



Established in 1918 as a public agency

Coachella Valley Water District

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

Directors:

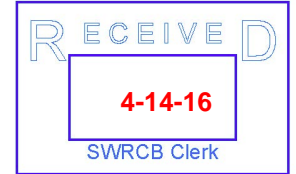
John P. Powell, Jr., President - Div. 3
Peter Nelson, Vice President - Div. 4
G. Patrick O'Dowd - Div. 1
Ed Pack - Div. 2
Cástulo R. Estrada - Div. 5

Officers:

Jim Barrett, General Manager
Julia Fernandez, Board Secretary

Best Best & Krieger LLP, Attorneys

April 14, 2016



VIA EMAIL ONLY

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

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Dear Chair Marcus:

Thank you for the opportunity to review and comment on the forthcoming changes to the Extended Emergency Regulation for Urban Water Conservation. Coachella Valley Water District (CVWD) has appreciated the opportunity to be involved in this process and to provide feedback.

We applaud the Board's willingness to amend the emergency regulations related to the current snowpack and precipitation levels and we feel it is vital that this action be taken as soon as possible.

CVWD is committed to helping its domestic water use customers achieve the State's water reduction mandate and we remain committed to managing our water supplies in a long-term, sustainable manner. We take the drought very seriously and we will continue to promote conservation in order to ensure sustainable supplies in uncertain times. Nonetheless, we risk losing the participation of our customers if we insist that there is a water shortage crisis when supplies are available.

CVWD has invested \$6.7 million dollars into conservation program payments this fiscal year in an effort to meet the State mandates and we are currently in the process of a rate increase. Perhaps more importantly though, CVWD has worked collaboratively with other local water agencies to develop and implement water management plans that include projects with estimated costs exceeding \$8 billion to provide sustainable drought resistant water supplies to the communities we serve.

CVWD is supportive of the use of supply as a metric to determine conservation targets. Basing targets on demand alone, as was done previously, tells only part of the story of our local water conditions.

Question 1: What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

The existing Emergency Regulation should be replaced by the Supply-Demand Based Emergency Drought Regulation Compliance Framework submitted to staff by a collaborative group of water agencies. This proposal allows for the consideration of supply as it relates to demand in the implementation of target demand reduction.

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?

The Supply-Demand Based Emergency Drought Regulation Compliance Framework lays out a method to account for regional differences by requiring that the local agencies analyze how the drought impacts their water supply portfolio.

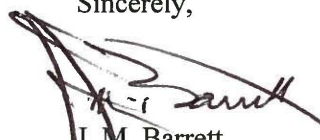
Question 3: To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

Fully—reliable local supplies should be a key, if not *the* key, factor in determining water conservation mandates. Managing local supplies has long been the top priority of water districts like ours. Responsible water management has always been an essential part of providing water services to desert communities.

CVWD takes water supply reliability very seriously. Since we were founded, nearly 100 years ago, our priority has been ensuring that our service area has a sustainable water supply. CVWD initiated stormwater capture programs in 1918, decades ahead of other areas of the State. Since our groundwater replenish programs began in the 1970's, we have, together with Desert Water Agency, recharged 3 million acre-feet of water into our basin.

Our conservation programs are robust and we have dedicated tremendous resources to improving water efficiency. During the drought emergency, we participated fully and took drastic measures to try to achieve our conservation mandate. Now that we are seeing some relief from the emergency, we ask that the State offer some relief to our customers who have trusted us to ensure a secure water supply.

Sincerely,



J. M. Barrett
General Manager

KR/Comm&Constrv/41716 SWRCB ltr, comment on Extended ER Regs for Urban Wtr Conserv