



January 12, 2017

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

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

Subject: Comment Letter - Urban Water Conservation Workshop

Dear Chair Marcus:

Thank you for this opportunity to submit Padre Dam Municipal Water District's comments on the potential extension or modification of the current Emergency Regulation for Statewide Urban Water Conservation.

Water sustainability and drought resilience remain very important to Padre Dam. Since June 2016, Padre Dam has been at a zero percent conservation standard through the self-certification option. However, water use from June – December 2016 remained 19 percent below 2013 levels proving Padre Dam and our customers have adopted a water conservation lifestyle. A mandate is not necessary for water efficiency to continue.

Padre Dam has adopted the mandatory water-waste prohibitions into our District Policy. These water waste prohibitions will remain a part of our policy regardless of a State mandate and/or drought.

In addition, Padre Dam continues to pursue increased supply reliability with our Advanced Water Purification Program, which would produce up to 30% of our current drinking water supply. Water supply diversification projects are an important element of a sustainable water supply future.

In response to the questions within the Notice of Public Workshop, please see Padre Dam's responses to the questions:

- 1. What elements of the existing May 2016 Emergency Regulation, if any, should be modified? Should the State Water Board wait until the hydrology for the current water year is known (April or later) before proposing adjustments to the current method for calculating conservation standards? And, should the State Water Board allow suppliers to update or modify their conservation standard calculations (and if so, how)?***

Padre Dam recommends the current emergency regulations expire in February 2017. This recommendation is based on the fact that the 2017 water year is producing record snow and rainfall throughout the State. We plan to continue to promote long-term water use efficiency, monitor supply conditions closely and if necessary take appropriate local actions consistent with our water shortage contingency plans.

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Considering current supply conditions throughout the state, sending a message to the public that the State remains in a drought emergency undermines our credibility with the public and hurts the effectiveness of future conservation messaging that would be needed during actual emergency conditions. The State Water Board should focus its efforts on those communities that are truly facing supply shortages and are unable to meet the water demands of their community.

2. *Should the State Water Board account for regional differences in snowpack, precipitation, and lingering drought impacts differently than under the current emergency regulation, and if so, how?*

The current “stress test” component of the emergency regulation already takes into account regional differences in snowpack and precipitation related to supply availability and should not be accounted for differently.

Additionally, when evaluating potential emergency drought conditions, the State Water Board should not only consider snowpack and precipitation, but also availability of drought-resilient supplies that are not reliant on uncertain hydrologic conditions. Many agencies, especially in the San Diego Region, have made significant investments in water supply reliability to ensure water availability during dry periods and should be accounted for fully when considering drought impacts.

3. *Executive Order B-37-16 requires the Board to develop a proposal to achieve a mandatory reduction in potable water use that builds off the mandatory 25 percent reduction in previous Executive Orders and lessons learned through 2016. The Board, however, is not required to act on this proposal. Should the Board act now, or later if conditions warrant, to a conservation standard structure like the one the Board adopted in February 2016 to achieve a mandatory reduction in water use? Should the Board set a conservation floor, individually or cumulatively?*

Padre Dam believes there is no need for the Water Board to act on any proposal to achieve mandatory reductions in water use. Executive Order B-37-16 prefaces this Board requirement with the phrase “To prepare for the possibility of another dry winter.” Current snowpack across the northern part of California shows a snow water content of 158% of average as of January 11, 2017. Many areas of the State are experiencing water levels they have not seen in a decade. Additional precipitation is expected.

Padre Dam does not support any type of conservation floor. If any future regulations are considered they must fully capture local supply conditions and actual supply shortages of individual urban water suppliers. Focus should be on areas that require assistance in meeting the water demands of their community.

Padre Dam continues to promote and encourage water conservation to our customers through drought-tolerant landscape classes, conservation device incentives and online learning resources. We are also considering a water reuse project, our Advanced Water Purification Program, which would produce up to 30 percent of our water supply locally – ensuring increased water reliability for our customers.

In addition to the comments provided in this letter, Padre Dam supports the comments provided in the letter from the San Diego County Water Authority, the District’s wholesale water provider.

Thank you again for the opportunity to provide comments on the potential extension of the Emergency Regulations. We look forward to continuing to work together to ensure a reliable water supply future for California.

Sincerely,

A handwritten signature in blue ink, appearing to read "Allen Carlisle". The signature is fluid and cursive, with the first name "Allen" and the last name "Carlisle" clearly distinguishable.

Allen Carlisle
CEO/General Manager

CC: Assemblyman Randy Voepel
Senator Joel Anderson
Padre Dam Board of Directors