



## Helix Water District

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

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May 13, 2016

To: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



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

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

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

We appreciate the board's continuing efforts to not only solicit input regarding revisions to the emergency regulations but also incorporate those recommendations into the staff proposal released on May 9, 2016.

Helix Water District, which provides drinking water to over 270,000 residents in eastern San Diego County, fully supports the concept behind SWRCB staff's proposed revisions to the emergency regulations. Water supply availability and drought planning vary throughout the state; assigning a conservation standard based on a water supplier's self-certified water supply conditions versus demand is a thoughtful and equitable approach to changing conditions statewide.

The district would like to provide the following two comments regarding how a water agency's water supply and demand would be calculated under the revised regulations:

- 1) **Demand over the next three years would be based on each supplier's average total potable water production for 2013, 2014 and 2015.**

The staff proposal specifies that demand projections would be based off of a water supplier's average potable water production during 2013 and 2014; these baseline years should be expanded to include 2015 as well. This three year average would mirror the baseline period being used to project future supply. It would also be a more accurate reflection of water use during a continuous three year dry period; initially, water use is high due to warm, dry weather, then it decreases as water agencies implement restrictions and public outreach campaigns to address ongoing drought conditions. Limiting the baseline period to 2013 and 2014 results in an artificially high projected demand.

2) **A floor, or minimum conservation level, should not be included in the revised regulations.**

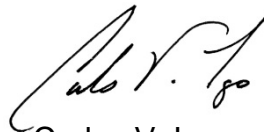
Including an arbitrary minimum conservation level defeats the purpose of revising the regulations to take into account each water supplier's actual water supply and demand conditions. While the future of the drought is uncertain, the proposal has taken a conservative approach by requiring water suppliers to project available supplies at the end of an additional three dry years, based on three of the driest and warmest years on record. This should more than adequately cover water needs during the remainder of the temporary regulations, with no arbitrary minimum required.

Again, we would like to express our appreciation to the State Water Resources Control Board members and staff for incorporating input from the water community over the past few months. Working together, the SWRCB has created a proposal that is logical and equitable and we would like to thank you for the opportunity to provide input.

Sincerely,



DeAna R. Verbeke  
Board President  
Helix Water District



Carlos V. Lugo  
General Manager  
Helix Water District