



# CITY OF OCEANSIDE

## WATER UTILITIES DEPARTMENT

Thursday, January 12, 2017



Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

The Honorable Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

RE: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the State Water Resources Control Board:

On behalf of the City of Oceanside, we wish to express our appreciation to the Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) for the opportunity to provide input on the extension and potential modification of the current Emergency Regulations for Statewide Urban Water Conservation.

Regionally, the San Diego County Member Agencies have dedicated the last ten years to ensuring that in addition to delivery of a safe and reliable water supply, investments have been made toward the development of local water supply through diversified methods including water reuse, recycled water and seawater desalination – all of which have contributed to seeing us through this drought with a surplus supply and sufficient available supplies to meet customer demand for the next three years.

In response to the information to be addressed at the public workshop, and more specifically the questions posed by the Board, we offer the following:

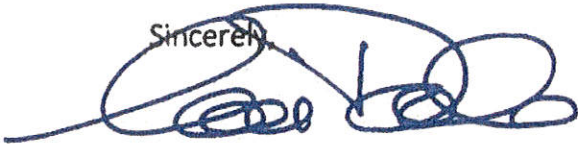
1. As for continued support for existing May 2016 Emergency Regulations, we encourage the Board to move forward to rescind the regulations now rather than later. This is predicated by the fact that many areas throughout the state are no longer experiencing emergency shortage conditions due to improved hydrologic conditions and agencies statewide have demonstrated supply sufficiency that has been made publicly available and transparent by each retail water agency.
2. In regard to the need to account for regional differences due to weather and hydrology, we must again reference the existing stress test that takes regional differences into consideration. Of greater importance because it is not dependent upon climactic conditions, this drought resilient supply is a critical element in determining supply sufficiency.

3. It is with some disappointment that we come to the third and last question posed by the Board as it ignores a critical component to any comprehensive plan to combat emergency water shortage- a drought resilient local supply. This has been a constant theme in our ongoing comments and responses to the state and, unfortunately, is one that is not greatly evidenced in the resulting actions. Without the inclusion of local supply in these proposals, we cannot support action taken by the state.

It is with great respect that we consider the responsibilities of the State Board and of the individual retail agencies located across the state. We appreciate and support the Board's continued inclusion of the supply reliability "stress tests" that recognize local efforts and considerations that help to demonstrate individualized compliance based on actual supply availability.

We thank you for this opportunity to participate in this collaborative effort and for the thoughtful consideration of our response to these proposals.

Sincerely,



Cari Dale  
Water Utilities Director  
City of Oceanside