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April 14, 2016



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

VIA EMAIL: commentletters@waterboards.ca.gov

Re: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend,

On behalf of Olivenhain Municipal Water District, thank you for the opportunity to provide the State Water Resources Control Board with input on the potential modifications to the February 2016 Emergency Regulations for Statewide Urban Water Conservation. OMWD provides 84,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

To date, OMWD is meeting the recently adjusted 24% reduction assigned to us by the State Board, and has drawn almost two million dollars from our operating reserves this fiscal year alone to minimize the financial impact of those reductions on the residential, agricultural, commercial, and industrial customers we serve.

In light of the fact that a majority of OMWD's water supply is not derived from the State Water Project or the Central Valley Project, and is not in short supply, OMWD strongly urges the State Board to incorporate the following modifications:

- Allow urban water suppliers to self-certify to the State Board based on actual supplies available and shortage conditions. All sources of supply should be evaluated as to the susceptibility to drought they are subject to. The total reduction should be based on supply availability, and can be evaluated by taking the sum of proportional supply of all sources.
- Allow urban water suppliers to achieve their conservation standard by imposing restrictions developed by the urban water supplier as opposed to State Board mandates. Each district is better informed about its customers and is best equipped to identify the most successful methods for achieving reduction in use.



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- Adjust Section 864 so as to promote water use efficiency, but not mandate end water use. An agency should not dictate how an individual is allowed to use their water beyond ensuring that water is not being wasted.
- Offer that the State Board can provide advice in the form of best practices to assist local agencies in promoting water use efficiency and developing outreach campaigns.

OMWD has demonstrated the capability of achieving a reduction in water use compliant with State Board mandates. This achievement is a result of continued communication with our customers. As our customers become more informed of the fact that local water supplies are not only adequate, but are in excess, it becomes increasingly difficult to communicate the need for water use restrictions. Customers express frustration as they discover that their actions to conserve water by allowing their landscapes to die were not necessary based on available water supply. If we continue to restrict water use despite having adequate local supply, we risk developing a resistance to conservation when we are faced with shortage.

If you or your staff should need any additional details pertaining to this assessment of the proposed modification and extension of the Emergency Regulations, please do not hesitate to contact me at 760-753-6466.

Regards,



Kimberly A. Thorner
General Manager

CC: Wade Crowfoot, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown, Jr.
Assemblywoman Marie Waldron
Assemblyman Rocky Chavez
Assemblyman Brian Maienschein
Assemblywoman Toni Atkins
Senator Pat Bates
Senator Joel Anderson
Senator Marty Block
Mark Weston, San Diego County Water Authority
Tom Howard, Executive Director, State Water Resources Control Board
Caren Trgovcich, Chief Deputy Director, State Water Resources Control Board
Planning and Performance
Max Gomberg, Climate Change Mitigation Strategist, State Water Resources Control Board
Dave Bolland, Association of California Water Agencies, via email, daveb@acwa.com