

**“COVER LETTER FOR WENDY SUGIMURA, PLANNING RE: WALKER
BASIN CONSERVANCY WATER RIGHTS IN MONO COUNTY”**

10-17-2025

From: Bruce Woodworth, Secretary, Antelope Valley RPAC

To: Wendy Sugimura, Director, Planning, Mono County, CA

Per your request, Wendy.

During the A.V. meeting 09-04-2025, Peter Stanton, Executive Director of the Walker Basin Conservancy provided an update to the Conservancy’s progress in facilitating the re-watering of Walker Lake, Nevada. [See Minutes of the meeting, accompanying.]

It is more than fair to say the RPAC was supportive of the regional effort: [See Minutes, Information/Discussion Items: 2.]

CONSEQUENCES from the A.V. RPAC Minutes: “However, in Antelope Valley (Walker, Coleville, Topaz), because of potential consequences of: 1. likely economics-driven land use changes toward subdivisions due to water transfers, and 2. the loss of irrigation, thereby precipitating dry brush and grass fire dangers and 3. Protecting the groundwater levels in the cases where expanded pumping due to diversion of surface water to the Lake -- brought the Committee to request placing the subject of County support for mitigation measures as a future AV RPAC agenda item”.

The Committee discussed involving the **County Counsel Office’s guidance**, and you asked me to put some thoughts together on how the Counsel might constructively suggest planning techniques to mitigate the effects of the Conservancy’s activities [See paragraph immediately above.] on our Valley.

There are clearly legal parameters and jurisdictional limits involved.

Also accompanying this letter is an excerpt from the Antelope Valley Area Plan. I have highlighted in Objective 4.B, Actions, Policies & Goals that raise conflicts with the CONSEQUENCES sketched above. References below refer to the Area Plan.

Executive Director Stanton pointed out that private property owners may have the right to sell that which they own to whomever that may choose and the replenishing water to Walker Lake (on that, we all agreed) was a worthy enterprise.

But severing the water from the land unarguably ends agriculture on an affected parcel which goes against Policy 4.B.2 and perhaps activates requirements of an Environmental Impact Report. Action 4.B.3.a prescribes “suitable statistical benchmarks for refresh rates and other technical data for proper agency review.”

Surely there is a legitimate public interest in the preservation of agricultural and natural resource lands. [Policy 4.B.2]

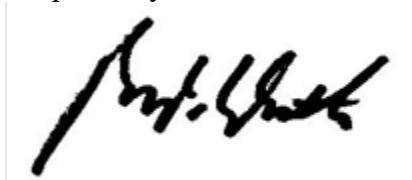
In the Antelope Valley, this transfer of water rights pertains to surface water. But it is settled science that that which affects surface water, also affects ground water¹ which in turn affects vegetation and naturally may lead to wildfires.

Ignoring the predictable consequences does not absolve government agencies for failure to plan for the expectable failure or to creatively design for it.

Agriculture does not survive without water. Land without other purpose will benefit not its owners and as with other real estate, would-be owners should minimally be advised by law of such risks, just as they are about risks of earthquake and flood. Such an action could tip the scale against too widespread sale of water rights in Antelope Valley.

Looking forward to the Counsel's perspective and to your reflections as to Planning.

Respectfully,

A handwritten signature in black ink, appearing to read "Bruce Woodworth", is written over a thin horizontal line.

Bruce Woodworth, Secretary

¹ Groundwater has historically been only lightly regulated, but that may be changing.