



May 16, 2016

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

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

Subject: Comment Letter – May 18, 2016 Board Meeting (Conservation Extended Emergency Regulation)

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

Thank you for the opportunity to submit Padre Dam Municipal Water District's comments on the proposed amendments to the Extended Emergency Regulations for Urban Water Conservation being considered at the State Water Board meeting on May 18, 2016. Padre Dam appreciates that the State Board incorporated previous recommendations from the water community into these Extended Regulations.

With respect to the proposed Extended Regulations we would like to offer the following comments:

Supply-Based Self-Certification

Padre Dam supports the proposed supply-based self-certification approach which accounts for each community's unique supply conditions, and reflects actual shortages projected within a supplier's service area. By taking into account actual conditions, the approach accounts for supplier investments in reliable drought-resilient local supplies and conservation.

Regional Supply Sufficiency

Padre Dam recommends that wholesalers be allowed to evaluate the sufficiency of available aggregate supplies to meet the aggregate demands of the urban water suppliers they serve. Assuming a wholesale water agency can demonstrate regional supply sufficiency, no additional analysis would be needed by its retail water agencies for their self-certification reporting. This would offer a more streamlined reporting option.

Incorporate 2015 Demands in Demand Calculations

Amend 864.5(a)(4)(b)(92) to calculate potable water demand using three years (2013 – 2015) to establish an average baseline potable demand. Including 2015 in the calculation of an average baseline demand is more representative of actual and future projected demands than using only 2013 and 2014. It is still a very conservative analysis because water demand from 2013 was before the Governor declared a statewide drought.

BOARD OF DIRECTORS
Douglas S. Wilson
Augie Scalzitti
Bill Pommering
August A. Caires
James Peasley

9300 Fanita Parkway
Santee, CA 92071
PO Box 719003
Santee, CA 92072-9003
619 448 3111
www.padredam.org

Conservation Standard Calculation

Padre Dam proposes amending Section 864.5(a)(4)(b) to calculate the conservation standard based on the **first year**, instead of the third year. The first year would account for a more average drought period than the extreme dry period the third year represents. Given the State's improved conditions in 2016 the first year would be more appropriate for the emergency regulations.

Adjust Potable Demand at the Retail Level to Account for Recycled Water Conversions

Padre Dam supports allowing retail agencies to adjust their baseline demand for potable water demand conversions to recycled water.

Additional Time to Submit Self-Certifications

Padre Dam requests an additional week for suppliers to submit information to the State Water Board, June 15 for wholesale suppliers and June 22, 2016 for urban water suppliers. This would provide additional time for agencies with multiple supply sources to gather and analyze data.

Maintain End User Conservation Requirements (Section 864)

Padre Dam supports the provisions to continue promotion of water conservation, including the prohibitions to prevent water waste. However, we recommend that the Water Board not delete the requirements of the original Section 864 (a)(6) and sec 864(b), related to the hospitality industry, specifically related to promoting re-using towels in hotels and serving water only on request in restaurants. Though these small items may have minimal savings, they help promote awareness among the public for the need to conserve water.

No mandatory conservation floor

We oppose a mandatory water conservation floor. It undermines the purpose and reliability of the self-certification analysis and continues to discount the value of local investments that support local drought supply reliability. Setting an arbitrary floor sends the wrong message to retail water customers.

Long-Term Water Use Efficiency Standards

Padre Dam supports and encourages future collaboration with the State Water Board and Department of Water Resources on the Governor's May 9th Executive Order regarding long-term water use efficiency. Padre Dam will continue to promote efficient water use and implement local demand management programs. As seen during previous droughts, we anticipate our customers will continue to maintain lower water use, even as self-certification demonstrates adequate water supply.

Thank you again for the opportunity to provide comments and for your willingness to consider changes provided by the California water community.

Sincerely,



Allen Carlisle
CEO/General Manager