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Dear Kent:

Pursuant to the recently circulated survey on Efficient Water Management Practices (EWMP's), we recommend that the existing set of EWMP's be kept as written in the statutory language, with no modification. Given the lack of reported data on which to base changes, appropriate local implementation of these EWMPs as established and developed is the most prudent course. Section 10608.48(d) requires that;

Agricultural water suppliers shall include in the agricultural water management plans required pursuant to Part 2.8 (commencing with Section 10800) a report on which efficient water management practices have been implemented and are planned to be implemented, an estimate of the water use efficiency improvements that have occurred since the last report, and an estimate of the water use efficiency improvements estimated to occur five and 10 years in the future. If an agricultural water supplier determines that an efficient water management practice is not locally cost effective or technically feasible, the supplier shall submit information documenting that determination.

Agricultural water suppliers have been asked to evaluate the local appropriateness of the EWMP as adopted and to provide estimates on implementation benefit for ten years from the plan submitted. Allowing suppliers to sufficiently consider and implement appropriate EWMPs will require more time than has elapsed since adoption of implementation guidance. Additionally, suppliers who will need to reconsider the appropriateness of these EWMPs for implementation during the next cycle will require additional time.

Any data on local viability collected through this survey process is premature and will not carry the same value as that done through a meaningful planning process.

Recommendations from other university irrigation researchers, irrigation experts and NGOs should reflect a need for meaningful data and effective local planning processes.

Sincerely,

Mike Wade
Executive Director