



April 13, 2015

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Comments on State Water Board Proposed Framework for Meeting Governor's 25% Water Reduction Mandate

Dear Representatives of the State Water Resources Control Board:

Padre Dam Municipal Water District has reviewed the State Water Resources Control Board's framework for meeting the Governor's mandate of 25% water reduction in urban areas. We very much appreciate the State's efforts to try and balance water needs with increasingly challenging water supply projections, and clearly see the need to save water becoming more important each and every day. However, we believe there are some fatal flaws with the proposed framework and strongly encourage you to consider our comments below.

Baseline Period for Cutbacks

We propose a different baseline period.

The 2013 baseline seriously disadvantages communities that already achieved major, sustained water conservation prior to 2013. For example, **water use in Padre Dam's service area declined 29 percent from 2007 to 2013.** By failing to account for this conservation, the proposed regulations punish those who have conserved already and rewards communities that did not make such early and sustained commitments to conservation.

The proposed targets will be very challenging for our agency as well as the customers we serve, given their already extraordinary conservation achievements.

Local Water Supply Development

We propose that agencies, or the wholesalers we purchase water from, that have made significant investments receive credit for development of highly reliable local supplies.

Rewarding water supply projects encourages and provides incentive to increase regional self-reliance as called for in the Governor's California's Water Action Plan.

Padre Dam opened an Advanced Water Purification Demonstration Project last week. We are hopeful that this project can provide a local, reliable and drought-proof water supply for the first time to our customers. Our hope is projects like this will allow Padre Dam and other agencies to be less reliant on imported water supply sources in the future. Unfortunately, with the current proposed framework local water supply development projects, such as our Advanced Water Purification Project, lose incentive because the agencies would receive no water supply benefit and therefore would continue to face cuts.

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Padre Dam currently imports 100 percent of our drinking water supply from the San Diego County Water Authority. For more than two decades, San Diego County has diversified its water supplies at a substantial cost through a historic water conservation-and-transfer agreement with Imperial Valley for independent Colorado River supplies, and construction of the Carlsbad Desalination Project. The desalination plant is more than 80 percent complete and on track to begin commercial production this fall, producing up to 56,000 acre-feet of drought-proof supplies annually. Under the State Board's proposed regulations, Padre Dam's ratepayers and ratepayers throughout San Diego County who are funding this \$1 billion project would experience no water supply benefit from the project.

Other Water Supplies

We propose the State consider a credit for agencies that receive water from other sources than the State Water Project. Approximately 30 percent of San Diego County's water supply comes from the State Water Project. The majority comes from other sources, including more the 50% (64% average for 5-year period from 2009-2013) that comes from the Colorado River, outside of California and not currently facing any supply restrictions. However, under the current proposed framework, agencies receive no credit for having other supply sources. In fact, these supplies would be included in the overall cutback being asked to achieve.

A better approach

We recommend the State Water Board remain focused on cutting discretionary outdoor water use. This could be accomplished by establishing statewide restrictions, such as limiting the irrigation of ornamental landscapes to 1 to 2 days per week statewide, based upon climate. This approach not only achieves immediate savings, but it will accelerate the transformation of California landscapes from high-water-use lawns to landscapes that are more appropriate given our limited water supplies. It also protects the economy by focusing on reducing lower-priority uses of water.

Padre Dam supports the strong need for additional conservation efforts throughout the state, especially in light of the continued severity of California's drought and lowest snowpack in recorded history. We believe the suggestions proposed above will assist in providing an equitable solution to the State's water use regulations while encouraging long term water supply solutions.

Thank you for your consideration.

Sincerely,



Allen Carlisle
CEO/General Manager