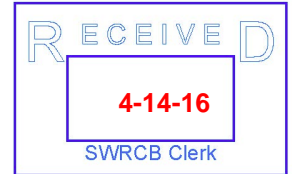


Santa Fe Irrigation District



April 14, 2016

The Honorable Felicia Marcus, Chair,
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk of the Board
1001 "I" Street, 25th Floor
Sacramento, CA 95814



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

Subject: Comments Letter – Urban Water Conservation Workshop

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

The Santa Fe Irrigation District (Santa Fe) appreciates the opportunity to provide input on potential revisions to the February 2016 Emergency Regulation. With many urban water suppliers statewide not experiencing supply shortages, this letter contains proposed refinements to the February 2016 Emergency Regulation, that take into account the actual shortage condition, if any, within a community.

Water agencies across the State have very different supply conditions. Consequently, we strongly urge the State Water Resources Control Board (SWRCB) to end the "one size fits all" statewide mandates to conservation. Through the process of developing our Urban Water Management Plan, we have accurate forecasts for both supply and demand. As a region, San Diego has detailed conservation mechanisms that will ensure that supplies will meet demands. These mechanisms include regional enforcement policies to ensure that member agencies meet conservation targets.

Santa Fe recommends that the SWRCB implement a supply based approach rather than a conservation mandate approach. In such a program, individual agencies, or regional groups of agencies, would certify that the supply conditions for that agency or region are adequate to meet demands. In areas where supply could be an issue, the agency or region would develop regionally specific conservation mandates in order to balance supply and demand.

Certification of supplies would require agencies or regions to demonstrate that they have supply reserves adequate to meet future droughts. Further, agencies or regions adopting this approach would need to have clearly defined demand management plans in place in order to effectively reduce demand should it be necessary.

We believe that the most effective and efficient place to manage water shortages and drought emergencies is at the local urban water supplier level. That is where actual supply conditions are most directly related to the need for reduced water use and where relationships with residents and businesses over water use is closest. The San Diego County Water Authority, of which Santa Fe

is a member agency, has submitted more specific detailed comments on modifications to the Emergency Regulation which Santa Fe supports.

In response to the State Water Board's April 20th informational workshop announcement and request for input, we offer the following recommendations:

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

If the Emergency Regulation is to continue, and given that local suppliers are the best equipped authority to assess the sustainability of local supplies, we support a self-certification process for urban water suppliers in lieu of a conservation mandate. The self-certification would require urban water suppliers, either individually or as a region, to report in June 2016 on available supplies (including surface water and groundwater storage) and demands through October 2016. Self-certification at a regional basis would be an available option if all urban water agencies in the region agree to this approach.

Santa Fe supports maintaining Section 864 "End User Requirements in the Promotion of Water Conservation."

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?

The best method to link water supply availability to needed conservation is for urban suppliers to conduct a water supply-demand balance and identify a gap between available supplies and water use. It is important to note that urban suppliers and regions that have diversified their supplies and made investments in water storage, like Santa Fe and the San Diego County Water Authority, among many others, are less susceptible to hydrologic variances of supplies and that resilience should be taken into account.

It is also important to note that areas of the state, like urban southern California that receive imported water from the Colorado River and State Water Project, have supply availability based on precipitation in those out-of-basin watersheds and with respect to the Colorado River, priority of water rights. Reliance on submission of a water supply-demand balance will show those supply sources, including the use of stored water, and provide a true indication of drought preparedness. Similarly, those urban water suppliers that rely solely on local or imported supplies linked to hydrology with limited water stored in reserves will be very apparent, and allow the State Water Board to focus its efforts on assisting with their vulnerability and ability to reduce water use.

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

It is essential that the State Board look to the urban water supplier's supply portfolio and encourage local water suppliers to manage drought and water shortage through development of resilient supplies, good planning, prudent water resource management, orderly drought response ordinances and outreach programs. An appropriate role for the State is to ensure that urban water

Ltr to SWRCB
April 14, 2016
Page 3 of 3

suppliers are prepared to manage drought and severe shortages and can demonstrate their preparedness. Diverse and reliable water supply portfolios along with efficient water use are the foundation for drought preparedness.

The State Water Board should evaluate the supply portfolio of urban water suppliers, and the linkage to expected water use (supply-demand balance). Additionally, the State Water Board should assess preparedness for drought response before imposing any standard that may not reflect the actual conditions at the local level.

The current emergency regulation's focus on achieving the State's water reduction standards solely through conservation does not allow regional or local water agencies to realize the benefits of their investments in water supply reliability - investments in self-reliance that are consistent with Governor Brown's Water Action Plan. This approach threatens to discourage ratepayers from supporting future water supply investments, stunting California's ability to meet the needs of its growing population amid an increasingly changing and challenging climate.

Again, we want to thank you for the opportunity to comment on the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation. Please feel free to contact me at 858.761.2110 or mbardin@sfidwater.org if you have any questions or require clarification regarding our comments.

Sincerely,



Michael J. Bardin
General Manager