

Date: April 20, 2000
To: State Water Resources Control Board
Subject: Comments on a Guide to Water Transfers

At the request of the Imperials Irrigation District, the Bureau of Reclamation held its Part 417 meeting in El Centro in open session. At the meeting, Robert Johnson, regional director of Reclamation, contended that, based on the Jensen Report, IID was not using at least 200,000 acre-feet of water efficiently.

Mr. Jensen was there and explained the water balance approach which he used and how he arrived at his determination.

I am a protestant that "SWRC8 not approve the IID petition to transfer water until this encumbrance is removed."

Section 6-4 & 5 of the guide concerns consumptive use, based on the water balance approach.

Enclosed is the Imperial baseline method which uses the water balance approach and is deemed to be an applied consumptive use statement. It was submitted to IID for its consideration. Importantly, this baseline method is deemed to achieve well within resolution to the matter of the "IID using its water efficiently".

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Imperial Baseline Method

Definitions:

1. **Baseline:** That level wherein it is demonstrated that the water is being put to reasonable and beneficial use (aka being used efficiently), the break between regular water conservation and extraordinary water conservation; the level at which wet water begins.
2. **Wet water:** The water which is conserved through extraordinary water conservation, water which is generated which is above the baseline and subject to transfer.
3. **Allocating water to the gate:** Transforms water held in trust by the District to water effectively owned by the landowner } erroneously perceived a logical extension of the IID quantifying its entitlement.
4. **Quantification:** The user entity agreeing to cap the amount of water it orders and uses based on the entitlement plus and minus adjustments; entitlement water does not convey ownership (e.g. unused entitlement water sell remain in the River for the benefit of the Junior stakeholders); quantification neither implies nor warrants that the water is being put to reasonable and beneficial use (e.g. Reclamation's contention that IID) is not using at least 200,000 acre-feet of water efficiently is memorialized within the Key Terms as a 20-year moratorium period).

Baseline method

It is deemed prudent to understand the water balance method used by Reclamation to determine the efficient/non-efficient use of water. This basic method is assumed to be:

- (1) Water delivered to the gate
 - (a) ET water
 - (b) Non-ET water
 - Leach water/excess leach water
 - Tailwater

For whatever, the standard for leach water in Imperial Valley is lower than the standard for Coachella.

The ET water is crop/weather oriented. And it is estimated. The tailwater as well as the water delivered can be measured.

The standard for leach water is predicated

Therefore, excess leach water can be calculated based on subtracting the E.T and other non-ET water from the water delivered.

The Imperial Baseline method uses two approaches:

- (1) Tailwater using a 15% standard
- (2) Average use of water by crop

The "average use" approach addresses excess leach water on sandy ground.

It is assumed with Jensen's simplified water balance reporting, sandy ground using twice as much water to grow the crop will have a very high "tailwater/Excess leach water" component. Typically most of this should be assigned to excess leach water.

A tiered tailwater schedule wherein the 15% standard becomes the benchmark provides an incentive side for tailwater for those who are not participant as well as for those who are (i.e. it is part of the regular water conservation plan). A moderate tiered delivery schedule might use the "average use to 20% above the average use" as benchmark band.

Incentive tiering would apply for use which is below the average. And escalated tiering would apply for use above this benchmark band.

It is proposed that the slope of the escalated tiering should be as reasonable as possible and still achieve the desired goals, i.e.

- (I) For the on-farm use to operate at the baseline level
- (II) (2) For there to be incentives for all the landowners/growers whether they are participants or not.

A companion objective is that this basic approach shall be effectively integrated with the on-farm grower participation approach.

It is assumed that the baseline establishes a level for describing wet water. And that any effective baseline will not preclude nor predicate the types of grower participation plans which may be pursued.