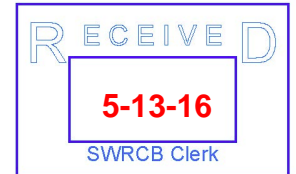


Santa Fe Irrigation District



May 13, 2016

The Honorable Felicia Marcus, Chair,
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk of the Board
1001 "I" Street, 25th Floor
Sacramento, CA 95814



Delivered via e-mail to: commentletters@waterboards.ca.gov

Subject: Comments Letter – Proposed Extended Emergency Regulation for Urban Water Conservation to be Considered by the SWRCB on May 18, 2016

Dear Chair Marcus and Members of the State Water Resources Control Board:

The Santa Fe Irrigation District appreciates the opportunity to provide input prior to the May 18, 2016 Public Hearing on the Proposed Extended Emergency Regulation State Water Urban Water Conservation (Extended Regulation). We also thank the State Water Resources Control Board and staff for the attention and effort invested in this process and the consideration given to our input over the last year.

In addition, we appreciate the willingness of the State Water Board to modify the regulations, based on comments provided by the state's water agencies, to incorporate a supply-based self-certification approach that accounts for unique supply conditions of each community and reflects the actual shortage conditions projected within a water supplier's service area. By taking into account actual conditions, the approach accounts for supplier investments in reliable drought-resilient local supplies and conservation.

We support the proposed supply-based self-certification approach that accounts for each community's unique supply conditions, and reflects actual shortages projected within a supplier's service area, with some recommended changes below.

- **Option for Wholesalers to Report Expected Supply Sufficiency within their Service Area** - Include an option that would allow wholesalers to evaluate the sufficiency of available aggregate supplies to meet the aggregate demands of the urban water suppliers they serve. Assuming a wholesale water agency can demonstrate regional supply sufficiency, no additional analysis would be needed by its retail water agencies for their self-certification reporting. This would offer a more streamlined reporting option.
- **Incorporate 2015 Demands** – Use three years (2013 – 2015) to establish an average baseline potable demand. Including 2015 in the calculation of an average baseline demand is more representative of actual and future projected demands than using only 2013 and 2014. It is

still a very conservative analysis that incorporates demand from 2013 before the Governor declared a statewide drought.

- **Adjust Potable Demand at the Retail Level to Account for Recycled Water Conversions** - Retail agencies that have reduced their potable demand through conversions to recycled water, should be able to adjust their baseline demand accordingly.
- **Do Not Set a Minimum Conservation Standard or Floor** – We do not support a minimum conservation standard when there is sufficient supply to meet demand. The proposed approach requires water suppliers to ensure an adequate supply during an additional three years of drought, which is a very conservative assumption built into the analysis. A minimum standard is arbitrary and creates a disincentive to future investments in reliable supplies.
- **Maintain Conservation Requirements for the Hospitality Industry** - Maintain conservation requirements contained in the current emergency regulation for the hospitality industry, which sends an important message about the need to conserve in the ongoing drought.
- **Request Additional Time to Submit Information** - Allow an additional week for suppliers to submit information to the State Water Board, June 15 for wholesale suppliers and June 22, 2016 for urban water suppliers.
- **Governor's Executive Order Provisions Regarding Permanent Long-term Improvements In Water Use** - We support future collaboration with the State Water Board and Department of Water Resources on the Governor's May 9th Executive Order regarding long-term water use efficiency. Agricultural Water Management Plans and Urban Water Management Plans are important long term planning documents that require significant time and energy to develop. Any new requirements should be incorporated into the next regularly scheduled updates of these plans.

Again, we want to thank you for the opportunity to comment on the Proposed Extended Emergency Regulation for Urban Water Conservation. Please feel free to contact me at 858.761.2110 or mbardin@sfidwater.org if you have any questions or require clarification regarding our comments.

Sincerely,



Michael J. Bardin
General Manager
Santa Fe Irrigation District