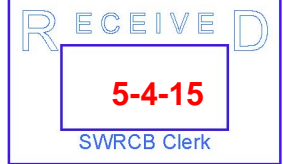




TWENTYNINE PALMS WATER DISTRICT



May 4, 2015

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

Re: Comment Letter-Emergency Conservation Regulation – Section 865(c) (2) Provision  
Regarding Water Suppliers With A Minimum Of Four Years Of Supply That Do Not Rely  
On Imported Water and Have Groundwater Supplies That Recharge Naturally.

Dear Ms. Jeanine Townsend,

The Twentynine Palms Water District appreciates this opportunity to respond to the State Water Resources Control Board's specific question contained in the "Notice of Proposed Emergency Regulation Fact Sheet," published April 28, 2015. The question asks "*whether the regulation should allow water suppliers whose supplies include groundwater to apply for inclusion the 4% reserve tier if it can be demonstrated that they have a minimum of 4 years of supply, do not rely upon imported water, and their groundwater supplies recharge naturally.*"

Our answer is an emphatic yes. This provision would represent an equitable and practical component to the regulation because it would acknowledge and account for the unique situations that similar urban water suppliers, like Twentynine Palms Water District are in. The District relies solely on naturally recharging groundwater as our source of potable water and we do not import any surface water. Given these circumstances, we have long managed our source of groundwater with diligence, such that we are confident of having a sufficient supply of water as demonstrated in our Urban Water Management and Groundwater Management Plans.

We understand the seriousness of the drought and its severe impacts on many regions of California. We support the Governor's and the Board's proactive approach to managing the state's valuable water resources. We also appreciate the Board's willingness to take steps to ensure that the forthcoming Emergency Conservation Regulation recognizes situations such as Twentynine Palms Water District.

As we explained in our prior letter to the Board on April 22, 2015, the Twentynine Palms Water District provides water service to a high-desert community on the southern boundary of the Mojave Desert in San Bernardino County, 54 miles northeast of Palm Springs. We serve 18,000 residents within an 87-mile-square area. The District lies within the boundaries of three groundwater basins: Twentynine Palms Valley Groundwater Basin, Joshua Tree Groundwater Basin and Dale Valley Groundwater Basin. Water provided to customers by the District is derived solely from groundwater pumped from supply wells located along the southern limit of the service area. The district receives no water from wholesale or retail purveyors.

The District has a long history of responsibly managing its valuable groundwater resources. Our desert landscape and climate make this imperative. We have promoted conservation measures that have resulted in the installation of local landscapes with drought-tolerant native plants. Residents and businesses alike have embraced the concept. Water use varies greatly in our service area, from 66 gallons per capita per day in cooler months to 139 gallons per capita per day in the heat of summer. As we noted in our prior letter, the reason for the higher summer figure is not lawn watering, like many communities. Rather, it is largely because the majority of our residents use evaporative water coolers (swamp coolers) to survive the heat. Our residents have only low to moderate incomes, and most cannot afford the expense of air conditioning. For health and safety reasons, they also cannot afford to turn off their swamp coolers during the summer to save water.

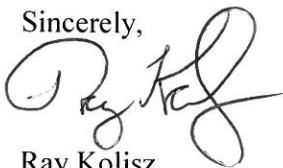
This situation alone would be sufficient reason for not requiring Twentynine Palms Water District to restrict water usage to the high levels contemplated in the draft Emergency Conservation Regulation. But for equally important reasons, the potential exception for water suppliers that import no water, have at least four years supply in reserve, and have naturally recharging groundwater supplies is a reasonable and sensible provision that should be incorporated into the regulation. Placing water suppliers that meet these three criteria into the 4 percent reserve conservation tier would still require that such suppliers contribute to the overall goal of achieving a 25 percent water savings statewide. At the same time, this provision would acknowledge that a higher conservation tier would not be appropriate under the circumstances.

This provision would be in harmony with the Board's approach to implementing the Governor's Executive Order No. B-29-15. The Board's stated goal is to ensure adequate water supplies in the future. In its most recent Fact Sheet, the Board emphasized that the tough restrictions it is imposing are necessary because the drought could continue, creating even greater water scarcity. As the Board stated, "no one knows how the future will unfold." While this is true for many areas, for Twentynine Palms Water District, this is not the case. The water supply for the District is assured for many years to come.

In summary, for the reasons described above, the Twentynine Palms Water District strongly supports the Board to refine Section 865(c)(2) of the forthcoming Emergency Conservation Regulation to permit an urban water supplier that does not rely upon imported water, have a minimum of four years of supply and their groundwater supplies recharge naturally to seek approval by the Executive Director to reduce total potable water production by 4 percent for each month as compared to the amount used in the same month in 2013.

We thank you for seeking feedback on this important potential provision to the Emergency Conservation Regulation, and would be happy to further discuss these issues with you and your staff at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Kolisz". The signature is fluid and cursive, with the first name "Ray" being more prominent than the last name "Kolisz".

Ray Kolisz  
Interim General Manager