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**Elsinore Valley Municipal Water District**

*Our Mission...*

EVMWD will provide reliable, cost-effective, high quality water and wastewater services that are dedicated to the people we serve.

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**General Manager**  
John D. Vega  
**District Secretary**  
Terese Quintanar  
**Legal Counsel**  
Best Best & Krieger

April 10, 2015

Jessica Bean  
State Water Resources Control Board  
Post Office Box 100  
Sacramento, CA 95812-0100

Via Email to:  
Jessica.Bean@waterboards.ca.gov

**SUBJECT: COMMENTS ON PROPOSED REGULATORY FRAMEWORK FOR MANDATORY CONSERVATION (AS RELEASED APRIL 7, 2015)**

Elsinore Valley Municipal Water District (EVMWD) appreciates the opportunity to comment on the Draft Regulatory Framework for Mandatory Conservation as released on April 7, 2015. EVMWD understands the water challenges that affect our state and supports the Governor's leadership and his continued commitment to addressing these challenges. EVMWD also understands the time constraint under which the State Water Resources Control Board (SWRCB) is laboring to promulgate the implementation of the Governor's Executive Order B-29-15.

While we fully recognize the gravity of the current drought crisis, we feel that the regulatory framework for mandatory conservation proposed by the SWRCB in response to the Governor's Executive Order is unfair on agencies such as EVMWD that have demonstrated a solid track record of water management. EVMWD has already implemented many of the strategies outlined in the Executive Order B-29-15, as highlighted below.

**Compliance with 20x2020:** EVMWD implemented a ***water conservation program*** in 2005 and ***budget based water rates*** in 2008 and has benefited with lower per capita water use. Compared to a 20x2020 goal of **240 gallons per capita per day (gpcd)**, EVMWD's 2014 water usage is **167 gpcd**. This represents a 30 percent reduction beyond the 20x2020 requirements.

**Landscape Ordinance:** EVMWD is in the process of implementing a landscape ordinance that will eliminate turf for new developments. The proposed ordinance also calls for an increased water efficiency rate, one that is more stringent than the State's Model Landscape Ordinance.

**Maximizing Reuse:** EVMWD has invested heavily in the development of local resources and supplies. 100 percent of EVMWD's recycled water is utilized for landscape irrigation and environmental enhancement.

**Sustainable Groundwater Management:** EVMWD has an excellent track record of managing its groundwater resources. Even prior to the recently passed Sustainable Groundwater Management Act, EVMWD had adopted an AB 3030 Groundwater Management Plan for the Elsinore Basin. The plan resulted in the implementation of deep injection aquifer storage and recovery (ASR) projects – one of the few successfully implemented ASR projects in Southern California. This project helped **EVMWD reduce its imported water supplies from the State Water Project and the Colorado River by 16 percent** in 2014. EVMWD's dry year program will achieve similar reductions in imported water use in 2015 and 2016.

To address the challenges associated with the implementation of the current framework as proposed, we request that the State Board consider the following:

- A reduction requirement that is consistent with a no-more-than 25-percent reduction from all California water suppliers, as noted in the Executive Order. Requirements beyond the mandated 25-percent reduction are unfair on agencies that have implemented many of the strategies outlined in the Executive Order.
- Reevaluate the four tiers based on the conservation accomplished by the agencies consistent with the State's 20x2020 mandate. For example, EVMWD current per capita is 30 percent lower than its 20x2020 per capita goal.
- Provide credit for the use of recycled water within a water agency's service area.
- Provide credit for dry-year storage projects such as EVMWD's ASR program. In a dry-year storage program, an agency stores wet water to be used during a drought. Agencies have spent millions of dollars to build the necessary infrastructure and purchase the wet water for storage to be extracted during a drought. The purpose of dry-year storage programs is defeated under the proposed drought framework.
- Provide credit for the use of local supplies. 40 percent of EVMWD's supplies are local resources such as groundwater and treated runoff from precipitation.
- Provide a consistent approach to estimate the R-GPCD metric. Agencies should have the option to adjust the R-GPCD to account for increasing population in their service areas.

In closing, we respectfully urge the SWRCB to reconsider its proposed regulatory framework and work with water agencies to address the challenges we face as a state. Should you have any questions regarding these comments, please contact me 951-674-3146, extension 8251.

Sincerely,



John D. Vega  
General Manager

