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Tony L. Stafford

Felicia Marcus, Chair  
State Water Resources Control Board  
c/o Jeanine Townsend, Clerk to the Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

December 2, 2015



Ms. Marcus:

Thank you for the opportunity to address the Board ahead of the Urban Water Conservation Workshop next week in Sacramento. I will be there on behalf of Camrosa Water District to present comments related to the exclusion of new water from the conservation-target calculation, but we would like to note a few other comments here, as well.

To the first: In early 2015, Camrosa completed a 1 million gallon a day brackish groundwater desalination facility, the Round Mountain Water Treatment Plant (RMWTP). The raw-water supply is brackish groundwater with TDS in the 1,500s—far too salty for drinking water and even higher than local farmers can use on their crops. Being a perched aquifer, the water does not communicate with other basins and is not available for any other use. With a price tag of more than \$6.5 million, treating that groundwater with reverse osmosis technology created a truly “new” water supply from a resource that would otherwise be unavailable for use.

The State Board’s R-GPCD methodology puts Camrosa in the eighth conservation tier, which requires a 32-percent reduction from the 2013 baseline. According to the current iteration of the conservation-target calculation, which does not exclude any potable water resource regardless of origin, Camrosa has fluctuated between 20- and 33-percent monthly reductions over the drought period, with a cumulative reduction of 25 percent. Since June, the RMWTP has produced just over 400 acre feet of water, or approximately 13 percent of our total potable production. Excluding this supply from the conservation-target calculation would increase our monthly reductions from 27 to 40 percent less than the 2013 baseline, with a **cumulative reduction of 33 percent**—a point under our conservation target.

Camrosa received \$2.3 million in Proposition 84 grant funding from the state of California to help build the RMWTP. Not giving credit in the conservation-target calculation for a new water source that the state helped fund strikes us as a poor way to incentivize future such projects, which decrease demand on not just the overstressed Delta, but, being truly “new” water, any water resource currently being utilized. We therefore request and recommend that the State

Board exclude verifiably “new” water sources from the conservation-target calculation should the current regulatory framework extend past its originally scheduled February 2016 termination.

Besides the new-water issue, Camrosa is also concerned that agencies that have invested significant resources in local nonpotable alternatives to imported water are not given any credit for those supplies in the conservation-target calculation.

Camrosa covers 31 square miles in southeastern Ventura County. We serve, on average, 15,000 acre feet of water to about 30,000 people every year. Sixty percent of that demand is for potable water, about two thirds of which is imported from the State Water Project via Metropolitan and Calleguas. The other third of our potable supply comes from local groundwater, including the RMWTP; as the desalter reaches its production capacity, the ratio of import to local will be closer to 50:50.

Eighty-three percent of our nonpotable system is supplied by either surface water or recycled water. The recycled water is tertiary-treated Title-22 recycled water produced at the Camrosa Water Reclamation Facility, and makes up 1,000 to 1,500 acre feet a year. The surface water we divert from Conejo Creek is a combination of runoff from City of Thousand Oaks streets and Hill Canyon Wastewater Treatment Plant effluent—water that would otherwise run, unused, to the sea. Instead, as a result of a \$16 million regional project, Camrosa has diverted more than 107,600 acre feet from the creek and delivered it, both within Camrosa’s boundaries and to the neighboring district within the Fox Canyon Groundwater Management Agency, for irrigation supply that would otherwise have come from imported water or highly taxed basins.

In 2003, 65 percent of Camrosa’s total supply came from imported water. Because of the District’s foresight and financial investment in building the Conejo Creek diversion project, developing recycled water, and now constructing the RMWTP, Camrosa has reduced its dependence on import water to 35 percent. These projects took decades to complete, and although they directly reduce the strain on current and future state water supplies, the current regulations do not recognize the contributions this district has made.

Thank you again for the opportunity to comment ahead of next week’s Board meeting. I look forward to addressing you then, and to answering any questions you and/or your Board might have for me at that time.

Sincerely,

A handwritten signature in black ink that reads "Tony Stafford". The signature is written in a cursive, flowing style.

Tony Stafford, General Manager