

The State Engineer Hearings on SNWA's water rights applications have ended. Thanks to those who made the journey to Carson City to comment in-person, as well as those who've already submitted written remarks. If you haven't yet sent in comments, we need you to do so!

As a reminder, you CANNOT email comments - they have to be sent "snail mail" and kept to 5 pages or less. **Comments have to be received by next Friday, the 20th** so time is short for you to get them written and in the mail.

Below, we've provided lots of suggested talking points on the various topics from the hearing to get your letters going.

Send your comments to:

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

General Points:

- Encourage the State Engineer to apply the District Court's decision and Nevada water law and deny SNWA's applications.
- These four valleys represent only Phase One of SNWA's ultimate intended project from rural Nevada. If this phase is permitted, it will only grow.
- SNWA has not demonstrated that it can effectively mitigate the widespread, destructive impacts that its proposed Groundwater Development Project pumping 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.

If you're in or close to the area that would be affected:

- Describe the people, families and communities who depend on groundwater and resources that depend on that water. What's it used for? What's at stake if it's lost?
- Describe any decreases in water levels and/or spring flows that you've personally observed and anything else that you think shows there is no excess water to be exported from the area.
- Emphasize the regional importance of Great Basin National Park and the spectacular clear clean air quality that provides stunning views and boasts the darkest night skies in the lower 48 states. Lost water means less vegetation which means more dust and murky skies.
- SNWA has not been a good neighbor to the ranching families who have lived and worked on the land for generations. Not only that, but their ranch management has been poor - operating at a loss unsustainable by any local ranchers and even losing some grazing rights.

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.

Specific to Spring Valley:

- SNWA's own evidence shows that pumping from the points of diversion in its actual applications to the State Engineer will result in massive groundwater mining, causing devastating long-term impacts to senior water rights holders and the environment in Spring Valley.
- The only alternative SNWA presented was an “ET salvage” project that would pump the same amount of water, causing as much or more devastating impacts, much more quickly. Neither of these options is acceptable under Nevada law.
- SNWA *intends* to mitigate the long-term impacts of the groundwater mining resulting from its applications, but haven't shown that they actually can effectively mitigate those impacts, or how they would.

Specific to Cave, Dry Lake, & Delamar Valleys:

- SNWA seriously undercounted the amount of groundwater that is committed to existing water rights and the environment in the basins within the White River Flow System that are downgradient from Cave, Dry Lake and Delamar Valleys.
- SNWA hasn't done any of the modeling or analysis needed to predict with any confidence where, when, and how drawdown, and therefore impacts, from the Groundwater Development Project will occur in these basins.