



April 14, 2016



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

VIA EMAIL

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

The Castaic Lake Water Agency appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Water Board) Urban Water Conservation Workshop. We are requesting the State Water Board consider the following comments regarding the potential extension and modification of the existing Emergency Regulation and any future regulatory action for Statewide Urban Water Conservation.

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

The State Water Board should consider whether a statewide emergency is still in effect, or whether there are now distinct local conditions and supply availability which should be reflected in a modified regulation for 2016. If the Emergency Regulation continues, it is suggested that:

- The Emergency Regulation should be modified in 2016 to require a baseline continued conservation statewide at some level (perhaps somewhere between 10% to 20%, but less than the current level), with additional conservation if warranted by local supply conditions.
- The Emergency Regulation should be modified to develop conservation targets that reflect available supply by retailer. Available supply should include all local sources, all import sources, as well as planned withdrawals or planned replenishment of water in surface or groundwater storage facilities or banks. Retailers could submit a one page operating plan for 2016 showing forecasted demand at different levels of conservation (from the 2013 baseline), compared to available 2016 supplies. A method of assigning a target that reflects available supply could then be applied.

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- The Emergency Regulation should permit groups of retailers within a watershed or served by a common wholesaler to work with their regional wholesaler to voluntarily affiliate by area and have an area wide target. This would facilitate consistent communication with the public about the conservation target and related water use restrictions in effect.
- The Emergency Regulation should, at a minimum, continue to ban waste and unreasonable use of water, and continue to grant local agencies the additional tools and authority to address such waste and unreasonable use.
- The Emergency Regulation should continue to require monthly reporting to facilitate ongoing monitoring of water consumption.
- The Emergency Regulation should continue to incorporate the various adjustments for climate, growth, water reuse and other factors that have been developed in prior modifications.

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?

Winter of 2015/16 featured varied effects of the El Nino pattern and varied results. In general conditions were wetter in the northerly portion of the state, and progressively drier from central to the south. Fortunately, the wet weather filled both State Water Project (Oroville) and CVP (Shasta) reservoirs. This has resulted in the availability 45% of Table A for SWP contractors, far more than in recent years. This means that some areas, while experiencing lower than average rainfall, will have more than adequate supply availability in 2016.

As suggested above, the disparate conditions mean a uniform statewide call for a continued 25% reduction would likely be met with public skepticism. The alternative would be to continue a baseline conservation message at some lower level, and assign higher conservation targets only where supply conditions warrant. As suggested in #1 above, retailers could submit one page water balance sheet operating plans for 2016 that demonstrate potential demand at different levels of conservation vs. available supply to demonstrate whether additional continued conservation above some baseline is necessary.

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

This should be a primary consideration. This was not considered in the original Emergency Order, which effectively sidelined multi-million dollar ratepayer investments in reliability made over the last decade during the very moment when they would have had value. This has been the subject of much confusion among our residents and threatens to undermine willingness to invest in further reliability enhancement projects. The State Board should consider that this also runs counter to requirements in the Urban Water Management Planning Act, SB 610/221, and other state policies encouraging the development of reliable water supplies.

We appreciate the opportunity to offer our comments and suggestions as the State Board considers whether a statewide water emergency order is still warranted, and what modifications are appropriate to reflect local conditions and supply availability.

Sincerely,


Matthew G. Stone
General Manager