



April 12, 2016

Jeanine Townsend,
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Delivered To: commentletters@waterboards.ca.gov
Subject: Comment Letter -Urban Water Conservation Workshop

Dear Ms. Townsend:

Thank you for the opportunity to submit Padre Dam Municipal Water District's input to the State Water Board for its consideration at the April 20, 2016 public workshop on the potential modification of the current Emergency Regulation for Statewide Urban Water Conservation.

Padre Dam serves 100,000 customers in a large service area comprising multiple communities of East San Diego County and our customers have done an extraordinary job achieving water savings during the current drought. From June 2015 through February 2016, Padre Dam achieved a 26 percent reduction in water use, exceeding our conservation standard of 20 percent by 6 percent to date. We have achieved this without raising water rates or imposing drought penalties. We experienced a similar response by our customers to conserve in the most recent previous drought in 2008-2011. We believe that through a combination of customer education and outreach, effective pricing signals that reflect sound cost of service principles and a focused drought response ordinance with enforcement mechanisms Padre Dam has been able to successfully manage the current drought and has demonstrated its ability to manage future droughts and water shortages.

Along with the ability to manage drought and water shortages through efforts to reduce water use, Padre Dam has focused on another, equally important element, of drought preparedness; developing drought resilient water supplies. Padre Dam has also been a leader and innovator in water recycling for almost 60 years and is currently in the advanced planning stages of a large scale cutting edge potable reuse project to add up to 20,000 acre feet per year of drought proof supplies to both Padre Dam and the adjoining Helix Water District.

We believe that the most effective and efficient place to manage water shortages and drought emergencies is at the local urban water supplier level. That is where actual supply conditions are most directly related to the need for water or reduced water use and where relationships with residents and businesses over water use is its closest. The San Diego County Water Authority, of which Padre Dam is a member agency, will be submitting more specific detailed comments on modifications to the Emergency Regulation which Padre Dam supports. From a more policy level perspective Padre Dam offer the following input for the Water Board to consider at its April 20, 2016 workshop:

What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

Padre Dam believes that a new resilience based approach should be taken in modifications to the Emergency Regulation that focus on an urban water supplier's sound approach to water management and drought preparedness. It should focus on conservation and enhanced water supply availability, and recognize regional and local distinctions in water supply availability and water use. It should encourage and incentivize a diversified "All of the Above" approach consistent with the Governor's Water Action

Plan as the best path to water reliability and drought preparedness. It should recognize that the most appropriate place to manage drought and water shortages is where the responsibility has historically rested, at the local and regional level. Varying levels of direct state involvement may be necessary but should be based on actual water supply conditions at the local level and aimed at facilitating prudent resource management, supplementing local and regional efforts and when necessary addressing emergency conditions that are not or cannot be managed effectively by the water supplier. This would entail modifying the current Emergency Regulation to rely on 1) supply and water use forecasting by the urban water supplier, 2) identification by the urban supplier of a conservation target directly linked to its available water supplies and 3) demonstration of the legal framework (Ordinance) in place to effectively enforce water use restrictions and achieve the identified conservation target.

How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

The best method to link water supply availability to needed conservation is for urban suppliers, region's that share supplies, or a common wholesale supplier to conduct a water balance and identify a gap between available supplies and water use. It's important to note that those urban suppliers and regions that have diversified their supplies and made investments in water storage, like Padre Dam and the San Diego County Water Authority among many others, are less susceptible to hydrologic variances of supplies and that resilience should be taken into account. It's also important to note that areas of the state, like urban southern California, that receive imported water from the Colorado River and State Water Project have supply availability based on precipitation in those out-of-basin watersheds and in respect to the Colorado River, priority of water rights. Reliance on submission of a water supply-water demand balance will show those supply sources, including the use of stored water, and provide a true indication of drought preparedness. Similarly, those urban water suppliers that rely solely on local or imported supplies linked to hydrology with limited water stored in reserves will be very apparent and allow the State Water Board to focus its assistance on their vulnerability and ability to reduce water use.

To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

Padre Dam ratepayers have made significant investments in recycling and demonstrated a commitment to conservation and water use efficiency over several decades and have done so to improve water reliability and supply availability in our District during times of drought and shortages. It is essential that the State Board look to the urban water supplier's supply portfolio and encourage local water suppliers to manage drought and water shortage through development of resilient supplies, good planning, prudent water resource management, orderly drought response ordinances and outreach programs. An appropriate role for the State is to ensure that urban water suppliers are prepared to manage drought and severe shortages and can demonstrate their preparedness. Diverse and reliable water supply portfolios along with efficient water use are the foundation for drought preparedness. The State Water Board should evaluate the supply portfolio of urban water suppliers, its linkage to expected water use (supply-demand balance) and their preparedness for drought response before imposing any standard that may not reflect the actual conditions at the local level.

Thank you for the opportunity to provide input on the workshop topic before the State Water Board.

Sincerely,



Allen Carlisle
CEO/General Manager