



November 30, 2015

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, California 95814

**Subject: Comment Letter – Urban Water Conservation Workshop**

Dear Ms. Townsend,

Casitas Municipal Water District (Casitas) appreciates the opportunity to provide comments to the State Water Resources Control Board (SWRCB) regarding changes to the extension of the Emergency Regulation to conserve urban water supplies in 2016. Casitas respectfully requests the SWRCB adopt modifications to the Emergency Regulation to more clearly provide consideration to existing water code and local management efforts. The following recommendations are intended to better serve the public's interest and more effectively manage water supplies throughout the State:

**Consider Local Water Supplies When Setting Tier Requirements**

- When setting tier reduction requirements consider local water management plans, the agency's development of local sustainable water supply resources, and the non-reliance on the importation of water from either outside the local watershed or State Water Project. Where local management of water supplies is demonstrating sustainability, allow for local decision-making to implement local water demand reduction measures.

**Change Water Supplier Definition.**

- Recommend SWRCB consider the use of the "Urban retail water supplier", as defined under the California Water Code Section 10608.12 (p), rather than the definition of an "urban water supplier" (Section 10617) that is currently applied by the emergency drought regulations. These definitions are distinctly different and have differing effects. Section 865(a)(4) should be clarified for suppliers that serve both a retail and wholesale capacity, that only the retail capacity is that which are applicable to the regulations. An agency may fall under the 3,000 service connection threshold for direct customer, and actually be a small water supplier, but be moved to more than 3,000 customers by virtue of its wholesale capacity by the use of Section 10617.

**Change the Requirement to Prepare an Agriculture Water Management Plan.**

- Recommend SWRCB be consistent with California Water Code Section 10826 and with Governor Brown's Executive Order B-29-15, paragraph 12 & 13 in that the SWRCB not require Water Agencies that provide water to less than 10,000 acres of agriculture (1) to file for an agricultural exemption, (2) the prepare and submit an Agricultural Water

Management Plan, and (3) the reporting of agricultural water demand in combination with urban water usage reporting.

- Recommend SWRCB be consistent with California Water Code Section 10826 and with Governor Brown's Executive Order B-29-15, paragraph 13 stipulating the deadline for Water Agencies with more than 10,000 planted acres complete an Agriculture Water Management Plan by July 1, 2016, rather than the SWRCB deadline of February 2016.

**Exempt Commercial, Institutional, and Industrial Water Reduction Targets from Urban Water Calculations.**

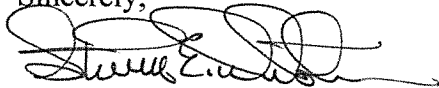
- Recommend SWRCB's tier setting only apply to residential customers.
- Tier setting for other than residential customers can create severe local economic consequences and is not recommended.
- Compel water demand reductions through the application of CII surveys and water use modifications where deemed practical.

**On-going Data Collection/Reporting.**

- Recommend extending the reporting deadline from the 15<sup>th</sup> of each month to the 28<sup>th</sup> of each month. The fifteen days from the end of the month to report is too short a period of time. The current reporting to the SWRCB within 15 days from the end of a month has caused agencies to report preliminary numbers and re-report when actual numbers are available. This additional time will allow agencies to gather meter readings at the end of the month, apply corrective action to metering anomalies, and summarize data in a final form. This action will avoid the SWRCB providing preliminary information to the media.
- Any monthly collection of data should include number of days within the reporting month so that it is more accurate.

If you have any question in this regard, please do not hesitate to contact me.

Sincerely,



Steven E. Wickstrum  
General Manager

CC; Dave Bolland, Special Projects Manager - ACWA