

**LATE COMMENT**

(5/18/16) Board Meeting- Item 10  
Conservation Extended Emergency Reg  
Deadline: 5/16/16 by 12:00 noon

BOARD OF DIRECTORS:  
FRANK I. HILLIKER  
STEVE JOHNSON  
EILEEN NEUMEISTER  
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PETE JENKINS



BRETT SANDERS  
GENERAL MANAGER

GREG MOSER  
ATTORNEY

DEXTER WILSON  
ENGINEER

May 17, 2016



The Honorable Felicia Marcus, Chair  
And Members of the State Water Resources Control Board  
c/o Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 "I" Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Via E-mail to SWRCB at [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: May 18, 2016 Board Meeting (Extended Emergency Regulation for Urban Water Conservation)**

Dear Chair Marcus and Members of the State Water Board:

Thank you for the opportunity to provide comments on the proposed revisions to the urban water conservation emergency regulation. Following are an itemized list of revisions that we feel would be appropriate given the experience of the last two years responding to the various emergency regulations, and the willingness of the SWRCB to make common sense adjustments.

1. We fully support the proposed supply-based self-certification approach that accounts for each community's unique supply conditions. By taking into account actual conditions, the approach accounts for supplier investments in reliable drought-resilient local supplies and conservation.
2. We would like an option that would allow wholesalers to evaluate the sufficiency of available aggregate supplies to meet the aggregate demands of the urban water suppliers. 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.
3. Incorporate 2015 Demands – use 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 that using only 2013 and 2014. It is still a very conservative analysis that incorporates demand from 2013 before the Governor declared a statewide drought.
4. Retail agencies that have reduced their potable demand through conversions to recycled water, should be able to adjust their baseline demand accordingly.

5. We do not support a minimum conservation standard when there is sufficient supply to meet demand. The proposed approach requires water suppliers to ensure an adequate supply during an additional three years of drought, which is a very conservative assumption built into the analysis. A minimum standard is arbitrary and creates a disincentive to future investments in reliable supplies.

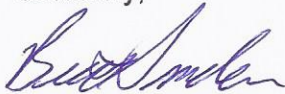
6. Maintain conservation requirements contained in the current emergency regulation for the hospitality industry, which sends an important message about the need to conserve in the ongoing drought.

7. We request that 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.

If you should have any questions please contact me at 619-443-3805 or by e-mail at [bretts@lakesidewater.org](mailto:bretts@lakesidewater.org).

Thank you very much for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brett Sanders".

Brett Sanders  
General Manager  
Lakeside Water District