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Division 1

Alan Day – *Director*
Division 5

Greg Prada – *Director*
Division 2



El Dorado Irrigation District

Michael Raffety – *Vice President*
Division 3

Dale Coco, MD – *Director*
Division 4

Jim Abercrombie
General Manager

Thomas D. Cumpston
General Counsel

In reply refer to: M0117-001

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

January 12, 2017



The Honorable Jerry Brown, Governor
State of California
State Capitol
Sacramento, CA 95814

Dear Governor Brown:

I am writing on behalf of El Dorado Irrigation District (EID) regarding Executive Order B-37-16, the State Water Resources Control Board's (SWRCB) Emergency Conservation Regulations and the upcoming SWRCB workshop to solicit input on potential adjustments to the May 2016 Emergency Regulations in response to precipitation levels and other drought indicators across the State since May 2016.

EID provides water, wastewater, recycled water and recreation services to over 100,000 residents of El Dorado County.

Executive Order B-37-16 Item 1 directed the SWRCB to adjust emergency conservation regulations through the end of January 2017 in recognition of differing water supply conditions across the State. It also called on the State Board to develop, by January 2017, a proposal to achieve a mandatory reduction in potable urban water usage that builds off of the mandatory 25% reduction called for in Executive Order B-29-15 and lessons learned through 2016 in order to prepare for the possibility of another dry winter.

The El Dorado Irrigation District requests that you rescind or modify this portion of the executive order due to vastly improved water supply conditions in the State over the last year and this winter.

Last winter's favorable precipitation and snowpack returned our water supplies to normal conditions. As a result, in May 2016 the El Dorado Irrigation District (EID) Board adopted a resolution that rescinded the District's own declared drought emergency and removed the Stage 2 drought conservation measures that were in continuous effect since February 2014.



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In June 2016, in accordance with the adjusted SWRCB emergency conservation regulations, the District self-certified that it had sufficient water supplies for another three years should drought conditions continue, resulting in a 0% conservation standard. Even so, our customers have continued to conserve and be water-efficient. Since February 2014, when our local drought declaration went into effect, our customers have conserved 26% compared to pre-drought usage. The District also met your voluntary 20% conservation call in 2014 and exceeded the 28% conservation mandate the SWRCB assigned it for 2015 and 2016. Since the District's drought declaration was rescinded in May 2016, our customers have continued to conserve at a 21% clip compared with 2013 usage.

So far this winter, El Dorado County has been deluged with large amounts of precipitation.

- Our primary water supply reservoir, Jenkinson Lake, began spilling on January 4, more than two months earlier than normal.
- Our Weber Reservoir is full and spilling.
- All reservoirs in our combined water-supply/hydroelectric project, FERC Project 184, are projected to fill and spill this year. Recently we have had to implement various flood-control measures at our facilities, including increased releases from Caples Lake to evacuate stored water to make room for additional inflow and snowmelt.
- We also draw a small portion of our supplies from Folsom Reservoir, where storage is currently 128 percent of average for this time of the year and flood-control releases are ongoing. Assuming prudent dam operations, Folsom Reservoir seems certain to fill this year.

The drought has long been over for El Dorado Irrigation District. We believe the same can be said for the 84% of the water suppliers in the State who submitted self-certification results with a 0% conservation standard.

We recognize that there remain limited areas in California where drought conditions are still in effect. We therefore will advocate that the SWRCB focus its assistance on those areas in meeting their water needs and conservation requirements. However, where drought conditions have ceased to exist like at EID, we will urge the SWRCB to rescind the emergency conservation regulation completely or let it expire in February, and restore local control.



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Finally, we request you rescind Item 1 of Executive Order B-37-16. In light of current hydrologic conditions, there is no justification to consider a return to mandatory conservation targets on a statewide basis. Instead, the most productive action now would be to shift our focus to developing a credible long-term approach to planning for drought and improving water-use efficiency over time.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas D. Cumpston', is written over a faint, larger version of the signature.

Thomas D. Cumpston
Acting General Manager

TDC:pj

cc: State Water Resources Control Board
EID Board of Directors
Jim Abercrombie, EID General Manager
Brian Poulsen, EID General Counsel
Brian Mueller, EID Director of Engineering

