



ECONOMIC DEVELOPMENT CORPORATION

servicing Tulare County

(5/5-6/15) Board Meeting- Item 6
Emergency Conservation Regulation
Deadline: 5/4/15 by 10:00 am

Chair

Craig Vejvoda
City of Tulare

Vice Chair

George Vasquez
Bank of the Sierra

Treasurer

Colby Wells
The Gas Company

Secretary

Teresa Boyce
City of Exeter

Immediate Past Chair

Nick Seals
Seals-Biehle Contractors

Leonel Benavides
City of Farmersville

Dr. Rosa Carlson
Porterville College

Stan Carrizosa
College of Sequoias

Bill Delain
Southern California Edison

Greg Gonzales
City of Woodlake

Warren Gubler
City of Visalia

Scott Harness
City of Dinuba

Steven Mecum
City of Lindsay

Mike Porte
Grubb & Ellis

Monte Reyes
City of Porterville

Cliff Ronk
Quad Knopf

Harroll Wiley
Workforce Investment Bd.

Dan Zoldak
Lars Anderson & Assoc.

May 1, 2015

Jeanine Townsend, Clerk to the Board
California Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 905814



Regarding: Comment Letter – Emergency Conservation Regulations

Board Members:

Thank you for the opportunity to comment on the proposed text of the emergency regulations implementing the 25% conservation standard.

Tulare County is one of the premier regions for agriculture and food processing in the State of California, producing \$7.8 billion in agriculture commodities, the largest of any county in California. Tulare County also ranks number one in the United States for dairy production and among the top citrus producers in the world. It is understood that water is an important part of ag production not just in our county, but throughout the State and as such we encourage all efforts to continue to protect the water resources necessary to maintain this segment of our economy.

Agriculture production, however, is just one part of the overall economic picture. The food processing industry, including the manufacturing of dairy products, frozen and fresh food products and juicing operations are also an important component of our local and regional economy. Food processing accounts for a large number of head of household manufacturing jobs in our communities. The water used by these companies is not only necessary for the manufacturing component but is also important for the sanitation of the facilities to ensure adequate food safety.

We recognize that the draft regulations do not specifically identify food processors and similar manufacturing processes as a target for reduction and we encourage your Board to maintain the legislative recognition of the importance of water used in these processes as you move forward with final regulations.

While “there are no specific use reduction targets for commercial, industrial and institutional users”, every effort should be made to encourage water suppliers to work with these sectors to achieve

conservation without impact to their operations, as reduction or curtailment of operations would result in the loss of jobs and thereby increased unemployment as well as other socio-economic impacts.

A definition for “informational order” should be established in Section 866 to make it clear that the “informational order” is a request for information and not similar to the “conservation order” found in other parts of the regulations. Likewise, we recommend that Section 866(b) be amended to read as follows :

The Executive Director, or his designee, may issue an informational order, **as defined**, requiring water suppliers, or commercial, industrial or institutional properties that receive any portion of their supply from a source other than a water supplier subject to section 865, to submit additional information relating to water production, water use or water conservation beyond that required to be reported pursuant to the other provisions of this article. **For commercial, industrial and institutional properties subject to this section, the review of the informational order shall be used only for the purpose of verifying compliance with Section 864 (c) and for no other purpose.**

Since commercial, industrial and institutional properties (as defined in Section 864(c) and 866(b) are only subject to either Section 866(c)(1) or 866(c)(2) an informational order should be narrowed in scope to these sections.

We appreciate the opportunity to comment on the draft regulations and appreciate your consideration of our comments and recommendations.

Very truly yours,



Paul M. Saldana, CEcD
President & CEO