IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA

FILED
OCT 04 1989 db
STATE ENGINEER'S OFFICE

IN THE MATTER OF APPLICATION NUMBER 53,406,
FILED BY Washoe County, Nevada,
ON 23 June 19 89, TO APPROPRIATE THE
WATERS OF Underground

PROTEST

Comes now Sierra Army Depot
Printed or typed name of protestant
whose post office address is Commander, Sierra Army Depot, ATTN: DEH-EPS, Herlong, CA 96113-5171
Street No. or P.O. Box, City, State and Zip Code
whose occupation is Defense of the United States of America, and protests the granting
of Application Number 53,406, filed on 23 June, 19 89
by Washoe County, Nevada to appropriate the
Printed or typed name of applicant
waters of Underground situated in Washoe
Underground or name of stream, lake, spring or other source
County, State of Nevada, for the following reasons and on the following grounds, to wit:

Application 50,195 was filed on 2 October 1986 by Washoe County to allocate 5.0 c.f.s. of groundwater for Quasi-Municipal use and is currently pending action by the Nevada State Engineer and is under protest. Application 53,406 requests to change the type of use of the 5.0 c.f.s. pending action under 50,195 from Quasi-Municipal to Municipal. Sierra Army Depot considers 53,406 to be part of the effort to export Honey Lake Valley groundwater out of the basin and objects to approval of the application based on the following points. (see attached sheet)

THEREFORE the protestant requests that the application be Denied
(Denied, issued subject to prior rights, etc., as the case may be)
and that an order be entered for such relief as the State Engineer deems just and proper.

Signed James M. Coverstone
Agent or protestant
JAMES M. COVERSTONE, Colonel, U.S. Army
Printed or typed name, if agent
Address Commander, Sierra Army Depot, ATTN: DEH-EPS
Street No. or P.O. Box No.
Herlong, CA 96113-5171
City, State and Zip Code No.

Subscribed and sworn to before me this 3rd day of October 1989.
Daniel A. Olver
Daniel A. Olver, CPT, U.S. Army, Judge Advocate
Notary Public
State of California
County of Lassen

$10 FILING FEE MUST ACCOMPANY PROTEST. PROTEST MUST BE FILED IN DUPLICATE. ALL COPIES MUST CONTAIN ORIGINAL SIGNATURE.

Application
53,406

1. Nevada's groundwater extractions in the Honey Lake Basin should not exceed Nevada's recharge, and deliberation by the State Engineer on 53,406 or any other proposal to further develop groundwater resources in the Honey Lake Groundwater Basin should be deferred until the U.S.G.S. Study is completed and considered concurrently with all other pending applications to ensure that overdraft does not occur.

2. Sierra Army Depot's potable wells are located no less than 8.5 miles from the western edge of the proposed municipal water well field. Pumpage and export of groundwater on the Nevada side of the Honey Lake Valley in excess of the amount of recharge attributable to waters incident upon the Nevada side of the basin could impact the quality of the water in depot potable wells. There exists to the northwest of these potable wells a large body of non-potable groundwater. The proposed municipal water well field is located generally to the southeast of the potable wells. It is likely that the level of extraction that would occur if all of the applications are approved would be of such magnitude as to cause the southeastern migration of the non-potable waters to the area where depot wells are located. This installation has shown beneficial use of the potable groundwater resource for over 40 years. If the quality of the water drops, the entire potable water supply would be lost and the depot would cease to function.

3. The mission at Sierra Army Depot is of a strategic nature and disruption of depot activities could seriously impair the ability of the U.S. Army to support the defense of the United States of America.

4. Much of the surface of Sierra Army Depot is fine grained materials. In the southern portion of the depot, the predominant surface soil is referred to as "blow sand" and the middle and northern lands (except Skedaddle Mountain) are silts from the old lake bottom (alkaline). On 11 July 1989 in Carson City, Nevada, the U.S.G.S. released preliminary findings of the study they have been conducting on the Honey Lake Basin. Under the scenario of 15,000 acre ft/year of exportation out of the basin, very little groundwater will remain to support evapotranspiration, 9% instead of the 42% which is available today. This along with the predicted drop in the static groundwater elevation would eliminate most of the vegetation on the installation. The loss of the vegetation would allow for the sand dunes to migrate and the silts to contaminate the air. A significant loss in air quality would result. The loss of our vegetative cover due to overdrafting of the groundwater resource is not acceptable.

5. The predicted drop in the static groundwater elevation at 15,000 acre ft per year of exportation was shown by the U.S.G.S. to have a possible impact of up to 100 ft in the area associated with our potable wells. The resulting loss in production would require that the Army construct at least one new well to support our current demand. As it stands today during peak demand periods, depot wells can barely maintain sufficient production.

6. Sierra Army Depot respectfully requests that the permitting of the domestic water well field be deferred until the following things occur.

a. The completion of the U.S.G.S. study that is currently underway.

c. Agreement between the Nevada State Engineer, the State of California, and Lassen County, as to a "safe yield" for exportation of groundwaters out of the basin. Safe yield being that amount of extraction that does not adversely impact the quality of our well water, the production capacity of our wells, and the surface vegetation on the Sierra Army Depot.

d. A bi-state study of the water quality and potential impacts of exportation on that quality much like the U.S.G.S. study that is currently underway for water quantity.

Sierra Army Depot hereby requests to reserve the right to submit additional data or evidence to further substantiate the above stated position.