

American Pistachio Growers
California Citrus Mutual
California Cotton Growers Association
California Cotton Ginners Association
California Grain and Feed
California Grape and Tree Fruit League
California Pear Growers Association
California Rice Commission
California Seed Association
California Tomato Growers Association
Pacific Egg and Poultry Association
Nisei Farmers League
Western Agricultural Processors Association
Western Growers Association

November 30, 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: Draft Report to the Legislature on the Methodology for Quantifying the Efficiency of Agricultural Water Use and Its Implementation Plan

Dear Dr. Alemi:

On behalf of the above organizations, thank you for the opportunity to provide public comment on the above mentioned Draft report to the Legislature. However, we understand that the comments are due on November 30th by 5:00 p.m., which is the same day you have scheduled a public workshop in Sacramento from 1-4 p.m. Therefore, we have asked that you extend the comment period in order for our Associations to fully review the Draft and provide comprehensive comments.

In the absence of a timely extension, we would like to address some primary concerns:

- **Productivity and Value** – We are greatly concerned that this section of the draft will be misunderstood and/or misused. Since the Legislature did not request a report on Productivity Methodology and the Value of Applied Water, we request

that it be eliminated or at the very least placed as an appendix to the report. If value is going to be quantified, we want to know how the entire value of a crop and all associated co-benefits will be captured, not strictly the commodity value.

- Implementation Plan – Implementation should start at the regional level. We would appreciate each Scale mentioned be placed in reverse order, putting Hydrologic Region Scale first, Water Supplier Scale second and Field Scale third. Additionally, because the Draft has many assumptions, we have concerns with the “complete by...” dates in each section as they create unrealistic deadlines.
- Costs – Although a cost spreadsheet is included in the report, we have significant concerns with the accuracy of these calculations. We believe they grossly under represent the true costs associated with this work.
- Appropriate Input – Academics were to be part of this process, and to date it is unclear whether they have had adequate input, or opportunity for input. Furthermore, the notice and comment periods are unacceptable. The focus should be on a quality report that allows stakeholders adequate time to provide their expert feedback. It is clear by the lack of input opportunity that this focus has been blurred.
- Recommendation – The Report should include a specific recommendation to the Legislature, and that recommendation should be included in the Summary and first few pages of the report. Laying out all of the variables without providing clear recommendations will only lead to confusion and misinterpretation. A complex report that reaches no conclusion and leaves it up to 120 people to decide how best to interpret the information will result in bad public policy.

The difficulty and complexity in quantifying the efficiency of agricultural water use in a report to the Legislature creates uncertainty in the minds of growers as to how it will be used. The Center for irrigation Technology just released a 2011 update to Agricultural Water Use in California. This report should be used in developing your report to the Legislature.

While we appreciate the Departments commitment to producing a quality product, we believe the timeline given in the legislation was far too short to adequately accomplish the task with meaningful stakeholder input. Holding public workshops the week of Thanksgiving was disingenuous and we again ask that the comment period be extended so that we can provide a more thorough comment letter that can better inform the Department, and the report.