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

January 12, 2017

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814



Esteemed Chair Marcus and Board,

Thank you for the opportunity to comment on the upcoming State Water Board workshop on extending the current drought emergency regulations.

While recent precipitation across the state has not cured all our ills, key reservoirs across the southland are already at encouragingly high levels and groundwater levels diminished by six years of drought have had the opportunity to start rebounding.

In addition to this climatic boon, state agencies and water suppliers have been hard at work figuring out how to implement Governor Brown's Executive Order B-37-16, "Making Conservation a California Way of Life." The stated purpose of this lengthy and collaborative process is to forestall uniform conservation mandates from the state in favor of new standards that take into account the unique climatic, demographic, and land-use characteristics of each urban water agency's service area. Any return to such a prescribed mandate under the purview of the drought emergency regulations would be counterproductive to that effort.

The self-certification process established in May of 2016 allowed the state to focus its efforts on specific regions and suppliers that have not undertaken sufficient levels of drought-resilient preparation and/or are so situated as to be at the direct mercy of continued water shortages. This new system revealed the ability and willingness of local water agencies to continue their conservation efforts. Indeed, according to staff presentations before your Board, the vast majority of water agencies achieved significant water savings goals: cumulative savings statewide from June 2015 through November 2016 came in at 22.6 percent.

Here at Camrosa, we have more than sufficient supply to meet demands for the next three years, and do not need State intervention or regulation to continue conscientious and efficient management of our water resources. With more than \$30 million of ratepayer investments over the last twenty years, Camrosa's drought-resilient alternatives to imported water have created a diverse portfolio of supplies that far exceed our highest annual demands: our customers recycle 100 percent of the tertiary-treated effluent from our water reclamation facility; our robust non-potable irrigation system has offset a third of our imported water demand since 2003 and provides a sorely needed alternative to groundwater pumping in an adjacent agricultural district; and our brackish

groundwater desalination facility, which came online in 2015 with \$2.3 million in funding assistance from the State via Proposition 84, reduced our demand on the State Water Project by an additional ten percent.

Despite the fact that Camrosa self-certified a zero-percent conservation target in June of 2016, Camrosa's Board of Directors called for a voluntary 15-percent reduction from the 2013 baseline in recognition of the ongoing drought. Our customers have demonstrated their commitment to being good stewards of our water resources, maintaining an average monthly reduction of 19 percent since the move to the voluntary conservation, and bringing our average reduction for all of 2016 to 24 percent as compared to 2013.

As you know from the draft report released in November, efforts are already underway to make permanent the monthly monitoring of drought conditions and water production of urban suppliers. The permanent prohibition of water waste, the implementation of Senate Bill 555 to quantify and decrease water loss, and the certification of innovative technologies for water conservation and energy efficiency also do not face any obstacles to being implemented, and efforts to do so proceed apace. That is, anything that may be required by a responsible extension of the drought emergency regulations will soon be covered by the new permanent regulatory framework.

Considering this, and the aforementioned position of Camrosa—as well as many other suppliers in our region—we encourage the Board to allow the current drought emergency regulations to expire next month.

Thank you for considering these comments. Should you or your staff have any questions, please don't hesitate to contact me at IanP@camrosa.com or 805.482.6562.

Sincerely,



Ian Prichard, Water Resources Manager

cc: The Honorable Frances Spivy-Weber, Vice Chair, State Water Board
The Honorable Dorene D'Adamo, Member, State Water Board
The Honorable Steven Moore, Member, State Water Board
The Honorable Tam Doduc, Member, State Water Board
Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Mr. Tom Howard, Executive Director, State Water Board
Mr. Eric Oppenheimer, Chief Deputy Director, State Water Board
Mr. Erik Ekdahl, Director, Office of Research, Planning and Performance, State Water Board
Mr. Max Gomberg, Climate Change Mitigation Strategist, State Water Board
Mr. Timothy H. Quinn, Executive Director, ACWA
Ms. Cindy Tuck, Deputy Executive Director for Government Relations, ACWA