

BAKER AREA CITIZENS ADVISORY BOARD

Elko Street; PO Box 15; Baker NV 89311

October 16, 2017

TO: Office of the State Engineer
Attn: Susan Joseph-Taylor
901 South Stewart Street, Suite 2002
Carson City, Nevada 89701-5250

RE: Public Comment – SNWA Ground Water Development Project – Spring, Cave, Dry Lake, and Delmar Valleys.

Dear Mr. King,

Please be advised that the Baker Area Citizens Advisory Board opposes the Southern Nevada Water Authority's (SNWA) Groundwater Development Project. We request that this communication be entered into the official record. Further, we request that the State Engineer deny all SNWA water applications associated with this project for the following reasons.

- The SNWA Ground Water Development Project is not in the public interest.
 - Great Basin National Park is a major tourist attraction. Lack of water and a potential dust hazard due to depleted water and depleted vegetation would significantly impact visitation numbers and hence, the local economy.
 - The proposed pipeline would hurt local economy due to decreased visitation because area would become a less desirable place.
 - Impacts from this project would put ranchers, farmers and ecotourism-based businesses out of business and depopulate rural areas.
 - Analysis shows that this project would eventually jeopardize hundreds of thousands of acres of habitat for mule deer, pronghorn antelope, elk, sage grouse, wild horses, fish of all kinds, and lead to major loss of game species, and extinction of rare plant and animal species.
 - Dust is a major health hazard. With it, there is the potential for radioactive soils to be distributed, further endangering the health of local residents.
- The SNWA Ground Water Development Project would harm other water rights.
 - Senior Water Rights would not be protected. It is inappropriate for the Nevada State Water Engineer to even consider changing the state water laws to fulfill the desires of one entity such as SNWA.
- SNWA has failed to:
 - Provide sufficient information on impacts to Fish Springs NWR, Deep Creek Valley, and Steptoe Valley.
 - Provide adequate and effective mitigation measures.
 - Provide adequate analysis of socioeconomic impacts.
 - Provide sufficient justification for failing to study the impact of drawdowns of less than 10 feet or of operation longer than 200 years after build-out when the SNWA Pipeline Project intends to operate indefinitely.
- SNWA has failed to analyze and address:
 - A sufficient range of alternatives. For example, building desalinization plants in Southern California in exchange for a larger portion of California's Colorado River water. .

In conclusion, we request the Nevada Division of Water Resources deny all of SNWA water applications associated with this project because of the multitude of adverse impacts and a litany of "unknowns" and "uncertainties."

We appreciate the opportunity to comment on the proposed SNWA Ground Water Development Project.

Sincerely,
Baker Area Citizens Advisory Board



Lynne M Hoffman, Chairperson

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