



Helix Water District

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Setting standards of excellence in public service

April 22, 2015

State Water Resources Control Board
Sent Via Email: Jessica.Bean@waterboards.ca.gov

Re: Comments on the Draft Emergency Drought Regulations issued on April 18, 2015

Dear Members of the State Water Resources Control Board:

Thank you for the opportunity to comment on the Board's Draft Emergency Regulations issued April 18, 2015. We understand the severity of water challenges facing our state and appreciate the various constraints under which the Board is operating in order to comply with the Governor's Executive Order.

Helix Water District is an urban water supplier which serves over a quarter of a million people east of San Diego. We would like to offer the following comments for your consideration regarding the draft regulations for urban water suppliers.

1) Climate differences should be considered in assigning conservation standards to urban water suppliers' service area.

We recommend grouping suppliers into their specific hydrogeological or CIMIS areas and then setting more appropriate conservation goals using GPCD numbers that reflect differing climate conditions within the state. As the Board's own website states, it is not appropriate to use residential gallons per capita per day water use data for comparison across water suppliers, unless all relevant factors are accounted for, including rainfall, temperature and evaporation rates. The revised nine tiered conservation standards does not account for these variables.

The Governor's Executive Order clearly seeks to target inefficient outdoor water use to meet statewide conservation goals. We encourage the Board to consider how climate conditions affect water use efficiency and to adjust the conservation standards accordingly.

2) Provide a credit to urban water supplier's that have alternative water supplies.

We recommend that urban water supplier's that have alternative potable water supplies be given a credit or a lower conservation standard. For example, the Carlsbad Desalination Plant is scheduled to come online in September 2015 and will provide 7 percent of the San Diego region's water demand. Each urban water supplier's conservation standard would be reduced by 7 percent for each month that the alternative supply is delivered.

While freshwater supplies are subject to periods of drought, alternative potable water supplies such as seawater desalination and potable reuse are not. While the development of these alternative water supplies provide drought relief for the

communities in which they are located, they also reduce demands for imported water, thereby providing drought relief for upstream communities as well.

Local communities have paid heavily for these diversified and reliable supplies through their water rates and those investments should be accounted for. Although the current drought needs an immediate response, not providing a credit for alternative potable water supplies will have a negative long-term impact on community support for future projects.

3) Allow regional management by assigning conservation standards to be met collectively.

Regions such as San Diego have drought management plans in place that have been successfully used during previous droughts to manage water supply and demand. We recommend that regions be provided with the option of responding collectively if they so wish, with the local water wholesaler being responsible for ensuring that the region, as a whole, meets the region's conservation standard set by the state. The wholesaler would then be responsible for passing on any penalties for non-compliance as a region to those individual agencies that did not meet their individual goals. This would provide regions with more flexibility and support a consistent regional message to local communities.

4) Further define the regulation stating that irrigation with potable water outside of newly constructed homes and buildings not delivered by drip or microspray.

Building projects are planned for years before construction begins. The Executive Order does not explain at what point new development would be subject to the provision. We recommend that the Board continue to work with the Building Industry association to develop a clear definition as to what projects will be required to meet this regulation and at what point.

Again, we understand the challenge the state faces in trying to address the complex water needs and water supply situations throughout the state. We also appreciate the time the Board has taken to review and incorporate previous comments received in regards to the draft framework. We hope that these comments and recommendations be taken into consideration as well as the Board continues to develop an equitable solution that achieves the needs statewide water savings.

Sincerely,



DeAna R. Verbeke
Board President
Helix Water District