



July 14, 2014

Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: Oakdale Irrigation District's Comments on Item 10: Consideration of a Proposed Resolution for Drought-Related Emergency Regulations Pertaining to Urban Water Conservation

Dear Chair Marcus and Board Members:

On July 8, 2014, the State Water Resources Control Board (State Water Board) staff released proposed urban conservation emergency regulations (Proposed Regulations). Oakdale Irrigation District (OID) joins in the comments provided by the San Joaquin Tributaries Authority and also requests the State Water Board make revisions to clarify that the Proposed Regulations will not impact water operations and delivery of non-domestic water.

As the Proposed Regulations note, the current drought is "severe" and "continues to present urgent challenges." OID understands the level of drought and supports water conservation. In response to the drought conditions, local water agencies have taken significant effort to improve water conservation and increase water use efficiency. OID implemented provisions of its Level II Drought Policy and began enforcement of those conditions at the beginning of March. As of the closing of June, OID has reduced its diversions 25% over its historical 10-year average. Therefore, OID actively supports local action that promotes water conservation and water use efficiency.

On those lines, OID believes the State Water Board needs to clarify the term "governing body of a public water supply" in the context of an Improvement District (ID) (Water Code Division 11, Part 7). OID interprets the "governing body" of the ID to be the elected Board of the ID and not the "trustee" managers of the ID for operations and maintenance purposes, such as an irrigation district.

Additionally, the Proposed Regulations seem to impose state-mandated invocation of local drought plans; i.e. the State Water Board is requiring local water agencies to implement specific levels of a drought contingency plan crafted by them. We think local water management agencies best understand the resources and demand of the communities they serve. The imposition of state-wide mandates on

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local management has the State Water Board starting down a dangerous path of undermining local control and management of water resources. OID recommends the State Water Board revise the Proposed Regulations to allow local management entities to continue to manage local water resources.

Thank you for the opportunity to listen to our concerns.

Sincerely,

OAKDALE IRRIGATION DISTRICT

A handwritten signature in blue ink, appearing to read "Steve Knell", with a stylized flourish at the end.

Steve Knell, P.E.
General Manager

SK;lfp