

Comments – Water Conservation and Efficiency Criteria 2005

On August 3, 4, and 9, 2005, Reclamation held public workshops to solicit comments on the draft Water Conservation and Efficiency Criteria (Criteria) used in the development of Water Management Plans (Plans). On August 24, 2005, the Criteria was noticed in the *Federal Register*. As in the *Federal Register*, the comment period closed September 30, 2005. Reclamation received comments as a result of the workshops and the *Federal Register* notice. Below are those comments followed by Reclamation's response. It is Reclamation's intent to accurately capture all the public's concerns in regards to the Criteria.

1. Comment:

All plans submitted under the 2005 Standard Criteria should be in a form that is readily posted on the Bureau's web site.

Response:

Comment incorporated and changes to the Criteria have been made as follows:

The 2005 Criteria have been modified to state, “Contractors are strongly encouraged to submit Plans in an electronic format to the local Area Office for review. However, hard copy of Plans are acceptable” (page 2 of Criteria).

“Following notification by Reclamation that the Plan has conditionally met the requirements of the Criteria, Contractors may submit three hard copies of the complete Plan, or contractors may (strongly encouraged) submit one electronic copy only. A resolution by the Contractor's Board of Directors formally adopting the Plan must also be submitted” (page 21 of Criteria).

2. Comment:

Water use information from the measurement of deliveries should be the basis, in whole or in large part, for raising needed revenue by water districts from their customers.

Response:

The following table has been added in the format section of the Guidebook to help clarify the information the contractors need to submit:

Annual charges collected from customers

(use most recent year data is available, see guide book for example)

YEAR _____

	Charges in dollars per unit	Charge units (\$/acre-feet) (\$/ acre) (\$/hcf) (\$/customer) etc.	Units billed during year (acre-feet, acres, hcf, customers) etc.	Multiply charges times units billed
Fixed Charges				
Volumetric charges				

3. Comment:

The descriptive information presented by agricultural districts should use measured water delivery data to highlight lands with the highest water duty.

Response:

The Criteria already include BMPs which encourage the development and use of water use data. BMP 3.A.3 (Provide or support the availability of Water Management services to water users) requires districts to provide irrigation system evaluations or crop and field data to its customers. Each of these measures provides the customer and the district with information that can be used to determine which fields are least efficient. BMP 3.B.1 (Facilitate alternative land use) and BMP 3.B.2 (Facilitate the financing of capital improvements for on-farm irrigation systems) are tools the district can use to increase efficiency on those fields which have been identified to have low efficiencies. In addition, BMP 3.B.4 (Incentive pricing) already requires districts to analyze incentive pricing programs which have been structured to provide a pricing disincentive for high water using crops and lands. In addition, information included in the background data required by the criteria provides the districts and Reclamation with information such as the types of irrigation systems being used in the district and the length of unlined canals. Districts and Reclamation use this data to

identify trends in water management improvements by comparing each of a districts 5 year plans.

4. Comment:

The Standard Criteria should encourage more granular displays of data to help identify other productive areas for efficiency improvements.

Response:

The purpose of the Criteria is for Contractors to develop and implement an effective Water Management Plan (Plan). Many districts going through the revisions of their initial Plans have demonstrated a continued advancement of their water use efficiency efforts. Since 1993 the Criteria has been revised 4 times. Each revision of the Criteria has challenged Contractors to increase their water management planning strategies. For example, in the 1999 Criteria the water balance was introduced. In 2002, Calfed's Targeted Benefits (TBs)/ Quantifiable Objectives (QOs) were added as an appendix.

5. Comment:

The 2005 Standard Criteria should prepare districts to make greater use of digitized data and graphic information.

Response:

Reclamation does not believe that GIS systems should be required by these Criteria. Many district preparing plans are small and do not have the staff and /or resources to accomplish GIS “coverage.” In addition, Reclamation is not aware of any other water conservation process in the state that requires GIS coverage. Reclamation is aware that several districts have already implemented GIS systems and encourages GIS system development through its Water Conservation Field Services financial assistance program and from Reclamation funded technical assistance provided by Irrigation Training and Research Center and California State Polytechnic University and San Luis Obispo.

6. Comment:

The 2005 Standard Criteria should encourage urban districts to upgrade their approach to water accountability and water loss reduction using the International Water Association's (IWA) standardized method.

Response:

Reclamation will review the IWA's standardized method when completed to determine its applicability. In addition, Reclamation is including performance measures in its financial assistance agreements in order to determine which cost effective practices can be implemented to reduce water losses.

7. Comment:

All of these improvements should apply to any regional criteria issued by the Bureau as well.

Response:

The current Regional Criteria is a pilot program and its effectiveness has not yet been determined. The Criteria were changed as follows to address this comment:

Section 7: Regional Criteria

Regional Criteria were finalized in 2004 for the Sacramento Valley River Contractors (SVRC) as a pilot project. Reclamation will be reviewing the SVRC Plan implementation to determine if these Criteria are as effective as the Standard Criteria. Criteria for other regions will not be developed until after this review process. If the Criteria are found to be as effective, and therefore extended, lessons learned from this process and the implementation of the Standard Criteria will be considered for the SVRC Regional Criteria Revision in 2009 and any future Criteria established for other regions. (page 21 of the Criteria).

8. Comment:

The QOs and the targeted benefits need to be better explained in the Criteria:

Response:

QOs were established in CALFED's ROD as a foundation for agricultural water user efficiency efforts. Since 2001, almost 200 TBs have been identified. Of those, approximately 25% of the QOs have been formalized. In 2004 Reclamation developed Regional Criteria for the Sacramento Valley as an alternative "experimental" pilot program to the current Standard Criteria. Once the Regional pilot program is complete, we will have a better understanding of the TBs/QOs approach. In addition, as more information becomes available on the TBs/QOs, Reclamation will re-evaluate the possibility of making them a BMP as part of the next Criteria review process. Although the QOs are not identified in the Criteria, the Water Management Planner does include a listing of all the QOs by agency (copy of the 2002 Water Management Planner enclosed).