



MesaWater
DISTRICT®

*Dedicated to
Satisfying our Community's
Water Needs*

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May 12, 2016

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



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

Honorable Board Chair Marcus and State Water Resources Control Board,

Mesa Water District (Mesa Water®) thanks the State Water Resources Control Board ("Board") and staff for the opportunity to comment on recent proposals to modify the emergency water conservation regulations.

Californians have proven their ability and willingness to conserve water during the recent drought emergency, both by increasing water use efficiencies and adjusting their personal behaviors and landscape irrigation.

Thankfully statewide water storage levels have significantly improved, and the current status of the drought is now much less exceptional.

Additionally, many water agencies have recently invested millions of dollars in developing sustainable, drought-resilient local supplies of water, and we believe that such investments should be recognized and included in determining the level of conservation needed in each community.

Mesa Water® recently enhanced capacity and efficiency improvements of its Mesa Water Reliability Facility (MWRF). The MWRF provides enough production capacity so that Mesa Water® is independent of the need to purchase imported water, which frees up that source for other users.

Local investments in water reliability are important during times of normal precipitation and storage levels, as well as during times of drought. Unfortunately, the initial conservation regulations failed to acknowledge local investments which sent a strong negative message to water resource planners regarding reliability investment, because it was not considered during this recent drought emergency.

Mesa Water® further believes that the Self-Certification of Supply Reliability is a more comprehensive, equitable, and effective means for assessing the needs for short-term conservation during this and future droughts. Mesa Water® fully supports this effort as a means of returning water supply reliability and conservation decision making to the local and regional water agencies.



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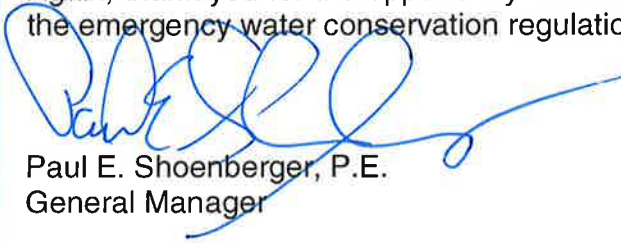
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However, Mesa Water® does not support the idea of a conservation floor, or minimum conservation level, being arbitrarily applied statewide. A conservation floor sends the wrong message to agencies considering investments in water reliability, and to the water users who would benefit from those investments. Californians have achieved significant water conservation levels and, based on our historical experience from past droughts, we believe it is quite unlikely that customers will immediately return to their historical water use, given permanent improvements in water use efficiency. Finally, a conservation floor defeats the purpose and goodwill basis for self-certification.

Mesa Water® also suggests removing the deadline requirement for water agencies to submit self-certifications. Rather, water agencies should be encouraged to submit self-certifications as soon as possible with the incentive that the sooner a self-certification is submitted and approved, the sooner its conservation standard could be adjusted. This helps everyone, hurts no one, and potentially requires a higher level of conservation until the water agency is able to submit its self-certification.

Lastly, based on Californians' improved conservation behavior and permanent improvements in water efficiency, Mesa Water® recommends that the calculation of demand for the purposes of the self-certification be modified to include CY 2015 (in addition to CY 2013 and 2014), recognizing that water demand for the next three years will be significantly lower than 2013 and 2014.

Again, thank you for the opportunity to comment on this proposal to modify the emergency water conservation regulations.



Paul E. Shoenberger, P.E.
General Manager