



Yorba Linda Water District

*Independent, Reliable and Trusted
Service for More Than 100 Years*



May 12, 2016

Kathy Frevert Kathy.Frevert@waterboards.ca.gov
State Water Resources Control Board
1001 I St 24th Floor
Sacramento CA 95814

RE: Comments May 18, 2016 Board Meeting (Conservation Extended Emergency Regulation)

Dear Ms. Frevert:

Yorba Linda Water District appreciates the opportunity to submit input on the Proposed Emergency Regulations, in response to the Governor's Executive Order B-37-16, extending the emergency regulations for urban water conservation through the end of January 2017. We are encouraged by the State Water Resources Control Board's (Water Board) willingness to receive comments throughout this declared emergency and we hope that this next round of analysis and amendments leads to a fair and reasonable blueprint to managing the State's water storage and delivery into the future.

In the drinking water industry it is hard to avoid water analogies; so allow me to use a medical analogy instead. As you consider these regulations you may want to think of water agencies as patients in a medical facility. Each patient has a unique reason for needing medical attention. Some patients may need to make lifestyle changes. Some may be in peak physical condition, yet are only in need of routine checkups.

The patients who are struggling with their health may need more attention and resources. The State should not dilute precious resources by trying to manage all 411 water patients (agencies), but instead should triage efforts to those who need it most. Most will get better through prescribed treatment and professional monitoring. A few may need surgery. One thing is certain however, all cannot be treated the same.

It is apparent from the discussion at the April 20, 2016 Water Board Workshop that the State understands this. In Orange County and in the Metropolitan Water District Service Area, water agencies have worked incredibly hard and done remarkable things in the ways of conservation, investment in drought resiliency, and sustainable supply. In our region, our patients are healthy and we know what we must do to maintain and improve that health.



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As you consider a conservation floor or minimum conservation level, we would encourage the Water Board to look no further than the 20x2020 goals as originally set back in 2009. With the Emergency Declaration in place, every agency in the State should presently be meeting that target. Yorba Linda Water District has been exceeding that conservation goal since the outset of the declared emergency. Using the baseline and targets set in Senate Bill X7 7 (2009), 20x2017 is a reasonable conservation floor and obtainable target during this extended regulation and a pathway to ensure statewide compliance by 2020.

We thank you for the opportunity to submit these comments regarding potential changes to the emergency regulations and we remain a committed partner in finding solutions to water reliability in California.

Sincerely,

Marc Marcantonio
General Manager

CC: YLWD Ratepayers
Orange County Water District, PO Box 8300, Fountain Valley CA 92728
Municipal Water District of Orange County, PO Box 20895, Fountain Valley CA 92728