



April 13, 2015

State Water Board
1001 I St, Sacramento, CA 95814
Sacramento, CA 94236

Attn: Jessica Bean

Email: Jessica.Bean@waterboards.ca.gov

Subject: Carlsbad Municipal Water District's Comments on the Proposed Regulatory Framework to Achieve a 25 percent Statewide Reduction in Potable Urban Water Use

Dear Ms. Bean,

The City of Carlsbad and its subsidiary, Carlsbad Municipal Water District, sincerely thank the State Water Board for the opportunity to comment on the Proposed Regulatory Framework to Achieve a 25 percent Statewide Reduction in Potable Urban Water Use.

Proposed Amendments. Carlsbad urges the State to consider amending its Proposed Regulatory Framework as follows:

- Offset drought-proof potable supplies (like desalination) in the calculations of GPCD.
- Utilize a 12-month running GPCD average to measure compliance, tying this average to the rainfall year (October through September). This would facilitate the use of weather data to understand regional differences in GPCD averages.
- Allow for retroactive revision of R-GPCD to make sure the baseline is established with the best available data and methods, particularly in the first year as agencies improve their data collection and reporting skills.

Comments. Carlsbad submits its comments below for consideration on the Proposed Regulatory Framework.

- By establishing the baseline of September 2013, the proposed framework does not provide credit for the consistent efforts to increase water use efficiency in the Carlsbad Municipal Water District service area that have been ongoing for the last two decades.
- The proposed framework also overlooks investments in diversification of water supplies that are independent from the State Water project, but crucial for local reliability and sustainability. For instance, Carlsbad supported SDCWA in the IID transfer and increased local storage projects.
- The proposed framework also overlooks investments in supplies that are completely drought-proof and independent of the State Water Project, such as the Carlsbad Desalination project. Ocean desalination should be allowed to offset the GPCD estimates counting towards the 25 percent statewide reduction.
- Overlooking investments in local self-reliance is a disincentive for future investments and is in direct conflict to the California Water Action Plan. If the State overlooks these investments, it could be difficult for local agencies to garner ratepayer support for future projects.

- The proposed framework can have significant impacts in the local economy. Carlsbad has a diverse business community and the ramifications of the proposed regulatory framework could adversely impact the recovering local economy.

Conservation Efforts. The City and District are committed to water conservation and understand the urgency of increased conservation efforts during California's Emergency Drought situation. Carlsbad has made numerous efforts over the decades to conserve water. Several of these efforts are highlighted below.

- Carlsbad has been implementing water use efficiency for many years, with programs such as its recycled water program, and a variety of residential water conservation outreach programs. Carlsbad established its recycled water program in 1991 and was delivering 2000AF annually by 1994. By 2008, Carlsbad had increased its recycled water delivery to approximately 5000AF annually. The City is in the process of expanding its system to increase delivery to approximately 7000AF annually, which will be close to 25 percent of the District's annual water needs. Since 1991, Carlsbad's service area population has increased by approximately 35 percent while the potable water demand has remained fairly steady. This is largely due to Carlsbad's conservation efforts, and production and use of recycled water.
- Carlsbad is a member agency of the San Diego County Water Authority (SDCWA) and has been supportive of the SDCWA efforts and investments to reduce dependency on supplies from the Sacramento-San Joaquin Bay Delta. These efforts and investments are significant and represent an increasingly larger percent of San Diego County's water supply portfolio.
- Carlsbad Municipal Water District's ratepayers have supported local and regional investments for the last 25 years, understanding the importance of reducing dependency on imported water. Carlsbad is scheduled to receive 2500 AFY of drought-proof ocean desalination water in December 2015.
- Carlsbad's efforts over the years are consistent with the actions laid out by Governor Jerry Brown in the California Water Action Plan, emphasizing conservation, increasing self-reliance and preparing for dry periods.
- Carlsbad strives to provide a high level of quality water operations by investing in Advanced Metering Technology that improves the efficiency of its infrastructure and also reduces water waste.

Thank you for the opportunity to comment on the Proposed Regulatory Framework to achieve a 25 percent Statewide Reduction in Potable Urban Water Use. We look forward to reviewing the final regulatory framework. If you have any questions specific to our agency, please feel free to contact us.

Sincerely,



Wendy Chambers
General Manager

cc: Steve Sarkozy, City Manager
Pat Thomas, Public Works Director