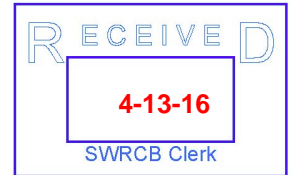




San Diego County Water Authority

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April 12, 2016

Delivered by e-mail to: commentletters@waterboards.ca.gov

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OTHER REPRESENTATIVE

County of San Diego

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop (4/20/16)

Dear Chair Marcus and Members of the State Water Board:

The San Diego County Water Authority appreciates the opportunity to provide input on potential revisions to the February 2016 Emergency Regulation. With many urban water suppliers statewide not experiencing supply shortages, this letter contains proposed refinements to the February 2016 Emergency Regulation that takes into account the actual shortage condition, if any, within a community. To incentivize residents, business and industries to invest in additional drought-resilient supplies and continue using water efficiently, any statewide conservation mandate must be based on the supplies available to that community.

Even though rainfall totals have been below average in San Diego County, our region maintains a reliable supply because of past investments in carryover storage and drought-resilient supplies. On average, only ten percent of the region's supplies come from runoff into local surface water reservoirs. Even in a wet year, similar to the last strong El Niño in 1998, the surface water supplies only provided about 20 percent of the supplies necessary to meet demands. The development of supply sources not reliant on precipitation has allowed our region to effectively adapt to a changing climate that could bring lower levels of precipitation and warmer temperatures. The investments made by the Water Authority and its member agencies include the transfer of agricultural conserved water from the Colorado River, recycled water, brackish groundwater recovery projects and the Lewis Carlsbad Desalination Project. The region has also done an excellent job using water efficiently with per capita potable water use down approximately 40 percent since 1990.

A public agency providing a safe and reliable water supply to the San Diego region

For this drought period, the Water Authority established a regional target based on the member agencies' reduction mandates, which the San Diego region has been successful in meeting. The aggregated target through February 2016 was 20 percent and the region exceeded that target, reducing water use 21 percent compared with the state baseline of 2013.

In response to the State Water Board's April 20th informational workshop announcement and request for input, we are offering two principal recommendations, summarized below, which address questions posed in the workshop notice.

Implement Self-Certification Supply-Based Approach In Lieu of a Conservation Mandate. If the Emergency Regulation is to continue, and given that local suppliers are the best equipped authority to assess the sustainability of local supplies, we support a self-certification process for urban water suppliers, in lieu of a conservation mandate. The self-certification would require urban water suppliers, either individually or as a region, to report in June 2016 on available supplies (including surface water and groundwater storage) and demands through October 2016. Self-certification at a regional basis would be an available option if all urban water agencies in the region agree to this approach.

Suppliers would certify their anticipated supplies and demands through October 2016 by providing information to the State Water Board. If available supplies are sufficient to meet anticipated demands and maintain supply reserves for future droughts, the supplier would be exempt from a mandated conservation standard under the current Emergency Regulation. If available supplies are not sufficient to meet anticipated demands, the actual shortage level identified would serve as their standard through October 2016. If the shortage is at five percent or less, the supplier would be exempt from a mandated conservation standard. If a supplier does not submit data to self-certify, their current conservation standard would either continue or default to a lower (less-restrictive) state standard.

As part of the self-certification, the State Water Board could collect estimates on the following types of information:

- Amount of all supplies by source (including existing and newly developed supplies) available June through October 2016
- Available reserve supplies in surface water and groundwater storage, after taking into account utilization through October 2016, that would be available should the drought continue
- Sustainability of groundwater supplies, taking into account utilization through October 2016 and reserves that are needed should the drought continue. (For

example: Have groundwater levels in your agency's aquifer(s) decreased or remained stable over the past 2 years?)

- Projected monthly potable water demands for June through October 2016, based on averages from 2013 and 2015
- Actual agency-adopted shortage level based on their Water Shortage Contingency Plan (WSCP), taking into account estimated water demands and available supplies through October 2016

The State Water Board would have the ability to verify agencies certified supply figures by requesting documentation that would support the figures (e.g., urban water management plans, integrated regional water management plans, watermaster annual reports, groundwater plans, drought management plans).

In addition, all suppliers would continue to take the following actions:

- Prohibit the specific water uses, as included in Section 864 of the current Emergency Regulation
- Report monthly through October 2016 (with compliance on a cumulative basis), as included in the current Emergency Regulation
- All urban water suppliers should have a documented mechanism (e.g., ordinance or minutes) enabling implementation of water use reduction stages based on a shortage identified by the water supplier

Focus Support on Water Suppliers and Communities Needing Assistance. We support the State Water Board in using its limited resources most effectively by focusing efforts on water suppliers and rural disadvantaged communities (DACs) with severe shortages and water quality issues. In focusing its efforts in this direction, the State Water Board can provide the necessary services and recommend funding for those that need the most help.

We look forward to continuing to work with the State Water Board, the Department of Water Resources and other stakeholders on a comprehensive drought response approach and potential long-term water use efficiency policy.

Sincerely,



Maureen A. Stapleton
General Manager