

## CENTER for BIOLOGICAL DIVERSITY

Because life is good.

Mr. Jason King Nevada Division of Water Resources 901 S. Stewart St. Suite 2002 Carson City, NV 89701 November 29, 2011

RE: Public Comments on SNWA requests for water rights in Spring, Delamar, Dry and Cave Valleys.

Dear Mr. King:

Enclosed is a DVD containing 21,063 comments from concerned publics across the country opposing the de-watering of the Great Basin by the water mining being proposed by the SNWA.

Nevada's "interbasin water transfer statute," NRS 533.370(6), currently requires the state engineer, you, to deny an application for an interbasin transfer of water if he finds that the proposed transfer would not be "environmentally sound" for the basin being diverted.

While the definition of "environmentally sound" is absent in the statute, it seems only reasonable to deem the water authority's request is not, given the catastrophic and irreversible impacts that would occur as a result of this groundwater extraction, as documented in the Bureau of Land Management's "draft environmental impact statement" for the pipeline proposal.

Water tables would drop by 200 feet; 192,000-plus acres of prime Great Basin shrubland habitats would be dried, destroyed and converted to dryland grasses and annuals, supporting invasive species like cheatgrass and Sahara mustard. Eight thousand acres of wetlands would be destroyed along with 310 springs and 125 miles of perennial streams.

The toll on species would also be staggering, and some species of desert fish and springsnails would go extinct. Widespread harm to other species would occur, including the imperiled greater sage grouse, southwestern willow flycatcher, Columbia spotted frog, pronghorn and elk.

These applications threaten the very natural heritage of the Great Basin in eastern Nevada and western Utah. Please deny the authority's water-right applications based on the severe, environmentally unsound impacts they would cause. In light of other options available to the authority for meeting reasonable water demands such as increased conservation, smart growth management and desalination options, they should be off the table.

Sincerely,

Ecologist/ Nevada Conservation Advocate

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