

Policies For Conjunctive Water Issues

Conjunctive Water Management:

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We are very concerned over the lack of legislative direction and absence of specific parameters in regard to how “Conjunctive Management” is going to be carried out. We urge a full public discussion of what conjunctive management of water resources means and how combining separate sections of state law will be implemented. Long and established separations for surface and groundwater rights cannot be quickly combined without a complete vetting of how issues and impacts will be worked through. Top down edicts by the State Engineer’s office, without local, public engagement of those being affected is not acceptable.

Statutory parameters need to be established to guide regulatory actions in how the State Engineer will implement and operate conjunctive management activities.

Regulatory activity related to carrying out conjunctive management needs to be based on established scientific documentation that the water relating to the conjunctive management of specific groundwater and surface water are connected, as well as an established understand to the degree one water right is relating to others.

The interaction of water from various sources involves many different elements include the timeframes and the degree to which connections take place. State policy on the use of conjunctive management needs to be based on site specific circumstances, which recognizes the variety of elements that exist at a specific site. Not all areas have the same connection and interaction throughout a system and this warrants consideration in implementing active management that has consequences to different water rights.

In responding to State Engineer actions where conjunctive management actions could have an impact on different water right owners, senior water right owners need to have their rights duly recognized as they wish to have the water associated with their rights dealt with. They should be able to receive water which meets their water rights instead of being required to accept financial or other compensation through mitigation measures that they do not voluntarily agree to.

Humboldt River Management Modeling:

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Modeling being developed by the U.S. Geological Service (USGS) and the Desert Research Institute (DRI) for the Humboldt River system requires validation and the findings related to the research need to be presented in an understandable fashion. The “conjunctive” management which will come as the result of this modeling must have a basis in factual information that the general public can effectively deliberate for soundness. Along with the findings of the Humboldt River Basin Capture Analysis, we believe that an overall river basin economic perspective needs to be factored into river and groundwater basin management actions for the Humboldt River system.

This process should apply to all other rivers in the state of Nevada.