



Santa Fe Irrigation District



January 12, 2017

Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Attention: Ms. Jeanine Townsend, Clerk of the Board
Sent via email to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Urban Water Conservation Workshop

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

Thank you for the opportunity to provide input on the potential extension or modification of the current Emergency Regulation for Statewide Urban Water Conservation. Our responses to the questions posed in the January 6, 2017, Notice of Public Workshop are based on the following facts:

The Santa Fe Irrigation District (District) continues to embrace water-use efficiency even though the District has not been subject to a conservation standard reduction since May.

- Water-use from June through December 2016 was 15 percent below 2013 levels.
- The District continues to promote long-term permanent water-use efficiency through education and outreach programs such as water-use checkups and rebate programs.

The District is located within the County of San Diego, a region that is not experiencing a drought emergency condition.

- Regional collaboration, responsible long range planning and significant investments in highly reliable supplies and infrastructure improvements (\$3 billion over 25 years) has strengthened the region's overall supply reliability and drought resiliency.
- Under the current emergency regulation's conservative "stress test" analysis, the District demonstrated the availability of adequate supplies to meet its demands, even if the next three years are dry.
- Dramatically improved statewide hydrologic conditions will only improve the reliability of supplies considered under the "stress test" analysis, for the District and urban water suppliers throughout California.

Below are responses to the specific questions contained in the Notice of Public Workshop:

1. *What elements of the existing May 2016 Emergency Regulation, if any, should be modified? Should the State Water Board wait until the hydrology for the current water year is known*

(April or later) before proposing adjustments to the current method for calculating conservation standards? And, should the State Water Board allow suppliers to update or modify their conservation standard calculations (and if so, how)?

Considering that urban water suppliers throughout the state, including the Santa Fe Irrigation District and those in the San Diego region, are not experiencing emergency drought conditions, we recommend the current emergency regulation expires in February 2017. We will continue to promote long-term water use efficiency, monitor supply conditions closely, and take appropriate local actions consistent with our water shortage contingency plan.

Maintaining the State's emergency regulations sends a message to the public that the state remains in a drought emergency, when current hydrologic and water supply conditions throughout the state continue to improve dramatically. This message undermines our credibility with the public and erodes the effectiveness of future conservation messaging that would be needed during actual emergency conditions. The State Water Board should focus its efforts on those communities that are truly facing supply shortages and are unable to manage drought impacts.

Should the State Water Board decide to wait until April to evaluate the regulation, we recommend extending the current emergency regulation only until April 2017 and not October 2017, as stated in the public workshop notice. In addition, we recommend maintaining the current "stress test" evaluation and allowing agencies to update their conservation standard calculation, if they so choose, should the SWRCB extend the regulations.

2. Should the State Water Board account for regional differences in snowpack, precipitation, and lingering drought impacts differently than under the current emergency regulation, and if so, how?


The current "stress test" analysis in the emergency regulation already takes into account regional differences in snowpack and precipitation in regards to supply availability and should not be accounted for differently. It should be noted that when evaluating potential emergency drought conditions, the State Water Board should not only consider snowpack and precipitation, but also availability of drought-resilient supplies that are not reliant on uncertain hydrologic conditions.

3. Executive Order B-37-16 requires the Board to develop a proposal to achieve a mandatory reduction in potable water use that builds off the mandatory 25 percent reduction in previous Executive Orders and lessons learned through 2016. The Board, however, is not required to act on this proposal. Should the Board act now, or later if conditions warrant, to a conservation standard structure like the one the Board adopted in February 2016 to achieve a mandatory reduction in water use? Should the Board set a conservation floor, individually or cumulatively?

Executive Order B-37-16 prefaces this Board requirement with the phrase "To prepare for the possibility of another dry winter." With the prospect of a dry winter fading with each passing week and storm system, there is no need for the Board to act on any proposal to achieve mandatory reductions in water use. 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 the urban water supplier.

Thank you again for the opportunity to comment on the potential extension of the emergency regulation. We look forward to continued collaboration with the State Water Board to ensure continued supply reliability for the state.

Sincerely,



Michael J. Bardin
General Manager

Cc: The Honorable Joel Anderson, 38th Senate District
The Honorable Toni Atkins, 39th Senate District
The Honorable Brian Maienschein, 77th Assembly District
The Honorable Todd Gloria, 78th Assembly District

