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November 5, 1996

Mr. Lester Snow
Executive Director
CalFed Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

Dear Lester:

Agricultural and environmental interests, working together over the past six years, have developed the AB 3616 Memorandum of Understanding regarding Efficient Water Management Practices for Agricultural Water Suppliers (MOU) as a means to demonstrate and improve efficient water management by agricultural water suppliers. I am writing to notify you, on behalf of agricultural water suppliers throughout the Central Valley, that agricultural representatives recommend CalFed adopt the MOU for the agricultural element of the water use efficiency common program. We recommend its use by CalFed for the following reasons:

First, the MOU establishes a voluntary, ongoing, and uniform planning process which recognizes the diverse nature of agricultural water supply systems. Second, the MOU establishes a process which documents existing efficiency and identifies any potential for improved water management without resource-intensive regulatory procedures. Third, the MOU utilizes a comprehensive cost benefit analysis to determine the appropriate level and extent of implementation from a menu of seventeen carefully crafted water management practices. Fourth, the MOU does not impose on water users unnecessary or infeasible practices which do not lead to increased efficiency. Fifth, the MOU has sufficient flexibility to recognize and encourage the management of water for multiple beneficial uses. Sixth, the MOU recognizes the planning effort already undertaken by many federal CVP contractors.

Further, we believe the MOU will address the concern expressed by the public that current supplies be used as efficiently as practical in order to justify public spending on a comprehensive Bay-Delta solution. We feel strongly that the MOU's planning, analysis and reporting provisions will address this specific concern adequately by documenting agriculture's existing high level of efficiency and encouraging appropriate improvements in efficient water management.

We believe the MOU is a well crafted compromise among a variety of interests with differing opinions. Already, a large number of agricultural water suppliers have taken the MOU under consideration and several districts, representing nearly two million acres of irrigated farm land, have indicated their intent to sign the MOU. We are confident that many ag water suppliers will sign the MOU in its current form.

From Our Field To Your Table... Water Makes It Happen

We strongly recommend that the MOU be adopted without change by CalFed. No water conservation or efficiency requirements, other than those contained in the MOU, should be imposed without substantial evidence that such additional measures will have a clear and direct relationship to the Bay-Delta solution. Agricultural water suppliers already have relinquished over one million acre-feet of annual water supply in critical years to meet Bay-Delta ecosystem needs. Central Valley farmers facing inadequate supplies already have a major incentive to achieve high levels of efficiency and conservation.

In the interest of including as many agricultural water suppliers as possible without subjecting them to duplicative processes, we urge CalFed to recognize plans developed and approved by the Bureau of Reclamation under the CVP Improvement Act as meeting equivalent requirements to those required of the MOU signatory agencies. The CVPIA required plans are at least as rigorous in their development as those prepared under the MOU. Requiring a CVP mandated plan and a MOU plan would be duplicative, onerous and will not further water use efficiency. This situation needs to be rectified, however, CalFed should accept either planning process as meeting the agricultural element of the water use efficiency common program until a resolution is in place.

We believe that the MOU is an appropriate mechanism for CalFed to address the issues of efficient agricultural water management. We will present the issue to the BDAC Water Use Efficiency Workgroup and urge CalFed to adopt our recommendation.

Sincerely,



Brad Shinn
Executive Director, California Farm Water Coalition