INDIAN WELLS VALLEY WATER DISTRICT

January 4, 2016

Ms. Kathy Frevert
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814
Kathy.Frevert@waterboards.ca.gov

Subject: Comments on Proposed Regulatory Framework

Dear Ms. Frevert,

Indian Wells Valley Water District (IWVWD) is a Special District located in the Upper Mojave Desert, approximately 50 miles west of Death Valley, serving approximately 12,500 residential and commercial customers within its service area, primarily within the City of Ridgecrest. The only source of water is groundwater within the Indian Wells Valley which is an unadjudicated basin. On behalf of the Board of Directors of Indian Wells Valley Water District, please accept the following comments on the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation.

The current 25% statewide conservation target established in the emergency regulations enacted by the State Water Resources Control Board (SWRCB) that took effect June 1, 2015 was based on a historical absence of Sierra snowpack as measured April 1, 2015. The snow that accumulates over the winter and early spring normally contributes over 30% of the water supply for the state. Recent measurements in the Sierra Range indicate water content in the snowpack ranges from 86% of the average for late December in the Southern Sierra to 116% of the average in the Central Sierra. Granted there are still three months until we will know for certain how this year will compare to April 2015, however consideration should be given to recognizing current conservation targets, particularly those in the highest tiers, are not sustainable without perpetuating unintended consequences. The 25% statewide target needs to be adjusted recognizing a repeat of last year's lack of snow accumulation does not appear likely. Understanding there is still uncertainty what the next three months will bring in terms of snow accumulation, it is prudent to remain conservative. Therefore, setting a statewide target on the order of 20% would be reasonable and acceptable.

Stakeholders have proposed an adjustment for climate recognizing water suppliers in inland desert areas face challenges suppliers in more temperate areas of the state do not. As proposed, stakeholders have suggested adjustments would be calculated by multiplying the deviation from the statewide average evapotranspiration (ET) rate by the water supplier's conservation target. Adjustments to the water supplier's assigned conservation target would range from 0% to 15%. Instead, SWRCB staff is proposing a climate adjustment using ET rates of not more than 4% for water suppliers in desert regions. For those of us located in arid desert areas and assigned a 36% conservation rate, a 4% reduction remains as challenging as the original target.

For the period from June 1st through November 30th, IWVWD has reduced water use by 24.5%, very close to the statewide 25% target. This reduction is in addition to a 20% decrease achieved within our service area prior to 2014. By excluding achievements prior to this year, those who did not embrace the 20X2020 initiative put forth by the Department of Water Resources in February 2010 early have not faced the same challenges that those who did act early to reach the goal. IWVWD is one of the Districts that took action prior to the current drought to decrease consumption. In addition to increased conservation outreach and educational programs, the Board of Directors passed two landscape ordinances in 2010 implementing planting and irrigation restrictions for both commercial and residential customers. The 36% conservation target assigned to IWVWD by the SWRCB results in an effective 50% reduction since 2007; certainly a challenging target to achieve considering other factors. When assigning new conservation targets, the SWRCB should give recognition and consideration to results achieved as a result of proactive actions taken by water suppliers prior to the implementation of mandatory restrictions.

Most significant in the case of IWVWD and other desert agencies are climate and land use density factors that impact ability to achieve the assigned 36% conservation target. High temperatures and low humidity typical to our desert area make evaporative cooling the most energy efficient and thus the primary method for cooling residences and businesses. According to a study by the University of Arizona's Office of Arid Lands Studies, "the percentage of household water used by the coolers was 25.8% for households without air conditioning, and 15.8% for all houses." Very few residences in our service area have both evaporative cooling and air conditioning. This study also states, depending on size, air movement, and relative humidity, seasonal water use for evaporate coolers can range from 7,350 to 22,050 gallons per cooler, or 35 to 100 gallons per day assuming 212 days of use. Consideration for this health and safety use, exclusive to arid desert areas, must be factored into discussion about sustainable conservation targets.

Land use density can have a significant impact on water consumption. A rural area with large parcels where hobby gardens and small animals are often kept will have a much higher residential gallons per capita per day (R-gpcd) than a highly urbanized area where apartment complexes occupy entire neighborhoods. These areas will have a high concentration of residents with relatively little outdoor irrigation resulting in much lower R-gpcd than a rural area where single families occupy larger parcels.

When considering an extension to conservation targets, IWVWD is supportive of a "hope for the best and expect the worst" approach. For the reasons cited, we do however believe the SWRCB should consider these suggestions prior to adopting a Proposed Regulatory Framework. In closing, it is important to not lose sight of the fact that conservation alone is not the solution to balancing California's water supplies with demands. Storm water capture, additional surface storage, water banking, and desalination are among the components that would comprise the comprehensive integrated solution needed.

Respectfully,

Don Zdeba
General Manager