April 14, 2016

Ms. Felicia Marcus, Chair and
Honorable Members of the State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter - Long-term Water Conservation Workshop

Dear Ms. Marcus and Honorable Members of the State Water Resources Control Board:

As a local urban water supplier and member agency with the San Diego County Water Authority, the City of Oceanside urges the State Water Resources Control Board (State Board) to support a long-term water policy that recognizes local investments in drought-resiliency, emphasizes ongoing water-use efficiency and leaves discretion with local water agencies to choose appropriate management strategies.

The current regulations' focus on achieving the State's water reduction standards solely through conservation doesn't allow regional or local water agencies to realize the benefits of their investments in water supply reliability – investments in self-reliance that are consistent with the Governor's Water Action Plan. For example, 15 percent of our water sold is currently produced locally from brackish groundwater here at our Mission Basin Desalting Facility in the City of Oceanside. Furthermore, we are investing over $21 million dollars in drought-resilient strategies and projects that will give us a more wide array of water supply tools to minimize disruptive shortages.

While well-intended, the State Board’s 2015 emergency conservation regulation largely overlooked these investments and required local urban water suppliers to impose mandatory reductions on their customers, even where local water supply conditions did not warrant such stringent restrictions. This approach should not be the basis for the State Board’s long-term strategy moving forward.

Rather than focusing on mandatory, across-the-board conservation that does not recognize local conditions, California’s long-term strategy should allow local water agencies to continue planning for and investing in water supply reliability actions to meet California’s future water needs.

Sincerely,

Cari Dale
Water Utilities Director
City of Oceanside