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UNITED STATES	DISTRICT COURT
	RICT OF NEVADA
UNITED STATES OF AMERICA,)	
UNITED STATES OF AMERICA,	3:73-CV-00128-MDD-WGC
Plaintiff,)	3./3-CV-00126-WDD-WGC
riamum,	
WALKER RIVER PAIUTE TRIBE,	
WALKER RIVERTAIOTE TRIBE,	UNITED STATES' ANSWER TO
Plaintiff-Intervenor,)	MINERAL COUNTY'S SECOND
vs.)	AMENDED COMPLAINT
vs.)	AMENDED COMI LAINT
WALKER RIVER IRRIGATION DISTRICT,	
a corporation, et al.,	, •
a corporation, et al.,	I
Defendants.	I
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US ANSWER TO MINERAL COUNTY COM	PLAINT Page 1 c

Plaintiff, the United States of America (United States), hereby answers the Second

Amended Complaint in Intervention of Plaintiff-Intervenor, Mineral County, Nevada, as follows:

1. The allegations contained in paragraph 1 are Plaintiff-Intervenor's characterization of its case to which no answer is required; to the extent they may be deemed allegations of fact, they are denied.

PARTIES

- 2. The allegation of who Plaintiff-Intervenor represents is Plaintiff-Intervenor's characterization, to which no answer is required. Admits that Plaintiff-Intervenor is a political subdivision, and is established under the laws, of the State of Nevada. As to the allegations in paragraph 2 that go to the effect of Walker Lake on Plaintiff-Intervenor, denies for lack of knowledge or information sufficient to form a belief as to their truth.
 - 3. Admits.

JURISDICTION

4. Admits.

GENERAL ALLEGATIONS

- 5. Admits that Walker Lake is a rare terminal lake. As to the allegation in paragraph 5 that the Lake is one of Nevada's most precious natural resources, denies for lack of knowledge or information sufficient to form a belief as to its truth.
- 6. Admits the allegations in paragraph 6 to the extent they accurately reflect the cited source, which document is the best evidence of its contents.
- 7. Admits that the Lahontan cutthroat trout is listed as threatened under the federal Endangered Species Act and that the tui chub is identified as a "subspecies of concern" by the

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American Fisheries Society. Admits remainder of the allegations in paragraph 7 to the extent they accurately reflect the cited source, which document is the best evidence of its contents.

- 8. Admits the allegations in paragraph 8 to the extent they accurately reflect the cited source, which document is the best evidence of its contents.
- 9. Denies the allegations in paragraph 9 for lack of knowledge or information sufficient to form a belief as to their truth.
- 10. Admits the allegation in paragraph 10 to the extent it accurately reflects the cited source, which document is the best evidence of its contents.
- 11. Admits the allegations in paragraph 11 to the extent they accurately reflect the cited source, which document is the best evidence of its contents.
- 12. Admits the allegation in paragraph 12 to the extent it accurately reflects the cited source, which document is the best evidence of its contents.
- 13. Denies the allegation in paragraph 13 for lack of knowledge or information sufficient to form a belief as to its truth.
- 14. Admits the allegation in paragraph 14 to the extent it accurately reflects the cited source, which document is the best evidence of its contents.
- 15. Admits the allegation in paragraph 15 to the extent it accurately reflects the cited source, which document is the best evidence of its contents.
- 16. Denies the allegations in paragraph 16 for lack of knowledge or information sufficient to form a belief as to their truth.
- 17. Denies the allegations in paragraph 17 for lack of knowledge or information sufficient to form a belief as to their truth.

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1	18. Admits the United States Congress established the Walker Basin Conservancy to
2	oversee a program of water rights acquisitions and other measures to restore Walker Lake. As to
3	the remainder of the allegations in paragraph 18, denies for lack of knowledge or information
4	sufficient to form a belief as to their truth.
5	STATEMENT OF CLAIM
6	19. The United States incorporates by reference the responses in the preceding
7	paragraphs 1 through 18 of this Answer as though fully set forth herein.
8	20. The allegations contained in paragraphs 20–23 constitute conclusions of law to
9	which no answer is required; to the extent they may be deemed allegations of fact, they are
10	denied.
11	PRAYER FOR RELIEF
12	1. The allegations contained in paragraphs 1–24 are Plaintiff-Intervenor's
13	characterization of its prayers for relief to which no answer is required.
14	The United States denies each and every allegation not previously admitted or otherwise
15	qualified.
16	Respectfully submitted this 28 th day of September 2021.
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18	/s/ Andrew "Guss" Guarino Andrew "Guss" Guarino
19	Attorney for the United States
20	Attorney for the Office States
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CERTIFICATE OF SERVICE It is hereby certified that on September 28, 2021 service of the foregoing was made through the court's electronic filing and notice system (ECF) to all of the registered participants. /s/ Andrew "Guss" Guarino Andrew "Guss" Guarino By: