



Nevada Farm Bureau Federation

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October 18, 2011

Division of Water Resources
901 South Stewart St. Suite 2002
Carson City, NV 89701-5250

Attention: Tim Wilson, Hearings Officer

Re: Application 80700

Dear Hearings Officer Wilson:

In accordance with your September 22 letter, requesting that we provide an outline of the issues relating to the proposed transfer and change of use of water by the National Fish and Wildlife Foundation, please include these comments as part of the materials you are collecting.

As we have stated in our protest of the proposed change, Nevada Farm Bureau is deeply concerned over the harm to be caused to other water right owners who depend on the efficiency in use and delivery of their water.

A host of issues surround the management of the irrigation system, the requirements of the irrigation district to meet the obligations to water right owners and the potential fashion that the National Fish and Wildlife Foundation will require service.

It seems that their agenda is intent on acquiring as much water as possible for their purposes and that agenda is counter to the best interests of the other water right owners who depend on the well-being of the irrigation district. Through their demands for water delivery, the system could be placed at risk and aid them in acquiring more "willing" water right sales.

Proper requirements need to be established in advance of any transfers to protect the integrity of the system and the interest of all water right owners.

Our organizational policy states that we want the State Engineer to require conditions on those acquiring water rights for change in the place of use and manner of use to mitigate for:

1. Damage or economic loss resulting to remaining agricultural producers
2. Reduction in storage levels
3. Loss of diversions and decreased efficiencies
4. Loss of vegetative cover on dewatered lands
5. Reduced tax base in the community."

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We also stress that the negative consequences of removing water from agricultural lands and the essential reclamation effort that must be in place to mitigate those consequences. As we have seen from similar dewatering outcomes in the Lahontan Valley, weeds and serious dust issues have come as the result of removing agricultural water rights from lands currently in production.

Our organizational policy states:

“Nevada Farm Bureau strongly supports the concept that if/when water, through purchase or other mechanism, is removed from a site and transferred to another site that the parties involved in the transfer must put into place sufficient reclamation procedures to ensure the establishment of permanent (perennial) vegetation to minimize the eventual environmental impacts that invariably occur when irrigated lands are retired from production.”

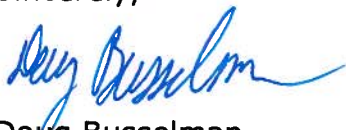
Attention must be given to addressing the environmental and economic impacts associated with stripping water from agricultural property.

Water resources are far too important to be wasted and not put to the uses for which they are appropriated. How is beneficial use of water for wildlife purposes measured and evaluated when the water is intended to be used at a place (Walker Lake) when the conveyance mechanism is questionable in delivering the amount and quality of water that is necessary to meet the intended use? Because of the unresolved agreement, still to be negotiated in order to move water to Walker Lake, there is even greater uncertainty that the water rights will be placed to the designated beneficial use (Wildlife) at the place of use (Walker Lake).

In further regard to moving water to a terminal lake, which already contends with water quality issues related to evaporation and dissolved solids being left behind after evaporation has taken place, how will water reaching the lake through the lower Walker River not further impair the water quality of the lake when the water evaporates?

The concepts outlined in this letter serve as the foundation for our concerns, but should not be considered as the limit of what we believe need attention in the consideration of the proposed water right changes. We reserve the ability to further interact in the process and comment on specifics as the process evolves.

Sincerely,



Doug Busselman
Executive Vice President

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