



# CITY OF OCEANSIDE

## WATER UTILITIES DEPARTMENT

January 5, 2016

Honorable Chair Felicia Marcus  
and State Water Resources Control Board Members  
1001 I Street, 25<sup>th</sup> Floor  
Sacramento, CA 95814

Dear Chair Marcus and State Water Resources Control Board Members:

The City of Oceanside is pleased to have this opportunity to comment on the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation (Framework). We also appreciate the efforts by the State Board to recognize the supply reliability differences throughout the State and to start taking steps to provide a more balanced, equitable and sustainable approach to managing California's current drought.

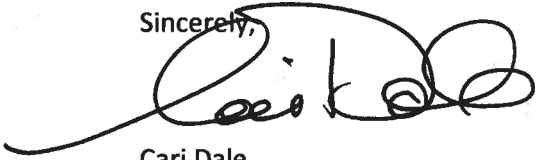
In support of the provision that individual agency conservation mandates be adjusted for climate, growth and the development of drought resistant supplies, we strongly urge additional consideration be given in respect to the following:

1. To recognize the regional variability in supply conditions and the need for ongoing review and modification of the Regulation based on these and other frequently changing conditions.
2. To equitably reflect the investments communities have made in drought-resilient supplies, the Emergency Regulations should provide credit for supplies developed prior to 2013. Pre-2013 supplies have better prepared California for this drought and future droughts by helping to reduce, forestall, or in some cases eliminate shortage impacts. In addition, these early investments in supplies reflect billions of local ratepayer investments. Within the Metropolitan Water District's service area alone, literally hundreds of millions of dollars in financial incentives have been paid to local agencies producing recycled water and brackish groundwater over the last 20+ years to reduce demand on imported water sources like the State Water Project to improve the water supply reliability of 18 million Californians during droughts and imported water shortages. As noted previously, these investments are consistent with the Governor's Water Action Plan.
3. To broaden the supply credit to be inclusive of drought-resilient sources of supply such as desalinated brackish groundwater and conserved water from long-term transfers. These supplies should be included as they are reliable during sustained shortages and can be demonstrated during the next 270 day period contemplated in an extended Emergency Regulation.

4. To eliminate the reduction cap of 4 percentage points in the proposed supply credit with the intent to more fully recognize the supply conditions and characteristics specific to regions and individual communities throughout the state. Recognition that would support Oceanside, along with all of the local water agencies in San Diego County, maintain a water reduction cap of no less than 8 percent.

Thank you for the opportunity to comment on the proposed Framework. We hope these recommendations will help the State Board gain greater perspective and appreciation of the unique local and regional supply conditions and investments being made throughout the state.

Sincerely,

A handwritten signature in black ink, appearing to read "Cari Dale", with a long horizontal flourish extending to the left.

Cari Dale  
Water Utilities Director  
City of Oceanside