

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

IN THE MATTER OF APPLICATION NUMBER 54058,
FILED BY Debra Richardson
ON July 9 1990, TO APPROPRIATE THE
WATERS OF Coyote Spring Valley, Clark Co.

RECEIVED

JUL 09 1990

Div. of Water Resources
Branch Office - Las Vegas, NV

PROTEST

Comes now Debra Richardson
Printed or typed name of protestant

whose post office address is 3601 Cambridge St. #151 Las Vegas, NV 89109
Street No. or P.O. Box, City, State and Zip Code

whose occupation is mother, and protests the granting
of Application Number 54058, filed on October 17, 1990

by Las Vegas Valley Water District
Printed or typed name of applicant to appropriate the

waters of underground / Coyote Spring Valley
Underground or name of stream, lake, spring or other source situated in Clark

County, State of Nevada, for the following reasons and on the following grounds, to wit:

See attached

THEREFORE the protestant requests that the application be _____
(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 Debra Richardson
Agent or protestant

Debra Richardson
Printed or typed name, if agent

Address 3601 Cambridge St. #151
Street No. or P.O. Box No.

Las Vegas NV 89109
City, State and Zip Code No.

Subscribed and sworn to before me this 9th day of July, 1990



CARL DIGENARO JR.
Notary Public-State of Nevada
COUNTY OF CLARK
My Appointment Expires
July 7, 1992

Carl Digennaro Jr.
Notary Public

State of Nevada

County of Clark

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

Based on information and belief,

1. This application is one of 146 Applications filed by the Las Vegas Valley Water District seeking a combined appropriation of some 64,195 acre feet of ground and surface water primarily for municipal use in Clark County. Diversion and export of such a quantity of water will deprive the area of origin of the water needed to protect and enhance its environment and economic well being, and the diversion will ~~will~~ unnecessarily destroy environmental, ecological, scenic, and recreational values that the State holds in trust for all its citizens.
2. The appropriation of this water when added to the already approved appropriations and existing uses in the Coyote Spring Valley Basin will exceed the annual recharge and safe yield of the basin. Appropriation and use of this magnitude will : lower the static water level and degrade the quality of water from existing wells and cause negative hydraulic gradient influences as ~~wells~~ as other negative impacts.
3. The granting or approving of the subject application in the absence of comprehensive planning, including but not limited to environmental impact considerations, cost considerations, socioeconomic impact considerations, and a water resource plan (such as is required by the Public Service Commission of private purveyors of water) for the Las Vegas Valley Water District Service area is detrimental to the public welfare and interest.
4. The granting or approval of the above-referenced application would be detrimental to the public interest in that it, individually and together with the other applications of the water importation project, would:
 - (a) Likely jeopardize the continued existence of endangered and threatened species recognized under the federal Endangered Species Act and related state statutes;
 - (b) Prevent or interfere with the conservation of those threatened or endangered species;
 - (c) Take or harm those endangered or threatened species; and
 - (d) Interfere with the purpose for which the federal lands are managed under federal statutes including, but not limited to, the Federal Land Use Policy Act of 1976.
5. The subject application should be denied because the population projections upon which the water demand projections are based are unrealistic and ignore numerous constraints to growth, including traffic congestion, increased costs of infrastructure and services, degraded air quality, etc.
6. The granting or approval of the above-referenced application should be denied because the lands lie within the boundaries of the Shoshone Indians, Nation, which is protected by the Ruby Valley Treaty of 1863. This treaty is currently under litigation and the granting of water rights should not be appropriated until litigation is completed.