



Helix Water District

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Setting standards of excellence in public service

February 6, 2017

Jeanine Townsend, Clerk to the State Water Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

2-7-17 Board Meeting-Item 9
Urban Water Conservation to Implement EO B-29-16
Deadline: 2/6/17 12 noon

VIA EMAIL: commentletters@waterboards.ca.gov



Re: 2/7/17-2/8/17 Board Meeting/Hearing/Workshop – Item #9 (Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation to implement Executive Order B-29-15, B-36-15 and B-37-16).

Dear Chair Marcus and members of the State Water Resources Control Board:

On behalf of Helix Water District's board of directors and customers, thank you for the continued opportunity to provide input on the potential extension and modification of the current Emergency Regulation for Statewide Urban Water Conservation. Helix Water District provides drinking water to over 270,000 residents in eastern San Diego County.

Helix Water District strongly supports allowing the statewide drought-related emergency regulations to expire this month. Much of the state is no longer experiencing severe drought conditions; in fact, statewide conditions are better now than they were in 2011 when the previous drought regulations were established. As of February 6, 2017, the statewide snowpack water content is at 173 percent of normal. This mixed message undermines the integrity of the state and local water districts, causing confusion with the public and discrediting our message in times of true water shortages.

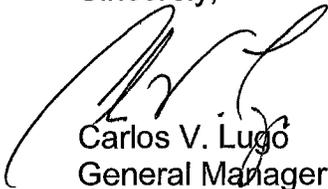
Additionally, the majority of the state's water 412 suppliers have self-certified that they have sufficient supply to meet demand for at least an additional three years, assuming severe drought conditions continue. Precipitation levels this year have already exceeded what the state received last year, placing these agencies in an even better position than they were when they completed their stress tests last summer. These agencies have planned for drought, through investments in drought resilient water suppliers and through ongoing conservation programs. To continue the emergency regulations in areas that are not experiencing a water supply shortage places a high financial burden on those communities; they have already paid for those long-term investments and now they are paying again for using less.

Our district, like others throughout the state, remains committed to promoting the efficient use of water. Our customers have continued to reduce their water use, even after our state mandated water use target was reduced to zero. This is the new norm; however, the appropriate place to address ongoing water use efficiency is through the long-term regulations, not under an emergency order.

With that said, if the state decides to continue the emergency regulations in spite of current non-emergency conditions, we strongly encourage the continued use of the current stress test methodology.

Thank you for the opportunity to comment on the extension and potential modification of the current emergency regulations for statewide urban water conservation. We look forward to working together to ensure any future regulations balance supply reliability with increased water use efficiency so that the future remains vibrant and sustainable for all Californians.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Lugo', is written over the typed name and title.

Carlos V. Lugo
General Manager
Helix Water District