



Kathleen Coates Hedberg, PE, MPH

January 6, 2016

Felicia Marcus
Board Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Sent via email: Kathy.Frevert@waterboards.ca.gov

Subject: Comments on Proposed Regulatory Framework

Dear Ms. Marcus and Board Members:

Thank you for your time at the Public Workshop on December 7, 2015 to hear and accept comments regarding modifying the existing Emergency Regulations. As I mentioned, Helix Water District has reduced water use over 22% between 2007-2013 and since the Governor's mandate we have reduced water use another 27% with our current per capita at 92gpcd. Along with conservation we have been actively pursuing new water supplies. With the recent addition of our local Carlsbad Desalination Project we have over 99% water available to meet our local needs.

I applaud the Board and Staff Recommendations that addressed modifications and adjustments to the Emergency Regulation. As stated the recommendations are based on a criteria that the modifications be transparent, intelligible, equitable, reasonable, provide sufficient water savings statewide, and be feasible to implement and enforce.

However, setting a Cap on Credits and Adjustments does not follow the criteria set forth for the modifications to the Emergency Regulation. A water supplier should be able to apply credits and adjustments as they are eligible. It is only equitable and reasonable that we receive credit where credit is due. Every gallon of new drinking water created should be credited against the conservation mandate accordingly.

I am concerned with the overall 4% Cap on Credits and Adjustments. We anticipate a 2% Climate Adjustment and also eligible for an 8% Drought Resilient Sources of Supply Credit. Capping at 4% means that we will receive less than half of the credits and adjustments we have earned. We should not be penalized for investment and planning and past conservation efforts.

Thank you again for your time and the opportunity to comment.

Respectfully,

Kathleen Coates Hedberg, PE, MPH
Board Director
Helix Water District