

October 18, 2017

Susan Joseph-Taylor
Office of the State Engineer
901 S. Stewart Street, Suite 2002
Carson City, NV 89701

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Re: Applications 53987-53992 and 54003-54021

Thank you for the opportunity to comment on the above listed applications for water rights in Eastern Nevada by the Southern Nevada Water Authority (SNWA).

We are concerned that if the above listed applications for water rights are granted that there will be irreversible impacts and damage to the springs, vegetation and animal life in Cave, Delamar, Dry Lake and Spring Valleys.

Given what we know about groundwater in Nevada and the arid west there is no way that SNWA can pump the volume of water they desire without having major negative impacts on all the existing discharge points (springs) and groundwater dependent vegetation in the basins subject to application plus basins receiving interbasin flows. Groundwater is a zero sum game. Export of water from any basin will inevitably reduce the volume of water in that basin available for current ecosystem support.

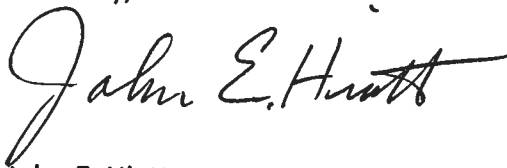
The monitoring and mitigation plans which SNWA proposes to develop in future appear to be nothing more than a smoke screen and diversion to avoid addressing the issue of future environmental damage. Once water tables decline and springs go dry there is no realistic scenario for meaningful mitigation without total cessation of pumping and SNWA will never agree to that. Also, there is no way that SNWA could mitigate for decreased flows in the three big springs in the Pahrangat Valley that will likely be impacted by pumping in Dry Lake and Delamar Valleys. By the time the impacts are noticeable it will be too late to reverse the damage.

The Shoshone Ponds and the "Swamp Cedars" in Spring Valley are totally dependent on having a high water table in that area. Any significant water withdrawals in Spring Valley will eventually impact those two areas and there will be no way to mitigate the damage.

The job of the State Engineer is to manage the State's water resources for the benefit of the citizens of the State. Under the "public interest doctrine" this should include the ecosystem services that the citizens value such as clean air and the wildlife that the State manages for the benefit of its citizens. Lake Valley and Spring Valley both have significant Sage Grouse populations which will almost certainly be negatively impacted if water rights as applied for are

granted. It is imperative that the State Engineer consider the long term impacts of groundwater export over at least 100 years. Any time period shorter than a century will inadequately address the long term impacts of the proposed applications.

Sincerely,



John E. Hiatt
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