



January 6, 2016

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The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Kathy Frevert
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comments on Proposed Regulatory Framework

Dear Chair Marcus and Members of the Board:

The Contra Costa Water District (CCWD) appreciates the opportunity to provide input on the *Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation* presented at the State Water Resources Control Board's (State Board) Committee meeting on December 21, 2015.

Climate Adjustment

The State Board staff recommendation uses a climate adjustment that is based on comparing the average July through September evapotranspiration (ET) for the water supplier service area to the state average. Using a simple-average for the state does not provide an accurate reflection of the population using the water. Using the simple average artificially increases the average because it gives the same weight to each of the 18 ET zones, regardless of population or water use. In particular, the current calculation provides no relief for agencies in Zone 8, which has considerably higher temperatures than Zones 1-6.

CCWD recommends revising the calculation so that agencies in Zone 8 are provided some climate adjustment. CCWD recommends using a population-weighted average for the "state average". Alternatively, using the average ET for Zones 1-6 would also provide a better adjustment.

Drought Resilient Sources of Supply Credit

The recommendation by State Board staff is to provide a credit to suppliers that have had at least 4 percent of their potable supply from indirect potable reuse, of either coastal wastewater or desalinated seawater, developed since 2013.

There is no credit proposed for agencies that have invested in environmentally beneficial off-stream storage. In 2012, CCWD completed the expansion of the Los Vaqueros Reservoir to 160,000 acre-feet with a key objective of adding storage to provide for drought resiliency and protection. This expanded reservoir and possible future expansion have the potential to assist water suppliers throughout the region improve their water supply reliability by providing a place

to store conserved water and use it in periods of drought. Water suppliers and their rate payers may be less willing to invest in drought programs and other local water supply programs if the State restricts the use of water so developed, which would seem to be in conflict with State's desire for more local self-sufficiency.

CCWD recommends revising the credit to provide a benefit for off-stream storage projects that are intended to provide drought-resiliency and supply reliability benefits.

Thank you for your consideration.

Sincerely,



Jerry Brown
General Manager

JB/CD:dmg