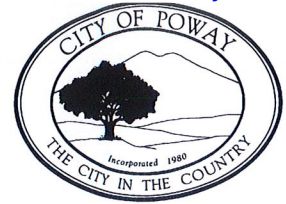


CITY OF POWAY

STEVE VAUS, Mayor
JIM CUNNINGHAM, Deputy Mayor
DAVE GROSCH, Councilmember
BARRY LEONARD, Councilmember
JOHN MULLIN, Councilmember



May 13, 2016



Chair Felicia Marcus and Members
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA, 95814
(Delivered by email to Clerk to the Board: commentletters@waterboards.ca.gov)

Subject: Comments on the Proposed Text of the Emergency Regulations

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

On behalf of the City of Poway I would like to express our support of the proposed regulation that would require a supply-based, self-certification process for meeting water conservation standards. We appreciate the State Water Board's willingness to modify the regulations based on comments provided by water suppliers throughout the state. The following comments and recommendations are provided:

- The City recommends an option that would allow a wholesaler--in our case, the San Diego County Water Authority--to certify supplies for the entire region. This would streamline the reporting process for the City of Poway and other retail agencies.
- We recommend that the proposed regulations use three years, 2013–2015, to establish an average baseline potable demand. Including the year 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 will still be a conservative analysis that incorporates demand from 2013 (before the Governor declared a statewide drought).
- The City does not support a minimum conservation standard when there is sufficient supply to meet demand. Such an approach would undermine the purpose and reliability of the self-certification process, and create a disincentive to future investments in reliable supplies. Furthermore, SBX7-7 already sets water use efficiency targets we are required to meet through our ongoing conservation efforts.
- We recommend that the current conservation requirements for the hospitality industry be maintained. We have made significant strides in changing the public's water consumption habits for many everyday activities, and it is important to continue the message that the need to conserve is ongoing.
- The City supports 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. Agricultural Water Management Plans and Urban Water Management Plans are important long- term planning documents that require significant time and resources to develop. Any new requirements should be incorporated into the next regularly scheduled updates of these plans.

Sincerely,

Dan Singer
City Manager

cc: Troy Bankston, Director of Public Works
Michael Obermiller, Assistant Director of Public Works

City Hall Located at 13325 Civic Center Drive
Mailing Address: P.O. Box 789, Poway, California 92074-0789
www.poway.org