



December 12, 2011

Manucher Alemi, Ph. D., P.E.
Chief, Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
Department of Water Resources
901 P Street
Sacramento, CA 95814

Submitted Via Email: jemaa@water.ca.gov

Re: SBX7-7 – “Draft Report – Methodology for Quantifying the Efficiency of Agricultural Water Use”

Dear Mr. Alemi:

Oakdale Irrigation District (OID) appreciates the opportunity to comment on the November 15, 2011 DRAFT of the above noted document. As a member of the Agricultural Stakeholder Committee (ASC) OID thinks that the Department of Water Resources (DWR) is uniquely positioned to provide the legislature with a clear, concise, subjective and feasible report on Agricultural Water Use Efficiency. It is our opinion that such a report will empower the legislature to make educated decisions with respect to subsequent legislation regarding Agricultural Water Use Efficiency in California.

With that in mind, OID offers the following items for your consideration.

- **Spatial Scales and Implementation Plan** – Given the amount of data currently available at the regional scale, we suggest that implementation should begin with the regional scale (and end at the field scale). Existing data could be quickly analyzed in a cost effective manner. Data analysis at the regional scale would certainly provide for refinement of what data we have, allow for identification of what data we need and provide DWR with an indication of where future resources should be allocated to meet defined (and realistic) implementation milestones. As a next step, we

suggest that resources be focused on those areas in the State where no regional data exists. Focusing on existing data sets will only serve to further the data gap and provide for increasing disparity between regions and subsequently the State as a whole.

- Productivity – The Legislature did not request from DWR a report on productivity indicators. A discussion concerning crop productivity or gross crop revenue with respect to crop water use such as that shown in Section 4 of the November 15, 2011 DRAFT should not be used as a means to quantify the efficiency of agricultural water use. This section should be excluded from the final report to the Legislature in an effort to avoid inevitable misuse.

As written, the November 15, 2011 DRAFT is difficult to understand, includes methodology not requested by the Legislature and ultimately provides the framework for an arduous discussion with the legislature resulting in likely another ambiguous directive to enact regulation. Again, OID appreciates the opportunity to comment and we strongly encourage DWR to take the time necessary to prepare and ultimately deliver a final report that is concise, feasible and compliant with the legislative directive. Should you have any additional questions, please feel free to contact us.

Sincerely,

OAKDALE IRRIGATION DISTRICT



John B. Davids, P.E.
District Engineer

cc: Administration Files
Board of Directors (5)
Eric C. Thorburn, P.E., Water Operations Manager