

SUBMITTED VIA E-MAIL (commentletters@waterboards.ca.gov)

July 14, 2014

Felicia Marcus, Chair
c/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100



Subject: 7/15/14 Board Meeting Item 10: Consideration of a proposed Resolution for drought-related Emergency Regulations pertaining to urban water conservation

Dear Chair Marcus and other State Water Board members:

Turlock Irrigation District is thankful for the opportunity to comment on the above-referenced agenda item and the draft emergency urban water conservation regulations. Governed by a five-member, locally-elected Board of Directors, TID was formed in 1887 as the first publicly owned irrigation district in California. Today, TID serves water to approximately 5,800 growers who irrigate approximately 150,000 acres within TID's irrigation boundary. TID also provides electric service to nearly 100,000 homes and businesses.

The La Grange Domestic Water System

In addition to the above services, TID provides domestic water service to approximately 60 customer accounts within the community of La Grange. La Grange is the only community to which TID serves domestic water. Accounts are charged based on one of two rate schedules; domestic water service or public facility water service (currently utilized by a school, park and post office). Water is supplied for domestic use and for outdoor landscaping use.

TID has managed the La Grange Domestic Water System (DWS) since it purchased the water right that served the community in 1921 and subsequently entered into an agreement with the community to provide domestic water. The water supplied to the DWS is diverted from the TID Main Canal into a raw storage reservoir known as French Pit for treatment. Water is treated in compliance with California drinking water standards and is stored in two tanks with total capacity of 83,000 gallons. Connections are metered to encourage conservation, and rate schedules are tiered based upon usage. Usage in 2013 was near 7.5 million gallons, or approximately 23 acre-feet (AF). Water quality is monitored regularly and is reported to Stanislaus County.

La Grange has not elected to form a community service district to serve the above services, which can be seen as a testament to the reliable, safe and affordable water provided to the community by TID.

Serving less than 3,000 domestic customers and supplying less than 3,000 AF of domestic water annually, TID is not an "urban water supplier" as defined by California Water Code §10617.

Proposed emergency urban conservation regulations

Section X.1, *Prohibited Activities in Promotion of Water Conservation* is overly vague and will cause confusion as to which agencies will be expected to enforce the prohibitions outlined in subsections (1) through (4) of the regulations. Are these activities to be enforced only by those agencies meeting the definition of urban water suppliers outlined in §10617 of the Water Code, as the regulation would imply? The regulation should clarify which types of water service providers will need to enforce these prohibitions, and who shall collect and retain any fines as described in subsection (b).

Section X.2, *Mandatory Actions by Water Suppliers* refers to Water Code §10617 in defining an “urban water supplier”, but later introduces the phrase “distributor of a public water supply” ...“that is not an urban water supplier” in subsection (e) while referencing Water Code §350. Water Code §350 does not define “distributor of a public water supply”, and the regulation needs to define agencies that fit the category of “distributor of a public water supply” and provide clarity on this topic.

TID is a member of the San Joaquin Tributaries Authority (SJTA) and shares each of SJTA’s concerns outlined in its comment letter regarding this agenda item and these emergency regulations. Specific to subsection (1) of Section X.2 (e), TID concurs with SJTA’s recommendation that the regulation be modified to read:

(1) Limit outdoor domestic irrigation by the persons it serves to no more than two days per week.

Lastly, subsection (2) of Section X.2 (e) requires implementation of “another mandatory conservation measure or measures” without suggesting of defining such measures that would be in compliance with the regulation. It is suggested that the regulation be clarified to define which types of conservation measures would be in compliance with the regulations.

As stated above, TID concurs with the comments and recommendations made on this matter by SJTA.

Thank you for taking TID’s comments into consideration on this important item.

Sincerely,



Casey Hashimoto, P.E.
General Manager