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Securing Your Water Supply

May 16, 2016

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



Delivered via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Staff Proposal for Extended Emergency Regulation for Urban Water Conservation**

Dear Chair Marcus and Members of the State Board:

Western Municipal Water District (Western) appreciates the opportunity to provide input to the State Water Resources Control Board (State Board) regarding the Staff Proposal for Extended Emergency Regulation for Urban Water Conservation (Proposal) that may become effective in June 2016. Western would first like to applaud the levels of professionalism, patience, and persistence of the State Board members, but especially the State Board staff during the many phases of the drought emergency. From our perspective, the State Board members were clearly pursuing the best interests of all Californians as you listened equally to both sides of the conversation in workshops and hearings. Staff members were open to concerns and available and responsive to requests for information and clarification. Thank you for your transparency, thoughtfulness, and for providing us with a seat at the table to express the viewpoints of the communities we serve.

Western is generally pleased with the Proposal as published on May 9, 2016. The Proposal is timely in that storage conditions have improved, but the entire state is not completely out of the current drought cycle. The Proposal is appropriate in that it returns the responsibility of water supply and shortage contingency planning to the local water supplier. The Proposal is proportional in that common-sense prohibitions on water waste will be retained statewide while local agencies will be required to demonstrate that their available water supplies are adequate to meet customer demands. **Western has just one request for the State Board's consideration – please review the self-certification timelines.**

### **Self-certification Timeline**

Western is a regional wholesaler that purchases water from the Metropolitan Water District of Southern California and then sells to retail agencies within our service area. As there are multiple levels of data required, we would like the State Board to consider allowing more time for the required self-certification reporting dates. We would like to request that wholesalers be given an additional week to gather, verify, and report the data. We request that the State Board consider changing the wholesaler due date from June 8, 2016 to June 15, 2016. This shift in the wholesaler due date will in turn require a change in the retailer due date. We believe this shift will allow agencies to acquire and properly check the data prior to submission.

Section 864.5 (a) should be revised as follows:

*(a) To prevent the waste and unreasonable use of water and to meet the requirements of the Governor's May 9, 2016 Executive Order, each urban water supplier shall:*

*(1) Identify and report on a form provided by the Board, no later than June ~~15~~<sup>22</sup>, 2016, the conservation standard that the supplier will be required to meet under this section;*

*(2) Identify and report on a form provided by the Board, no later than June ~~15~~<sup>22</sup>, 2016, the data relied upon by the supplier to determine the conservation standard reported pursuant to this subdivision including, but not limited to identification of each source of supply the supplier intends to rely on and the quantity of water available under that source of supply given the assumptions of this section;*

*(3) Certify, no later than June ~~15~~<sup>22</sup>, 2016, that the conservation standard reported pursuant to this subdivision is based on the information and assumptions identified in this section; ~~and~~*

*(4) Beginning June 1, 2016, reduce its total potable water production by the percentage identified as its conservation standard in this section each month, compared to the amount used in the same month in 2013.*

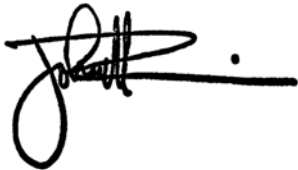
*Section 864.5(e) should be revised to read "Each urban water wholesaler shall calculate, to the best of its ability, and no later than June ~~8~~<sup>15</sup>, 2016, the volume of water that it expects it would deliver to each urban water supplier in each of the next three years under the assumptions identified in subdivision (b), and post that calculation, and the underlying analysis, to a publicly-accessible webpage."*

### **Minimum Conservation Standard**

In response to the State Board's request for thoughts on a minimum Conservation Standard we have given it some serious consideration and have discussed it with some of the retail suppliers in our region. We do not believe it is necessary for the State Board to mandate a minimum. Under the Proposal, each agency would already be responsible for its own balance of supply availability and demand management. Western has no plans to completely rescind our water shortage contingency plan should this Proposal be adopted. Instead, prudent water supply planning dictates that Western maintain a high level of its shortage contingency stages

requiring our customers to adhere to their individual water budgets or pay the highest tier penalty for inefficient use. Based on five-years of water budget pricing experience, we have calculated that this local effort will maintain a significant reduction in demand relative to 2013. Thank you for your consideration. Western is committed to the efficient use of water and will continue to help our customers with their efforts. We look forward to continuing to work with you to improve water supply management throughout the state.

Sincerely,

A handwritten signature in black ink, appearing to read "John V. Rossi", with a long horizontal line extending to the right.

JOHN V. ROSSI  
General Manager