



Dedicated to
Satisfying our Community's
Water Needs

BOARD OF DIRECTORS

Shawn Dewane
President
Division V

Ethan Temianka
Vice President
Division III

Jim Atkinson
Director
Division IV

Fred R. Bockmiller, Jr., P.E.
Director
Division I

James R. Fisler
Director
Division II

Paul E. Shoenberger, P.E.
General Manager

Phil Lauri, P.E.
Assistant General Manager

Coleen L. Monteleone
Assistant General Manager
District Secretary

Andrew N. Hamilton
District Treasurer

**Bowie, Arneson,
Wiles & Giannone**
Legal Counsel

1965 Placentia Avenue
Costa Mesa, CA 92627
tel 949.631.1200
fax 949.574.1036
info@MesaWater.org
MesaWater.org

(12/7/15) Public Workshop
Urban Water Conservation
Deadline: 12/2/15 by 12:00 noon

November 24, 2015

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



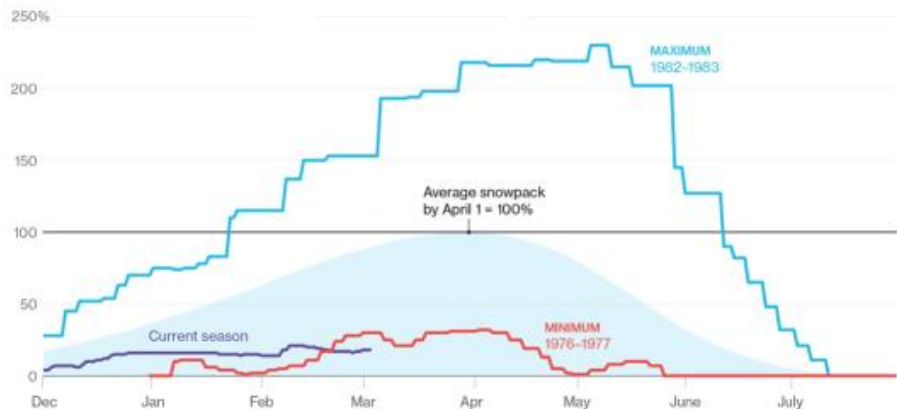
Subject: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus:

On behalf of Mesa Water District (Mesa Water®), thank you for this opportunity to submit comments related to the State Water Resources Control Board's (Board) Urban Water Conservation Workshop to take place on Monday, December 7, 2015. Mesa Water® appreciates the difficult and important decisions that the Board has made in order to address California's current drought as well as the State's long-term water supply challenges and water use issues. For the Board's consideration when determining a potential extension and/or modification of the existing Emergency Regulations for Statewide Urban Water Conservation, Mesa Water® offers the following comments:

1. Reconsider the Need for Continued Mandates Based on April 2016 Snowpack and Reservoir Conditions

If the drought persists through January 2016, we recommend extending the existing Emergency Regulations, with modifications, until April 2016 to allow time to assess water supply conditions through the winter, as hydrologic conditions for the year are not likely to be well-defined by the end of January. Per the Department of Water Resources (DWR), the April 1st snow reading each year is hydrologically significant because it represents the most comprehensive information on California's snow cover and water content for the water year. Snow accumulates to its maximum each year, usually in April, and it diminishes during spring and summer until the next water year (as shown in the below image).



Note: Data for current season as of March 4, 2015
Source: California Water Resources Department



*Dedicated to
Satisfying our Community's
Water Needs*

BOARD OF DIRECTORS

Shawn Dewane
*President
Division V*

Ethan Temianka
*Vice President
Division III*

Jim Atkinson
*Director
Division IV*

Fred R. Bockmiller, Jr., P.E.
*Director
Division I*

James R. Fisler
*Director
Division II*

Paul E. Shoenberger, P.E.
General Manager

Phil Lauri, P.E.
Assistant General Manager

Coleen L. Monteleone
*Assistant General Manager
District Secretary*

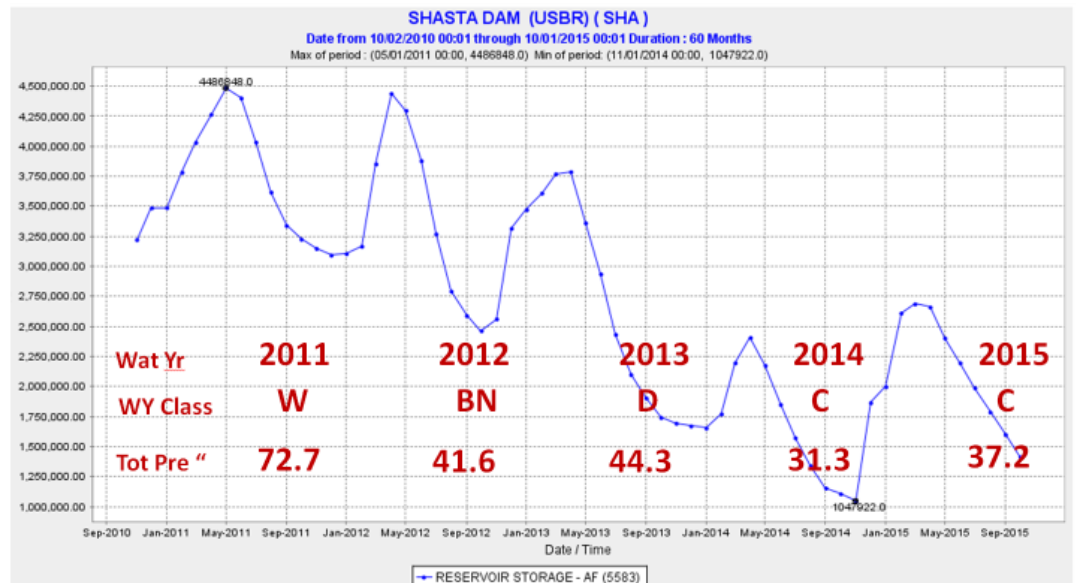
Andrew N. Hamilton
District Treasurer

**Bowie, Arneson,
Wiles & Giannone**
Legal Counsel

1965 Placentia Avenue
Costa Mesa, CA 92627
tel 949.631.1200
fax 949.574.1036
info@MesaWater.org
MesaWater.org

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
November 24, 2015
Page 2 of 3

The same accumulation model holds true for rainfall and reservoir levels, as depicted in the image below showing United States Bureau of Reclamation (USBR) data for Shasta Dam reservoir water storage levels as an example.



It is important for the Board to establish any proposed reduction mandate and/or modifications to the Emergency Regulations with a clear linkage to supply conditions both statewide and regionally. Thus, if water supply conditions improve by April, we recommend rescinding or modifying the reduction mandate to reflect regional and local supply conditions. If water supply conditions do not improve, or worsen, by April, it would be appropriate to revisit the Emergency Regulations with an open, transparent process that allows as much time as possible for meaningful input.

2. Consistency With SBx7-7

The Board’s Emergency Regulations policies and definitions should be consistent with the established language in SBx7-7. Per SBx7-7, water production from indirect potable reuse (IPR) projects are treated in the same manner as water produced from “purple pipe” non-potable recycled water projects. However, the Board’s draft regulations, as proposed, do not provide for equal treatment of water reuse and recycled water projects, and only recycled water production has the benefit of exemption from the amount of potable water produced/used by urban water agencies. We support the exemption of both IPR and non-potable recycled water from the “total water production” calculation as part of the mandatory water reduction framework.



*Dedicated to
Satisfying our Community's
Water Needs*

BOARD OF DIRECTORS

Shawn Dewane
*President
Division V*

Ethan Temianka
*Vice President
Division III*

Jim Atkinson
*Director
Division IV*

Fred R. Bockmiller, Jr., P.E.
*Director
Division I*

James R. Fisler
*Director
Division II*

Paul E. Shoenberger, P.E.
General Manager

Phil Lauri, P.E.
Assistant General Manager

Coleen L. Monteleone
*Assistant General Manager
District Secretary*

Andrew N. Hamilton
District Treasurer

**Bowie, Arneson,
Wiles & Giannone**
Legal Counsel

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
November 24, 2015
Page 3 of 3

3. Allow Combined Regional Conservation Targets and Reporting

Based on the criteria for forming an SBx7-7 Regional Alliance, per Water Code Section 10608.28, provide a voluntary option for regions to work together to achieve water conservation and demonstrate compliance with the Emergency Regulations. If the region is successful at meeting the regional conservation standard, all water agencies in the region would be deemed successful. If the region is unsuccessful at meeting the regional conservation standard, each agency would need to meet its individual conservation standard. Mesa Water® is part of the Orange County 20x2020 Regional Alliance led by the Municipal Water District of Orange County (MWDOC).

4. Provide A Credit for New Water Supplies, Including Desalination

In order to encourage local investments in developing new water supply sources that offset surface water use and reduce reliance on California's drought-impacted supplies, such as the Bay-Delta, we support a credit for desalinated water from the "total water production" calculation as part of the mandatory water reduction framework. Similar to the equal treatment of all types of recycled water, we recommend providing the benefit of exempting water produced via desalination from the amount of potable water produced/used by urban water agencies.

Please feel free to contact me with any questions or requests for additional information. Meanwhile, Mesa Water® remains committed to improving long-term water use efficiency, and to continuing our implementation of plans and programs to achieve water conservation.

Sincerely,

Paul E. Shoenberger, P.E.
General Manager

c: Mr. Max Gomberg, Climate and Conservation Program Manager