



Nevada Farm Bureau Federation

2165 Green Vista Dr., Suite 205, Sparks, NV 89431

1-800- 992-1106 | www.nvfb.org

November 24, 2020

Division of Water Resources
901 South Stewart Street, Suite 2002
Carson City, Nevada 89701-5250

Regarding – Designation With Limitations For East Walker Lake Valley (109)

State Water Engineer:

Nevada Farm Bureau is submitting these comments in regard to the proposed designation Order for East Walker Lake Valley (109).

Under the Order it is included the provision regarding the future treatment of irrigation water rights...

“WHEREAS, in accordance with NRS 534.120, the safeguarding of the limited groundwater supply within the East Walker Lake Valley Hydrographic Basin necessitates and demands that irrigation use be excluded from the preferred uses of the groundwater resource and that applications to change the manner of use of existing rights to irrigation will be denied.”

Nevada Farm Bureau disagrees with the need for this type of designation to be necessary...

1. The perennial yield for East Walker Lake Valley is set at 5,500 acre feet and the committed amount of water rights identified in the Order is 20,111.84 acre feet. Simply put any application for irrigation water rights should be denied on the basis that there isn't any available water.

2. Nevada Farm Bureau's newly adopted policy states – ***“Nevada Farm Bureau believes that agricultural water rights are a benefit for the environment, is a public benefit and fulfills a valuable public purpose. There is no justifiable purpose to designate a groundwater basin with restrictions or non-preferred status for agricultural irrigation.”***

While we take no exception for the designation Order for management purposes, **we do not believe that the designation with the limitations are warranted** for the points made above.

RECEIVED
2020 NOV 25 AM 11:37
STATE ENGINEER'S OFFICE

Page 2:

We further urge that whatever criteria might be used to advance the authority of excluding irrigation from preferred uses be transparent and the reasoning for the basis of the decision to be spelled out in whatever decisions are made.

Again, we maintain that following the law will preclude the need for excluding irrigation from preferred uses.

Sincerely,



Doug Busselman,
Executive Vice President

RECEIVED

2020 NOV 25 AM 11:37

STATE ENGINEERS OFFICE