



PALO VERDE IRRIGATION DISTRICT

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TELEPHONE (760) 922-3144

April 6, 2011

Mr. Baryohay Davidoff
Dept. of Water Resources
P. O. Box 942836
Sacramento, CA 94236-0001

Re: March 18, 2011 Draft Agricultural Water Measurement Title 23, Div 2,
Chapter 5.1, Article 2 Section 597 to 597.6

Dear Mr. Davidoff:

Palo Verde Irrigation District (PVID) has additional comments regarding your proposals for Agricultural Water Measurement since my March 10, 2011 letter to you:

1. In Section 597.1(f) : Who were the intended parties being referred to by Section 10608.8(d) in reference to the Quantification Settlement Agreement? Is it just the QSA signatories? Or is it any agricultural water agency 'concerned' in/by the QSA? In the cost analysis report of March 29, 2011 at 4 locations the phrase "exempt as QSA signatories" was used. Specifically, which agencies were considered to be exempt? Would it be possible to exempt all agricultural agencies diverting water from the Colorado River under their water right as long as the QSA is in effect since what's not used by them is made available to and distributed by the QSA parties?
2. Senate Bill X7 and these Water Measurement Proposals are handling 'diverted water' the same as 'consumptively used' water. There should be a distinction between the two types. Where in Senate Bill X7 or in these proposals for implementation do agencies that return a portion of their diverted water back to the original source get a credit applied to the diverted amount? Water users downstream of these types of agencies are able to use this returned water as if it had never been diverted by the upstream user.

This returned water is being recycled without having to be expensively treated. For these types of agencies, using the equation 'diversion less return water volume' divided by 'consumptively used water volume' would provide a 100% efficiency value. These types of agencies should be exempt from these proposed procedures and requirements if no real water gets created by these proposed procedures/requirements.

3. In your Cost Analysis ...Statement dated March 29, 2011, on page 8, Table 1, who are the 3 agencies in 'Southern California, Coast & Other' category serving over 25,000 acres? A Table indicating which agencies were being evaluated for Table 1 in the section with acreage served over 25,000 acres would clarify discussion and be informative.

4. In these tough economic times, there was no consideration for how hard it is for an agency to pass costs thru to their customers.

Thank you for the opportunity to comment on this proposal. If you have any questions, please call me at 760-922-3144.

Sincerely,

Roger Henning
Roger Henning
Chief Engineer