

VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

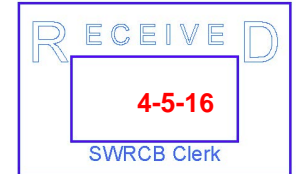
April 5, 2016

**(4/20/16) Public Workshop
Urban Water Conservation
Deadline: 4/14/16 by 12 noon**

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Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814

Sent via e-mail to: comments@waterboards.ca.gov



**Subject: Comments – State Water Resources Control Board Public Workshop,
Urban Water Conservation, April 20, 2016**

Dear Ms. Marcus;

As on several occasions before, we want to thank you for the opportunity to comment prior to the April 20, 2016 Workshop, Urban Water Conservation. Further, we want to express our appreciation for the attention and tremendous effort you, the rest of the Board and the involved SWRCB staff have invested in this long and difficult process.

In response to your "Notice of Public Workshop, Urban Water Conservation," we would like to respond to the questions posed for the workshop as follows:

Workshop Question 1 – "What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?" In response, SWRCB should:

- Delete those sections of the Emergency Regulation that impose mandatory reductions (conservation standards) on individual urban water suppliers;
- Maintain Section 864 "End User Requirements in the Promotion of Water Conservation", which includes the mandatory prohibitions that apply to all Californians; and
- Maintain monthly reporting to the State Water Board (per the current emergency regulation).

Workshop Question 2: "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?" In response, the SWRCB should:

- Focus its efforts on those water suppliers facing the most severe shortage conditions and address emergency conditions that are not or cannot be managed effectively by the water supplier; and

- Coordinate efforts and resources with the Department of Water Resources to identify those areas hardest hit and provide assistance to ensure that the supplier is able to manage future drought situations.

Workshop Question 3 – “To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?” In response, the SWRCB should:

- Formally recognize that drought response actions should be managed at the local and regional level, based on actual supplies available and shortage conditions, by modifying the Emergency Regulation to require the following:
 - Urban water suppliers, either on an agency basis or as a region, would self-certify to the State Water Board as to the availability of secure and verifiable water supplies to meet demands through the Regulation period (October 2016 or sooner).
 - Upon request by the State Water Board, the water supplier would provide supporting documentation such as, an urban water management plan, drought management plan, integrated resources plan or groundwater management plan, to demonstrate sufficient supplies.
 - Urban water suppliers would self-certify the ability to implement mandatory use reduction stages of their adopted Water Shortage Contingency Plan as necessary based on the supplier’s shortage condition.
 - Suppliers unable to make this certification would be required to implement mandatory conservation measures, commensurate with the specific level of unmet demand or shortage.

Again, our sincere thanks again for the opportunity to make written comment and we look forward to participating in the April 20, 2016 SWRCB Workshop.

Sincerely;



Gary Arant
General Manager