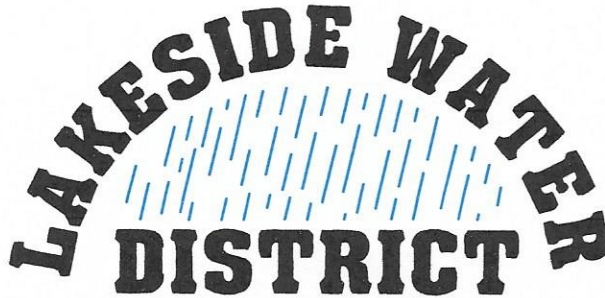


BOARD OF DIRECTORS:
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GENERAL MANAGER

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DEXTER WILSON
ENGINEER

January 12, 2017

Public Comment
Urban Water Conservation Workshop
Deadline: 1/12/17 12 noon

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



(Delivered by e-mail to: commentletters@waterboards.ca.gov)

Subject: "Comment Letter – Urban Water Conservation Workshop"

Dear Chair Marcus and Commissioners of the State Water Resources Control Board:

On behalf of the Board of Directors and Rincon Water customers, thank you for the opportunity to submit these comments regarding the Board workshop scheduled for January 18, 2017 to discuss proposed adjustments to the Conservation Extended Emergency Regulations (Extended Regulations).

In regards to the potential Extended Regulations, the following responses or recommendations are provided:

1. Emergency Conservation Regulations for 2017. As the State Water Resources Control Board (SWRCB) considers extending the emergency regulation in February 2017, they must consider that many parts of the state are not experiencing emergency drought conditions due to improved hydrologic conditions, development of drought resilient supplies, or both. The SWRCB should rescind the emergency conservation regulations for those areas with adequate supplies, and focus on those communities that require assistance in meeting the water demands of their community. The SWRCB could continue its "stress test" demand reduction measures for areas in which supplies are inadequate in 2017 to meet normal demands. The only applicable sections of the May 2016 regulations that should be made permanent are Section 864, End User Requirements, and for those areas with inadequate supplies, Section 864.5, Self-Certification.
2. Yes, each region needs to have the latitude and ability to address their specific conditions, and in our opinion most **do not** require an emergency regulation at this point. In fact, given the current conditions, it is hard to justify having "emergency regulations" when many can argue the state is no longer in short term emergency.
3. Executive Order B-37-16 directs the SWRCB to develop a proposal to achieve mandatory reduction in potable urban water usage that builds off the mandatory 25% reduction in previous Executive Orders and lessons learned of 2016. It would be disingenuous of the SWRCB to propose mandatory regulations given that this water year is already producing record rain and snowfalls across the state.

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Chair Marcus
January 12, 2017
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It should be further noted that majority of water agencies, through their UWMPs and Drought Response Ordinances/Plans, have well established mechanisms that would allow these agencies to move in and out of drought conditions, based on local water supply conditions. By adopting a drought response protocol that allows local and regional agencies to continue to utilize local/regional resources, develop additional drought tolerant sources of supply, and coordinate regional requirements, while still promoting conservation ethics and practices, is highly recommended and the prudent action at this point. Emergency regulations, if needed, can be reviewed once again in late calendar year 2017 based on hydrologic conditions. Further under no conditions would we recommend the State Water Board adopt a conservation standard structure, similar to the February 2016 regulation that does not fully capture local supply conditions and actual supply shortages experienced by a public water system or a urban water supplier.

Lakeside Water District recommends that long term conservation aspects continue to be addressed through prudent development of programs and projects, and potentially regulations, as illustrated in the December 2016 draft report "Making Water Conservation a California Way of Life". We look forward to continuing to develop mutually supportable conservation/supply goals

With that said, Lakeside Water District continues to promote efficient water use and we expect our customers will continue to maintain generally lower water demand levels in coming months, even as self-certification demonstrates adequate water supply reliability in the face of normal drought cycles. In fact, Lakeside Water is cumulatively at 22 percent conservation savings from June 2015 to December 2016 as compared to 2013.

Thank you for the opportunity to provide these comments for the January 18th Board workshop. Please feel free to contact me at BrettS@Lakesidewater.org or at 619-443-3805 for any additional comments or clarifications to these comments.

Sincerely,



Brett Sanders
General Manager
Lakeside Water District