

Board of Directors

James B. Murtland, President
Erin R. Lump, Vice President
David A. Drake, Treasurer
Dr. Gregory M. Quist, Director
Diana L. Towne, Director



*A Public Agency Serving the
Greater Escondido Valley Since 1954*

General Manager

Greg Thomas

Board Secretary

Wanda Cassidy

General Counsel

Redwine and Sherrill

2-7-17 Board Meeting-Item 9
Urban Water Conservation to Implement EO B-29-15
Deadline: 2/6/17 12 noon

February 3, 2017

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



Sent via e-mail: commentletters@waterboards.ca.gov

Subject: "February 8, 2017 BOARD MEETING (Conservation Extended Regulation)"

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

On behalf of the Board of Directors and Rincon Water customers we submit these comments regarding the proposed resolution and regulations to potentially be adopted on February 8, 2017 on extending Emergency Conservation Regulations for 2017.

As the State Water Resources Control Board (SWRCB) considers extending the emergency regulation an additional 270 days, the Water Board has not fully taken into consideration that many parts of the state are not experiencing emergency drought conditions due to improved hydrologic conditions, record rain and snowfall levels this water year, development of drought resilient supplies, or all of the above. The SWRCB should RESCIND the emergency conservation regulations for those areas with adequate supplies, and only focus on those communities that require assistance in meeting the water demands of their community. The SWRCB could continue its "stress test" demand reduction measures for areas in which supplies are proven inadequate in 2017 to meet normal demands. The only applicable sections of the May 2016 regulations that should be made permanent are Section 864, End User Requirements, and for those areas with inadequate supplies, Section 864.5, Self Certification.

Given that the climatic and hydrologic conditions through early February 2017 are at historic levels in rainfall and snow levels, the State DOES NOT require an emergency regulation at this point. In fact, given the current conditions, it is hard to justify having "emergency regulations" when many can argue the state is no longer in short term emergency conditions, especially after the Governor has declared 50 of 56 counties in flood emergency. Another excellent indicator of adequate water supplies is that reservoirs are dumping water to make room for more rain and future snowpack melt, and DWR has upped state water project allocations to 60 percent, the highest percent in many years!

Executive Order B-37-16 directs the SWRCB to develop a proposal to achieve mandatory reduction in potable urban water usage that builds off the mandatory 25% reduction in previous Executive Orders and lessons learned of 2016, related to the **possibility of another dry winter**, which wording was inadvertently left out of the discussion. It would be disingenuous of

Jeanine Townsend, Clerk to the State Water Board
State Water Resources Control Board
February 3, 2017
Page 2 of 2

the SWRCB to propose extending emergency regulations an additional 270 days given that this water year is already producing record rain and snowfalls across the state, which has eliminated the possibility of another dry winter. And, that EO item was really intended for the long term aspects, as discussed below.

Rincon Water is a part of the long-term conservation aspects being addressed through prudent development of programs and projects as illustrated in the December 2016 draft report "Making Water Conservation a California Way of Life". Rincon Water looks forward to develop mutually supportable conservation regulations and demand reduction methods to address potential impacts of climate change, that should also be balanced with actions of the Governor's Water Action Plan, increasing supply storage, developing alternate sources of supply, and assessing the impacts to an already fragile economy of all these actions.

With all that said, Rincon Water continues to promote efficient water use and codified the local supply and demand management programs (included emergency regulation Section 864 in our local Drought Ordinance), and our customers continue to maintain lower water demand levels, even as self-certification demonstrates adequate water supply reliability in the face of climate change. In fact, Rincon Water is cumulatively at 29 percent conservation savings from June 2015 to January 2017 as compared to 2013. Our customers understand conservation is here to stay, however, they are asking the questions on why are we still in an "emergency" when everyone sees the rain and snow levels, placing our elected leaders in a very precarious position.

Thank you for the opportunity to provide these comments for the February 8th Board meeting. Please feel free to contact me at gthomas@rinconwater.org or 760-745-5522 x606 for any additional comments or clarifications to these comments.

Sincerely,



Greg Thomas
General Manager

cc: Board of Directors, Rincon Water
Senator Joel Anderson
Assemblywoman Marie Waldron
Ms. Kim Craig, Deputy Cabinet Secretary, Officer of Edmund G. Brown, Jr.
Ms. Maureen Stapleton, General Manager, San Diego County Water Authority
Mr. Tim Quinn, Executive Director, ACWA
Mr. Dave Bolland, ACWA