

James Cioffi, President  
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Patricia G. Oygur, Director  
Craig A. Ewing, Director



Mark S. Krause, General Manager-Chief Engineer  
Best, Best & Krieger, General Counsel  
Krieger & Stewart, Consulting Engineers

Ms. Felicia Marcus, Chair  
State Water Resources Control Board



May 13, 2016

Dear Ms. Marcus,

Desert Water Agency (DWA) would like to thank the State Water Resources Control Board (State Water Board) for the opportunity to submit comments on proposed changes to the Extended Emergency Regulation for Urban Water Conservation (emergency regulation). We support this resolution and look forward to working with staff through the self-certification process.

We applaud the Board's willingness to amend the emergency regulation in light of local water supply conditions. It is clear that the Board has spent a great amount of time trying to amend the emergency regulation to address the conditions of the state's many diverse water agencies. We believe a framework like this will be a useful tool during future drought emergencies.

DWA is proud that our customers have already met our 20x2020 conservation requirement, and we look forward to working with the Department of Water Resources and the State Water Resources Control Board on development of new long-term water conservation targets and modifications to Water Shortage Contingency Plans. Our long-term planning efforts were, and will continue to be, pivotal to weathering drought conditions. Local input and control will be very important in developing long-term regulations.

Desert Water Agency supports the concept of accounting for local supply and also the concept of self-certification. We look forward to working with State Water Board staff through the self-certification process.

#### **IMPORTED WATER SUPPLY**

Desert Water Agency imports water to recharge our groundwater basin. It is not clear whether imported water used for recharge should be treated differently in self-certification than imported water that is treated and served.

Desert Water Agency would appreciate clarification on this matter.

#### **GROUNDWATER SUPPLY**

Desert Water Agency's largest source of supply is the Indio (Whitewater River) Subbasin, which several neighboring water agencies also overly. The exact volume of water in the subbasin is unknown, and as the basin is not adjudicated, we don't have a specific quantity of water allocated to our agency. We are hopeful that the self-certification process will allow DWA to demonstrate the availability of our supply.



The estimated storage capacity of the subbasin is 29,800,000 acre-feet (Department of Water Resources, 1964). The amount of water in storage has been estimated at 10,200,000 acre-feet (Tyley, 1974) in the first 700 feet of saturated deposits with a reduction of about 33,000 acre-feet per year. In a 2014 evaluation, Coachella Valley Water District found that from 2003 to 2012 there was no overdraft in the Indio subbasin, and a slight surplus resulted from implementation of water management plan activities. DWA does not anticipate the need to drill additional wells for the purposes of additional extraction if drought conditions were to persist through 2019. The basin has been managed responsibly for decades in order to help reverse the effects of overdraft resulting from our area's urbanization. Desert Water Agency and our neighbor Coachella Valley Water District have imported more than a trillion gallons of water since 1973. We take the health of our basin very seriously.

Our communities have invested heavily in imported water and recycled water as a way to help make our supply more resilient and reliable even in the face of ongoing drought conditions. We are pleased that our customers will benefit from planning that has been done for shortage situations. This drought has made our customers more conscious of their water use and has also led to permanent changes that will save water in perpetuity.

#### **IN CLOSING**

We applaud the State Water Board for recognizing local supply as a major factor in determining revised emergency restrictions. We're pleased that it appears that local agencies will have more input in the self-certification process. We've been managing our supplies for decades and understand the nuances of our supplies and communities. We are confident that local water agencies would support future emergency regulations that appropriately account for local supply conditions.

We ask that staff be flexible with water agencies through the self-certification process as some data may not be readily available.

Helping our customers achieve conservation gains has been a top priority for DWA. We have spent an incredible amount of time, energy and resources to yield unparalleled conservation. We are proud that our customers have exceeded the governor's 25 percent statewide conservation mandate, making significant contributions to statewide savings and our region's groundwater savings.

We share the SWRCB's goal of protecting California water resources. We will continue to help customers conserve and to enforce mandatory water use restrictions.

Thank you,

A handwritten signature in blue ink that reads "Mark A. Krause".

Mark Krause

General Manager-Chief Engineer

Desert Water Agency