

April 20, 2015

VIA E-MAIL

State Water Resources Control Board
Attention: Jessica Bean
Sacramento, CA

Re: Mandatory Conservation Draft Regulations

Dear Sir or Madam:

The Kinneloa Irrigation District is a small public water agency serving 584 customers in the Kinneloa Canyon area in Los Angeles County northeast of Pasadena California. I am writing to provide comments and raise issues regarding the proposed Mandatory Conservation Regulations issued on April 18, 2014 by the State Board.

While our Board of Directors and I understand the need to have an approach to conservation that is understandable, adequately addresses the state's needs in terms of conservation, and is not overly complex, my agency feels that the proposed regulations are too simplistic, and may result in disparate and unfair treatment of water users throughout the state.

For example, no consideration is given to the effects climate may have on a water agency's customers and their water needs or the size and type of the properties that an agency serves. We believe that the following factors should be taken into account during the Board's deliberations:

- Some effort should be made to differentiate between consumers in densely populated areas that primarily live in apartments, condominiums and houses on small city lots and suburban customers living in single family homes on large lots were as much as 80% of total water usage is for irrigating landscaping to protect homes from wildfires and hillsides from erosion and mudslides. Our water district serves homes in a hillside community with these ever present dangers.
- The GPCD should be computed on a 12-month average, not just the summer period. Our customers have dramatically reduced consumption in the winter period when the usage is more comparable to urban water users.
- The compliance assessment period should be based over a 12-month period rather than a nine-month period (June-Feb).
- Many of our customers use outdoor irrigation to grow food which is a beneficial use of the water.
- Nearly all of the water used by our customers is recycled into the aquifer from which it is pumped because their homes are on septic systems. Furthermore, storm water from our area is captured and diverted into spreading basins rather than into concrete channels leading to the ocean. The district should get credit for the fact that expect for water lost by evaporation, all our water goes back into the ground.
- Our district does not use imported water.

Thank you for the opportunity to comment on the proposed regulations. The Kinneloa Irrigation District feels strongly that through careful consideration of the varied financial and operational circumstances facing California's water agencies, the State Board will be able to craft regulations that are fair and equitable to all customers and their water agencies. If you have any questions regarding this matter, please contact the undersigned.

Very truly yours,

Melvin L. Matthews
General Manager
Kinneloa Irrigation District
1999 Kinclair Drive
Pasadena, CA 91107-1017
Phone: 626-797-6295
Direct Line/Voicemail: 626-798-2379
Fax: 626-794-5552
Mobile: 626-622-9137
E-mail: mel@kinneloairrigationdistrict.info
Internet: <http://www.kinneloairrigationdistrict.info>
Personal E-mail: melmatthews@outlook.com