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April 21, 2015

Comment on Emergency Regulations 4/18/2015

I am Special Counsel for the Indian Valley Community Services District (IVCSD) which supplies water and is not an urban water supplier with well under 1,000 end users. Three of five Board members were recently recalled. The District is burdened by debt, distrust and an antiquated leaky water distribution system, barely avoiding receivership in the last couple of years.

First, since many of the residents of Indian Valley pump their own groundwater or have appropriative rights to our streams, it would be helpful if SWRCB would spell out how if at all your regulations for end users apply to them. With the complexities of water law and regulation, your clarification of the extent of your authority would be very helpful.

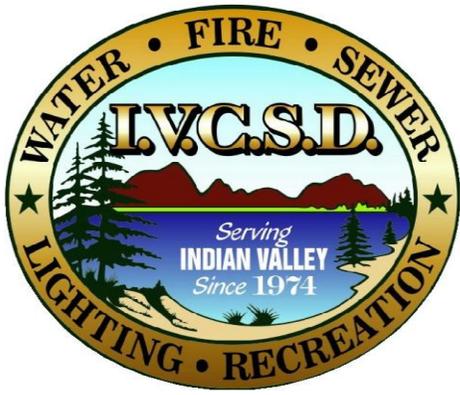
Second, in Section 865(b)(1) the Board recognizes the importance of leak detection in conservation and apparently relies on the self interest of the end user to incentivise repair and thus conservation. As to urban suppliers, you have created a tiered system of conservation goals which I understand to be based in large part on existing conservation efforts. IVCSD has a well documented measurable record of leak repair and resultant conservation in our distribution system over the last two years that shows conclusively that we have met your conservation requirements by repairing our delivery system to the end user. Just as you give credit for urban conservation, we request similar credit and consideration for our efforts. To require our end users to further reduce usage denies us the credit for conservation as provided for urban suppliers in the tiers which suggests a denial of fundamental equal protection of the law. We are a rural community and these things get personal especially when your neighbor with a well is watering every day.

Third, there is an apparent inconsistency between subdivisions 1 and 2 of Section 865 (f). Subdivision 1 gives a rural supplier the option to use two day a week watering *or* other measures to achieve a 25% reduction. However, subdivision 2 requires that the rural supplier confirms that it has implemented the two days per week requirement which changes the “or” in subdivision 1

to “and.” Do we or do we not have the option to achieve the goal by measures other than the two days per week requirement? Perhaps including leak repair that achieves measurable conservation in the delivery system.

Finally, with respect to Section 866(a)(1) are you giving the Director the authority to specify the additional actions to be taken or simply authorizing the Director to give the order for the supplier to devise and implement actions designed to achieve compliance.

Thank you for your consideration of these issues. I am sure we are not the only small rural water supplier facing this issue.



Indian Valley Community Services District

“Providing services for our community health, well being, and prosperity.”

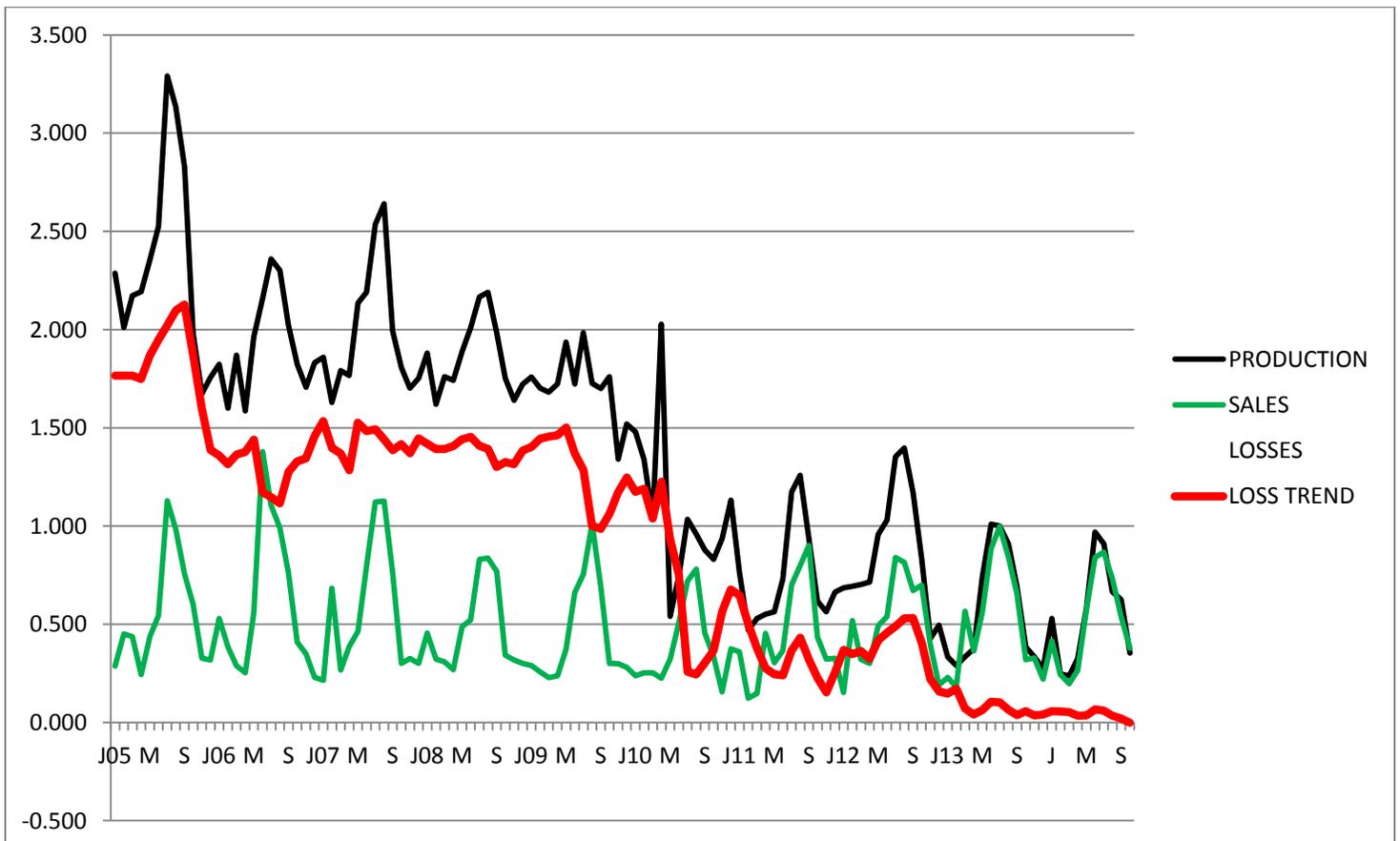
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Board of Directors

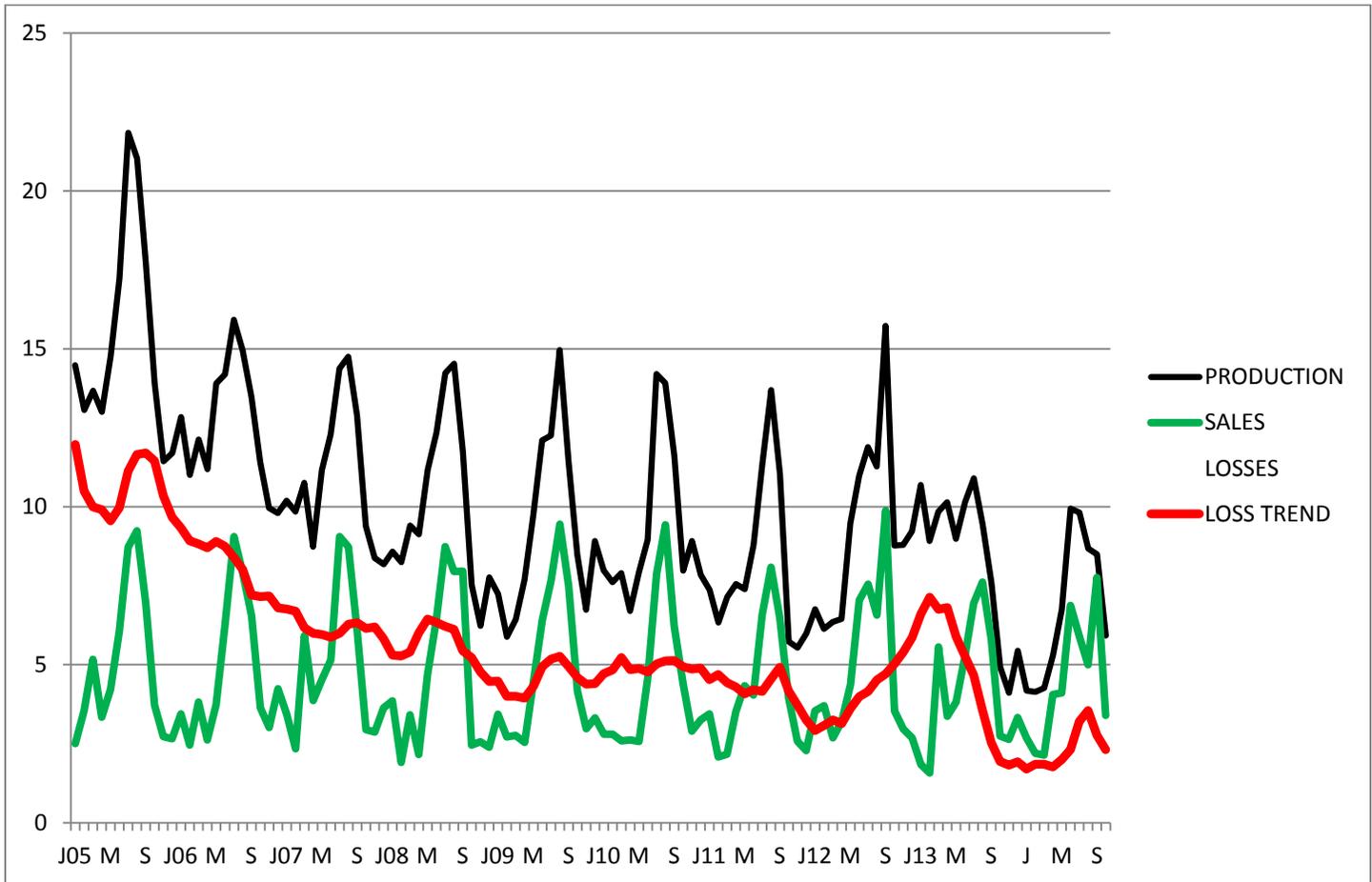
Brad Smith, Chair
 Mike Yost, Vice-Chair
 Blake Shelters
 Jane Braxton Little
 Matt Cassol

MEMORANDUM FOR RECORD
 6 NOVEMBER 2014
 JESSE LAWSON, GENERAL MANAGER/CHIEF OPERATOR
 RE: IVCS D WATER CONSERVATION EFFORTS

Indian Valley Community Services District is responsible for the operation of two publicly owned water systems, Greenville and Crescent Mills. These systems consumed an average of a combined 250 million gallons of water a year since 1980. IVCS D recognizes the fact that water is a precious natural resource as well as a valuable community resource and began conservation efforts in 2006. These efforts were hindered by a severe lack of resources available to the water departments. Our communities concentrated our efforts on water losses in the systems. In 2005 Crescent mills was losing an average of over 1,800,000 gallons a month while Greenville was losing an average of over 10,400,000 gallons of water a month. Water department crews started with Greenville, the larger of the two systems. From 2006 - 2009 crews worked during the night to identify and isolate loss points without disturbing users. By the end of 2009 crews had reduced losses from the 10+ million gallons a month down to an average of 4.3million per month. Focused then moved to Crescent Mills. The same techniques were used, and further refined, to reduce losses in Crescent mills to less than 35,000 gallons a month on average by 2012. See chart below:



After the successful near elimination of losses in Crescent Mills, crews returned attention to the Greenville water system. Crews continued to eliminate loss points systematically using the methods refined in Crescent Mills. By the end of 2013 losses were down to an average of less than 1.9 million gallons a month. See chart below:



The two water systems will consume less than 85 million gallons in total this year. This is 165 million gallons less than the systems were averaging before 2006. That is a reduction in use of over 65%. We, as a community, own and operate these systems and are very proud of our efforts. We welcome the challenge of reducing our consumption even further. These numbers, and our progress in their continued improvement, are reported every month at the District's regular Board meetings.

*****NOTHING FOLLOWS*****