

From: Carolyn Brittin
To: Roberts, Bill
Date: 9/8/2006 9:02:16 AM
Subject: Fwd: Comments on Region M per State Water Plan

Please include these in public comments on state water plan

>>> "Ray Prewett" <ray@valleyag.org> 6/21/2006 8:50:15 AM >>>
Hello Carolyn,

As a member of the Region M Water Planning I would like to offer a few comments about what ends up being in the state plan relative to Region M. I am assuming that you might use the Executive Summary (ES) as the basis for what ends up in the state plan for our region and I want to call your attention to some things about our ES that I do not think are representative of our regions needs and priorities. Our ES was completed with limited opportunity for review by all the members of our planning group. This limited opportunity for review is not a criticism of anyone but is the result of the tight schedule as we came near the deadline for the consultant to submit our plan to TWDB.

Most of the ES is devoted to charts and very little narrative is included. I hope when the final state plan is written and our region's plan is incorporated that more space for narrative will be provided on the water management strategy of improving water distribution infrastructure to reduce leakage and evaporation. Repairing and improving this infrastructure and on farm water conservation are the most cost effective strategies in our plan as documented in the table showing the cost of the different strategies. The ES narrative mentions the municipal strategy of buying water rights but the limited narrative does not mention anything about improving the infrastructure to conserve water for agriculture and the cities. I encourage the TWDB to consider a more balanced treatment of all sectors in the final state water plan. Agriculture's water use in the region is decreasing but it is by far the biggest water user in the region. Our best opportunity to reduce our projected water shortage is through "conservation" and since agriculture uses the most water this is the area where the most water conservation can be achieved. I think sometimes that because agriculture is the residual user that we think we can act like an irrigation water shortage is not a "real shortage", if you understand what I am saying.

I also have a comment on how infrastructure costs are presented in Region M's plan and I suspect this comment may apply to other regional plans as well. The costs for water management strategies in Region M's plan are total costs. I think showing total costs is misleading at least for some elements of the plan. For example, Region M's plan has a cost figure for on-farm water conservation. Again, as far as I know this is a total cost figure. Using total costs for some sectors like the municipal sector may make sense because all the costs are looked at as being assumed by some

level of government. Not so for on-farm agricultural activities. On-farm water conservation projects are performed on private property and farmers pay for most of these costs. The primary government cost share program for on-farm activities is the EQIP program and a relatively small number of farmers participate in this program except in the High Plains. The cost share rate for EQIP is generally 50%. Therefore, to treat on-farm costs as if some level of government is going to pay for 100% is very misleading as I see it. What is the solution to how on-farm costs are shown? I understand that all the regions are going to be encouraged to do an infrastructure cost report like was done after the first round of planning but that we will be encouraged to do it sooner after the regional plans are finished this time. I do not know how to address the issue but I would encourage you and other to figure out a way that is a more appropriate comparison between agricultural costs for on-farm compared to the cost of saving water for municipalities.

My last comment has to do with a suggestion for how the next round of regional planning is done. Most irrigation districts are bigger water users than most of the Water User Groups (WUGS) but the TWDB guidelines do not treat individual irrigation districts as individual WUGS. I do not pretend to speak for the management of irrigation districts but to me we need to have a separate water management strategy for each individual district and to do that under the format for water planning would require that each district be a separate WUG.

Ray Prewett