



November 7, 2012

Mr. Fethi Benjemaa  
Department of Water Resources, Water Use Efficiency Branch

Re: Quantifying Agricultural Water Use Efficiency (Section 10608.64 of SBx7-7)

Dear Mr. Benjemaa:

This letter provides comments on the November 1, 2011 draft “Quantifying the Efficiency of Agricultural Water Use”.

1. The report should make more clear that much could be gained by evaluating the efficiency of a representative sample of different crops in various areas of the state. As the draft explains, such a phased approach might ultimately be adopted comprehensively or might provide enough information that subsequent quantification would be unnecessary. The report should emphasize the valuable information that implementing the proposed methodology could provide – but the current draft instead emphasizes how difficult it would be to collect comprehensive information. It might be far easier and less costly to assess representative but not comprehensive information, at least initially.
2. The legislation does not appear to require that DWR would implement the methodology. The legislature could allow DWR to hire one or more consultants to implement quantification. The report should make this clear.
3. As indicated by letter on September 12, 2011, there are three approaches to efficiency that should be pursued – (1) water management, (2) productivity and (3) economic. The draft incorporates all three approaches but provides much greater emphasis, with implied greater value, on the water management approach. The report should treat all three approaches equally and incorporate methodologies to address each at the field, water supplier and regional scale. It would be an error for the report to imply that productivity or economic return are less important than what portion of the water is used by the plant.
4. The water management section does not appear to allow for any calculation of water that is simply lost to evaporation (as opposed to transpiration) and might be saved. This should be included.
5. The outreach has been heavily skewed toward ag district personnel and farmers. DWR should reach out more to environmental and urban water stakeholders.

Thank you for your consideration of these views.

A handwritten signature in blue ink that reads 'Spreck Rosekrans'. The signature is fluid and cursive, with the first name 'Spreck' being more prominent than the last name 'Rosekrans'.

Spreck Rosekrans  
Senior Analyst