

October 9, 2017  
Office of the State Engineer  
901 S. Stewart St. Suite 2002  
Carson City, Nevada 89701

Dear Mr. Jason King:

My name is Gianni Giuliano. I currently study Environmental Science at the University of Nevada, Reno in addition to serving as the Environmental Justice Fellow for the Progressive Leadership Alliance of Nevada. As a local organization, comprised of Nevadans advocating for environmental justice, we urge the State Engineer to reject the Southern Nevada Water Authority (SNWA) water grab, disrupting White Pine County, Lincoln County, and state parks in the respective counties in an effort to lighten the drought conditions affecting the Colorado River Basin, the providing source of water for the Las Vegas Valley.

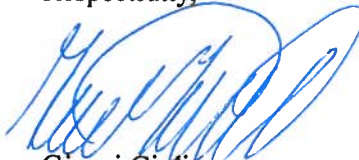
Nevada is the most arid state in the United States. Drought is inevitable. Water in Nevada is undeniably a sacred asset. We cannot compromise our vital resource, in the current climatic condition of our state. Water authorities in eastern Nevada such as the Central Nevada Water Authority (CNWA) claim that Nevada as a whole is experiencing difficult water supply issues. In a 2014 press release on CNWA's website, CNWA acknowledges that not only the Colorado River Basin is undergoing drought, but the Great Basin is as well. While we recognize that Las Vegas's population is increasing, it is important to not de-emphasize the conservancy of water provisions from the Colorado River Basin and Lake Mead in an effort to feed an unsustainable growth model in Southern Nevada. Nevada simply cannot afford to exhaust Eastern rural Nevada's water resources for the sake of Southern Nevada to reap the benefits.

While SNWA acknowledges climate change, the proposed groundwater grab would significantly impact the ecological state of Spring, Delamar, Dry Lake, and Cave Valley; in other words, SNWA should specifically acknowledge human-influenced climate change and more honestly assess and take corrective action on their current water grab proposal, which would only devastate various life ecosystems and communities in rural Nevada, not support them. The extent of SNWA's water grab proposal including wells and piping equipment would obstruct fishing practices in Spring Valley State Park, infringe on a number of endangered species in the Great Basin, and hinder recreational use for tourists and residents. Great Basin National Park is also threatened considering the project's close vicinity to the U.S. protected park. National Park Service recognizes the 2015 establishment of the \$800,000 observatory in Great Basin National Park which has now become a point of interest for astronomical research. In addition to the scientific implications, neither SNWA nor the Bureau of Land Management mention the impact on indigenous communities or the economic development and safety of affected towns within White Pine County and Lincoln County. SNWA claims to have the support of this project from many of the major industries in Southern Nevada, but those voices only account for a few representatives who cannot fairly speak on behalf of authorities, businesses, residents, and indigenous individuals that this project would affect in Eastern Nevada.

Nevada's neighboring semi-arid, desert-climate states, California, Arizona, Colorado and Utah, are performing thorough water supply and demand analyses in the name of sustainability. The findings in these reports are intended to showcase water imbalances that the Southwest is facing. These states, with larger populations and tourism than Nevada, believe in secure future water plans as the solution, and we urge SNWA and other benefactors of this water grab to do the same.

In summary, the ecological, economical, and social impact as a result of this project are indefinite. SNWA's management, mitigation and monitoring plan lacks support in terms of basic pre-project demonstrations as well as managing needs in the future. We urge the State Engineer to review the logistics of SNWA's proposal and the drastic changes Great Basin would endure as consequence, by extension, deny SNWA's request to divert scarce water from rural Nevada to Southern Nevada.

Respectfully,



Gianni Giuliano  
Environmental Justice Fellow  
Progressive Leadership Alliance of Nevada  
<http://ej.planevada.org>