

ARVIN COMMUNITY SERVICES DISTRICT

309 CAMPUS DR. • ARVIN, CALIFORNIA 93203

Phone (661) 854-2127 • Fax (661) 854-8230

LATE COMMENT

May 4, 2015



Attn: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Emergency Conservation Regulations

Dear Board Members:

I am the General Manager of the Arvin Community Services District ("ACSD") and write this letter on behalf of ACSD in regard to the State Water Resources Control Board's ("Board") Proposed Emergency Conservation Regulations.

ACSD is committed to doing its part to successfully implement the Governor's directive to decrease potable water usage statewide by 25%. However, there are several areas of concern in the Emergency Conservation Regulations that need to be addressed. We are hopeful that the Board will consider these concerns and address them through appropriate changes in the Proposed Text of the Emergency Conservation Regulations.

Subtraction of Water for Commercial Agriculture Use

The Proposed Text of Emergency Regulations of Water Code §866(e) allows Urban Water Suppliers that serve 20% or more of its total production for commercial agriculture use meeting the definition of Government Code §51201, subdivision (b) to subtract the amount of water used from commercial agriculture from its water production total.

The ACSD feels that the 20% requirement is arbitrary and that any water used for commercial agriculture use should be allowed to be subtracted from an Urban Water Supplier's water production total. A specific percentage for deduction from water production would potentially be unfair and create situations that would not

accurately reflect non-agricultural water savings. If an Urban Water Supplier provided 18% of its water service for commercial agricultural use, that entity would be forced into a position to encourage additional commercial agricultural water use so that it could obtain the 20% requirement to do the deduction, thus not actually saving water. As stated, to be fair all water used for commercial agriculture purposes should be allowed to be deducted. This approach would be consistent with how the Governor's Executive Order generally addresses agricultural water use.

Population Fluctuations

The proposed conservation methodology appears to be flawed in that it does not take into account changes in population from the 2013 numbers to the numbers required to be reported. It also does not appear to account for fluctuations in populations that occur due to the influx of migrant agricultural workers during the very months being utilized for the conservation standard (summer months). Population fluctuations should be taken into account for reporting and conservation requirements.

If you should have any questions, please do not hesitate to give me a call.

Very truly yours,



FERNANDO PANTOJA
General Manager