applications and participating in hearings for applications may go on for many years, draining all the resources we have. And yet to not protest, to let the project go forward as planned by SNWA will also end our life as we know it today.

I would like to trust the science about the region and the amount of water available. But in the hearings I heard clearly and frequently that science is not foolproof and without error. Some of the science presented was speculative and some science was completely lacking such as soil data. The amount of perennial yield varies widely from study to study. Expert opinions differed about the same set of data, but most agreed the margin of error is large. The opinions of people who have lived in these valleys for generations have largely been ignored or mocked by SNWA attorneys. However, local residents should be considered as experts in field science. Responsible interaction with the environment has been a means of survival for long-time residents. We have seen springs dry up, observed the effects of reduced water on plants and animals, and watched as wetlands transitioned to bare soils or stands of cheat grass, Russian thistle, and halogeton. Prevention of serious impacts while utilizing available water is a continual battle for local residents. This knowledge should carry weight in the decision-making process.

I would like to believe adaptive management, monitoring, and mitigation will protect the land, wildlife, scenic vistas, and local people from unreasonable impacts as SNWA has repeatedly promised. But I was alarmed to hear that SNWA does not have a 3M program in the development stages nor do they have money set aside for such a program. They say no one knows how to do it until the pumping begins. Further, SNWA experts agree that the proposal before the State Engineer will not work - but say they have another plan that will work. Managing and monitoring a project over an immense area and with potentially devastating impacts should not be approached so cavalierly and haphazardly. Management should include input from as wide a field of experts as possible, including local people. As part of a management plan, standards should be set. Thresholds and triggers should be determined long before pumping begins. This is the only way to assure that science and good environmental stewardship will have precedence over political and monetary needs.

I would like to believe decision-makers involved in the proposed project would protect target valleys from unacceptable impacts. Ultimately, it falls on the entity who has the most to gain and least to lose from excess groundwater withdrawal (SNWA) to make meaningful decisions. SNWA must not be allowed veto power in the MMM. The state engineer's office should be receive all monitoring data promptly and frequently. The agreements proposed - the DOI stipulated agreements, the biological monitoring plan for Spring Valley, and the UT/NV agreement - do not offer protection for residents and lack necessary enforcement to ensure that harm is not done. The Nevada State Engineer alone has the power to intervene and stop the pumping once it begins. This puts tremendous pressure on one person whose job is dependent upon the political goodwill of those in power.

I urge you to reject the current applications from SNWA. The proposed GWP in this hearing will not capture available ET without severe groundwater mining and severe impacts.

I urge you to be very conservative in your judgments as to the amount of water that can safely be removed from these valleys since the science does not have much consensus among experts. Impacts could be devastating to those of us who live in the valleys and destroy valued homes and traditions handed down by our pioneering ancestors.

I urge you to ensure that agreements and management programs concerned with interbasin transfers include ironclad safeguards for residents in target valleys. Establish triggers and enforcements which would halt pumping in a timely manner until decisions satisfactory to all concerned parties are reached. Provide measures now which will protect future decision makers from having to choose between doing the environmentally sound thing and the politically expedient thing.

Our legacy may be measured by what happens in these water hearings. Please ensure that it is a gift to our heirs, not a travesty.

Sincerely,

Ken & Kathy Hill

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