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STATE WATER RESOURCES
CONTROL BOARD
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DIV OF WATER RIGHTS
SACRAMENTO

April 11, 2013

Antelope Valley Mutual Water Company
P.O. Box 43
Topaz, CA 96133

Re: Comments on the notice of petitions for temporary transfer and change filed by Walker River Irrigation District (WRID) licenses 6000 and 9407 (applications 221 and 1389) and involving federally adjudicated rights established by the Walker River Decree.

The Antelope Valley Mutual Water Company (AVMWC) owns water rights and distributes the water on over 14,600 acres located in Mono County on the West Walker River near the Walker/Coleville area. While the AVMWC supports WRID's participation in the Walker River Restoration Program, there are concerns that changes to the existing uses of water on the Walker River system could have a negative impact on the AVMWC. At first glance, one would assume that being upstream from WRID would pose no threat to the AVMWC, but because of the uniqueness of the Walker River Decree this is not the case. The most senior water rights in the Decree are measured and delivered at the Wabuska gauge (Wabuska) which is downstream from WRID's current place of use. The first concern is that if the place of use is changed below Wabuska on potentially 50,000 acre feet of water, this would diminish return flows from lands above Wabuska creating a need to acquire the lost water from decreed users to meet the demand at Wabuska, thus altering the priority on the entire river system. The second concern is the timing of the release of the water from the reservoirs into the river system. Currently the releases are during the irrigation season when they have the ability to make the delivery of the decreed water more efficient (sharing of loss while in the system). If the timing of the releases were to be changed (outside the irrigation season) this could put more stress on the decreed users having to absorb more of the delivery loss in the river system, thus altering the priority on the entire river system. Therefore, the potential exists that the AVMWC would be negatively affected by the transfer.

At this time the AVMWC has no proof that these concerns would prove to be true. They are simply thoughts from our users that have insight, knowledge and a good understanding of the Walker River system and its affects on the AVMWC. A positive in WRID's proposal is that it is year to year and not permanent. This "try and see" approach seems the best way to develop a better understanding of how altering water use in the system would affect users such as the AVMWC. This would then allow the AVMWC to comment the next year with more data to back up our concerns if need be.


Dwain Chichester, President AVMWC