



NEWHALL COUNTY WATER DISTRICT

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(5/18/16) Board Meeting- Item 10
Conservation Extended Emergency Reg
Deadline: 5/16/16 by 12:00 noon



May 13, 2016

Kathy Frevert, Conservation Specialist
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Via Email Only: commentletters@waterboards.ca.gov

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

Dear Ms. Frevert:

The Newhall County Water District (NCWD) appreciates the opportunity to provide comments on the State Water Resources Control Board's (Board) Draft Regulations. We thank you for your recognition of a supply reliability based approach to transition away from the previous strictly demand reduction based approach. We look forward to working with the Board and submit the following comments for consideration to ensure this new process is successful.

1. Provide a slightly longer time for compliance by amending Sec. 864.5(a)(2) and 864.5(a)(3) to June 22, and Sec. 864.5(b)(4)(e) to June 15. This allows wholesale and retail agencies some additional time to ensure that their calculations are quality-assured.
2. Amend 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 highly conservative "worst case" conditions associated with the third year hydrology.
3. Amend 864.5(a)(4)(b)92) to calculate potable water demand based on an average of three years including 2015, which is expected to better reflect lower water user demand in the face of continued drought conditions as would be communicated by water suppliers, the state and the media.

4. NCWD opposes the imposition of a “floor” of required minimum conservation as it undermines the purpose and reliability of the self-certification analysis and continues to discount the value of local investments that support local drought supply reliability.
5. NCWD will continue to promote efficient water use and implement the local supply and demand management programs, and expect our customers to continue to maintain general lower water demand levels in coming months.

Thank you for the consideration of these comments.

Sincerely,
Newhall County Water District



Stephen L. Cole
General Manager