

Huff, Gwen

From: Spreck Rosekrans [srosekrans@edf.org]
Sent: Thursday, October 28, 2010 10:41 AM
To: Agriculture Water Use Efficiency
Subject: EDF comments re 1404 and other ASC issues etc.

DWR Team

I appreciate being asked to participate in the Agricultural Stakeholder Committee. If you add my name to the list on the Internet you might also want to correct Walt Ward's name as it is misspelled. See http://www.water.ca.gov/wateruseefficiency/sb7/committees/asc_members.cfm

I wrote in my notes that today is the final deadline for comments on the A2 "charge" and implementation of 1404. I suggest that DWR provide confirmation of these deadlines in writing, perhaps both via email and posted on the website (after all, it is a public law and other interested parties ought to be able to opine even if they are not official members of the committee). I have not seen either. In addition the website could be better organized to make clear which are older versions of documents that are no longer relevant and to make sure that all relevant documents are posted.

As far as implementation of Section 1404, DWR should pursue the intent of the legislature to collect as much information as possible and encourage agricultural users and districts to provide useful information. Clearly combining the intent of 1404 and sbx7, the legislature believes that volume should be a factor in pricing and it cannot occur unless good data is provided.

At the October 21st meeting, I was surprised to hear that some data could only be requested since it was not explicitly authorized by the legislation. It is not clear to me that DWR's authority is so limited. DWR broader mandates, as well as the specific ones provided in 1404 and sbx7 should allow it to require that water users provide a reasonable amount of accurate information even if it is not explicitly requested by law.

Finally, it is essential that all data be collected electronically so that it can then be aggregated in useful form for all parties. This has not occurred to my knowledge with the UWMPs, making that data much less useful than it otherwise would be. Data collected through the implementation of these laws should of course be integrated with other DWR public databases.

I look forward to our meetings two weeks hence.

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