May 15, 2026

Subject: Technical Committee Recommendations Regarding Revisions to Draft Agricultural Water Safety Metrics

On behalf of the California LGMA Technical Committee:

The CA Technical Committee reviewed the current draft food safety agricultural water metrics on May 5th and 8th and offers the following recommendations for consideration. These recommendations reflect the Committee's collective technical expertise and are intended to strengthen the scientific and practical application of agricultural water safety requirements while improving their effectiveness across the diverse California production environments.

Explicit Rationale:

The Technical Committee recommends that the rationale supporting the proposed metric revisions be clarified and strengthened to more explicitly reflect the scientific research, technical expertise, and industry data that support these changes.

Where new requirements are proposed, the supporting rationale should clearly identify

- The specific risks or hazards being addressed
- The scope of the risk (e.g., local, regional, or industry-wide)
- The technical evidence supporting the requirement
- Consider existing or overlapping regulatory requirements (i.e. ag orders, water resource directives, etc.)
- The expected risk-reduction benefit

Providing clearer, evidence-based justification for proposed revisions will strengthen technical credibility, improve stakeholder understanding, and support more consistent implementation of risk-based agricultural water safety practices.

Risk Based Framework:

The Committee recommends that the draft metrics proposal be revised to incorporate a more risk-based framework. The revised framework should better align monitoring and assessment requirements with 1) actual water source vulnerabilities, and 2) operational risk factors. Suggestions include using:

- generic *E.coli* testing if Total Coliform testing is not practical and,
- assuring clear definitions for flood waters and "heavy" rainfall when determining risk to water sources and systems.

A risk-based approach would allow for more targeted implementation of water safety practices, improve resource allocation, and support science-based decision-making across the industry.

Risk Classifications and Criteria:

A key recommendation is the development and implementation of water well risk classifications. The Committee believes that establishing clear well classification criteria based on factors such as:

- construction integrity,
- age,
- location,
- hydrogeological conditions,
- proximity to potential contamination sources, and
- historical performance

These criteria would provide a more technically sound basis for determining assessment frequency and mitigation requirements. Additionally, using resources such as those provided by the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) and/or the Monterey County Water Resources Agency can assist with risk classifications. Such classifications would enable industry stakeholders to prioritize oversight and corrective actions according to relative risk, rather than applying uniform requirements to wells with significantly different risk profiles.

Training and Education:

The Technical Committee strongly supports requiring formal training and/or education, specifically for water system and well assessments that follows a Train-the-Trainer model where a member representative can be trained and subsequently train others from their company. The training or education should be specific in nature and take into consideration training already required by the LGMA, so as to not be redundant. The Committee believes that standardized technical training, that uses real world industry case studies (failing check valves, fertigation contamination, shallow wells, failed well integrity, etc.) would build internal industry competency and improve the quality and consistency of well assessments conducted throughout the sector.

This training would provide several important benefits:

- Equip qualified industry personnel with the technical knowledge necessary to conduct comprehensive and scientifically defensible well assessments.
- Promote greater consistency in evaluation methodologies and documentation practices.
- Facilitate more timely identification of vulnerabilities and corrective actions; and

- Reduce reliance on third-party assessment services where variable assessor experience, variable familiarity with agricultural operations and lack of operational context could be detrimental to assessment outcomes.

Alignment with AZ and CA LGMAs:

Lastly, the Committee recommends that language suggested by the AZ Technical Sub-Committee, and moving Table 1B into Appendix A, be adopted when appropriate for alignment between the AZ and CA Metrics.

Conclusion:

In summary, the Technical Committee recommends that revisions to the draft food safety water metrics proposal focus on:

- Improvements to the rationale supporting proposed changes
- Incorporating a stronger risk-based decision framework
- Establishing clear water well risk classification categories
- Requiring standardized well assessment training
- Allowing trained industry personnel to conduct detailed well assessments in lieu of mandatory third-party services, where appropriate
- Adopting AZ LGMA suggested edits to enhance alignment between the AZ and CA LGMA Metrics

The Committee believes these revisions would improve both the scientific defensibility and practical implementation of the metrics, ultimately strengthening agricultural water safety outcomes while supporting feasible industry compliance.

We appreciate the opportunity to provide these recommendations and remain available to offer additional technical input as revisions are considered.

Sincerely,

Jacob Odello
Chair, CA LGMA Technical Committee