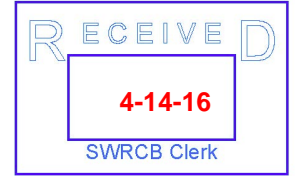




THE CITY OF SAN DIEGO

April 14, 2016



Sent via Electronic Mail: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

Thank you for this opportunity to address the three questions posed in the State Water Resources Control Board's (State Water Board) Notice of Public Workshop for Wednesday, April 20, 2016, and to continue the dialogue regarding the design and implementation of the Emergency Water Conservation regulations. We are pleased that general hydrologic conditions have improved this year, as is represented in the Department of Water Resources' March 2016 announcement that Table A Allocations were anticipated to increase to 45%, and we are hopeful that the State Water Board's deliberations will conclude that statewide emergency conditions are no longer merited. To the extent that any areas in the state continue to face severe shortages or water quality issues, we support focused problem-solving efforts by the State Water Board.

Absent the discontinuation of the Emergency Regulation, the City of San Diego supports amendments allowing individual agencies and regions the ability to determine their drought resilience based on the availability of supplies to meet anticipated demands. Should an agency anticipate a supply imbalance, it would identify and communicate to the State Water Board the demand reductions necessary to achieve supply balancing.

The City of San Diego continues to promote water-use efficiency as a civic responsibility citywide. As an original (1991) member of the California Urban Water Conservation Council (CUWCC) San Diego's Public Utilities Department has never wavered from its commitment to water-use efficiency education and incentives and has been a leader in water conservation. San Diego is now embarking on the implementation of next-generation best management practices for water conservation, including the installation of smart water meters citywide. Additionally, our Pure Water Program will assure that San Diegans are reusing, and thereby conserving, indoor water uses.



San Diego is pleased to offer the following responses to the three questions asked by the State Water Board:

1. What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

The City of San Diego supports a supply-based approach in lieu of continuing the statewide conservation mandate. This proposed approach would direct water agencies to assess their ability to meet demands through October 31, 2016, based on their available supplies. Agencies would certify their determination on June 1, 2016, and provide monthly reporting thereafter to assure compliance with their determination. Self-certification at a regional basis would be an available option if all urban water agencies in the region agree to this approach.

As part of the self-certification, the State Water Board could collect estimates on the following types of information:

- Amount of all supplies by source available June through October 2016.
- Available reserve supplies in storage that would be available for the coming water year(s).
- Sustainability of groundwater supplies taking into account projected water use through October 2016 and that reserves are needed to maintain the aquifer within a safe operating range.
- Projected monthly potable water demands for June through October 2016, based on past monthly averages from 2013 through 2015.
- Actual agency-adopted shortage level based on their Water Shortage Contingency Plan, taking into account estimated water demands and available supplies through October 2016.

The State Water Board would have the ability to verify agencies' certified supply figures by requesting documentation that would support the figures. All suppliers would continue to prohibit specific water uses included in Section 864 of the current Emergency Regulation and be prepared to implement the actions specified in their Water Shortage Contingency Plan, as appropriate.

2. How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

The supply-based approach described above aligns perfectly with an approach that accounts for regional differences in water supply reliability. In the San Diego region, for example, we would expect that the San Diego County Water Authority (Water Authority) would account for all local and imported water supplies, including seawater desalination and recycling – both of which are available independent of hydrologic conditions. Additionally, the amount of water made available by the Metropolitan Water District will be known to the Water

Page 3
Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
April 14, 2016


Authority by May of 2016 as well, making the regional supply balancing assessment relatively easy to complete.

3. To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

We strongly encourage the assessment of an urban water supplier's supply portfolio during the term of the extended emergency regulation in order to determine the most appropriate emergency conservation response. This assessment is inherent in a supply-based approach and is what the City of San Diego always incorporates when analyzing the severity of drought conditions and determining appropriate responses for our ratepayers.

The City of San Diego is pleased that our ratepayer investments in supply diversification and water use efficiency have resulted in strong resiliency in the face of drought circumstances. A supply-based approach makes sense for not only assuring that California has enough water through October of this year, but also for the long-term. It is incumbent on all water agencies to perform "real-time" supply balancing analyses and restrict demands as needed. Moreover, it is incumbent on all water agencies to make the investments necessary to assure limited impacts from future droughts.

Sincerely,



Halla Razak, P.E.
Director, Public Utilities Department

CP/slh