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RE: Applications 53987-53992 and 54003-54021

On behalf of the Nevada Chapter of Backcountry Hunters and Anglers (NV BHA), the sportsmen's voice for our wild public lands, waters and wildlife, I submit these comments of concern regarding the applications from Southern Nevada Water Authority (SNWA) to withdraw water from aquifers and springs in northeast Nevada. **In short, we encourage the State Water Engineer to apply the District Court decision by Judge Estes and deny SNWA's water rights applications in Cave, Dry Lake, Delamar, and Spring valleys.**

Despite the recent additional hearing, we feel there is **no clear evidence SNWA can mitigate the predicable widespread harmful impacts** of its proposed Groundwater Development Project. We're concerned the projected substantial drop in water levels in these valleys over time will have serious negative impacts to wildlife habitat and, in turn, to our valuable NV wildlife resources. Chief among these impacts are the loss of springs, seeps, sub-irrigated meadows and

other wetlands, and the subsequent death of native vegetation Dependant on access to the water table. In turn, this would degrade or destroy both critical and general habitat for big game, small game, fish and birds, as well as other sensitive non-game species. **Loss of wildlife habitat ultimately leads to loss of traditional sporting opportunities.**

The 3M planning process apparently is still intended by SNWA to be opaque and developed along with the project, rather than at the outset. **Rural communities and agencies such as USFS, BLM and NDOW must have a say in developing monitoring processes and triggers for action up front.** Also, under any 3M regime, SNWA should be presumed, as the largest water user exporting 100% of what it withdraws, to be the cause of any subsequent impacts. Conceivably, lacking such clarity at the outset, putting the burden of voluntary monitoring and calls for action on local entities, can result in **discovery of negative impacts too late for effective action or mitigation.**

More specifically, we believe the **data clearly shows substantial drawdown** in Spring Valley, which would have profound transforming effects on the vegetative make-up of the valley, negatively impacting wildlife habitats. **Widespread damage to habitat, in our experience, cannot be mitigated.** In addition, we object to disrupting a natural system to the point that certain sensitive areas or species can only be supported in future by human intervention. In Cave, Dry Lake, and Delamar Valleys, we don't believe there is adequate data on the **potential impacts to interconnected down-gradient basins** to support allocating water from them at this time. We ask for prudence to ensure that those basins are not inadvertently robbed of their vitality as flow is siphoned away in the upper basins.

Our members enjoy visiting these proposed **affected areas for their high recreational value**: to hike, camp, hunt, fish, and enjoy the outdoors. Elk, antelope, deer, waterfowl, and turkey are among the many attractive game opportunities. In addition, the loss of one of our nation's **designated "dark sky" areas**, noted for crystal clear nights, to increased dust from vegetation die-off is something that's hard to quantify. As outdoor recreationists we find great value in the clean air and clear skies.

Impacts to this area not only threaten sporting opportunities for future generations, they also **threaten the economic viability of our culturally rich rural communities**, which would face the 1-2 punch of losing both agricultural and tourism dollars as dewatering takes its toll. Sportsmen are proud that our recreation contributes to the economies of Ely, Baker, Pioche, and other towns in and around these valleys. All Nevadans who treasure our valuable public lands resources have a vested interest to ensure these communities survive and thrive. Like the land, they too are **part of our rich heritage**.

Rejecting these applications is a necessary protective action to safeguard the health of our public lands and wildlife, whose sustainability is the "savings account" for the future of all Nevadans. Our public lands are the foundation for the significant contributions of sportsmen, recreationists, outdoor recreation and tourism industries to rural economies and to our state in general. Nevada attracts many new businesses to our urban centers in no small part because of the **quality of life our rural public lands and wildlife resources provide**. We have a vested interest to keep our "piggy bank" full.

**For all the above reasons, NV BHA asks that the State Water Engineer find that no substantial additional water is available in these basins. Please**

**reject SNWA's applications 53987-53992 and 54003-54021.**

Respectfully,

Karen Boeger, Board member

Nevada Chapter, Backcountry Hunters & Anglers