



SWEETWATER AUTHORITY

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December 1, 2015

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



Subject: Comment Letter – Urban Water Conservation Workshop December 7

Dear Ms. Townsend:

Thank you for the opportunity to submit comments to the State Water Resources Control Board (State Water Board) regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation. Sweetwater Authority (Authority) appreciates the challenges the State Water Board faces in addressing the statewide drought, and the Governor's Orders to manage water resources during these unprecedented times.

The Authority and other 23 water agencies in San Diego County have been preparing for drought conditions for more than two decades through one of the most aggressive water supply diversification strategies in the nation. The San Diego region has made a major commitment to water conservation in reducing per capita water use by nearly 40 percent since 1990. The Authority has made substantial investments for expanding local water supplies, including the proposed expansion of its Richard A. Reynolds Groundwater Desalination Facility expansion. This project, when completed in 2017, will add an additional 2,600 acre-feet of local water.

The Authority has the lowest water consumption per capita of any water agency in San Diego County and one of the lowest in the state. In addition, San Diego County ratepayers have invested billions of dollars to secure more reliable supplies and upgrade regional infrastructure. The strategy has worked! Even after four years of drought, the San Diego region has 99 percent of the water necessary to meet projected demands. Despite these investments and its consistency with the Governor's Water Action Plan, the current state emergency conservation regulation prevents communities from receiving their full water reliability benefit because the availability of these supplies is not taken into account. Despite the fact that San Diego has these supplies readily available, it cannot use them to protect the region's \$218 billion economy, and quality of life for its residents.

*A Public Water Agency
Serving National City, Chula Vista and Surrounding Areas*

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In addition, the emergency regulation has contributed to increased water rates for the Authority's customers, as it is forced to meet revenue requirements on lower sales. The Authority is in the unfortunate position of having to explain to its customers why their bills are going up, even though customer usage is down and many are low income and senior citizens. Customers who have conserved for years now believe they are being treated punitively despite their best efforts.

The Authority urges the State Water Board to adopt modifications to the emergency regulations that provide a more balanced and sustainable approach to protect the San Diego region and the state's economy, keeping in mind that "one size doesn't fit all." Specifically, the Authority recommends that the State Water Board consider the following in any extension or modification of the current regulations:

- Take into account any changed supply conditions due to winter storms (i.e., El Niño effects). Since the State Water Board members will not know the resulting 2016 water year supply conditions prior to taking actions on an extension to the emergency regulations, specific dates or trigger points should be established to continually evaluate supply conditions
- Adjust urban water supplier mandates based on local supply conditions and actual shortage conditions. The majority of water agencies in San Diego County receive supplies from a wholesale provider. If the wholesale provider can verify adequate availability of water supply, then those agencies should receive a reduced conservation mandate or no mandate at all
- Credit new supply development (such as desalination plant, recycled water, and transfer agreements) appropriately, recognizing water agencies and its ratepayers who have had the foresight to invest in new long-term local water supplies, and conservation and transfer agreements
- Allow agencies to control conservation activities through its own Drought Response Plans, rather than imposing mandatory state restrictions and penalties. Retail agencies are in a better position to understand specific local conditions and needs

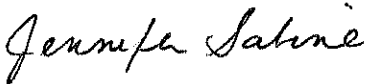
The Authority supports the San Diego County Water Authority's proposed "Alternative Path to Compliance" and the recommendations therein. Lastly, the Authority does not recommend that any additional data points or information be collected by the State Water Board at this time.

In summary, the Authority recognizes the challenging job facing the State Water Board and appreciates its efforts. Water conservation is an important facet of managing drought conditions, and is a good practice even in the best of times; however, the current

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emergency regulation, by focusing just on conservation, does not provide a sustainable, equitable, or holistic approach to managing droughts. Please give careful consideration to the Authority's comments and other letters and comments you may receive from other retail water agencies who are closest to water consumers.

Sincerely,



for

James L. Smyth
General Manager

cc sent via email to:

State Water Resources Control Board
Dana Frieauf, San Diego County Water Authority
Sandy Kerl, San Diego County Water Authority
Maureen A. Stapleton, San Diego County Water Authority