

## OFFICE MEMO

To: Dennis Letl	DATE: May 14, 1998
FROM: Ed Craddock	SUBJECT: CALFED Water Use Efficiency Appendix Comments

Page 1-2, first full paragraph: suggest adding a sentence to the end of the paragraph, *The Water Code also provides for the Department of Water Resources to offer assistance to water suppliers to implement efficient water management practices (Water Code Section 1094).*

Page 2-7, end of first paragraph: consider adding the following sentence, *Another mechanism for assuring a higher standard of water management could be the documentation of water use efficiency from a Mobile Irrigation Lab or similar irrigation system evaluation program.* (Where these programs exist, some of the highest irrigation efficiencies in California are attained)

Page 2-13, last paragraph: suggest replacing the current language with, *If an acceptable majority of agricultural water suppliers have not begun implementation of the generally applicable EWMPs within the two-year period described in the MOU, including the development of their agricultural water management plans by January 1, 1999, then legislative and regulatory mechanisms will be triggered. An acceptable majority includes irrigation districts that have approved USBR plans under the CVPIA, and other irrigation districts that serve surface water to at least the remaining two-thirds of the total acreage served by districts in the CALFED solution area, including the Imperial Valley. A deadline of January 1, 1999 is appropriate because it accommodates the two year requirements embodied in the agricultural MOU for implementing Exhibit A, List A generally applicable EWMPs (including plan development).*

Page B-1 through B-8, general comment: While CALFED staff has made an effort to answer some questions related to agronomic land fallowing, there has not been enough technical discussion to accept or reject such a concept. We suggest deleting the last paragraph at the end of Page B-8 and replacing it with, *An agronomic-based rotational fallowing program could meet the long-term productivity of San Joaquin Valley agriculture by maintaining soil productivity and improving water use efficiency. Such a program, if well designed technically with the support of the agricultural community, could help meet the solution principles CALFED has espoused. In order to evaluate the program technically and gain support, a fallowing program should be evaluated under the auspices of the California Department of Food and Agriculture and its Board of Food and Agriculture. Through these two entities, the University of California and other state and federal agencies, conclusions could be reached about the viability of this approach within two years.*