

October 14, 2017

Office of the State Engineer
Attn: Susan Joseph-Taylor
[901 S. Stewart St. Suite 2002](#)
Carson City, NV 89701

Dear State Engineer,

My husband and I retired to the Snake Valley area after 40 years in Las Vegas. We saw the danger in living in such a crowded desert area with limited natural resources, and so moved north to this sparsely populated area, which is also a desert. We're disturbed to hear of all the efforts of Las Vegas to appropriate the water from our new home. We ask ourselves why SNWA hasn't explored ways to restrict population expansion and wasteful watering practices? Maybe even think about running a pipeline from the flooded Midwest to their water starved land? How about desalination?

Anyway you look at it the cost will be sky high, so instead they chose to pipe water from an area in their own state that means nothing to them. Our GBWA has asked for our support by writing to you with our concerns. So far we feel our communities' efforts have staved off several attempts to drain the water from our valley. But here are a few legal issues that need to be seriously considered by you to save our future:

General Points:

- Please apply the District Court's decision and Nevada water law and deny SNWA's applications.
- The four northern valleys represent only Phase One of SNWA's ultimate intended project from rural Nevada. If this phase is permitted, it will only grow.

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- SNWA has not demonstrated that it can effectively mitigate the widespread, destructive impacts that its' proposed Groundwater Development Pumping Project would cause to senior water rights and the environment.
- SNWA said that the project's environmental impacts, and their monitoring and mitigation plan, have been fully evaluated and approved by the federal agencies in the EIS for their main pipeline right of way. But that isn't true, and SNWAA is trying to mislead us all by claiming otherwise.
- The feds have said they can't evaluate the actual impacts until SNWA does basin-specific modeling, and are counting on the State Engineer to fully consider the project's actual impacts as part of deciding how much water can be appropriated. Also, the Final EIS for this project has been overruled and sent back to the BLM for a failure to provide adequate mitigation measures.

SNWA's Monitoring, Management and Mitigation (3M) Plans:

- The 3M plan is a "trust us" approach with SNWA in control. Rural Nevadans should have a say in the 3M plan implementation. Stakeholders must be involved in that process.
- The 3M plan puts the burden on rural people who are being impacted to defend their water rights, at potentially devastating cost.
- SNWA determining if their pumping is the cause of an impact is like the fox guarding a hen house. The presumption should be that SNWA pumping caused impacts that are outside of baseline conditions, and it should be SNWA's burden to prove otherwise, not the senior water rights owner.
- SNWA still has not produced evidence that supports the limited number and sparse placement of monitoring wells. The public has no way of knowing whether those locations are based in science and would be effective.

Thank you for your consideration of our concerns.

Sincerely, Mike and Jo McDonald, 501 E. Snake Canyon Rd, Baker, NV, 89311

Mike McDonald *jo medonald*
 ps In ancient times David slew Goliath. It can & should happen again.

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