From: David Hampton [mailto:dhampton@bvh2o.com]
Sent: Wednesday, January 19, 2011 3:46 PM
To: Water Use Efficiency
Cc: Rodriguez, Larry
Subject: Comments for A2 and ASC

Gentlemen,

The comments below are regarding the most recent A2 meeting and general ASC meetings:

Data Sources-
In regard to your request for different references on water measurement devices, methods and accuracy, I would like to reiterate the importance of taking into consideration the conditions for which the information was derived. There were good examples brought up at the last meeting such as laboratory values versus field values, open channel versus pipeline and flow accuracy versus volume accuracy along with other conditions that impact accuracy like water quality or entrance conditions. Other aspects to consider are common devices, degree of maintenance/installation and the cost of the devices. I understanding that there's an effort to not list specific measuring devices but there is certainly a group of devices that make up the majority of what is currently being used throughout California and this should be included as part of the evaluation.

Also, as we struggle with determining how lab performance or a manufacturer's specification may translate to field performance, any information that you gather regarding field data should also be examined with similar scrutiny. Accuracy data obtained from Ag districts is valuable information as long as it is evaluated considering the operations and facilities of the corresponding district. If a district has a pipeline system that uses all new magnetic meters with an average field measured accuracy of 3% that shouldn't apply to all districts nor just pipeline districts. Conversely, if an open channel district reports 20% then that shouldn't apply to others just because they're open channel systems also.

Delivered Via Groundwater-
Unfortunately we were not able to discuss this issue at the last meeting but here are my thoughts on the subject. Although not every section of SBX7-7 implies that it is dealing with surface water, there are no sections that indicate it applies to groundwater. There are no provisions that authorize water suppliers to collect private records, to access private property or specify equipment on private wells and therefore I would suggest that DWR has no authority to request data from private wells to be included in reports. Even under circumstances where private well owners agree to allow access to their property there remains the issue of volume of water delivered at the "delivery point." In the draft regulation document the Delivery Point is defined as " …the location at which the agricultural water supplier transfers physical control of irrigation water to a customer or group of customers…" My guess is that most members generally agree with this definition but it raises the questions as to what location is the actual delivery point and who is in control of the water when it's been added to the aquifer. I believe when considering the private recovery wells this is a clear cut issue and only becomes a subject for debate where the recovery wells are owned by the water suppliers. Even then I find it difficult to convince myself that groundwater recharge or "conveyance" was intended as part of SBX7-7. Additionally, incorporating groundwater "deliveries" adds on a significant layer of data and groundwater recharge activities that can potentially span several different projects, districts, regions and not to mention overlapping years which leads to even more potential problems when determining system efficiencies and reporting. The aquifer should be considered a storage facility rather than a conveyance facility and therefore the efficiencies and wasted water that SBX7-7 is geared towards doesn't apply here.

If you have questions please feel free to contact me.

Thank you,
David Hampton
Buena Vista Water Storage District
Ph. 661-324-1101
Fx. 661-764-5053