



County of San Diego



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May 12, 2016

Kathy Frevert, Conservation Specialist
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Frevert:

Re: May 18, 2016 BOARD MEETING (Conservation Extended Emergency Regulation)

In response to Executive Order B-37-16 issued by Governor Brown on May 9, 2016, the State Water Resources Control Board (Water Board) has proposed that amendments be made to the Drought Emergency Water Conservation Regulations, 23 CCR § 863 et seq. The County of San Diego appreciates the effort made by the Water Board in the proposed amendments to develop a method by which each urban water purveyor's conservation targets are tied to water supply availability. This approach recognizes regional variation and continues to incentivize water conservation when necessary. While the County conceptually agrees with the main component of the proposed amendments, the County has some concerns with the retention of the 8% conservation standard for those urban water purveyors and wholesalers that do not self-certify.

The Water Board has proposed in the latest amendment to the Emergency Regulations, that no minimum conservation level be imposed on self-certifying urban water purveyors and wholesalers that can demonstrate they have adequate potable water supplies to meet demand over a three year period. The County agrees that a minimum conservation level should not be required. Further, the County does not understand why a similar approach has not been applied to urban water purveyors and wholesalers that choose not to self-certify. Instead, the Water Board has proposed to retain the 8% minimum conservation standard for these suppliers. It is unknown at this time whether all 24 of the local water suppliers in our region will take action to self-certify. To support consistency in the regulations and avoid unfairly penalizing those agencies that may elect not to self-certify, the County would suggest that the 8% minimum conservation standard be removed.

Kathy Frevert
Page 2
May 12, 2016

The County very much appreciates the opportunity to provide these comments. If you have any questions or would like additional information, please do not hesitate to contact me directly at (619) 531-4940 or Charley Marchesano, Energy and Sustainability Chief, Department of General Services, at (858) 694-2987.

Sincerely,



DONALD F. STEUER
Assistant Chief Administrative Officer/Chief Operating Officer

cc: Helen Robbins-Meyer, Chief Administrative Officer
April Heinze, Acting General Manager, Community Services Group