

NSE Hearing on Water Applications/Protests in Spring, Cave, Delamar, and Dry Lake Valleys
Public Comment by Rose Strickland
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I am Rose Strickland from Reno, Nevada. I speak as a citizen and co-owner of Nevada's water along with the other 2.7M Nevadans. And I speak as a conservationist and outdoors person who values the hardy wildlife and plants and humans who live in and down-flow from the 4 targeted basins.

I started to recycle my comments from the CDD hearing in 2008. As I've sat through the first nine days of this hearing, I've realized that not much has changed in SNWA's arguments on water availability and where the carbonate aquifer flows or doesn't flow. And nothing has changed in the stipulated agreements with the federal agencies, including their secrecy.

But, in reality, a lot of things have changed since '08:

- o The 4000 page draft EIS from the BLM estimates the devastating impacts of this groundwater mining project on over 19K square miles of eastern NV and western Utah.
- o The continuing economic recession has deflated the formerly booming southern NV economy and need for more water. Falling revenues have weakened the project's financial feasibility.
- o We finally have an estimate from the applicant of the project costs, well, the capital costs, of \$15.4B. Of course, this estimate doesn't include O&M costs, or the costs of the Monitoring, Management and Mitigation plans which SNWA has promised to implement.
- o On the first day of this hearing, we learned from Pat Mulroy that SNWA has no intention of starting construction on this once urgently needed pipeline project, even if the State Engineer approves

all the applications and BLM grants a ROW; not until Lake Mead falls to 1075 foot elevation. Who can predict that day with any accuracy?

What's missing from this hearing so far is significant:

An example: Lake Mead dropped to only 6 feet above the official shortage level last year and we're told that more water is needed for drought protection. If groundwater is pumped only during droughts, we understand how this would work. But if it's pumped every year, why haven't we heard how rural groundwater would be stored for use during droughts?

In conclusion, I urge the State Engineer to deny these applications.

If the State Engineer does approve any of the applications, then I strongly recommend:

- o Colorado River flows were over-estimated in 1922. Don't make the same mistake with the carbonate aquifer flows or the perennial yield estimates in these 4 basins.
- o Enforce a requirement for 200 years of monitoring to track pumping impacts.
- o Be prepared to order reductions and elimination of pumping which does "unreasonably" impact existing users and harms the environment.
- o And, please, do not depend on the federal agencies and SNWA to make water management decisions for Spring, Cave, Delamar and Dry Lake Valleys (and all the other basins affected by pumping drawdowns) through their secret MMM process, forever.