



201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

January 12, 2017

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

Attention: Ms. Jeanine Townsend, Clerk of the Board
Sent via email to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the State Water Resources Control Board:

Thank you for the opportunity to comment on the proposed extension and modification of the current Emergency Regulation for Statewide Urban Water Conservation. The Vallecitos Water District (Vallecitos or District) serves approximately 100,000 customers in north San Diego County and has been following the development of conservation regulations quite closely. We look forward to working with the State to further develop regulations in a manner that recognizes the importance of using our precious water wisely while acknowledging the disparate climatic and water supply conditions that the State's water agencies face.

The January 6, 2017 Notice of Public Workshop issued by the State Water Resources Control Board requested public comment on three questions that will be addressed at the January 18, 2017 Workshop. Following are Vallecitos' comments on those three 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)?*

Based on climatic conditions prevailing throughout the State, including Southern California, Vallecitos believes that the emergency regulations should be lifted immediately. It sends a very confusing message to the State's residents when we continue operating under emergency water conservation regulations given the amount of precipitation we are experiencing. Virtually every day television stations and newspapers

are carrying stories about flooding, overflowing reservoirs and road closures due to historic snowfall levels. The credibility of our messaging, both current and future, is strained when we do not react to these conditions. Should the climatic conditions change during the water year, the Board could revisit this issue.

If the Board were to continue with the existing emergency regulations, or propose alternative emergency regulation language, then the current "stress test" methodology should remain, which recognizes a local agencies ability to provide water in a broader context than simply looking at water conservation. Water conservation is, and will continue to be, a way of life in San Diego County. The County, in conjunction with its wholesale water supplier, the San Diego County Water Authority, have been a model for the State in developing and implementing water conservation strategies that have led to ever decreasing per capita consumption levels.

- 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 conversation about regional differences needs to extend beyond precipitation. Any regulations regarding water use regulations, emergency or otherwise, need to take a comprehensive look at all the factors that local agencies consider when preparing their UWMPs. Local supplies, which were developed at significant cost to the local agencies and their ratepayers, need to be recognized. Ignoring those actions, or not giving full consideration to the impacts of those actions, sends a strong message to the agencies that the development of local supplies is discouraged by the State. If any changes are made to the regulations, they should be to more fully recognize those local efforts, which will further encourage alternative supply development.

- 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?*

Vallecitos is opposed to any mandatory reduction in water use, including the establishment of conservation floors, on a basis that does not factor in the specific circumstances of individual water districts. As mentioned above, local supplies that have been developed by local agencies must be considered. Vallecitos has committed to directly purchase more desalinated water from the western hemisphere's largest seawater desalination facility than any other retail water agency in California. The purchase of that water came at great cost to our ratepayers, who supported the agreement with the understanding that they would have greater water supply reliability. Across the board conservation targets that do not fully recognize the efforts taken by this agency have the potential to be financially damaging to the District.

Thank you again for the opportunity to comment on the proposed actions. Regardless of the outcome of the workshop, Vallecitos will continue to work with its customers to use water in a reasonable fashion. The District looks forward to working with the State Water Board to develop appropriate regulations that ensure water supply reliability for all Californians.

Please feel free to contact me at 760-744-0460 or gpruim@vwd.org if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn Pruim". The signature is fluid and cursive, with the first name "Glenn" written in a larger, more prominent script than the last name "Pruim".

Glenn Pruim
General Manager

cc: Board of Directors, Vallecitos Water District

