



LATE COMMENT

CALAVERAS COUNTY WATER DISTRICT

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May 16, 2016

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The Honorable Felicia Marcus, Chair
and members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: May 18, 2016, Board Meeting (Conservation Extended Emergency Regulation)

Dear Chair Marcus and members of the Board:

The Calaveras County Water District (CCWD) is grateful for the opportunity to submit comments to the State Water Resources Control Board (State Board) on the Proposed Conservation Extended Emergency Regulation.

CCWD serves nearly 13,000 water customers, and is the largest water supplier in Calaveras County. The District is appreciative that the State Board has set a collaborative tone throughout this drought emergency and actively listened to feedback from water suppliers when adopting policies to address water shortage supply challenges.

State Board staff has prepared a draft Proposed Emergency Regulation in response to comments received by the State Water Board at its April 20 workshop, and in response to Gov. Brown's Executive Order B-37-16 directing the State Board to extend the emergency regulations for urban water conservation through the end of January 2017. The Proposed Emergency Regulation is intended to address the significant precipitation the state experienced from October 2015 through this March, which has significantly improved water supply conditions statewide and provided a welcome measure of drought relief.

The District supports Gov. Brown's executive order to make adjustments to the emergency regulations to reflect current supply conditions on a regional basis. Additionally, the District applauds State Board staff's Proposed Emergency Regulation, which takes water suppliers' feedback into account and focuses on regional water supply reliability instead of a statewide demand reduction approach. The District is in strong support of the Proposed Emergency Regulation, which proposes that urban water suppliers will be allowed to self-certify supply reliability under the assumption that the next three years will be dry, and conservation programs will be implemented using Water Shortage Contingency

Plans that suppliers have developed specifically to address supply shortages in their respective service areas.

Recommended Changes

The District concurs with the Association of California Water Agencies (ACWA) in recommending the following changes to the Proposed Emergency Regulation.

- 1) Amend Sec. 864.5(a)(4)(b) to calculate the conservation standard based on the first year, rather than the third year to reflect immediate emergency conditions rather than more speculative and highly conservative “worst case” conditions associated with the third year hydrology.
- 2) Amend Sec. 864.5(a)(4)(b)(2) to calculate potable water demand based on an average of three years including 2015, which is expected to better reflect likely water user demand in the face of continued drought conditions, as currently communicated by water suppliers, the state and the media.

Conservation Floor

In response to the State Board’s request for comment on a “conservation floor”, the District is not supportive of such a policy. Water suppliers that have made significant investments in their water rights and infrastructure should reap the benefits of that careful planning and not be held to standards not supported by local supply conditions. If the revised Emergency Regulation is not adequate when it is revisited in January 2017, the State Board may consider implementing appropriate conservation standards at that time to help bridge the gap between supply and demand.

Final Thoughts

The District strongly supports the Proposed Emergency Regulation and believes it showcases an effective collaboration between water suppliers and the State Water Board. While these new guidelines will certainly lessen conservation requirements in many portions of the state, CCWD remains committed to supporting the efficient and wise use of water resources. Moreover, CCWD is committed to working with the Brown Administration, State Board and Department of Water Resources on the transition from the Emergency Regulation to the development of long-term water conservation policies that will serve the best interest of the state well into the future.

We look forward to collaborating with the State Board and other agencies on these worthy objectives.

Sincerely,

Joel Metzger, Conservation Coordinator
Calaveras County Water District

Ecc: Dave Eggerton, General Manager, Calaveras County Water District