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April 13, 2015

Felicia Marcus  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

***Re: Comments on the State Water Resources Control Board's Proposed Water Use Restrictions***

Dear Chair Markus:

On behalf of the Vista Irrigation District, a public agency that provides water service to over 124,000 people in the city of Vista, and portions of San Marcos, Escondido, Oceanside, and unincorporated areas of San Diego County, I would like to submit the following comments regarding the State Water Resources Control Board's (State Board) proposed framework for meeting Governor Brown's mandate for a 25 percent reduction in urban water use statewide.

Clearly, the need to save and use water more efficiently is becoming more important every day, and we appreciate the State Board's efforts in trying to balance water needs with available supplies. However, after reviewing the State Board's proposed framework, we have some serious concerns. Our concerns are summarized below.

1. The proposed baseline for water reduction targets punishes those who have conserved and rewards those who have not. The District's per capita water use has declined by 34 percent since 1990, and it has declined 20 percent since 2007. By setting the baseline for conservation at 2013 levels, the proposed framework punishes those who have conserved, like the District's customers, and rewards communities that have not made sustained commitments to conservation.
2. The proposed framework punishes those who have invested in producing their own alternate water supplies while rewarding those who have not. The current approach does not give any credit to agencies or regions that have made substantial investments in water supply reliability in order to free up water for the rest of the state. Under the Board's proposed regulations, the ratepayers in San Diego County (including those in our service territory) who have funded water supply reliability projects, such as the Carlsbad Desalination Project, would experience no water supply reliability benefit from the water produced.

3. The proposed framework threatens commercial and industrial production as well as local agriculture. The proposed regulatory framework will hamper economic recovery in San Diego and statewide because it treats economic uses of water the same way as ornamental landscapes. Unlike agriculture in other areas of the state such as the Central Valley, agriculture in San Diego County is treated just like residential landscapes under the proposed regulations.

A better approach may be to continue to focus on severely reducing discretionary outdoor water use. This could be accomplished by establishing stricter statewide landscape restrictions taking into consideration differing climates. This approach achieves immediate savings and helps protect the economy by focusing on lower priority uses water.

We appreciate the opportunity to provide input on the proposed framework and hope the State Board takes our comments into consideration when developing the final framework. Please feel free to contact me with any questions that you may have regarding our comments.

Regards,



Roy A. Coox  
General Manager