

Lamont Public Utility District
8624 Segrue Road Lamont, CA 93241
Phone 661-845-1213 Fax 661-845-4436

April 22, 2015

Jessica Bean
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
Jessica.Bean@waterboards.ca.gov

Re: Proposed Text of Emergency Regulations Implementing Executive Order B-29-15

Dear Ms. Bean:

I am the General Manager of the Lamont Public Utility District (“LPUD”) and write this letter on behalf of LPUD in regard to the State Water Resources Control Board’s (“Water Board”) Proposed Text of Emergency Regulations Implementing Executive Order B-29-15. LPUD appreciates the Water Board’s efforts to involve municipal water suppliers and other regulated entities in the process of implementing the Executive Order.

LPUD 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 as to the implementation of the Governor’s Executive Order. We are hopeful that the Water Board will consider these concerns and address them through appropriate changes in the Proposed Text of the Emergency 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 (a) to subtract the amount of water used from commercial agriculture from its water production total.

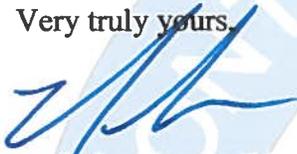
The LPUD feels that the 20% requirement is arbitrary and that any water used for commercial agriculture use should be allowed to be subtracted from an urban water supplier’s water production total. The LPUD’s commercial agriculture use varies on a monthly basis between approximately 10%-28%. Locking into a specific percentage for deduction from water production would create chaotic results that would not accurately reflect water savings. As stated, all water used for commercial agriculture purposes should be allowed to be deducted. This approach would be consistent with how the Executive Order generally addresses agricultural water use.

Allow a Process to Revise Reports

The LPUD believes that there should be a process in place to allow urban water suppliers to amend previous reports filed with the Water Board when the urban water supplier can show that there was a miscalculation and/or incorrect information was unintentionally provided and any new calculation or information is provided with an explanation as to the previous inaccuracy and shows why the new information is correct. In addition, if such information shows a different average use of gallons per day during the designated time period for establishing conservation tiers then the urban water supplier should receive a revised conservation tier designation.

Thank you for inviting LPUD and other urban water suppliers to provide comment on the Water Board's Proposed Text of Emergency Regulations. If you should have any questions, please do not hesitate to contact me.

Very truly yours,



Nicholas Turner, P.E.
General Manager

