

November 18, 2011

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

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STATE ENGINEER'S OFFICE

Dear State Engineer King,

This is to express my deep concerns as a citizen of the State of Nevada about the harm to the public interest that would follow the withdrawals by SNWA of 126,000 acre feet of groundwater annually from Spring, Cave, Dry Lake, and Delamar Valleys in White Pine and Lincoln County.

The people who wrote our existing laws could not have anticipated groundwater withdrawals of this magnitude. Nor did they know (then) how streams and springs depend on groundwater. But we know. Reductions in groundwater levels of 10 feet are sufficient to kill off flora and dry up streams and springs. Nevada law allows reductions of up to 40 feet. Surely no one imagined this magnitude of pumping/interbasin transfer and the concomitant desiccation of millions of acres when they wrote the basic standards. Surely such outcomes are not in the spirit of the law. Indeed, our modern statutes give you the authority to deny applications that are environmentally unsound. Please reject these applications to avoid the harm they would cause.

The testimonies by Dr. Patten and Dr. Deacon about the effects of the water table declines on plant life, and the testimony by Dr. Harrington about the unending mitigation challenge (and the costs of it) are very clear. **The proposed interbasin transfers will harm the environment.** Furthermore, the loss of the surface water will undermine ranching, outdoor recreation, the survival of native wildlife and big game, and so on. **Neither man nor animal would thrive there again.**

Nevadans do not support the permanent loss of millions acres of natural landscape in exchange for thousands of acres of temporary city landscaping. 130,000 acre-feet either supports about 82K acres of new Las Vegas household landscaping, or, at least the 2.1 mil. acres of the state's natural landscape that is within the origin basins. Drawdowns and desiccations may extend far wider, as SNWA itself has predicted.

SNWA is duly proud of its capture/recycle/credit system that allows it to deliver 100% of any number of households' indoor water needs. According to SNWA, **Las Vegas indoor water needs are not constrained by water availability indefinitely into the future.** The State Engineer also has the authority to reject the application if there is insufficient need.

The imported groundwater would support expanded landscaped residential development. But **expansion of the housing supply is exactly the opposite of what's needed to restore housing values, financial security and economic prosperity to the 99% of Las Vegas.** No wonder the majority of Nevadans—including Las Vegans-- do not support this pipeline project.

The fact that the groundwater is not needed for indoor use also has very important implications for the financial feasibility of the project.

SNWA testified that its ability to cover the full costs depends on Las Vegas water customers being unresponsive to price increases. They reported they'll need to raise the commodity charge from \$0.30 to \$4.67 per 1,000 gallons (i.e., from \$32 to \$90 per month for all charges), while Las Vegas are assumed to continue to use 189 gallons per capita per day. One way to hold costs down would be to import even *more* groundwater. (Moving less than the planned amount would raise costs per customer even higher.)

It is well known that demand for outdoor use water is *quite* responsive to price. Thus, SNWA's projected revenues are way off. The very important implication is that **SNWA will not be able to finance the project at its planned scale, much less at a smaller scale.**

Expectations of limits on future development in White Pine and Lincoln Counties undermine investment and growth in those counties today. The need to avoid the damage of self-fulfilling expectations may be why Nevada law authorizes the State Engineer to deny rather than to approve projects that would never be undertaken anyway due to their financial infeasibility. Please remove that threat now. Please let those counties grow again.

In sum, it is obvious to Nevadans that the proposed groundwater withdrawals and interbasin transfers (i) are environmentally unsound, (ii) unduly harm and limit the current and future growth and development of the economies in the affected regions, (iii) serve no critical need, and (iv) the project would not be economically feasible, especially not at less environmentally damaging scales. It is clear to us that the proposed project is **not** in the public interest.

We hope it is clear to you and your staff. We support and applaud you for doing what's right for all of Nevada, and especially what's right **for the future generations of Nevadans.**

We also know that monitoring now cannot help us avoid the future deleterious effects on our environment from that project. To ensure the sustainability of our state, please reject these applications.

Thank you.

Sincerely,



Maureen Kilkenny
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Reno, NV 89509

cc:

Senator Harry Reid <http://reid.senate.gov/contact/index.cfm>
Senator Dean Heller http://heller.senate.gov/contact_form.cfm

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