



Established in 1918 as a public agency

Coachella Valley Water District

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

Directors:

John P. Powell, Jr., President - Div. 3
Peter Nelson, Vice President - Div. 4
G. Patrick O'Dowd - Div. 1
Ed Pack - Div. 2
Cástulo R. Estrada - Div. 5

Officers:

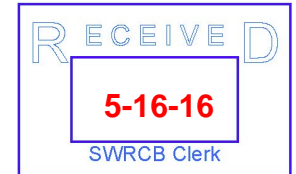
Jim Barrett, General Manager
Julia Fernandez, Board Secretary

Best Best & Krieger LLP, Attorneys

May 16, 2016

VIA EMAIL ONLY

The Honorable Felicia Marcus
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



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Dear Chair Marcus:

Thank you for the opportunity to review and comment on the proposed revisions to the Extended Emergency Regulation for Urban Water Conservation. Coachella Valley Water District (CVWD) has appreciated the opportunity to be involved in this process and to provide feedback.

We applaud the Board's willingness to amend the emergency regulations related to the current water supply levels. CVWD is supportive of the use of supply as a metric to determine conservation targets. Basing targets on demand alone, as was done previously, tells only part of the story of our local water conditions. We are pleased to see that the latest staff proposal allows local water districts to manage local supplies, as is their key responsibility.

CVWD is committed to helping its domestic/urban water use customers achieve the State's water reduction mandate, as is evidenced by our investment of \$6.7 million into conservation program payments this year. We remain committed to managing our water supplies in a long-term, sustainable manner. We take the drought very seriously and we will continue to promote conservation in order to ensure sustainable supplies in uncertain times. Additionally, as the local water supplier to almost 110,000 domestic/urban water connections, we have, and will continue to work diligently to ensure that we have the supplies to meet our demands.

CVWD is supportive of the proposal presented by staff. Below are some suggested modifications and comments:

- 1) Provide some additional time for agencies to ensure that their calculations are correct before the submission deadline. We suggest an additional week.
- 2) Use a multi-year average to calculate demand as one water year may not be reflective of actual demand during drought conditions.
- 3) Do not include a "conservation floor" in the regulations as doing so would discount the intent of allowing local agencies to determine their conservation needs based on their local supply and demand scenarios.

May 16, 2016

CVWD takes water supply reliability very seriously. Since we were founded, nearly 100 years ago, our priority has been ensuring that our service area has a sustainable water supply. We have replenished our groundwater with natural supplies since the beginning and expanded our replenishment program to include imported water from the Colorado River in the late 1940s and from the California State Water Project in the 1970s. Together with Desert Water Agency, we have replenished more than 3 million acre feet of imported water into our basin.

Our conservation programs are robust and we have dedicated tremendous resources to improving water efficiency. During the drought emergency, we participated fully and took drastic measures to try to achieve our conservation mandate. We commend the SWRCB on its willingness to adjust the regulation now that we are seeing some relief from the emergency and will provide the same adjustment promptly to our customers.

Sincerely,



J. M. Barrett
General Manager

HE/Comm&Constrv 051616 SWRCB ltr to Chair Marcus-comment on Extended ER Regs for Urban Wtr Consv