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January 06, 2015

Sean Sterchi, PE
San Diego/Imperial District Engineer
California Department of Public Health
Drinking Water Program District Office – San Diego
1350 Front Street, Room 2050
San Diego, CA 92101

Subject: 2014 Annual Report-SDWA Compliance Project

Dear Mr. Sterchi,

On May 16, 2000, the California Department of Health Services (DHS), now the California Department of Public Health (DPH), issued a departmental determination that the Imperial Irrigation District (IID) had fulfilled the requirements of its Compliance Agreement to implement the exclusions outlined in Section 116275(s) of the California Safe Drinking Water Act (SDWA). Through the methodologies, procedures, and processes established by the Compliance Agreement, IID's non-agricultural water users have been "excluded" on a case-by-case basis as domestic water connections and, therefore, IID is not required to submit an application for a Public Water Supply permit. In accordance with this determination, please accept this letter as IID's fourteenth annual report (covering the 2014 calendar year) outlining its ongoing SDWA compliance efforts.

In 2014, the vast majority (71.1%) of IID's 3,705 canal water users were excluded based on the "alternative water" designation. The remaining canal water users either received treated water from a local municipality or small public water system (6.4%), or did not use the canal water for 'residential purposes' (5.9%). Some portions of our accounts were also classified as idle/vacant (16.5%).¹ Once again, IID was not forced to terminate any canal water connections last year in order to maintain compliance, nor did we issue any disconnection notices. On no occasion in 2014 did IID have 15 or more canal water connections that failed to have an alternative water source for drinking and cooking purposes.

Last year four DHS Approved Providers (D&M Water Company, El Oasis Water Company, Roman's Water, and Sparkletts Waters) continued to provide alternative water delivery service to IID customers. The IID Board of Directors continued to provide funding for the Alternative Water Assistance Program to prevent the termination of water service to low-income water users who meet certain criteria. Applicants for this program are solicited from non-compliant accounts during the termination notification process. IID staff continues to work with the Imperial County Planning & Development Services Department to ensure that new rural construction projects are not permitted until both agencies' water requirements are fulfilled and that all major subdivisions connect to an adequate potable water supply prior to construction.

In 2014, while IID continued to contract with a database consultant to provide technical support, ongoing maintenance, and system improvements for its SDWA compliance verification and tracking database, it

¹ Based on data from December 29, 2014.

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also began to develop in-house expertise via a multi-year knowledge transfer process. The linkage between this database and the IID's SAP computer system has been in place for several years now, and staff has settled into a routine with regard to data maintenance and verification procedures. Account information and owner records are regularly updated as new information becomes available and/or as tenant changes occur. Additionally, the ability to access data from IID's power records at each service pipe location has improved our capacity to monitor these tenant changes and ensure compliance with SDWA requirements. Not only does this digital relationship facilitate data transfer, it increases the timeliness with which staff can respond when these changes do occur. Of course, physical site visits continue to play a critical role in IID's routine SDWA compliance and enforcement activities along with the annual DHS Approved Provider verification process. To facilitate these efforts, in 2014 IID continued to dedicate a field staff position to assist current office and database personnel in these rural site visits.

In 2009, IID received approval to establish the Imperial Region for the California Department of Water Resources' (DWR) Integrated Regional Water Management Plan (IRWMP) process. The following year IID kicked off this planning effort, intended to serve as a collaborative approach to managing all aspects of water resources within the region. The IRWMP planning effort involves multiple agencies, stakeholders, individuals, and groups who will strive to address various water related issues and perspectives through a comprehensive approach aimed at developing mutually beneficial solutions. IID views the Imperial Region IRWMP process as a new opportunity to address water planning issues, including treated water requirements and rural water uses. The IRWMP was adopted by the IID Board of Directors in October 2012.

As always, IID appreciates the cooperation of your agency and staff as we continue to ensure IID canal water users are compliant with both federal and state SDWA. We look forward to working with your office and other partners to develop long-term strategies aimed at reducing rural dependence on IID's canal water system. If you have any questions, please feel free to contact me directly at (760) 339-9083.

Sincerely,



David Bradshaw
Assistant Water Department Manager
Planning & Technical Services

Attachment-12/29/14 SDWA Annual Report
cc: Board of Directors/GM/Legal/WD Mgr
Tina Shields, Manager, Colorado River Resources
Carrie Cruz, Water Operations Analyst I
Armando Villa, ICP&DS

IMPERIAL IRRIGATION DISTRICT
SAFE DRINKING WATER ANNUAL REPORT

Report Date: 12/29/2014

Section	Description	Excl	Count	Percent
1	EXCLUDED CONNECTIONS (per SDWA definitions)			
	Non-Domestic Use Exclusion			
	Irrigation, stockwater, etc. (no indoor use)	1	182	4.9
	Private Well	3	36	1.0
	Sub_Total		218	5.9
	Alternative Treatment Exclusion			
	Large Public Water System (municipal/private PWS)	3	205	5.5
	Small Public Water System (<200 connections)	3	33	.9
	Sub_Total		238	6.4
	Alternate Water Supply Exclusion			
	Approved Provider (verified)	2	2611	70.5
	Approved Provider (financial assistance)	2A	23	.6
	Sub_Total		2634	71.1
	Alternate Water Supply - non-approved source	4	0	.0
	Idle/Vacant Accounts (no indoor use of canal water)			
	Vacant	7	596	16.1
	Vacant (No Meter)	7A	14	.4
	Sub_Total		610	16.5
	New Accounts (Verification in progress)	5	4	.1
	Water User Association	6	0	.0
	Section Total		3704	100.0
2	CONNECTIONS (per SDWA definitions)			
	No Alternative Water (indoor use of canal water)	9	0	.0
	POE, No Alternative Water (point of entry system)	9	0	.0
	No Response (not verified)	9	1	.0
	Sub_Total		1	.0
	Section Total		1	.0
	Grand Total		3705	
	New Construction Total		10	
	Number of days exceeding SDWA compliance requirements (15 or more connections per SDWA definitions) in 2014		0	