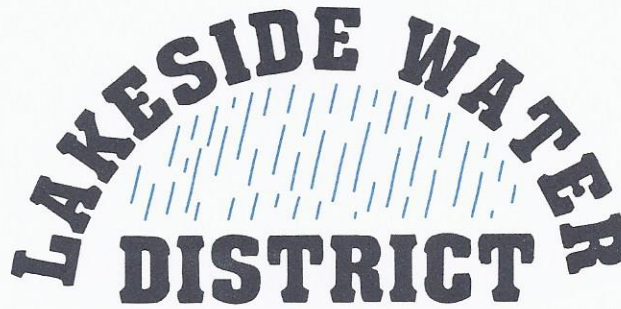


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April 10, 2015

Ms. Felicia Marcus  
State of California  
Water Resources Control Board

Re: Proposed Regulatory Framework for Mandatory Conservation,

Dear Ms. Marcus,

Lakeside Water District, a water district in east San Diego County hereby submits a response to the water-use framework proposed by the State Water Resources Control Board to reduce urban water use statewide by 25%. Generally, we feel this framework does not take into account the investment and planning that has been done, or the infrastructure that has been built in San Diego County to respond to and alleviate drought conditions in our region.

#1 The proposed framework punishes those who have conserved and rewards those who have not. The 2013 baseline seriously disadvantages communities that already achieved major, sustained water conservation prior to 2013. For example, water use here at Lakeside Water District has dropped 25% from 2007 to 2014 and 20% within the San Diego County region. By failing to account for the conservation, the proposed regulations are arbitrary and punish those who have conserved and rewards communities that did not make such early and sustained commitments to conservation.

#2 The proposed framework punishes those who have invested in new supplies while rewarding those who have not. The state's current approach does not give any credit to agencies or regions that have made substantial investments in water supply reliability, thus eliminating the incentive to increase regional self-reliance as called for in the Governor's California's Water Action Plan. For more than two decades, the San Diego region 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 along with storage improvements locally. The desalination plant is projected and on schedule to supply 56,000 acre feet to the San Diego region and its 24 water agencies in 2015/16. Under the State Boards proposed regulation, the rate payers in San Diego County who are funding this \$1 billion project would experience no benefit from water produced by the plant. Lakeside Water District has itself invested over \$1 million in groundwater wells and treatment that helps the region conserve imported water.

#3 In addition, we support the San Diego County Water Authority and its member agencies who have a high demand for agriculture water and who propose to reclassify their use as agriculture use and not ornamental i.e.; residential landscape use. In 2013, the value of agriculture crops in San Diego County totaled \$1.9 billion. San Diego County is the 19<sup>th</sup> largest agricultural economy in the United States and has the highest dollar value per acre crop of any county in California. A comprehensive evaluation of agriculture water use in San Diego County needs to be included with any drought use plan.

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, and also protects the economy by focusing on reducing lower-priority uses of water.

Finally, we ask that San Diego County water agencies be given the consideration of a regional cutback goal of 15% and not an agency by agency cut back approach. The San Diego County Water Authority who purchases all water that is imported into San Diego County along with the City of San Diego, have very aggressive public relations campaigns that have provided significant conservation results. Combined with the Governors Executive Order proposals and the new usage restrictions I've outlined, I believe that San Diego County will achieve a reasonable 15% cutback level as compared to 2014.

All 24 member agencies of the Water Authority have drought ordinances in place that put us ahead of many other agencies throughout California. This reason along with the exceptional investment in additional resources should give us special standing during this crisis, and allow our region to respond on a more local level, without the State's intervention or enforcement tactics.

I appreciate the opportunity to submit our response to the proposed drought regulatory framework and would welcome any questions to our proposals.

Sincerely,



Brett Sanders  
General Manager  
Lakeside Water District  
10375 Vine Street  
Lakeside, CA 92040