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SIX N RANCH, Inc.

General Farming
Smith, Nevada 89430

April 18, 2013

Charles R. Hoppin, Chairman
California Water Boards
State Water Resources Control Board
1001 I Street
P.O. Box 100
Sacramento, CA 95812-0100

STATE WATER RESOURCES
CONTROL BOARD
2013 APR 22 AM 11:02
DIV OF WATER RIGHTS
SACRAMENTO

Re: Notice of Petitions for temporary transfer and change filed by Walker River Irrigation District

Dear Mr Hoppin:

My name is Richard Nuti, and along with my brothers we operate a third generation family farm with hopes of one day passing it on to the next generation.

Our history in Smith Valley, NV dates back to 1936 when our grandfather purchased the original 320 acres with storage water rights allocated under License #6000 (Application 2221) from Topaz Reservoir on the West Walker River. As the years went by, our grandfather and father were able to purchase more land and eventually brought us into the operation.

Over the years we have grown garlic, onions, potatoes, wheat, barley, oats, alfalfa, grass, but more recently we have concentrated on growing alfalfa for export and grass for the feed store market.

We all know that water issues are a huge concern in the West. Please understand that some farmers and ranchers do not agree with sending water to Walker Lake.

Item #1: Adding to the existing place of use covered under License #6000, Topaz Reservoir and License #9407 Bridgeport Reservoir, we ask that you deny this request.

Historically, water transfers have never been allowed out of the Walker River Irrigation District boundaries. Walker Lake was never considered as part of the District. Although this may seem to be a noble idea to try to save a dying lake, it is a

terminal lake and will eventually die even with the addition of upstream user's water. Opening this door will begin the demise of a thriving agricultural community.

Item #2: Fish and wildlife preservation and enhancement. The 25,000 acre feet they refer to will not even cover the evaporation of the lake for one year, let alone the river losses in getting it there. The hundreds of millions of dollars being spent now would be better directed at cleaning the river channel below Wabuska all the way to Walker Lake, or by installing a pipeline. Then a series of ponds and sloughs on the sides of the river could be created in various places to enhance wildlife habitat. The water flowing into these areas could be controlled by a system of gates and canals with the runoff water flowing back into the river. With the river channel cleaned, they would get the maximum amount of water to the lake as is possible. As the river channel exists now, there is an estimated 40% loss just to get the water to Schurz

Your notice states "For release of up to 25,000 acre feet for in-stream dedication to Walker Lake involving water that was previously stored or would have otherwise been held in storage at Topaz Reservoir and/or Bridgeport Reservoir." This is where the biggest injury to storage water users will occur. There is talk of holding water back in the reservoirs for release in November. Our irrigation season ends on October 31st of every year. If we leave any water in the reservoirs, that water becomes part of the whole to use next year. It no longer belongs to an individual water user, but to all water users.

If NFWF were allowed to keep storage water in the reservoirs for release at any time other than during the irrigation season of April 1st to October 31st, they would be taking water that belongs to the other users.

There is a difference between in-stream dedication and irrigation. Irrigation water percolates into the ground, helping to recharge the underground basin. Water used for irrigation is turned off at harvest time which leaves water in the reservoirs for later use. On certain years, we may have water left in the reservoirs which becomes the pool of water with which we start the next season.

If water is used for in-stream dedication, we lose all the recharge of that water. We also lose the potential for some of that water to be left in the reservoirs for next year. Unlike farmers who have to turn off water to harvest their crops, in-stream dedication users will use 100% of their water every year. On certain years, because we storage water users are trying to be good stewards and conserve water, we have ended up losing the water we have left in the reservoir which goes back in to the general pool of ownership.

In the last sentence of your Notice of Petitions, it says "Temporary changes under Water Code Section 1725 may be effective for a period of up to one year." We all know that temporary changes, once put in place, are easily made permanent. Please do not open that door.

The Walker River Irrigation District has acknowledged in a letter dated November 23, 2010, that "The decisions the District makes today with respect to changes to stored water benefits to accommodate the Desert Terminal Lakes program will have broader implications over the long term."

We request that you not allow the Walker River Irrigation District to move water out of the District Boundaries and to not allow any additional Purpose of Use.

Respectfully submitted,



Richard B. Nuti
President
Six-N-Ranch, Inc

mrn

CC: Walker River Irrigation District, c/o Darren Cordova, MBK Engineers
Ken Spooner, W.R.I.D.