Comments on Draft Water Resources Program Guidance – Determining Irrigation Efficiency and Consumptive Use Public Review Draft, September 2026, Publication 26-11-017

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Thank you for the opportunity to comment on the draft guidance and policy. This comment letter includes general observations, as well as specific recommendations in underline format for Ecology consideration.

General Comments

1. Ecology is commended for taking on an update to this guidance document and the role of the Washington Irrigation Guide (WIG) and other ET estimators in permitting. It's long overdue and inherently complicated.
2. I agree that Dr. Troy Peters is a recognized expert in this field, and close coordination with Dr. Peters and WSU in future updates to this policy will improve accuracy, consistency, and transparency in its implementation.
3. At the same time, one of the conflicts that resulted in the litigation (Superior Court Complaint 04-2-02345-6 *Benton County Water Conservancy Board and Franklin County Water Conservancy Board v. Ecology*) that created a need for GUID 1210 in the first place, was differing "expert" practitioner opinions around nuanced elements of the irrigation water budget.
    a. On November 9, 2024, I participated in a law conference panel on the origin of GUID 1210. I've uploaded a copy of that presentation which provides an overview of the events leading up to the creation of GUID 1210. Slide 22 of that presentation contains a list of peer-review scientists that Ecology convened on this topic in 2004. Ecology should consider whether some peer review of Dr. Peter's work, on which the GUID 1210 update is based, would be helpful to build consensus on the state of the science 20 years later.
    b. I presume that the new GUID 1210 authors have the benefit of the litigation and policy development file from 20 years ago. If you don't, I was able to resurrect much of this with the help of Assistant Attorney General Steve North, who was the lead attorney on the case at that time, in preparation for my 2024 law conference panel. I have uploaded select pieces of that record where I refer to it for context.
4. In addition to my comments, if any of the new GUID 1210 authors would like to talk more about this history, I would be happy to make myself available. As Ecology's

consumptive use expert in 2004 for that workshop, and the lead author of the original GUID 1210, I may be one of the few remaining practitioners in the state who still knows the entire history on this topic. My offer, and these comments are not made out of an idle desire to revisit the past, but rather it appears to me that some elements of the new guidance document, and statements made during the September 29th webinar Ecology hosted, appear to conflict with Ecology's previous positions and the state of the science outlined in the 2004 Workshop (discussed in more detail below).

5. One of the concerns raised previously, and is of potential concern now, is consistent application of consumptive use guidance across regions. Ecology proposed a two-fold solution to this issue in the past. First, the original Draft of GUID 1210 contains a three-page "Forward" that then was removed when the document was finalized (see upload). Page 2 of that Forward documents a proposed training schedule to help address this concern, which was implemented and helped raise the overall awareness of guidance implementation amongst permit writers. Additionally, Ecology created a statewide consumptive use expert position that had shared responsibility and availability across the regions to assist in permitting challenging or unique consumptive use cases. I occupied that position until I left Ecology in 2012. Given the large number of practitioners that will routinely use this guidance document for water right permitting (e.g. Ecology staff, conservancy board members, cost-reimbursement contractors), Ecology should implement an appropriate level of training and support.
    a. I've uploaded the February 2007 statewide training I gave to Ecology regions and conservancy board members at that time to help implement consistent application of the guidance.
6. Another concept that was a strong part of the agenda in the 2004 Workshop, and should receive some attention in this guidance, is direction to the user on the relative accuracy of the methods and the assumptions on which they are based. For example, in the 2004 Workshop Agenda (uploaded), the experts were asked to offer opinions on questions on accuracy and sensitivity in outcome to assumptions. Ecology should similarly include information on accuracy and sensitivity in its new guidance.
    a. For example, Ecology has good guidance on meter accuracy (e.g. 5% to 10%) in its metering rule, WAC 173-173.
    b. In contrast, Ecology and Dr. Peters last attempted significant updates to this guidance between 2008 and 2012 in what was known at that time as the "Provisional WIG". Ecology's FAQ on the Provisional WIG (uploaded) notes

that the relative accuracy of the ET method alone (e.g. Blaney-Criddle, ASCE Standardized Penman-Monteith) could affect results by ±25% (Page 2).

c. I worked with Dr. Peters on the Provisional WIG project before I left Ecology and recall we evaluated other sources of error that should be considered. These included weather station location and installation in conformance with NRCS standards, aerial photo interpretation, and accuracy around crop coefficient research. For example, I recall a presentation Dr. Peters likely still has, which graded the existing Washington stations, including many that do not conform to proper installation requirements.

d. My comments above are not intended to diminish this tool or guidance. Indeed, for many water right evaluations, this analysis will become the central investigatory tool. However, permit writers, conservancy board members, and cost-reimbursement consultants should have an appreciation for the relative accuracy of the method as the evaluate water rights.

e. For example, I've had discussions with permit writers about whether relinquishment or water code violations applys to a 100 acre-foot authorization, when metering data shows use within the 5% metering rule error (e.g. 97 acre-feet; is 3 acre-feet relinquished, or is the entire water right valid given the uncertainty in methodology?). Or in contrast, is a 103 acre-foot use a compliance violation relative to a 100 acre-foot authorization. For a method that introduces considerably greater error than metering, the guidance should consider how a permit writer approaches extent and validity other than just saying case-by-case. The latter will simply lead to permit inefficiency and litigation, while the former may help with more consistent application.

f. OpenET is a helpful tool, but should be used and viewed through the lens of its own published accuracy limitations, and I suggest you reference that: Accuracy & Known Issues | OpenET page on the OpenET site.

7. The draft guidance does not (but should) reflect other parts of the water budget noted in the Washington Irrigation Guide, and the draft GUID 1210 guidance from 2004, that may affect efficiency judgments. These include whether or not an irrigator uses water for frost protection, sunburn protection, leaching, pre-irrigation, post-irrigation, chemigation, fertigation, germination, wind erosion protection and other common additive uses. These uses will necessarily push one lower in, or out of, the typical efficiency range and may lead to questions about reasonable use and waste of water. These are all well-established beneficial uses and permit writers should at least be instructed to inquire about their applicability in making case-by-case judgements.

8. Indeed, the conceptual origin of the efficiency range noted in GUID 1210 may have been lost (for many) to time. Footnote 2 of the 2004 Draft GUID 1210 cites an important 2002 paper by Dr. Terry Howell as the basic foundation for the ranges ultimately adopted (but was not carried forward into the adopted guidance as it was part of the "Forward"). But even this paper was merely a compilation of research done by Howell, Hanson and many others as noted. The ranges are based on Distribution Uniformity research across hundreds of farms for each irrigation method. There were about two dozen papers compiled for the 2004 Workshop for the experts to review. I've retained many of these, and when I left Ecology in 2012, one of the senior managers in OCR likely inherited this "binder". Looking on-line, many of the references I've retained now appear to be behind journal paywalls. For example, the 1996 paper referenced by Howell called "Field assessment of irrigation system performance" is now behind a subscription paywall, but the Executive Summary notes it studied 385 irrigation systems relative to Distribution Uniformity. Slide 50 of the 2007 training presentation I uploaded includes excerpts of the 1000 systems evaluated by Hanson that informed Howell's table. I believe it is important to provide context for the ranges that appear in GUID 1210. The ranges agreed to in the 2004 Workshop generally reflected a standard deviation of farmers (e.g. 68% of those that were studied fall in that range around the mean of a normal distribution). Ecology should better explain the origin of the ranges, because it will help inform users on how to deal with circumstances where farms fall outside those ranges.
9. Ecology should consider improving language about the changing nature of this methodology relative to static water right authorizations and statutory tests. One of the concerns that stalled implementation of the Provisional WIG circa 2008-2012 was that water duties went down for some stations relative to the 1985 WIG. Some stations/locations also went up. Changes in water duty will occur over time as methodologies improve (e.g. Penman-Montieth replaces Blanney Criddle), research is updated (e.g. new crop coefficient values are published), weather stations are installed or relocated or removed, and climate itself changes. The WIG itself was actually the third ET guidance document co-published by NRCS and WSU, with Circular 512 and XB0925 both pre-dating it. These earlier publications contained some good information that the WIG did not, including how ET changes in response to drought, which eventually became part of the Yakima Water Transfer Workgroup consideration of drought transfers (e.g. colloquially, WIG +2 inches) to cover higher ET during drought years. The dynamic nature of changing ET can be challenging to interpret and apply to different static water code tests, including extent and validity, impairment, public interest, and relinquishment exemptions like "varying weather conditions" under RCW 90.14.140(1)(g). This guidance likely can't unpack every one

of these instances, but without some additional direction, confusion will result. Perhaps the examples could be strengthened with some of this in mind.

10. In several locations in the draft guidance and in Dr. Peter's 2025 paper, there are references to "experts" and "irrigation professionals" and even a "Certified Agricultural Irrigation Specialist". The bulk of this guidance will most often be used by volunteer, unlicensed Conservancy Board members, cost-reimbursement staff (who may in some cases be licensed CWRE's, PE's, HG's), and Ecology review staff (typically in the Environmental Specialist series, but with no licensure). Where this guidance refers to experts and professionals, I recommend it clarify what is expected here.
11. A related concern is that some of the data sources underlying these on-line tools are not freely or consistently available to all users. For example, archived station records from programs such as WSU's AgWeatherNet appear to be subject to data-use restrictions or fee-based access, potentially limiting an applicant's or Board or Ecology reviewer's ability to independently verify results. Such limitations can make independent verification difficult and raise additional questions regarding reproducibility, consistency among reviewers, and reasonable access to the information needed to support regulatory decisions. We have already received comments from Ecology on this topic in response to specific changes saying it cannot independently verify such results because of cost. Is Ecology accepting at face value results that are behind subscriptions or paywalls, and for those that choose to follow this guidance (e.g. conservancy boards, cost-reimbursement contractors), what documentation burden does Ecology require? Alternatively, perhaps Ecology could maintain an annual ET spreadsheet on its website to assist with data access issues and help with repeatability and consistency.

Page-Specific Publication 26-11-017 (aka GUID 1210) Comments

1. Page 1. The bulleted list does not include a specific reference to evaluations of consumptive use under the public interest test. This is nested in part under some other cases (e.g. bullet 5, trust), but in my experience Ecology has applied a consumptive use increase/"recency" inquiry in other permitting situations. For example, groundwater changes trigger a public interest test that surface water changes do not. Does Ecology expect practitioners to consider consumptive use issues under the public interest test? If so, my understanding is that this is not a prohibition in increasing consumptive use in the same way ACQ works, but rather it would be a weighing of issues across the entire public interest spectrum.
2. Page 2. Consumptive Use Definition. Consider removing the fixed 10% value in the definition itself. It is the only numeric value provided in the examples, and (as I note

later), is better served in the context of examples rather than a definitional statement.

3. Page 2. Crop Irrigation Requirement (CIR) Definition. I don't believe this definition is correct, and it is inconsistent with the correct definition noted on Page 4, Page 6, and in the WIG. CIR does not include the other additive elements of the irrigation water budget like frost protection, leaching, and many others. Consider revising the definition here. This statement specifically conflicts with the original statement on Page 2 of GUID 1210 in the CIR definition, which is correct.
4. Page 2. ET Definition. When discussing / defining ETc, consider clarifying introducing crop coefficient (Kc), and that Etc is often calculated by multiplying reference ETr x Kc (e.g. National Irrigation Guide, Page 17-4). You introduce this fairly late in the paper in Section 5.2. Kc research is ever-changing which is another source of uncertainty in using the online models.
5. Page 2, TIR definition. While this definition is largely unchanged from its original form in the original GUID 1210, the statement on "miscellaneous water requirements" could be misconstrued if the CIR definition is left as is, and does not include the specific additive nature of elements of the water budget I've noted earlier. If the CIR definition is edited, no change here is needed.
6. Page 3, Background. If Ecology is interested in preserving the history of the development of this document here, it could condense my earlier comments into a simple bulleted list with relevant dates for Circular 512 (1969), XB0925 (1982), WIG (1985), WIG Supplement (1992), GUID 1210 (2004), Provisional WIG (2008-2012), New Ecology Consumptive Use Guidance Publication 26-11-017 (adoption date).
7. Page 3, Footnote 5. Unlike in the definition section, the reference to a 10% runoff evaporation rate is better suited here. Like other elements of the water budget, this too can be variable and at times Ecology has used vegetation surveys to better estimate this, but having an "order of magnitude" guidance value here is helpful.
8. Page 4. Practitioners often encounter situations where estimated TIR is greater than the duty in the water right. A footnote on this page and an example of this situation in Appendix B would be helpful guidance. The TIR (aka "Water Duty") itself is not a limitation of a water right, but is a tool in considering reasonable use as noted in *Ecology v. Grimes* (1993). When the estimated TIR > the original authorization, but reductions in acreage has occurred to compensate, that is typically just crop management. However, when the estimated TIR > the original authorization and acreage is the same as that authorized, then the practitioner should consider those implications. Either efficiency has to go up (i.e. reconsider whether original Ea assumptions are correct), or the ET has to go down (i.e. deficit irrigation may be occurring) to stay within the water right. Sometimes deficit irrigation is deliberate

(e.g. to meet other crop quality goals) and sometimes it results from not having enough water right authority or having a system that is low in the efficiency range and suffers from low distribution uniformity. An example on this topic will cost you little in page count and gain you greater consistency in the future.

9. Page 8. From a sequencing standpoint, consider moving the concluding sentence at the end of the second paragraph, "Selection of the average Ea, %Evap, %CU, and %RF from Table 1 is often reasonable", until after the bulleted list of reasons to consider something other than the mean value on Page 9. The practitioner should only select a value after the investigation—not default there. In addition to the bullets noted, here are additional situations that should help a practitioner think about whether their situation is similar to the mean, similar to a below-average application, or similar to an above-average application, and help select an Ea that is appropriate to it.
    a. What was the original authorization's assumed efficiency and has anything changed since that original Ecology judgement was made? Absent any changes in infrastructure, it may be appropriate to retain that judgment than supplant it with an average value.
    b. What is the size of the farm/water right? Of all criteria, size often matters. Small settings tend to have lower efficiency that are reasonable due to labor and capital constraints.
    c. Is the irrigation setting for commercial crops or self-use? Commercial ventures are better capitalized and have better labor control and are often at the higher end of the Ea range.
    d. Is the water right owner public or private? Public entities have access to public funding (also a waste consideration), have a rate base that allows for greater capitalization, and a fixed labor base. These can improve Ea in some situations.
    e. Is there a non-irrigation overlapping use? For example, if the land is also used for grazing / stock use, then that would tend to lower Ea. Similarly, if the land has a recreational component (e.g. irrigation of parks, golf courses), that can lead to compressed irrigation windows relative to typical farming and lower Ea.
10. Page 9. This page could use a greater explanation on the range of efficiencies and implications of each. Right now, it reads like we'll consider the average first as reasonable, we may increase Ea if the first set of bullets are true, and then if someone is below average, then pejorative words like "improper", "inadequate", and "error" should lead a practitioner to look at waste which has to be prevented to the

greatest extent possible. Instead, I would characterize 5 different groups of situations and recommend you include an example of each in Appendix B.

a. Group 1 (peak Ea). Ea for their system is near 100%. These are groups who could be large, commercial private farmers (e.g. pivots, drip, soils moisture monitoring, irrigation scheduling). It could also include some that are deficit irrigating, so the practitioner should consider whether a full CIR is appropriate (e.g. deficit wine grapes example with drip irrigation, 100% Ea, but lower CIR than what may be published). Ecology's guidance in general doesn't not address deficit irrigation well, and it should as it is a common practice for farmers for many crops to produce appropriate quality over quantity.
b. Group 2 (above average Ea). Some/many of the higher Ea criteria in the bulleted list on Page 8 are present. This might direct a practitioner to select an Ea near the top of the range rather than the mean.
c. Group 3 (average Ea). This could include situations where elements of both higher and lower Ea criteria from the list on Page 8 and 9 are present, or situations where little is known (e.g. perhaps the farm is no longer operational and the water has been in a trust donation for some time).
d. Group 4 (below average Ea). This could include some/many criteria on the list on Page 9 and those I noted above. However, as I noted on how the ranges were developed, below average Ea is not waste. Words that have a negative connotation like "improper" and "inadequate" should not be used to describe this group. The 20-acre horse ranch and hayfarm I ran for 20 years was irrigated by wheelines, big gun sprinklers, and handlines. It would certainly be at the lower end of the efficiency range (e.g. 60%) as it had labor constraints (just me), was in a state of constant repair (grazing animals and irrigation infrastructure often collide (literally), was not a commercial venture, was small, did not employ automation or formal irrigation scheduling, but was not wasteful (according to the *Aquavella* Court that agreed on a reasonable, but low efficiency). Consider changing some of the adjectives you use to describe this case to differentiate it from Group 5.
e. Group 5 (wasteful). Ecology dips its toe in the waste arena here, and it is inevitable that you do so given the subject matter. However, citing Grimes and noting only that inefficient practices should make the practitioner consider waste does the topic a disservice. Ecology should also cite RCW 90.03.005 and the broader set of criteria for waste, as well as the seminal litigation on this subject (i.e. MVID I and MVID II): "*Further, based on the tenet of water law which precludes wasteful practices in the exercise of rights*

to the use of waters, the department of ecology shall reduce these practices to the maximum extent practicable, taking into account sound principles of water management, the benefits and costs of improved water use efficiency, and the most effective use of public and private funds, and, when appropriate, to work to that end in concert with the agencies of the United States and other public and private entities." Take for example the research by Hanson noted earlier (excerpted below). For periodic move sprinklers (i.e. handlines), draft GUID 1210 repeats the same range as the original GUID 1210: 60 to 85%. I agree with Dr. Peter that the state of this science has not likely changed much since 2004 when it was last considered. Hanson contains data that helped inform that. Certainly I would agree that the 1.8% of those surveyed with less than 10% DU are wasteful. But are the 14.6% of those surveyed in the 51% to 60% range wasteful just because they fell outside of one standard deviation relative to the mean? That may include windy farms, farms with poor soil, small farms and many other factors that are reasonable. Waste is a legal evaluation informed only in part by Ea, but has many other criteria that should be considered. In that latter example, if the farmer in question was a public irrigation district like MVID was, I might feel differently than if it was a 20-acre private hay farmer (e.g. public funding eligibility prong under RCW 90.03.005). I think you can expose a wider range of possibilities on Page 8-9 with minimal text additions. And having a better understanding of the GUID 1210 history and the genesis of the data that created the ranges below is critical to a permit writer making sound judgement, so preserving some sense of history in this guidance, even an abbreviate form, will lead to better results long-term.

DU Range	CM	SS	PM	MS	D	F	B
0-10	0	0	1.8	0	0	0	0
11-20	0	0	0.9	0	0	0	0
21-30	0	0	2.8	1.4	1.2	0	0
31-40	1.8	0	7.3	2.5	1.8	2.0	2.9
41-50	1.8	12.5	14.6	4.3	2.4	2.6	1.4
51-60	1.8	21.4	13.8	14.5	6.1	9.2	1.4
61-70	22.8	39.2	29.3	21.3	14.7	5.9	12.9
71-80	38.6	21.4	20.2	27.2	27.0	20.4	10.0
81-90	33.3	5.4	8.2	25	35.0	27.3	35.7
91-100	0	0	0.9	3.6	11.6	32.9	35.7

CM = continuous-move sprinklers, SS = solid-set sprinklers, PM = periodic-move sprinklers, MS = microsprinklers, D = drip emitters, F = furrow, B = border.

11. Page 9. The guidance mentions site constraints "soils" and "topography" but it may be helpful to provide more clarity on this topic. For example, cobbly or gravelly soils, or steeper topography, can result in lower efficiency. Referencing the NRCS Web Soil Survey Web Soil Survey - Home and USGS National Map Viewer tool for contours: (The National Map - 3D Viewer) could be helpful resources, or even the original Appendix A in the WIG as, unlike ET, static soil information in that publication is likely still relevant.
12. Page 10. Table 1. Most of the numbers in Table 1 changed slightly and largely conform with my understanding of the science. However, a central issue in the 2004 litigation was focused on a conservancy board change that allowed a very high %Evap value for a center pivot system with top of pipe sprinklers. Early literature suggested, as does the current Draft Ea, that 40%+ consumptive use can occur in those settings. The theory here is that the application level is on the order of 15 feet in the air, and has greater evaporation potential due to wind drift, low DU and spray evaporative loss. But later researchers found that the early literature overstated %Evap based on drop size research. Top of pipe sprinklers that have large drop sizes did not evaporate as greatly as previously theorized because the surface area to droplet volume ratio was small (as compared to small droplet mister type sprinklers, which have a high surface area to volume ratio). The collective experts decided on a range of %Evap from 5 to 15% largely based on height of application, stressing case-by-case judgement throughout (e.g. perhaps windier conditions could enjoy more than 15% evaporation). Ground level application (e.g. flood, furrow) didn't get a "zero" but rather 5% on the theory that there was greater evaporation from a free water surface than wet ground. Mid-elevation application methods (e.g. about 3 to 5 feet) got a 10% value for %Evap, while high elevation methods (e.g. top of pipe, overhead impact) got the highest value of 15%. The current draft Table 1 has values for %Evap that are much greater than the 2004 experts. Is this supported by the current literature and peer review? Please ask Dr. Peters to relook at the %Evap numbers for scenarios that have a "zero", and for sprinkler values > 15%, as these conflict with the earlier panel of experts' opinion.
13. Page 11. This could be a good place to discuss accuracy issues given you broach this topic in the first paragraph, or in Section 5.1 where you discuss meter accuracy.
14. Page 11. The discussion of when to use data from the Effective Water Use Model should be strengthened. I agree that annual consumptive use estimates are appropriate for ACQ. Averages, however, may not be the best choice for proposed water uses. With climate change and water use needs increasing, why would a historical average over any time period be the right choice. It may be better to consider the methodology outlined in XB0925 where you consider both the average

and the drought frequency of the individual locale. That pre-WIG guidance document contains table for 2, 5, 10, and 20 year drought additions to the water budget. An average-only outlook immediately sets the water right holder for failure on compliance if they follow crop need over water right authority, or on crop yield sacrifices (e.g. deficit irrigation) if they follow water right authority over crop need.

   a. The guidance provides no direction on the other criteria on page 1 (e.g. impairment, trust, and my recommended addition of public interest). It should. In fact, the original GUID 1210 contains this sentence on this topic: "*While an ACQ change requires averaging of the two highest years of consumptive use, consumptive increases that could lead to impairment may be evaluated using the highest year of consumptive use*". Ecology should not provide guidance on only a subset of the situations it instructs practitioners to use the guidance for.

15. Page 13. Section 5.2. We have had recent firsthand experience in using these models, only to find that the data change months later when we go back to them without any explanation. The WIG is outdated, but was repeatable and immutable. The point about recording the date and information at time of retrieval is important. However, how will Ecology evaluate this if the information changes mid-processing? For example, if an analysis is completed by a conservancy board or cost-reimbursement contractor, and then Ecology reviews and finds it different, does that prompt a modification of the decision or not? Or what if that data is behind a paywall and Ecology can't independently verify that a third party has erred or promoted an unreasonable interpretation? Does it matter if the change is within the margins of error noted previously? And if we're to use these on-line techniques, can those keepers be instructed to maintain a log of changes when data sets are updated so the causation is not left in doubt? One can imagine a situation where data gives you a 10% higher or lower number and we don't know how or why to discuss the change (e.g. did a new crop coefficient get published, was another two years added to the data set, did a station calibration change?).
16. Appendix A: Yellow boxes. This has the danger of short-circuiting all of the judgement discussion that came before, because %CU noted here is based on Average % Evap, rather than a calculated or estimated %Evap given Ecology's bulleted lists on Page 8 and 9. This same challenge exists throughout this flowchart whenever %CU is used, because %CU in Table 1 really means Average %CU. I suggest you add a footnote to %CU throughout this graphic that say: "Table 1 provides both %CU based on Average %Evap, and a means to modify %CU based on criteria described on Pages 8 and 9 of this guidance. Users should bias towards calculating %CU based on site specific conditions rather than assuming it".

17. Appendix B. The three examples provided here are mildly helpful, but are the equivalent of "vanilla" and "chocolate" in an ice cream parlor of "rocky road" and "spumoni". Having examples that only outline situations where average and above average results occur, and calling them "reasonable and non-wasteful" does not explore the harder elements that are all too common, and reinforces the undercurrent in this policy that anything that is below average is wasteful. Contrast this to Ecology's Terms of Use Policy that has many more examples, across a larger range of situations, and is therefore more instructive. Or contrast it with the six examples in the 2007 Ecology training that includes harder topics like deficit irrigation and Ecology calculations that differ only slightly from that of a Conservancy Board's and within the margin of error. Please include a wider range of examples dealing with the subjects I've raised herein to provide greater guidance on the diversity of experiences that are commonplace. The guidance document is already 32 pages—a couple more for clarity is worth it.