

St. Mary River Irrigation District

1210 - 36th Street North, Lethbridge, Alberta P.O. Box 278 T1J 3Y7
Telephone (403) 328-4401 Fax (403) 328-4460 Email smrid@telusplanet.net



June 16, 2006

File: 1-W-2

Ross Herrington, P. Eng.
Senior Water Policy Advisor
Environmental Conservation Branch
Environment Canada
Room 300, 2365 Albert Street
Regina, SK
S4P 4K1

Dear Mr. Herrington:

Re: IJC Report

Enclosed is the St. Mary River Irrigation District response to the April 2006 Report, on the St. Mary and Milk Rivers to the IJC, by the Administrative Measures Task Force.

Yours truly,

A handwritten signature in blue ink, appearing to be "R. L. Renwick", written over a rectangular stamp area.

R. L. (Ron) Renwick, P. Eng.
General Manager

RLR/dc
Enc.



Serving over 370,000 acres of irrigation

**The St Mary River Irrigation District (SMRID) response to the April
2006 Report, on the St. Mary and Milk Rivers to the IJC, by the
Administrative Measures Task Force**

The SMRID has worked hard over the last 25 years to develop world class irrigation water distribution systems all dependent on the 1909 treaty and 1921 administrative order. This development has heavy emphasis on the conservation and efficient use of irrigation water. It includes over 780 km. of water distribution pipelines which eliminate water loss due to seepage and evaporation. Also included are approximately 400 km. of rehabilitated canals whereby water losses due to seepage are reduced or eliminated. Automated water controls throughout the SMRID further improve water management.

Some 1700 farm units within the SMRID have responded to the need for conservation by installing highly efficient on farm irrigation systems. Most of these involve low pressure center pivot irrigation systems. In fact some 270,000 acres out of 372,000 acres are irrigated using this system.

SMRID has further demonstrated respect for its water supply, which is based on the certainty of the 1909 treaty and 1921 administrative order, by sharing water during periods of shortage, even though legally not obliged to do so. Water has been shared in proportionate equal amounts among farm irrigators and all those non irrigators who receive water through the irrigation distribution system.

SMRID does support a review of water administrative procedures. These could include accounting procedures for surpluses and deficits as well as any other procedures that may produce mutual benefits to both sides.

SMRID believes the 1921 Order, as it affects the St Mary River, means balancing daily flows and reconciling them on a 15/16 day period. SMRID also believes the 1909 Treaty was based on each Country being able to make the most beneficial use of the available water during the irrigation season and sharing the water equally in the non irrigation season. A change to an annual balancing period, on the St Mary River, would require that flood flow volumes be included in calculation of annual flow volumes. It is acknowledged that these volumes do pass into Canada, however, only a portion are retained with the balance flowing to the Hudson Bay. Therefore an annual balancing period would give unfavourable treatment to the downstream country and would require that Canada receive reduced flows during the early spring and late

summer periods which are important periods for irrigation. Any in stream flow requirements would likely also be affected adversely. Therefore any modifications to the balancing period must be based on the concept of mutual benefits.

In summary, SMRID wishes the Canadian and United States Governments to continue with a spirit of cooperation and understanding so that mutual benefits can continue to be provided to both countries within the scope of the 1909 treaty and 1921 administrative order. Formation of a bi-national Working group would have merit. Negotiated letters of intent could result and assist the process.

