



NEWHALL COUNTY WATER DISTRICT

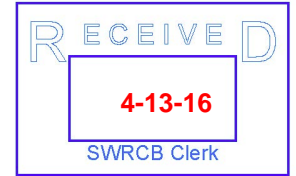
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(4/20/16) Public Workshop
Urban Water Conservation
Deadline: 4/14/16 by 12 noon

April 13, 2016

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



Attn: Jeanine Townsend - *Via Email Only*

Subject: Comment Letter - Urban Water Conservation Workshop

Dear Ms. Townsend:

The Newhall County Water District (NCWD) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Water Board) Urban Water Conservation Workshop. We are requesting the State Water Board consider the following comments regarding the potential extension and modification of the existing Emergency Regulation and any future regulatory action for Statewide Urban Water Conservation.

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

The State Water Board has done a good job at adjusting conservation targets based on regional differences such as, climate, growth, and reuse. However, additional credits should be allowed based on regional planning efforts of sustainable supplies such as, banking, transfers, and other local supply portfolio planning. Urban Water Management Plans should be used to help the State Water Board identify the regions who have planned, invested, and prepared robust supply portfolios and adequate conservation target credits should be allotted.

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?

State Water Project supplies are directly related to precipitation in the central and northern regions of the state. Therefore, conservation efforts should be linked to State Water allocations. In addition, to the regional climate, growth, and reuse differences in calculating conservation targets, supply and demand factors should be taken in to consideration. If supply (with current State Water allocations) exceed a supplier's demand, then conservation targets should be appropriately adjusted.

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

Emergency drought situations call for tough response from regulators and swift action from water suppliers. However, since Urban Water Management Plans (UWMPs) are designed to support long-term resource planning, and ensure adequate water supplies are available to meet existing and future demands, they should be strongly considered in both emergency and proposed future conservation regulations.

We believe future long-term sustainable regulations are needed, but they should not be based on "emergency" conditions. Prior to the passage of Senate Bill x7-7 (20x2020), a rigorous process was used, which included stakeholders, regulators, and the public to develop coherent and comprehensive regulations for water efficiency and sustainability. We look forward to working pro-actively in collaboration with the Administration, State Water Board, and the Department of Water Resources (DWR) on a long-term water use efficiency policy and drought contingency approach that will be effective, less costly for water agencies and water users, and will require less ongoing administration burden for the State Water Board.

Sincerely,
Newhall County Water District


Stephen L. Cole
General Manager