



NEWHALL COUNTY WATER DISTRICT

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(12/7/15) Public Workshop
Urban Water Conservation
Deadline: 12/2/15 by 12:00 noon

November 30, 2015

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 for Statewide Urban Water Conservation.

1. The emergency regulation should take into account investments made in **drought sustainable supplies**.

Urban water suppliers who have increased regional self-reliance, proactively invested in water banking programs, and who have planned for drought conditions specified in their Urban Water Management Plan should be allowed to meet reduction targets through a combination of conservation and drought sustainable supplies.

2. The emergency regulation should provide demand **credits for reuse** such as indirect potable reuse (IDPR) and recycled water supplies.

Reusing treated wastewater directly reduces the demand on potable water supplies, specifically imported supplies. It also provides regional redundancy and reliability. Credit should be provided to each Urban Water Supplier using these various sources of supply including but not limited to indirect potable reuse (groundwater recharge) and traditional "purple pipe" recycled water.

3. The emergency regulation should take into account **climate differences** among the Urban Water Suppliers and use a climate factor in their water reduction calculation.

California's climate varies widely from hot dry deserts to mountainous subarctic conditions. Each community relies on water differently based on the varying climate. A "climate factor" will allow each Urban Water Supplier to protect the local environment and focus conservation efforts on water thirsty landscapes. Trees are a critical component to the states landscape and protecting these shade canopies will also help combat climate change.

4. The emergency regulation should allow for **regional averaging** of drought reduction targets.

Throughout the state, there are many areas with multiple Urban Water Suppliers providing service to a regional community. Allowing regional Urban Water Suppliers to work together on a common reduction target incentivizes a community based approach and a common water savings message.

Our comments above are regarding the "Emergency Regulations" only. 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 are requesting the State Board use the framework of 20x2020 to enhance these regulations for Urban Water Suppliers.

NCWD looks forward to continuing to work with the State Water Board on the development of these conservation regulations.

Sincerely,
Newhall County Water District



Stephen L. Cole
General Manager