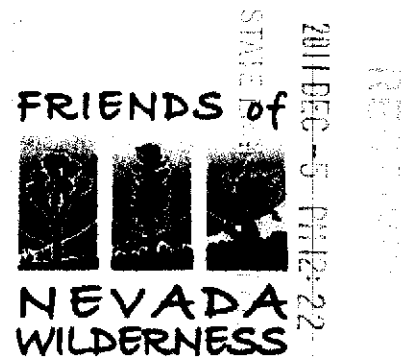


November 30, 2011

Susan Joseph-Taylor  
Chief Hearing Officer  
Office of the State Engineer  
901 S. Stewart Street, Suite 2002  
Carson City, NV 89701



Dear Susan:

Thank you for the opportunity to provide input into the Southern Nevada Water Authority (SNWA) request to pump water from Spring Valley in White Pine County to Las Vegas in Clark County. Friends of Nevada Wilderness has been around for 27 years working to protect our wild Nevada heritage. We have many members who enjoy hiking, hunting, fishing, camping, wildlife watching, star gazing, photographing natural landscapes, painting, participating in special events, driving for pleasure and just plain exploring the wonderful backcountry in eastern Nevada. On behalf of our Friends of Nevada Wilderness members, Board of Directors and staff we submit these comments.

We would like to go on record in opposition to the exportation of water from one basin to another especially from Spring Valley and Snake Valley to Las Vegas.

We believe that not enough is known about the groundwater resources in Lincoln and White Pine Counties for the State Engineer to make an informed decision with regard to a significant allocation of groundwater to the SNWA for export to Las Vegas. Before any decision is made there is need for an extensive research program of well drilling, water sample analysis and pumping in Lincoln and White Pine Counties to allow the State Engineer to make an informed decision about the impacts of groundwater pumping in Delamar, Dry Lake, Cave and Spring Valleys. There is no meaningful mitigation for the effect of falling water tables on springs, vegetation and wildlife since there are no alternative sources of water in Lincoln and White Pine Counties.

The "public interest" in this instance extends not just to the customers of the Southern Nevada Water Authority but to all the citizens of Nevada and western Utah and to the life sustaining ecosystems of the affected hydrographic basins.

Nevada is the driest State along with one of the most biological diverse in the nation. For example, ground-water pumping, water diversion and degradation in water quality can be linked to the critical status of many of our native fish species. Spring Valley has at least two endemic fish species the relict dace and the Pahrump killifish

Other key species include the Western snowy plover with their breeding population on Yelland Lake in Spring Valley; the Brazilian free-tailed bats that roost in Rose Guano Cave in Spring Valley; and the ferruginous hawk nests in low numbers all across northeast Nevada. A slight drop in the water table could lead to the loss of rare stands of "swamp cedar" in Spring Valley, which would ultimately lead to a loss of nesting habitat for the ferruginous hawk.

Other important bird species that could be impacted include: nesting population of greater sandhill cranes the long-billed curlew, willet and Wilson's snipe. In addition, Spring Valley is home to one of the rarest reptiles found in Nevada, the Sonoran mountain kingsnake that lives in southern Spring Valley.

Both Spring and Cave Valley are also home to the greater sage-grouse, a sagebrush obligate species which the U.S. Fish and Wildlife Service has determined to be warranted for listing as either endangered or threatened but for which there is insufficient funding to carry out the requisite studies at present. The Fish and Wildlife Service has stated that it will make a determination by 2015. If the greater sage-grouse is listed as either threatened or endangered that will have very significant impacts upon land and water uses in both Spring and Cave Valleys. This possibility needs to be taken in account in making a decision on allocation of rights to groundwater.

The infrastructure needs for this project (345 linear miles of power lines, 345 miles of pipeline, up to 195 wells, six pumping stations, two electric substations, and the over 13,000 acres and several hundreds of miles of new roads) would fragment thousands of acres of wildlife habitat. This is on top of the construction of large power corridors (SWIP) and proposals for renewable and non-renewable energy developments.

Many wildlife species in Spring Valley would be as much affected by the fragmentation of their landscape and associated increases in human disturbance and invasion of nonnative plants as they would by the loss and/or degradation of their watering sites. Species in this category would include pronghorn, pygmy rabbits, mule deer, burrowing owl, golden eagle and bald eagles.

If water rights are granted to make building a pipeline from Spring Valley to Las Vegas feasible and water export begins then those rights will be, for practical purposes, non-revocable, no matter how great the adverse impacts. The irreversible nature of an over-allocation of groundwater is what makes this decision so important. A mistake made now will be with us forever. We believe the only prudent decision is to require that a definitive study of the groundwater situation in the valleys where applications have been filed be undertaken and completed prior to any final issuance of water rights. To not do this would be irresponsible and would leave a poor legacy for the future.

Sincerely,



Shaaron Netherton  
Executive Director  
Friends of Nevada Wilderness

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