

DEL PASO MANOR *Water District*

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April 21, 2015

State Water Resources Control Board

Re: Del Paso Manor Water District Comments on Proposed SWRCB Emergency Regulations Regarding Prohibitions of Activities and Mandatory Actions During Drought Emergency

Honorable Members of the Board:

Del Paso Manor Water District is a municipal water supplier formed under the County Water District Act. We are a small district serving approximately 1,800 residential and commercial customers in northern Sacramento County. The District relies exclusively on groundwater to supply its customers, but is in the process of developing a conjunctive use/surface water utilization program. In response to the Governor's emergency proclamation in 2014, our District has successfully embarked on a voluntary water conservation program which has yielded a 20.7% reduction in water consumption over the prior year 2013. We are an active participant in regional management of groundwater and surface water supplies through the use of best management practices, all in conjunction with the Sacramento Groundwater Authority (SGA) and the Regional Water Authority (RWA). To the point, we have been able to achieve reductions greater than mandated with a program of education and interaction with our customers and plan on continuing with the same program requiring our customers to cut by 25%. However, as a small public water supplier, we are providing comments on aspects of the proposed regulations which, we believe, do not adequately or accurately address the needs of small water agencies and their customers. Primarily, our concerns are the construction of the language of the proposed regulations, and also potential problems with their implementation.

1. The Proposed Regulations at Section 865 f (1) (A) (B) and 2 (B) Are Contradictory.

Section 865 f (A) (B) state we can take one or more of the following actions: Limit outdoor irrigation **OR** implement another mandatory conservation measure or measures to achieve a 25% reduction; however, 2(B) states we must report confirming we limited outdoor irrigation to no more than 2 days per week. This section needs better clarification as to what constitutes "monthly reporting.

2. The Proposed Regulations reporting requirements are problematic.

Del Paso Manor Water District is a small agency with limited staff. We have always read our production meters when we read our commercial meter accounts on the 15th of the month. When last year's reporting element for Urban Water Suppliers was implemented, we began reading the

production at the end of the month as well to establish a baseline and/or to establish records comparable to Urban Water Suppliers. However, our 2013 records are not on a "calendar" month; we only began keeping "calendar month" records in August 2014. We will be able to report for a "like time period" but can not report on a "calendar month" basis. Many small agencies may have similar situations; therefore, we are suggesting the reporting for small agencies be "on the monthly basis" or "for a like time period near June 1 to November 30".

Del Paso Manor Water District is committed to achieving further reductions in consumption in this unprecedented drought year, and will continue to work with its customers and local and state agencies to achieve greater reductions. However, we are concerned with the nature of the proposed regulations, insofar as they constitute a "one size fits all" approach that amounts to an encroachment on the authority and function of water districts. We believe it is more appropriate for the Board to establish targets to be achieved by the water suppliers, rather than micromanaging their daily operations, as local agencies have a better understanding of how best to achieve stated consumption goals.

Thank you for addressing these concerns and reconsidering your proposed regulations.

Sincerely,

A handwritten signature in cursive script that reads "Debra Sedwick". The signature is written in black ink and is positioned above the printed name and title.

Debra Sedwick
General Manager