

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Utah Board of Water Resources) Project No. P-12966-005
Lake Powell Pipeline Project)

MOTION TO INTERVENE OF GREAT BASIN WATER NETWORK

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Regulatory Commission, 18 C.F.R. 385.212 and 385.219 (2008), Great Basin Water Network hereby submits this motion to intervene in this proceeding.

I. COMMUNICATIONS AND SERVICE

All communications, pleadings, and orders with respect to this proceeding should be sent to the following individual:

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II. INTEREST OF THE PETITIONER

Great Basin Water Network (GBWN) is a broad-based coalition and 501(c) (3) charitable nonprofit organization of urban and rural interests, ranchers and farmers, rural counties and communities, Native American Tribes, hunters and anglers, conservationists, and businesses. GBWN’s mission is to promote sound, holistic water policy and water resource management in order to protect locally sustainable water uses for local beneficial uses, the environment, and the public welfare of future as well as present generations in the Great Basin region. GBWN seeks to achieve these goals through research, science, education, networking, litigation, and advocacy throughout the extended Great Basin region. Members of GBWN live in and pursue a wide variety of outdoor recreational activities throughout Utah

and Nevada. These people cherish and often rely economically on the health of the environment, the wildlife, and the rural agrarian communities of the Great Basin.

Founded in 2005, GBWN is an all-volunteer effort, with the exception of lawyers and technical experts who GBWN hires as contractors in particular campaigns or cases. Among the threats to sustainable water resources and supplies in the Great Basin that spurred the creation of GBWN were a number of patently unsustainable proposals to mine groundwater or transfer water between basins in a manner and at a scale that would jeopardize rural communities and the environment in a number of high desert valleys within the Great Basin. Chief among these ill-advised proposals was the Southern Nevada Water Authority's (SNWA's) proposal to drain groundwater from eastern Nevada and Utah's West Desert – threatening an area nearly as large as all of New England - for export to Las Vegas (the “Groundwater Development Project” or “GWP”).

According to an Environmental Impact Statement prepared by the U.S. Bureau of Land Management, SNWA's Groundwater Development Project would result in lowering the water table between 10 and 200 feet, 5 feet or more in ground subsidence over 525 square miles, 34,742 tons of windblown dust produced each year, and put at risk 305 springs, 112 miles of streams, 8,000 acres of wetlands, 191,506 acres of shrubland wildlife habitat for sage grouse, mule deer, elk and Antelope. The EIS makes clear the grave danger SNWA's pump and pipe project would pose to Great Basin National Park, at least three National Wildlife Refuges, multiple state wildlife management areas, several endangered and threatened species, important Native American cultural sites and resources, and the cultural and socioeconomic viability of the affected area. The BLM's EIS and the Nevada State Engineer's recent ruling also bear testament to the harmful impacts that SNWA's GWP likely will have on senior water rights in affected areas of Nevada and Utah.

The proposed Lake Powell Pipeline Project would remove large amounts of Colorado River water from Lake Powell and transport that water for consumptive use in Washington and Kane Counties, Utah. By transferring Colorado River water in this way, the Lake Powell Pipeline would directly encourage unsustainable water use in the Great Basin and imperil the viability of the environment and traditional rural communities in the affected part of the Great Basin. These effects are contrary to the values and goals that GBWN actively seeks to protect and achieve.

Further, the proposed Lake Powell Pipeline's diversion of water from the Colorado River for use in Utah's Washington and Kane Counties would result in a downstream depletion of supply to Lake Mead, the source of 90% of the water supply for Las Vegas and Clark County, Nevada. The decrease in water delivered to Lake Mead as a result of the Lake Powell Pipeline would make it far more likely that construction of SNWA's Groundwater Development Project, would be triggered (which would occur when Lake Mead's water level drops below an elevation of 1075 feet). As described above, the effects of the GWP's unsustainable groundwater pumping on the environment and rural communities of a large area within the Great Basin directly threaten GBWN's mission and charitable work to promote sustainable, holistic water management in the Great Basin. In this way, too, the proposed Lake Powell Pipeline is contrary to and poses a grave danger to GBWN, its mission, and its goals.

Thus, the construction, operation, and maintenance of the Lake Powell Pipeline would adversely impact GBWN members who ranch and farm, work, worship, reside, and recreate in the region impacted by both the Lake Powell Pipeline and the SNWA GWP.

Finally, GBWN has important information and perspectives to bring to this process, consideration of which will serve the public interest.

III. CONCLUSION

Wherefore, Great Basin Water Network respectfully requests that the Commission grant our Motion to Intervene as a party with full rights to participate in all further proceedings.

Respectfully submitted on 11/19/2018

Steve Erickson, Member, Board of Directors
Great Basin Water Network