

From: Timothy K. Parker [<mailto:tim@pg-tim.com>]

Sent: Tuesday, April 14, 2015 9:48 AM

To: Oppenheimer, Eric@Waterboards; Don Zdeba

Cc: Timothy K Parker; Jim Worth; Charles Krieger; Chuck Cordell; Chuck Cordell; Chuck Griffin; Don Cortichiato; Leroy Corlett; Peter Brown; Charles F. Cordell; Chuck Griffin; Don Cortichiato; Leroy Corlett; Peter Brown; Marcus, Felicia@Waterboards

Subject: Re: Mandated 35% Reduction

Hi Don and Eric:

Although I would imagine that the SWRCB and Governor's office are already aware of these facts, I thought it might be useful to add that Agriculture in the Indian Wells Valley has never received any water from the State or federal water projects due to a lack of conveyance, meaning Agriculture has had zero reductions in water supply, and also has had no limitations on groundwater use over the past four years. So Agriculture in the Indian Wells Valley has not suffered from State and Federal water project cutbacks like in the Central Valley and elsewhere on the massive water projects main arteries. In fact since 2010, 2200 acres of pistachios were added in the valley which at maturity require 4 to 5 acre-feet per acre, for a total of 8,800 to 11,000 AF-yr. Add that on top of a currently estimated annual groundwater budget deficit of approximately 15,000 AF-yr, and the deficit nearly doubles, greatly increasing the difficulty for the community to reach a sustainable balance in the coming decades as required under the Sustainable Groundwater Management Act.

Now, a portion of those 2,200 acres of pistachios were removed temporarily apparently due to a crop defect, but they will be replanted in the very new future if not already in process.

So while urban users are under directives by the state to conserve, Agriculture plans to continue ramping up groundwater use in the valley for pistachios, and does not have to my knowledge any sort of plan for conservation or reductions in demand for any of the crops grown which includes alfalfa.

Hope this is useful additional information.

Tim Parker

Timothy K. Parker, PG, CEG, CHG

Parker Groundwater

PO Box 221597

Sacramento, CA 95822

916-596-9163 office

707-509-8750 office

916-833-5800 mobile

www.pg-tim.com

Tim@pg-tim.com

NOTICE: This email and any attachments with it (files or other electronic media) are the property of Parker Groundwater, Inc. All rights are reserved without limitation, including copyright. The proprietary information contained in this email message and any associated attachments is intended for the use of the recipient(s) named above. If the reader of this email is not the intended recipient, you are hereby notified that you have received this email in error and that any review, distribution or copying of this email and/or associated attachments is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the original message and any associated attachments. The unauthorized use of this email and/or associated attachments is prohibited and disclaimed by Parker Groundwater, Inc.

On Apr 14, 2015, at 9:03 AM, Don Zdeba <don.zdeba@iwvwd.com> wrote:

<image001.jpg>

Eric,

I attempted to find direction on the SWRCB's website for the appropriate channel to provide comment on the Emergency Water Conservation Regulations and was not successful so I thought I would start with you.

Briefly Indian Wells Valley Water District (IWWVD) is one of the 135 water agencies on which the 35% reduction has been imposed. We are a desert community completely dependent on groundwater and considered a medium priority basin. IWWVD has approximately 12,000 residential and commercial connections. Humidity is extremely low and temperatures extremely high (110 is not uncommon) during the summer months. Evaporative cooling is the most efficient method for residential cooling and each cooler can use as much as 22,000 plus gallons during the summer season (based on a study by the University of Arizona). Summer afternoons are also typically windy which, along with the heat, contributes to the harsh conditions for maintaining landscaping. Our district has already achieved the 20% by 2020 reduction Governor Schwarzenegger and this new mandate to reduce an additional 35% translates into a reduction from 9198.5 acre-feet in 2007 to about 4,896 acre-feet in 2015. While it is a fact our district can achieve even more through conservation, this additional 35% reduction is an extreme burden being placed on our customers while we have an alfalfa farm reporting 7,524 acre-feet of pumping and a new pistachio farmer that over the past two years has planted 1,600 acres that will consume about 6,400 acre-feet (collectively twice as much as IWWVD pumped for our entire customer base last year). It seems unreasonable that 30,000 residents are being asked to reduce their usage almost 50% over the past 8 years while two farmers raising nuts and hay share none of the pain.

I would appreciate the State Water Board considering my comments.

Regards,

Don

Donald M. Zdeba
General Manager
Indian Wells Valley Water District
500 West Ridgecrest Blvd.
P.O. Box 1329
Ridgecrest, CA 93556-1329

E-mail: don.zdeba@iwwvd.com

Office: (760)384-5555

FAX: (760)375-0167

<image004.jpg>