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April 16, 2013

STATE WATER RESOURCES  
CONTROL BOARD

2013 APR 19 AM 11:14

DIV OF WATER RIGHTS  
SACRAMENTO

To: State Water Resources Control Board

Division of Water Rights

Re: In Response to the Notice of Petitions for Temporary Transfer and Change Filed by Walker River Irrigation District Licenses 6000 and 9407 (Applications 2221 and 1389)

The original intent for Topaz and Bridgeport reservoirs was to supplement later decree rights and additional water rights for expanded acres under Walker River Irrigation District (WRID) were also included. These additional acres were given a 2.059 duty per acre and are called New Land Water Rights. Since the start of the use of the reservoirs, the storage and management of the reservoirs has and will continue to be the heart of the WRID operation.

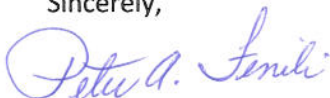
As an independent farmer with New Land Water Rights, I have concerns regarding Temporary Transfers and changes filed by WRID licenses 6000 and 9407 (applications 2221 and 1389).

First and foremost, the water that is stated in the second purpose of the notice of petitions, *previously stored or would have otherwise been held in storage at Topaz Reservoir and/or Bridgeport Reservoir*, could possibly lead to the reservoirs being drawn down to zero percent storage on an annual basis. This is a concern because the succeeding irrigation season will begin with a very low storage if the winter months do not produce normal storage levels.

Secondly, the longer diversion season that is currently being proposed is in conflict with the present policies being used. The conflict comes from lengths of diversion seasons being different. The current policy used states that the withdrawal period for storage water is from April 1<sup>st</sup> through October 31<sup>st</sup> of any given year. The proposal is asking that the withdrawal period be from October 1<sup>st</sup> of one year into July 15<sup>th</sup> of the following year. This is a concern because the longer diversion season will interfere with maximum use of storage capacity and operations.

Finally, I feel it is important to state that the proposed change in policy of operation will create hardships, especially for the New Land Water Right holders. A system drawn down to its bare minimum leads to members of the system to lose vital elements which in turn can lead to a loss in operations.

Sincerely,



Peter A. Fenili

Cc: Walker River Irrigation District, c/o Darren Cordova; Walker Irrigation District; Kenneth Spooner Fenili Family Trust; Peter A. and Veronica J. Fenili, P.O. Box 3, Smith NV, 89430 Ph: 775-465-2489