



Helix Water District

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Setting standards of excellence in public service

January 12, 2017

Public Comment
Urban Water Conservation Workshop
Deadline: 1/12/17 12 noon

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



VIA EMAIL: commentletters@waterboards.ca.gov

Re: Comment Letter – Urban Water Conservation Workshop

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 opportunity to provide input on the potential extension and modification of the current Emergency Regulation for Statewide Urban Water Conservation.

In response to the questions posed in the January 6, 2017, Notice of Public Workshop, we would like to make the following recommendations:

- 1) The existing May 2016 emergency regulations should be allowed to expire in February 2017 as urban water suppliers throughout the state are not experiencing emergency drought conditions, either due to improved hydrological conditions, development of drought resilient supplies, or both.

Statewide emergency regulations should only be enacted when there is a statewide emergency. Continuing to deliver the message that there is a severe statewide drought, considering current water supply conditions in different parts of the state, undermines water supplier credibility with the public and makes future conservation goals more difficult to achieve in times of actual emergency.

If the state decides to extend the emergency regulations, they should only be extended through April 2017 and the current "stress test" evaluation should remain in effect. As the "stress test" approach accounts for local and regional supply and demand through 2019, assuming additional dry years, the SWRCB could then focus on those water suppliers that require assistance in meeting the water demands of their community.

- 2) California is a diverse state with diverse water supplies and conditions; as such, regional differences in snowpack and precipitation should always be considered when developing emergency drought regulations.

However, regional investments in storage and drought resilient supplies need to be considered as well. The current "stress test" takes these factors into account and should remain in effect, if the emergency regulations are continued. With that said,

considering current snowpack and precipitation levels along with local supply conditions, the emergency regulations should expire in February 2017.

The San Diego region has been committed to developing drought resilient supplies and managing water supply uncertainties through regional drought management plans for decades. Plans such as these enabled the region to certify that it has necessary supplies if dry conditions were to continue for an additional three years, which is why acknowledging both regional supply conditions and drought resilient supplies is so critical.

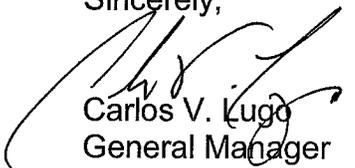
- 3) Executive Order B-37-16 directs the State Water Resources Control Board to develop a proposal to achieve mandatory reduction in potable urban water use that builds off the mandatory 25 percent reduction in water use, assuming that severe drought conditions continue. Since the state is no longer experiencing severe drought conditions, the emergency regulations should be allowed to expire in February 2017. This would allow the state to focus instead on taking the necessary time to develop meaningful long-term regulations to achieve a permanent, and sustainable increase in water efficiency through "Making Water Conservation a Way of Life."

This transformation is already beginning to occur as a result of ongoing outreach efforts, both locally and statewide, and it is continuing in many areas even absent of state mandated water use reductions. Thanks to a long term commitment to conservation and investments in drought resilient supplies, Helix Water District's conservation standard was reduced from 20 percent to zero under the "stress test." However, the district's customers continue to save even with no state mandate, achieving a cumulative 19 percent reduction in water use between June 2015 and December 2016 when compared to 2013.

Under no circumstances should any emergency regulations reassign arbitrary conservation standards to urban water suppliers such as those adopted by the SWRCB in February 2016. Any emergency regulations adopted by the state must take into account both local supply conditions and actual supply shortages for each individual water supplier.

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,



Carlos V. Lugo
General Manager
Helix Water District