From: Alemi, Manucher
To: Ballanti, Rachel;
cc: Sims, Susan;
Subject: FW: I"m Available until 2:30
Date: Monday, May 16, 2011 12:38:16 PM

-----Original Message-----
From: Osann, Ed [mailto:eosann@nrdc.org]
Sent: Friday, May 13, 2011 4:28 PM
To: Alemi, Manucher
Subject: RE: I'm Available until 2:30

Manucher --

Here are three specific recommendations that we're making --

RECOMMENDATION: Revise subpart 597.3(b)(A)(i) to read as follows:

(A)(i) The agricultural water supplier does not have, and lacks the legal authority to obtain, sufficient access to allow for the installation, operation, and maintenance of measurement devices at customer delivery points.

RECOMMENDATION: Revise section 597.3(b)(A)(2) to read as follows:

The agricultural water supplier has determined that the applicable accuracy standard of 597.3(a) cannot be met with commercially available measurement devices, where the agricultural water supplier provides documentation of the flow rates, elevations, and operating conditions that make it impossible to measure volume at each customer turnout for which the measurement exemption is claimed, and these data and the finding have been reviewed, signed and stamped by a registered Professional Engineer. An agricultural water supplier that utilizes the provisions of this section must demonstrate compliance with this section every three years, to account for changes in technology or cultural practices that may enable compliance with section 597.3(a).

RECOMMENDATION: Revise Section 597.2(a)(1) to delete the words "flow rate" and "velocity" from the definition of "accuracy", and revise Sections 597.3(a) and (b) to delete the words "flow rate" and "velocity" from the range of options for agricultural water measurement.

Ed

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