

Section VI: Water Use Efficiency Information

A. EWMP Implementation and Reporting

1. Critical EWMPs

(1) Water Measurement (Measure the volume of water delivered to customers with sufficient accuracy to comply with subdivision (a) of Section 531.10 and to implement paragraph (2).)

All of the turnout deliveries within the District are fully metered with propeller flowmeters which register both instantaneous and totalized flows. Meters are repaired and/or replaced as necessary. The District staff is capable of repairing these meters when required.

The District maintains daily delivery records for each turnout being used and maintains records of daily water orders from the SWP. A grower's water use to date and remaining allocation is maintained by the District's comprehensive database system (Latis) that the District has used for nearly ten years. The system helps manage water orders, water use, water supply, water contract information, and water delivery system information.

Staff measures all flow meters located at turnouts along distribution laterals from the canals. The operations superintendent generates a monthly Water Transaction Report from Latis for Water Users to view. This report shows deliveries and any other water related activity (i.e., transfers, exchanges, recharge, etc.) for water users to view. See Appendix 9 for an example of the monthly Water Transaction Report.

The District's obligation to measure water deliveries ends at the meter. The Latis system is proving to be very effective in assisting staff and management to manage and analyze a variety of water related data with the ultimate goal of efficiently managing District water supplies.

BWSD is confident its existing water measurement devices meet the $\pm 12\%$ accuracy standard, and replacement meters meet the $\pm 5\%$ accuracy standard.

This EWMP is being implemented at a satisfactory level.

(2) Volume-Based Pricing (Adopt a pricing structure for water customers based at least in part on quantity delivered.)

BWSD's contracts with its Water Users establish a fixed unit pricing (Volumetric Rate Structure - \$/AF) payment structure for SWP water supplies. This pricing structure also includes District fixed and variable costs. Both SWP and District fixed and variable costs are charged on a contract basis (i.e., assuming that full contract amount is available in any year). By July, both SWP and District variable costs for the preceding water year are adjusted to actual usage. This methodology mirrors the payment and adjustment structure

which KCWA applies to its Member Units and which DWR applies to its contractors. Full costs (unsubsidized) are recovered for SWP water supplies.

With the Monterey Agreement, establishment of an Agricultural Rate Management Fund (Fund) helps to convert the relatively high SWP fixed costs, which are charged on a contract basis, into more of a volumetric charge. Portions of agricultural contractor's payments are held in a trust account, to be used whenever SWP allocations are less than 100 percent of contract amount. The Fund is used to pay fixed costs for that portion of water that is unallocated due to water shortages, however, it is not fully funded and can only off-set about a 10%, or less shortage (>90% SWP Allocation) in any year. As an example, if the water supply allocation in a year were 80 percent of contract amount, then the trust fund would pay the fixed costs for 20 percent of Table A contract water (that portion not available for delivery).

The trust fund has reduced the carrying cost for SWP Table A contract water and converted the agricultural repayment system into more of a volumetric charge for both fixed and variable costs.

BWSD is one of the most conservationally advanced agricultural water districts because of the price of water. The water charge is already sufficiently high to encourage the water users to conserve water without imposing additional penalties such as those that might be incurred from a tiered water pricing program. At this time, the District has determined that a tiered water pricing system is not feasible.

2. Conditional EWMPs

(1) Alternate Land Use (Facilitation of alternative land use for lands with exceptionally high water duties or whose irrigation contributes to significant problems, including problem drainage.)

By a mechanism known as the "Top Contract", Water Users in the Service Area take delivery of and pay for SWP water that cannot be delivered to the lands in portions of the District that are not currently served by District facilities. This has two benefits: 1) it provides a source to fund the District's annual obligation to KCWA to pay for said water; and 2) it allows the water to be put to beneficial use within the District.

The District has also participated in groundwater banking facilities that use lands located south of the District in a different alternative manner. Instead of growing crops, the District is banking water for future use.

BWSD will consider requests for alternative land uses. Most lands in BWSD are considered excellent for agricultural purposes. However, about 50% of the land in the District would require pumping lifts of 300+ feet for deliveries. Lift costs coupled with already high unit cost of water make construction of additional conveyance facilities cost prohibitive.

Another aspect of the Monterey Agreement, which meets the criteria for this AWMP relates to the marketing of up to 130,000 AF of KCWA's SWP agricultural Table A contract water to other SWP urban contractors. To date, all of the 130,000 AF SWP Table A contract water has been permanently transferred to other SWP urban contractors.

Outside of the Monterey Agreement, other permanent transfers of SWP Table A contract water have occurred within Kern County. Generally, KCWA does not object to transfers of SWP Table A contract water among Member Units. (Kern County Water Agency Water Management Plan, October 2001)

Water Users within the District are free to transfer water amongst each other without the consent of the District. However, current BWSD policy requires that any request to transfer water for use outside of the District be submitted to the District in writing and that other Water Users in the District be offered a first-right-of-refusal to purchase said water at full-cost. Once these conditions are met, the transfer is approved.

In summary, the following types of water transfers are allowed by current BWSD policies once certain conditions are satisfied:

- 1) Between neighboring districts and the same owners in each district.
- 2) Between non-neighboring districts and the same owners in each district.
- 3) Between Water Users within the District

This EWMP has been implemented, and will continue to be implemented through the practices described in this section.

(2) Recycled Water Use (Facilitation of use of available recycled water that otherwise would not be used beneficially, meets health and safety criteria, and does not harm crops or soils.)

A considerable amount of oilfield-waste water is produced from petroleum production in BWSD. This water generally contains high total dissolved solids (TDS) and high concentrations of other constituents of concern including boron and selenium. Unfortunately, the cost associated with treating this water to a quality acceptable for agriculture or domestic purposes is prohibitive at this time.

BWSD does not have access to any municipal recycled water sources. However, the potential exists to reuse oil field produced water. The current costs for treatment (such as reverse-osmosis) and water disposal exceed BWSD's customer's ability to pay for them. An arrangement between BWSD (Ag) and an urban agency would be required, or the per AF cost of treated water would need to be comparable to that of SWP water from the CA Aqueduct for such a program to work. One possible plan would be for the urban agency to pay to desalt brines and BWSD would use the oil field produced water for agricultural purposes. In return, BWSD would turn over SWP water to the urban agency. Another possibility would be that the oil field produced water be treated so as to be cost effective for agricultural use.

Adequate funds are currently not available, and are not expected to become available, for this EWMP to be locally cost-effective or technically feasible during the term of the AWMP. Thus this EWMP will not be implemented though the District will continue to evaluate it.

(3) On-Farm Irrigation Capital Improvements (Facilitate financing of capital improvements for on-farm irrigation systems)

BWSD is a progressive district and along with its Water Users already have implemented the best available technology for conveying water to crops. The District could help Water Users secure financing of new irrigation systems through a lending institution; however, most are already efficient in applying water to their fields.

Thus, this EWMP is not technically feasible, and will not be implemented.

(4) Incentive Pricing Structure (Implement an incentive pricing structure that promotes one or more of the following goals: A. “More efficient water use at the farm level such that it reduces waste”; B. “Conjunctive use of groundwater”; D. “Reduction in problem drainage”.)

Water marketing and transfers already occur routinely within the District and frequently outside the District within the KCWA in accordance with adopted policies. Water marketing, transfers and exchanges offer an opportunity to achieve both the reliability of the water supply and costs at levels economically viable for District water users. Through water transfers and/or exchanges, row crop farmers may release their water entitlement in dry years to permanent crop needs.

The District facilitates transfers and exchanges in accordance with the following priorities: 1) in-District transfers, 2) transfers within KCWA, and 3) transfers outside the KCWA. The District relies on these transfers and exchanges with other water entities to provide the necessary flexibility to optimize beneficial use of the water supplies available to the District.

This EWMP has been implemented and will be continued with current practices.

(5) Infrastructure Improvements (Expand line or pipe distribution systems, construct regulatory reservoirs to increase distribution system flexibility and capacity, decrease maintenance, and reduce seepage)

BWSD’s two main canals are concrete lined although approximately 6 miles of the approximately 35 miles of canal has experienced minor damage due to localized soil collapse. The entire District has lined canals or pipelines. The two regulating reservoirs are lined with a clay liner. The District’s two terminal reservoirs are unlined. However, given the way the canals are operated, little if any water spills into the unlined reservoirs. On the rare occasion when a spill occurs, most of the water is recovered and put back

into the canal. Distribution system losses are so low (usually on the order of 1%), and additional improvements to reduce losses have been deemed to be locally cost effective.

The District's two main reservoirs (415 Reservoir and 500 Reservoir) are used primarily for short-term regulation of the District's two main pump stations (Pump Station 1A & 1B, respectively). Because of their relatively small storage capacities, long-term storage of surplus water is generally not applicable. To minimize pumping costs and energy bills during the summer peak energy period (noon to six) the combined storage of the 415 and 500 Reservoirs provides only one to two hours (1-2 hours) of curtailment pumping. As previously mentioned, studies by P&P have shown that the benefit-cost ratio for additional storage in the District is not economical under current conditions. However, should grants, low interest financing or other funding sources become available, BWSD will investigate additional storage facilities to expand load-shifting capability, regulation, and/or surplus water storage capabilities.

Currently, adequate funds (including funds from other beneficiaries of the WMP) are not available, and cannot reasonably be expected to be available, for implementation of the EWMP during the term of the WMP. Proposition 50, a current State-funding source, specifically excludes funding for surface storage projects. There is no other funding available. Also pursuant to a Net Benefit Analysis performed in accordance with Exhibit E, the implementation of the EWMP will not provide any significant financial benefits for the water supplier during the term of the WMP (very low B/C ratio).

BWSD does not plan to implement this EWMP during this planning cycle. But the District will continue to evaluate potential improvements for future plan cycles as technologies and funding opportunities change.

(6) Order/Delivery Flexibility (Increase flexibility in water ordering by, and delivered to, water customers within operational limits)

BWSD already has flexibility in water ordering and delivery. Most water orders and deliveries are based on an arranged demand system where the frequency and duration is flexible. The rate of flow is flexible to the extent that capacity of the delivery system allows. The storage capacities inherent in the California Aqueduct and the District facilities allow BWSD to provide some flexibility in water ordering and delivery.

This EWMP has been implemented at a satisfactory level, and will continue to be implemented by continuing the practices discussed in this section.

(7) Supplier Spill and Tailwater Systems (Construct and operate supplier spill and tailwater systems)

Except in case of emergencies, BWSD does not experience operational spills from their canals or pipelines. Daily deliveries are matched with the ordered demand, utilizing different pumping configurations at Pump Stations 1A and 1B and other downstream control structures in the canal and distribution laterals. In the worst case, emergency spills

at the end of the canal can be gravity fed back into the distribution system for beneficial use.

BWSD has implemented this EWMP previously at a satisfactory level and will continue to implement it by operating its existing canal spill re-capture systems after emergencies.

(8) Conjunctive Use (Increase planned conjunctive use of surface water and groundwater with the supplier service area)

BWSD currently has an active conjunctive use program, primarily through groundwater banking programs outside of the District. In dry years, the District can pump up to 15,000 AF of banked groundwater on behalf of its customers to supplement SWP shortages. And, Westside Mutual Water Company provides similar services to a certain landowner. Given the location of the District, an exchange with local agencies is utilized to return banked water diversions of SWP water for use into BWSD, while other agencies use the groundwater.

The District has practiced conjunctive use of water for many years. Due to the significant amount of acreage planted in permanent crops, demand within BWSD remains relatively constant from year to year. In dry years, when supplies from the SWP are low, supply deficits are augmented with banked supplies and/or through purchases and transfers.

This EWMP has been implemented at a satisfactory level, and will continue to be implemented by the practices described in this section.

(9) Automated Canal Controls (Automate canal control devices)

As the water is lifted from Pump Station 1A, it is discharged into the 415 Reservoir. From there, water can be delivered through the 415 Canal system or diverted to Pump Station 1B and lifted to the 500 Reservoir for delivery through the 500 Canal. At the outlet of each reservoir to the 415 and 500 Canals is a canal gate that isolates the reservoir and canal. Numerous check and canal gate structures that are located at various locations along the canals are used to set water levels and flows in the canal. Canal gates are operated automatically, using the SCADA system or laptop via WiFi connection in the field, to match the desired deliveries for each day. Flow rates through the automated structures are calibrated as a percentage of how far the gate is open. These canal gates were converted to automatic operation, under the prior water conservation plan, after being operated manually since the facilities were constructed in 1966.

This EWMP has been previously been implemented at a satisfactory level. There are no further plans for additional canal automation, as they have been automated already.

(10) Customer Pump Test/Evaluation (Facilitate or promote customer pump testing and evaluation)

The District encourages the proper maintenance and operation of wells, pumps and other landowner facilities.

Customers do have many booster pumps on pressurized irrigation systems supplied with power by Pacific Gas and Electric (PG&E). PG&E provides subsidized pump tests to any customer requesting it through a program administered by Fresno State University (Center for Irrigation Technology).

The District will implement this EWMP by further publicizing PG&E's program by providing a link on the District's website to PG&E's website regarding the program.

(11) Water Conservation Coordinator (Designate a water conservation coordinator)

BWSD has designated the Executive Director of the Westside Water Authority as water conservation coordinator for the purposes of the Memorandum of Understanding for Agricultural Water Suppliers.

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BWSD considers that it has adequately implemented this EWMP, and will continue to implement it with Greg Hammett serving as water conservation coordinator.

(12) Water Management Services to Customers (Provide for the availability of water management services to water users)

On-farm irrigation and drainage system evaluations

BWSD has contributed to the North West Kern Resource Conservation District's (NWKRCDD), formerly the Pond-Shafter-Wasco Resource Conservation District, mobile lab program for many years, contributing at least \$2,000 annually to the program. This contribution supports the cost to perform numerous irrigation evaluations per year countywide. This program is designed to evaluate irrigation systems on-farm, offering recommendations to improve distribution uniformity and overall system improvements.

NWKRCDD has routinely performed several system evaluations in BWSD for Water User on an annual basis. BWSD will continue to support NWKRCDD efforts and cooperate to perform system evaluations in their District.

Many of the District Water Users perform system evaluations in-house along with irrigation scheduling and other management techniques for water conservation. Other Water Users, if interested would be pointed to the NWKRCDD or equivalent agency.

This EWMP has been implemented at a satisfactory level, and will continue to be implemented through support of NWKRCDD activities.

Agricultural water management educational programs and materials for farmers, staff and the public

KCWA has conducted an in-school water education program for 15 years. The program has been approved by Kern County's Superintendent of Schools as meeting classroom science and history criteria. This program targets children in grades 1-6.

BWSD individually contributes and/or pays annual dues to the following organizations that target water awareness both locally and State-wide:

- Water Education Foundation
- California Water Awareness Campaign
- Kern Teacher Ag Seminar
- Water Association of Kern County

This EWMP has been implemented at a satisfactory level, and will continue to implement it through activities described in this section.

(13) Identify Institutional Changes (Evaluate the policies of agencies that provide the supplier with water to identify the potential for institutional change to allow more flexible water deliveries and storage)

BWSD's administrative and O&M office is located in the District. Water Users frequently visit the office to place water orders, discuss maintenance activities and administrative matters. As previously noted, the District is nearly entirely dependent on the State Water Project (SWP) for its water supply. The SWP has historically been, and is expected to continue to be, subject to delivery deficiencies. Contractual obligations are 4.1 million acre-feet (MAF) per year while the average annual water supply is approximately 2.5 MAF. As environmental and urban water demands continue to increase, the reliability of the SWP decreases for all SWP contractors. Delivery deficiencies are related to both the reduced quantity of water available and the increased frequency that shortages are imposed. The District continues to look at ways to further stabilize, or firm up, the reliability of the water supply so that production agriculture can continue to flourish in the District.

One method of stabilizing the water supply that the District has initiated is groundwater banking. The District participates in the following groundwater banking/recovery programs:

- KCWA Pioneer Property
- Berrenda Mesa Spreading Grounds

Through 2020, the District and its water users had approximately 94,400 acre-feet (af) in storage in these projects. One District landowner also participates in groundwater banking activities through the Kern Water Bank.

BWSD has initiated and will continue efforts to develop programs with other agencies that would alleviate the aforementioned problems regarding water supply stability.

In addition as shown below, this EWMP has previously been implemented at a satisfactory level with the following practices, which will be continued:

Regular District Meetings

BWSD holds monthly meetings and distributes a meeting notice to each requesting person by U.S. Mail, email or fax. On average, about 90% of the major Water Users attend each monthly meeting.

Other Meetings

In addition to the monthly meetings, other meetings include:

- The General Manager attends monthly KCWA Member Unit Managers meetings, to discuss pertinent topics and issues.
- The General Manager, Legal Counsel and Board Members attend the annual ACWA conferences.
- The District also holds special meetings to discuss urgent matters on an as needed basis.
- Any meeting can be translated for attendees that wish to hear information in Spanish.

BWSD website

BWSD has an active web site that provides a variety of information about the District and will be updating it as needed. The web address is <http://www.belridgewsd.com>.

Links to KCWA and DWR

Contractually, the only institution to which BWSD is subject is the KCWA. Similarly, contractually, the only institution to which KCWA is subject to is DWR. Nevertheless, policy differences arise nearly every year with respect to water supply and operations of the SWP. Generally, as policy issues arise, they are discussed among the State Water Contractors, Inc. (SWC), a non-profit organization of SWP contractors. Once agreement is reached by the SWC as a whole, then DWR is engaged to seek changes in the subject policies.

SWC holds an annual retreat at which DWR and Contractor policies and issues are reviewed in depth. DWR management staff is invited to these retreats and participate in the discussions. This has been a valuable forum for resolution of issues.

BWSD, along with KCWA, considers the existing arrangement for resolution of policy issues to be successful. DWR and SWC policies are discussed and resolved as they arise, leading to a dynamic resolution process.

This EWMP will continue to be implemented by continuing current practices.

(14) Supplier Pump Improved Efficiency (Evaluate and improve the efficiencies of the supplier's pumps)

In 2001 and 2011, BWSD utilized State grant and PG&E rebates to help fund pump efficiency tests on all District-owned pumps and to help fund selected pump repairs to improve performance. The District intends to keep testing pumps to ensure that these units are operating at peak efficiency. Pumps with low efficiencies will be re-evaluated to determine if newer more efficient units would replace existing less efficient units.

The District installed sensors in Pump Station "1A" for remote control utilizing the SCADA system under the prior Water Management Plan, and similar improvements to Pump Station 1B are being made. A unique feature implemented by the District's electrical technician, displays on a screen each pump's electrical usage in kWh per AF. Over time, if this value (kWh/AF) begins to decrease, it is an indication that the pump or motor is beginning to deteriorate and thus the unit is running inefficiently and needs to be evaluated. The kWh/AF number can be correlated to an overall plant efficiency (OPE).

This EWMP has been implemented at a satisfactory level, and will be continued as described in this section.

Table 47 summarizes the EWMPs implemented and planned, Table 48 summarizes the EWMPs efficiency improvements, and Table 49 summarizes the schedule to implement EWMPs.

Table 49 includes estimates of Water Use Efficiency (WUE) Improvements that occurred since adoption of the prior Water Management Plan (2005). In most cases data was not available to allow quantification.

The prior Plan's water balance calculations indicated very high overall District WUE had been attained by 2005, with little room for improvement.

WUE improvements from EWMPs to continue and/or be implemented are also in Table 49. These also generally have no available data to allow for an estimate. Given the District's current WUE estimate of nearly 100%, little improvement is expected over the next 5-10 years. Rather, maintenance of high WUE is the expectation.

Table 48. Report of EWMPs Implemented/Planned (Water Code §10608.48(d), §10608.48 (e), and §10826 (e))		
EWMP No.*	Description of EWMP Implemented	Description of EWMPs Planned
Critical EWMPs		
1	Water Measurement	Continue current practices
2	Volume-Based Pricing	Continue current practices
Conditionally Required EWMPs (locally cost-effective and technically feasible EWMPs)		
1	Alternate Land Use	Continue current practices
2	Recycled Water Use	No plans to implement but will continue to evaluate
3	On-Farm Irrigation Capital Improvements	Continue current practices
4	Incentive Pricing Structure	Continue current practices
5	Infrastructure Improvements	No further improvements planned
6	Order/Delivery Flexibility	Continue current practices
7	Supplier Spill and Tailwater Systems	Operate current systems. No plans for further improvements
8	Conjunctive Use	Continue current practices
9	Automated Canal Controls	No further plans to automate
10	Customer Pump Test/Eval.	Publicize PG&E's program on the District's website
11	Water Conservation Coordinator	Continue current practice
12	Water Management Services to Customers	Continue current practices
13	Identify Institutional Changes	Continue current practices
14	Supplier Pump Improved Efficiency	Continue current practices
Other Optional EWMPs (as applicable)		
Notes: *EWMP numbers correspond to (Water Code §10608.48(c))		

**Table 49. Report of EWMPs Efficiency Improvements
(Water Code §10608.48(d), §10608.48 (e), and §10826 (e))**

Corresponding EWMP No.(s)*	EWMP	Estimate of Water Use Efficiency Improvements That Occurred Since Last Report <i>(Quantitative or Descriptive)</i>	Estimated Water Use Efficiency Improvements 5 and 10 years in future <i>(Quantitative or Descriptive)</i>
Critical 1	Water Measurement	No data available to estimate	0%
Critical 2	Volume-Based Pricing	No data available to estimate	0%
Conditional 1	Alternate Land Use	No data available to estimate	0%
Conditional 2	Recycled Water Use	No data available to estimate	0%
Conditional 3	On-Farm Irrigation Capital Improvements	No data available to estimate	0%
Conditional 4	Incentive Pricing Structure	No data available to estimate	No data available to estimate
Conditional 5	Infrastructure Improvements	No data available to estimate	0%
Conditional 6	Order/Delivery Flexibility	No data available to estimate	0%
Conditional 7	Supplier Spill and Tailwater Systems	No data available to estimate	0%
Conditional 8	Conjunctive Use	No data available to estimate	0%
Conditional 9	Automated Canal Controls	No data available to estimate	No data available to estimate
Conditional 10	Customer Pump Test/Eval.	Not applicable (new EWMP)	No data available to estimate
Conditional 11	Water Conservation Coordinator	No data available to estimate	0%
Conditional 12	Water Management Services to Customers	No data available to estimate	No data available to estimate
Conditional 13	Identify Institutional Changes	No data available to estimate	No data available to estimate
Conditional 14	Supplier Pump Improved Efficiency	No data available to estimate	No data available to estimate

Notes:

*EWMP numbers correspond to (Water Code §10608.48(c)).

Table 50. Schedule to Implement EWMPs (Water Code §10608.56 (d))				
EWMP	Implementation Schedule	Finance Plan	Budget Allotment	1999 AWMC MOU Demand Measures
Critical				
1. Water Measurement	NA	NA	(1)	C-1
2. Volume-Based Pricing	NA	NA	(1)	No equivalent
Conditional				
1. Alternate Land Use	NA	NA		B-1
2. Recycled Water Use	NA	NA		B-2
3. On-Farm Irrigation Capital Improvements	NA	NA		B-3
4. Incentive Pricing Structure	NA	NA	(1)	C-2
5. Infrastructure Improvements	NA	NA		B-5
6. Order/Delivery Flexibility	NA	NA	(1)	B-6
7. Supplier Spill and Tailwater Systems	NA	NA		B-7
8. Conjunctive Use	NA	NA	(1)	B-8
9. Automated Canal Controls	NA	NA		B-9
10. Customer Pump Test/Eval.	NA	NA		No equivalent
11. Water Conservation Coordinator	NA	NA	(1)	A-2
12. Water Management Services to Customers	NA	NA	(1)	A-3
13. Identify Institutional Changes	NA	NA	(1)	A-5
14. Supplier Pump Improved Efficiency	NA	NA	(1)	A-6
Other EWMPs:				
1999 AWMC MOU A-4: Improve communication and cooperation among water suppliers, users, and other agencies.				
1999 AWMC MOU B-4: Facilitate voluntary water transfers.				
Grand Total all EWMPs				
Note: There is no equivalent AWMC Critical EWMP #2 or Conditional EWMP #10 NA = Not Applicable (1) Budget allocation within District's operation budget				

B. Documentation for Non-Implemented EWMPs

The District has considered, but rejected two conditional EWMPs. The remainder have either been previously implemented, are continuing to be implemented, or will be implemented. Non-implemented EWMP justification/documentation was described previously and is summarized in Table 51.

Table 51. Non-Implemented EWMP Documentation (Water Code §10608.48(d), §10608.48 (e), and §10826 (e))				
EWMP #	Description	<i>(check one or both)</i>		Justification/Documentation*
		Technically Infeasible	Not Locally Cost-Effective	
2	Recycled Water Use	x	x	Salinity of industrial wastewater exceeds safe re-use limit and treatment is cost prohibitive for customers at this time.
3	On Farm Irrigation Capital Improvements	x		Current on-farm efficiencies (>95%). Any further improvement unlikely with current technology.

Notes:
*Justification/Documentation can include summary cost-benefit analysis or engineering determination with reference to the specific study/agency/engineer responsible for making that determination.