

## BELLA VISTA WATER DISTRICT

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April 14, 2016

Delivered by e-mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

Subject: Comment Letter – Urban Water Conservation Workshop

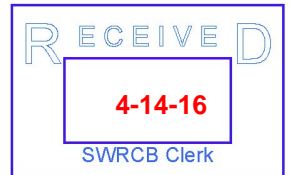
Dear Chair Marcus and Members of the Board:

The Bella Vista Water District (District) appreciates this opportunity to provide comments to the State Water Resources Control Board (State Water Board) regarding possible additional modifications to the Extended Emergency Water Conservation Regulation (Emergency Regulation), in consideration of current water supply conditions.

The District serves a population of approximately 18,500 and is located generally northeast of the City of Redding in western Shasta County. The District encompasses approximately 34,360 acres (54 square miles) and the unincorporated communities of Palo Cedro and Bella Vista. Approximately one-third of the District is located within the City of Redding and serves City residents. The District is very diverse with customers that include high density residential, rural, commercial, public institutions including a number of schools, two colleges, golf courses, as well as agricultural customers. The District's is a Central Valley Project (CVP) contractor with a Water Service Contract and diverts water from the Sacramento River. The District declared a water shortage emergency on February 27, 2014, and implemented stage 3 – Severe Water Shortage of its water shortage contingency plan.

The District's customers have achieved remarkable and previously unprecedented water conservation savings, although at considerable effort, expense and sacrifice. Presently, the District is continuing to implement the unprecedented mandatory water use restrictions although water shortage conditions have been alleviated by this winter's welcome precipitation, and water supplies are now fully adequate to meet our water user's needs.

We are an equal opportunity employer and provider.



The District is providing comments in response to the three questions posed in the meeting notice distributed by the State Water Board.

**1. What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?**

The District believes that the Emergency Regulation should now be rescinded by the State Water Board based on greatly improved water supply conditions statewide, especially in northern California, as a result of significant winter precipitation and snowpack. There is presently no statewide emergency that necessitates a statewide emergency regulation. Although precipitation and snowpack conditions may be only “normal” or even somewhat “below normal” in some regions of the state, sufficient surface water supplies are clearly available to water agencies statewide such that storage is being fully replenished and the drought emergency has been entirely or substantially alleviated. The U.S. Bureau of Reclamation has announced a 100% supply for CVP contractors north of the Delta that is “based on a cautious estimate of the amount of water that will be available for delivery to CVP water users and reflects current reservoir storages, precipitation and snowpack in the Central Valley and Sierra Nevada.” Having endured two years of shortage restrictions, the District’s customers are acutely aware the severity of the drought has been mitigated, and it is now extremely important to acknowledge that conditions no longer warrant extraordinary emergency conservation mandates. The District can support a state call for voluntary water conservation as a response to the possibility of a dry winter.

**2. How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?**

Regional differences in precipitation have little to do with water supply security for most water agencies statewide. Regional differences within the CVP are largely due to limitations in conveyance and disproportionate impacts of regulatory constraints on the operation of the project. Those constraints are reflected in the incredibly diverse water supply allocations to the various regions within the CVP service area. For example, despite flood releases from Lake Shasta, the CVP supply allocation for South of Delta contractors is presently only 55% for M&I and 5% for Agricultural Use! Any “lingering drought impacts” will need to be assessed in coming months and appropriate responses developed to targeted specific conditions identified within affected communities. Potential actions include diverse water supply investments by water agencies to augment available supply and to mitigate the effect of regional precipitation deficiencies.

**3. To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?**

The State Water Board should not place itself in the position of evaluating the reliability of urban water supplier’s water supply portfolios in the context of the Emergency Regulation.

**Conclusion**

The District firmly believes it is time to end the State Water Board’s mandatory water use restrictions statewide. Continuing mandatory restrictions in order to sustain significant conservation efforts that are vastly disproportionate to regional and the overall statewide water supply conditions will undermine the credibility of the Administration and the District and will make it much more difficult to generate support for any future emergency should severe conditions re-emerge in the future.

The Honorable Felicia Marcus  
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Thank you for your thoughtful consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "David J. Coxey". The signature is written in a cursive style with a large initial 'D' and a stylized 'C'.

David J. Coxey  
General Manager