

Pam Borso

I would urge you to consider water use efficiency. Almost all captures of savings in other arenas are done with efficiency measures, yet nowhere in the draft is hardly mentioned. This is a simple resource to acquire.

The proposed rule has only two mentions of "efficiency" and "conservation," with no definitions and distinctions between the two terms. The draft contains explicit sections on water rights, storage, altered water management, habitat, and environmental monitoring, but no explicit section on water use efficiency.

Again, I hope the final rule recognizes the enormous benefits that efficiency improvements, especially in agricultural irrigation (because of the magnitude and timing of use) would provide here.