



# IID

*A century of service.*



April 14, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Comment Letter – Urban Water Conservation

Dear Ms. Townsend:

The Imperial Irrigation District appreciates the opportunity to provide comments prior to your April 20, 2016 public workshop regarding the potential modification of the February 2016 Emergency Regulation for statewide urban water conservation. In particular, the State Water Board requested input about elements of the regulation that may need modification to account for regional precipitation differences, drought impact variations and the reliability of water supply resources for urban water suppliers.

Consistent with its previous comments dated May 29, 2015, and December 2, 2015, IID continues to believe that the revised mandates for the urban water suppliers served by the district (the cities of Brawley, Calexico, El Centro and Imperial) are overly cumbersome for these disadvantaged communities and should be reduced to the lowest 4 percent tier. Imperial County routinely struggles with one of the highest unemployment rates and lowest per capita income levels in the state, and these emergency regulations create yet another economic burden for our residents and water systems as they attempt, with only limited success, to implement and enforce unfunded demand reduction measures within these communities.

With regard to precipitation, while it may have a significant impact on some areas' annual water supplies, IID is a desert region that averages less than 3 inches per year of rainfall. Thus, precipitation has little to no influence on IID's municipal water uses, which comprise less than 2 percent of IID's annual water demands and rely solely on IID's 3,100,000 acre-feet Colorado River water entitlement. This supply is provided according to the terms of IID's federal 1932 permanent water delivery contract, which is comprised of at least 2.6 million acre-feet of reliable, drought-resistant, present-perfected Colorado River water rights.

Since 2003, IID has implemented the nation's largest agriculture-to-urban water conservation and transfer program that has created over 3.9 million acre-feet for urban Southern California water users, including over 1 million acre-feet over the last two years alone.

**Imperial Irrigation District Annual Water Conservation Summary**

All Values are Consumptive Use Volumes in Acre-Feet at Imperial Dam

Year	Misc PPRs	Conserved Water								Total Conservation
		IID/MWD Efficiency (1988 Agreement)	All-American Canal Lining	San Diego County Water Authority Conservation	Salton Sea Mitigation Conservation	Exhibit C Payback Conservation	IOPP Conservation Payback	ICS Conservation	Coachella Valley Water District Conservation	
2003	11,500	105,130	—	3,445	0	0	—	—	0	108,575
2004	11,500	101,900	—	20,000	15,000	48,149	0	—	0	185,049
2005	11,500	101,940	—	30,000	15,000	31,266	0	—	0	178,206
2006	11,500	101,160	—	40,000	20,000	37,154	0	1,000	0	199,314
2007	11,500	105,000	—	50,000	25,021	34,831	1,263	0	0	216,115
2008	11,500	105,000	8,898	50,000	26,085	0	16,197	0	4,000	210,180
2009	11,126	105,000	65,577	60,000	30,133	0	0	13,797	8,000	282,507
2010	11,500	105,000	67,700	70,000	33,761	0	0	0	6,809	283,270
2011	11,500	103,940	67,700	63,278	0	0	0	10,528	16,000	261,446
2012	11,500	104,140	67,700	106,722	15,182	0	14,299	0	21,000	329,043
2013	11,500	105,000	67,700	100,000	71,398	0	93,057	0	26,000	463,155
2014	11,500	104,100	67,700	100,000	89,168	0	117,391	37,735	31,000	547,094
2015	11,500	107,820	67,700	100,000	153,327	0	0	37,357	36,000	502,204
2016										
2017										
<b>Total</b>	<b>149,126</b>	<b>1,355,130</b>	<b>480,675</b>	<b>793,445</b>	<b>494,075</b>	<b>151,400</b>	<b>242,207</b>	<b>100,417</b>	<b>148,809</b>	<b>3,766,158</b>

With less than 35,000 acre-feet of demands attributable to the four municipal public water systems affected by the Emergency Regulations, the targeted conservation reduction goals for these entities would reduce local urban water use by only about 7,000 acre-feet annually, which pales in comparison to the Herculean water conservation efforts already being put forth by IID and its agricultural water users each year. These urban demand reductions are not considered conservation under the terms of IID’s transfer agreements and, due to federal water management policies and Colorado River water accounting rules, these supplies cannot be stored for future local urban uses. Instead, these demand reductions simply provide additional supplies that become available to IID’s agricultural water users, or flow through the Colorado River priority system to junior contractors without financial reimbursement to IID or these cities.

As such, IID continues to advocate strongly for additional reductions in, or the elimination of, the mandated demand reduction targets for the cities of Brawley, Calexico, El Centro and Imperial. IID’s massive conservation and transfer efforts should be acknowledged and considered more than sufficient to address Imperial County’s contribution to both the California and Colorado River droughts and in determining these water suppliers’ conservation standards.

Sincerely,



Tina Anderholt Shields, PE  
 Water Manager