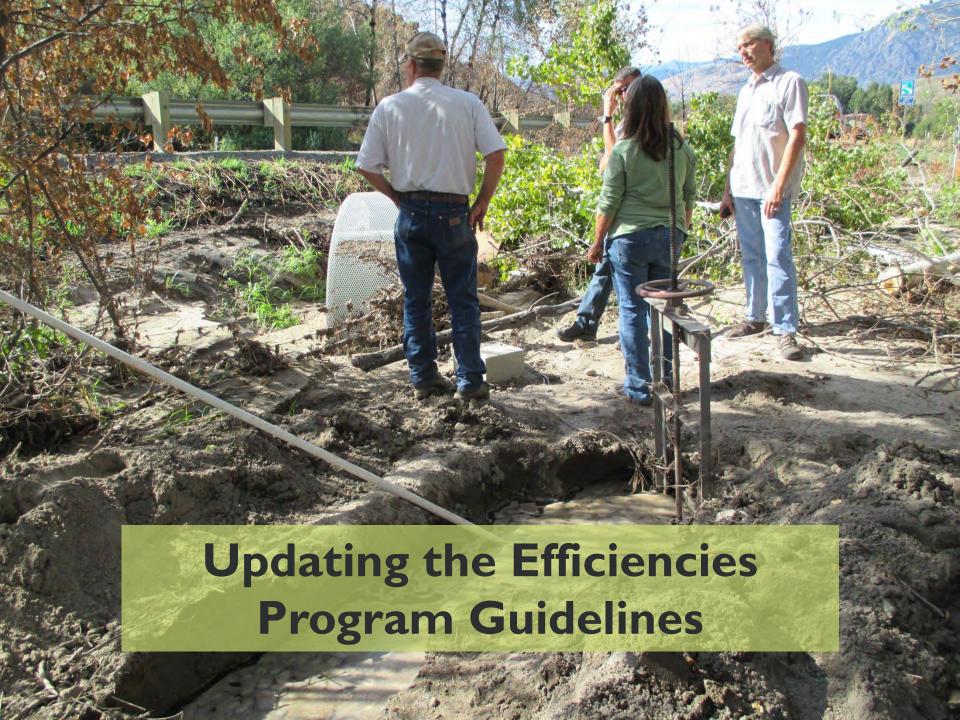


Washington State



Jon Culp

Water Resource Programs Manager Commission Action Request September 21st, 2023







		J T TOOL G. O.
Topic Area	Comment	Action/Edit
General	Would like to stress the need for cost considerations, or rural rate increases, for the communities like ours where the supplies are limited and the companies that perform these services hold a veritable monopoly in the valleys where they are located. If a Cooperator would like to use a different company, they have to pay the travel and lodging of crews on top of the exorbitant cost of transportation of materials.	The old guidelines had an on-farm contract cap of \$400,000. It has been such for nearly a decade and may need to be further adjusted upward due to inflation in the cost of pvc (oil) and steel.
	The CD reached out to NRCS for a comment on a \$100,000 cap per landowner and a picture as to the current cost of projects that were supported by NRCS programs. The comment from our local partners and the data they provided support our stance that this cap would be limiting to projects that would be large enough to make an impact on instream flow. The head of the local NRCS stated that "At least in Okanogan County most of our applications are smaller in size but	The \$100,000 was based on general SCC guidance, however, comments and data indicate that this is insufficient to implement larger projects or projects further away from vendors.
	County most of our applications are smaller in size but this kind of limit would definitely hinder any bigger system from going in."	The guidelines have been amended to the old cap of \$400,000.

Action/Edit Topic Comment Area General (On-farm projects and practices must be Guidelines completed by the end of each fiscal year.) amended to read: "On-farm We can't do construction in the winter in this projects and practices must part of the state. Is there going to be allowance for extensions? What will happen to funding, if be completed so? If rolled over, would the ability to apply for by the end of new funding be impacted in the event a project the biennium." had to be split up to allow for appropriate funding?

Topic Area	Comment	Action/Edit
Genera	limitations. The proposed project limitation of \$100,000/landowner will continue to mean that the IEGP will not be an option for most of our landowners. That is just too low and is in fact 25% of what the traditional project limit in IEGP has been. Of the 23 IEGP projects we completed between 2002 and 2015, only four had cost share amounts less than \$100,000. We have an RCPP project underway right now focused on sprinkler conversions. We are working with the producers to sign contracts with NRCS. This is the list of contracts being signed with producers for typical irrigation efficiency projects in our district: Contract Cost \$ 443,736 \$ 325,948	Guidelines amended to read: "On-farm projects and practices must be completed by the end of the biennium."
	\$ 430,375 \$ 233,878 \$ 120,046 That amount is only the RCPP (NRCS) payment and does not include the additional funding we've secured for projects that have trust water, fish screen and/or fish passage components. On average, the NRCS payment is about 60% of the actual cost of the project (except for the HU contracts which pay at the 90% NRCS payment rate).	

Topic Area	Comment	Action/Edit
General	No limitation to the Irrigation District projects is concerning. The IEGP funding amount just isn't high enough to fund those large projects and the onfarm components. Could there be a limit to how much of the total available funding can be used for irrigation district projects to prevent a couple of projects from taking all the funding?	The per project cap on large piping projects was removed several years ago. Some of these projects can cost several hundred thousand dollars up to multimillions. We anticipate these large projects in our budgeting work during our biennial budget process to minimize their impact on smaller project needs.

Topic Action/Edit Comment Area General The draft proposed This year's drought situation and Ecology's slow guidelines would allow response to it was disappointing. Similar drought for the renozzling of conditions are currently forecast for next year, so existing sprinkler systems. we are preparing for the worst. With KRD deliveries Weather stations would being reduced in later summer attempting to keep also be eligible, especially if the data is some water flowing as long as possible, renozzling available to the public to for lower pressures is coming forward as a help with irrigation scheduling decisions. significant need. Does this fit into the category of **Irrigation Water** Irrigation system component refurbishment? IWM Management Planning, plans and weather stations are on the list but not as a stand alone practice, would only be eligible if it the IWM itself. Could that be considered? Again, identifies needed capital with the looming drought conditions, we are being improvements. the higher technology IWM contacted by local producers interested in through a consultant assistance with higher tech IWM systems. would likely need to come from operating funds, not capital.

Topic Area	Comment	Action/Edit
General	We have fifteen projects ready to go and more irrigators waiting for assistance. The two projects per district per fiscal year won't meet the demand in our district.	The proposed guidelines allow for the program manager to make an exception to this based on: • Availability of funds, • Identified need, • District productivity, • Project benefits to Underserved Farmers and Ranchers, or • Other high priority consideration.

Topic Action/Edit Comment Area Urban agriculture is a growing Love that the requirement to trust is removed and Eligible sector. There are many **Activities** that the whole state gets a chance to put in for examples of small urban irrigators using domestic projects. That being said, we found a few things water supplies that have been developed to a drinking water that made us a bit uncomfortable. Those were in standard and are expensive. the eligible activities and included: roof runoff Roof runoff collection would be considered a source switch collection, urban ag practices, green energy power, to save drinking water for that purpose. water banking and the upland practices. We fear Green energy power would that by opening it up to that urban component, the be applicable to all projects, rural and urban. An example scope of the program has pivoted away from would be solar power to run a center pivot. Water Banking irrigation efficiencies. opportunities are vast. Presently, many in WA are watershed or subwatershed based. Upland practices would be those that help subdue a shifting hydrograph by holding water supplies in the uplands longer to bolster base flows into the dry season.

Topic Area	Comment	Action/Edit
Eligible Activities	Under proviso funding is awarded based on water savings at a proportional rate. Only a few of these [listed eligible activities] provide measurable water savings. How is funding to be determined in situations where there is not a savings? Wells, outreach, weather stations, water banking.	Removed BMP from the draft guidelines. We will investigate this activity further.

Topic Area	Comment	Action/Edit
Eligible Activities	Will there be any eligible activities that are preventative in nature as far as things like "Drought Planning".	If the identification of vulnerabilities in irrigated agriculture are a part of the planning process, participation in such activities would qualify under a technical assistance budget award to districts. The Department of Ecology is developing a grant program for drought resiliency that will cover a planning effort as an activity or project.



Action/Edit √ On Farm Project cap \$400,000 √ Removed Water **Banking**

- √ Project completion requirement at end of each biennium
- √ Added clarifying language to eligible activities



- Irrigation application systems
- Irrigation conveyance systems
- Variable Frequency Drive (VFD)
- Roof runoff collection and storage
- Irrigation water storage, reregulating, and retiming
- Irrigation or stockwater well (such as source switch from surface to ground water)
- Ground water recharge
- Water resource/conservation outreach and education (technical assistance activity only)
- Irrigation and stockwater right outreach and education (technical assistance activity only)
- Urban-agriculture water conservation outreach/education (technical assistance activity only)
- Irrigation system component refurbishment (such as the replacement of nozzles and gaskets)
- Tree fruit shade cloth
- Weather stations for localized/shared Irrigation Water Management or Scientific Irrigation Scheduling
- Soil moisture monitoring equipment
- Urban agricultural practices that save water, such as: heritage gardens, scalable soil moisture collection, irrigation, and etc.
- Green energy power with eligible projects (such as solar power to run a center pivot)
- Fish screens with eligible projects
- Irrigation water management plans (technical assistance activity only)
- Water banking
- Upland practices that reduce water demand or retime runoff* (such as beaver dam analogs)
- Drought Planning (technical assistance activity only)





Thank you!

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