



2469 S. Danette Way. Yuma, Az 85365

To Whom It May Concern:

Re: LGMA Water Metrics

Having treated about 16,000 acres as a subcontracting company during the 2019/2020 growing season, I would like to suggest the following language to be considered and added to the AZ LGMA Metrics. Because the metrics in their current state, under the Glossary for “Antimicrobial Water Treatment”, “Irrigation Water Treatment”, “Ultraviolet Index”, and “Water Treatment” are all explicit and implicit in conveying potential types of approaches for water treatment, the whole of the LGMA metrics accounts for assumptions that treatments will primarily be chemical agents.

As such, I suggest including additional components within the metrics that make clear (more clear) that UV is an equally acceptable approach to be used. The glossary definition under “Antimicrobial Water Treatment” reads: “*A physical, energetic, or chemical agent, applied alone, in combination, or as a sequential process, to achieve and maintain a defined microbiological water quality standard.*” The allowance is certainly made here to make UV treatment possible, but additional items would bring clarity and help.

Since UV is used broadly, typically, AND effectively in many industries with the same goal of destruction of bacteria, it is only natural that the LGMA include and welcome such an effective and viable approach.

As to where this language is incorporated (be it in the Glossary, body of the metrics, or within the appendix is up to you. But such items, at a minimum, should be considered as potential parameters to capture when using UV, knowing that the grower/company itself is the driver with the final decision. Of course, as they do so, the specific parameters are to be spelled out in their SOP.

Please consider ensuring these terms are available as encouragement for growers/companies to consider and deploy all types of Antimicrobial Water Treatment:

Wavelength, Wattage, Fluence, Turbidity, GPM, Water Temperature, Lamp Style (standard output, high output, amalgam)

Thank you,

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