

April 22, 2015

Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95810

*Delivered via email to [Jessica.Bean@waterboards.ca.gov](mailto:Jessica.Bean@waterboards.ca.gov)*

Dear Ms. Marcus;

The City of Escondido thanks the State Water Resources Control Board (SWRCB) for its consideration of past comments submitted by the City concerning the Draft Emergency Drought Regulations. The changes made for the last issue of the draft regulation on April 18 demonstrate that the Board is sincere in its effort to develop equitable and practical regulations.

The City strongly recommends the following changes to the draft regulations issued on April 18 in addition to the comments made concerning the draft regulations issued on April 7.

1. **Delay the effective date of the Final Regulations until July 1, 2015** to allow retail agencies sufficient time to implement their own necessary Code changes and to allow sufficient time for customers to come into compliance.
2. **Allow urban water suppliers to omit from water production totals, all water delivered to commercial agricultural customers.** The draft regulations issued on April 18 allow this omission only for urban water suppliers that deliver 20% or more of their total production to commercial agriculture. The City believes this cutoff point to be arbitrary and recommends that all qualifying commercial agriculture should be omitted.

The City thanks you for your consideration of these comments. If you have any specific questions regarding this letter, please contact Christopher McKinney, the City's Director of Utilities, at 760-839-4090 or [cmckinney@escondido.org](mailto:cmckinney@escondido.org).

Sincerely,



Sam Abed  
Mayor, City of Escondido