April 14, 2016

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The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

The Bella Vista Water District (District) appreciates this opportunity to provide comments to the State Water Resources Control Board (State Water Board) regarding possible additional modifications to the Extended Emergency Water Conservation Regulation (Emergency Regulation), in consideration of current water supply conditions.

The District serves a population of approximately 18,500 and is located generally northeast of the City of Redding in western Shasta County. The District encompasses approximately 34,360 acres (54 square miles) and the unincorporated communities of Palo Cedro and Bella Vista. Approximately one-third of the District is located within the City of Redding and serves City residents. The District is very diverse with customers that include high density residential, rural, commercial, public institutions including a number of schools, two colleges, golf courses, as well as agricultural customers. The District’s is a Central Valley Project (CVP) contractor with a Water Service Contract and diverts water from the Sacramento River. The District declared a water shortage emergency on February 27, 2014, and implemented stage 3 – Severe Water Shortage of its water shortage contingency plan.

The District’s customers have achieved remarkable and previously unprecedented water conservation savings, although at considerable effort, expense and sacrifice. Presently, the District is continuing to implement the unprecedented mandatory water use restrictions although water shortage conditions have been alleviated by this winter’s welcome precipitation, and water supplies are now fully adequate to meet our water user’s needs.

We are an equal opportunity employer and provider.
The Honorable Felicia Marcus
April 14, 2016
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The District is providing comments in response to the three questions posed in the meeting notice
distributed by the State Water Board.

1. What elements of the existing February 2016 Emergency Regulation, if any, should be
modified and how so?

The District believes that the Emergency Regulation should now be rescinded by the State Water Board
based on greatly improved water supply conditions statewide, especially in northern California, as a
result of significant winter precipitation and snowpack. There is presently no statewide emergency that
necessitates a statewide emergency regulation. Although precipitation and snowpack conditions may be
only “normal” or even somewhat “below normal” in some regions of the state, sufficient surface water
supplies are clearly available to water agencies statewide such that storage is being fully replenished and
the drought emergency has been entirely or substantially alleviated. The U.S. Bureau of Reclamation
has announced a 100% supply for CVP contractors north of the Delta that is “based on a cautious
estimate of the amount of water that will be available for delivery to CVP water users and reflects
current reservoir storages, precipitation and snowpack in the Central Valley and Sierra Nevada.”
Having endured two years of shortage restrictions, the District’s customers are acutely aware the
severity of the drought has been mitigated, and it is now extremely important to acknowledge that
conditions no longer warrant extraordinary emergency conservation mandates. The District can support
a state call for voluntary water conservation as a response to the possibility of a dry winter.

2. How should the State Water Board account for regional differences in precipitation and
lingering drought impacts, and what would be the methods of doing so?

Regional differences in precipitation have little to do with water supply security for most water agencies
statewide. Regional differences within the CVP are largely due to limitations in conveyance and
disproportionate impacts of regulatory constraints on the operation of the project. Those constraints are
reflected in the incredibly diverse water supply allocations to the various regions within the CVP service
area. For example, despite flood releases from Lake Shasta, the CVP supply allocation for South of
Delta contractors is presently only 55% for M&I and 5% for Agricultural Use! Any “lingering drought
impacts” will need to be assessed in coming months and appropriate responses developed to targeted
specific conditions identified within affected communities. Potential actions include diverse water
supply investments by water agencies to augment available supply and to mitigate the effect of regional
precipitation deficiencies.

3. To what extent should the State Water Board consider the reliability of urban water supplier
supply portfolios in this emergency regulation?

The State Water Board should not place itself in the position of evaluating the reliability of urban water supplier’s water supply portfolios in the context of the Emergency Regulation.

Conclusion

The District firmly believes it is time to end the State Water Board’s mandatory water use restrictions
statewide. Continuing mandatory restrictions in order to sustain significant conservation efforts that are
vastly disproportionate to regional and the overall statewide water supply conditions will undermine the
credibility of the Administration and the District and will make it much more difficult to generate
support for any future emergency should severe conditions re-emerge in the future.
Thank you for your thoughtful consideration of these comments.

Sincerely,

[Signature]

David J. Coxe
General Manager