

Jessica,

Under Sec. 865 Mandatory Actions by Water Suppliers.

(c) (2)

Each urban water supplier whose source of supply does not include groundwater or water imported from outside the hydrologic region and that received average annual precipitation in 2014 may, notwithstanding its average July-September 2014 R-GPCD, submit for Executive Director approval a request to reduce its total water usage by 4 percent for each month as compared to the amount used in the same month in 2013. Any such request shall be accompanied by information showing that the supplier's sources of supply do not include groundwater or water imported from outside the hydrologic region and that the supplier's service area received average annual precipitation in 2014.

My comment is that banked water within the hydrologic region/basins are not being considered? Municipalities that operate internally within a single basin, use 100% groundwater and have banked water in storage available to them. Seemed to be lost in the shuffle of the regulations.

For example: the City of Tehachapi has an allowed pumping allocation(APA) of 1,848 AFY. The City also leased 400 AF in 2014 (this was also internal to the basin). The City produced 2,182 AF in 2014, the combination of APA and leased water was more than our total production for 2014, which gave us carryover into 2015. The City also has 1,290 AF in banked water in storage within our groundwater basin. So all of our operations are soundly within the safe yield of the Tehachapi Basin.

It seems as though these types of scenarios are not being considered in the above mentioned section.

Thank you for the opportunity to comment.

Best regards,

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