

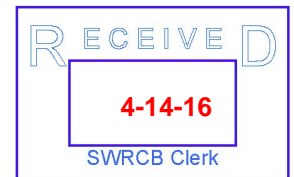


Felicia Marcus, Chair  
State Water Resources Control Board  
c/o Jeanine Townsend, Clerk to the Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

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**General Manager**  
Tony L. Stafford

April 14, 2016

Dear Ms. Marcus:



Thank you for the opportunity to comment on the potential modification of the current Emergency Regulation for Statewide Urban Water Conservation.

The Emergency Regulation has been an important tool during California’s drought emergency to achieve the Governor’s mandated conservation target of 25 percent. By the Board’s own calculations, more than 1.1 million acre-feet of water have been saved by the state’s 411 urban water suppliers, amounting to a 24-percent reduction. Camrosa’s overall percentage reduction has been exactly on par; through March 2016, Camrosa has reduced 23.96 percent over the drought period. Having successfully petitioned to adjust our conservation standard based on the Round Mountain Water Treatment Plant (RMWTP), a 1 MGD reverse-osmosis desalination facility that qualifies as a “drought-resilient source of supply,” Camrosa’s conservation standard is now 24 percent. California has demonstrated its willingness and ability to heed the Governor’s dramatic rallying cry for conservation, and now that the state has received significant rain over the 2015-16 rainy season, the need to continue the Emergency Regulation has passed.

Of the three specific questions outlined in the Workshop Notice on which the Board is seeking input, questions 1 and 3 are of primary concern to Camrosa.

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

**Camrosa encourages the State Board to lift the Emergency Regulation in its entirety.**

Unlike in previous years when reservoir levels were severely diminishing, the Metropolitan Water District of Southern California (MWD) is currently filling its reservoirs to near-capacity levels. As of April 14, 2016, two of MWD’s three main reservoirs were at 87-percent capacity or above (see attached). The April 1, 2016 snowpack analysis indicated near-normal conditions, signaling a decrease in the severity of the drought, and rainfall events in Northern California enabled state regulators to increase State Water Project (SWP) allocations to 45 percent. While Castaic and Diamond Valley Lake, the two main sources of our area’s imported water storage, are closer to 40-percent of capacity, because of the increased SWP allocations, they are expected to remain close to half full throughout the water year.

The relief all this provides, however, is tainted by the fact that the vast majority of the rainfall prior to the March 17 allocation increases made its way under the Golden Gate Bridge and out to sea. It is estimated that as much as 800,000 AF of water was lost—enough to have filled Southern California’s

water storage reservoirs to brimming. The regulatory and litigatory obstacles to moving water through the Delta to Southern California are among the main drivers of Camrosa's strategy to increase our independence from the SWP. At a time when weather patterns are not just highlighting but actively increasing the scarcity of that resource, it would seem incumbent upon the State Board and DWR to encourage the development of local supply alternatives, and reward those agencies that have already invested in them. The state has done this very thing, and Camrosa has benefitted from such programs; the RMWTP was partially funded by a \$2.3M Prop 84 grant. Prolonging a reactive, blanket approach to urban potable water production, on the other hand, sends the opposite message, and discourages local agencies from investing in local resources.

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

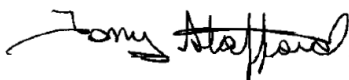
The reliability of urban water supplier portfolios is of paramount importance in this discussion. Ensuring a safe, reliable water supply for our customers is Camrosa's top priority, which we've implemented by developing a diversified portfolio of water resources, including the RMWTP, potable groundwater, and recycled/non-potable water. The development of local resources to prepare for severe drought conditions like those we have been experiencing has been a significant financial investment for our district. The state should recognize the efforts we and other local agencies have made to build local self-reliance and alleviate demand on the SWP during periods of water shortages.

To this end, Camrosa **encourages the State Board to exclude local groundwater pumped from basins that are not in overdraft, as determined by the CASGEM Basin Prioritization, from any conservation-target calculations and/or mandated reductions.** Exclusion of these additional local resources from conservation calculations would send a positive message that the state supports local districts that engage in long-term, responsible planning to ensure reliability for their customers.

As an overall policy, Camrosa supports local control and decision-making in water management strategies, and we have invested significant resources in developing solutions that address our region's ongoing supply challenges. Later this month, our Board will consider adoption of a resolution supporting local oversight of long-term water conservation and management policy. The state should recognize that many local agencies have done an outstanding job of addressing water needs in their districts, and that they are best equipped to continue anticipating and resolving water supply challenges in their areas.

Thank you again for the opportunity to submit input. I'm happy to answer any questions you, the Board, or staff might have about these comments.

Sincerely,



Tony Stafford, General Manager

# Reservoir Water Storage in Southern California

Report Date: 4/14/2016 - 12:00 AM

**Castaic Lake - DWR Reservoir**  
 Reservoir Information: [http://cdec.water.ca.gov/cgi-progs/staMeta?station\\_id=CAS](http://cdec.water.ca.gov/cgi-progs/staMeta?station_id=CAS)

**Silverwood Lake - DWR Reservoir**  
 Reservoir Information: [http://cdec.water.ca.gov/cgi-progs/staMeta?station\\_id=SLW](http://cdec.water.ca.gov/cgi-progs/staMeta?station_id=SLW)

**Lake Perris - DWR Reservoir**  
 Reservoir Information: [http://cdec.water.ca.gov/cgi-progs/staMeta?station\\_id=PRR](http://cdec.water.ca.gov/cgi-progs/staMeta?station_id=PRR)

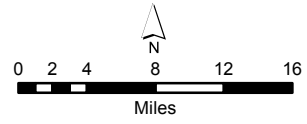
**Lake Mathews**  
 Total Capacity = 182,000  
 Current Storage = 163,155  
 90% Full

**Diamond Valley Lake**  
 Total Capacity = 810,000  
 Current Storage = 322,342  
 40% Full

**Lake Skinner**  
 Total Capacity = 44,000  
 Current Storage = 38,064  
 87% Full

### Legend

- Freeway
  - Reservoir
- Capacity and Storage values are in Acre-feet (N/A = Data Not Available)



**MWD**  
**Metropolitan Water District of Southern California**  
**GIS Services**

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